

**Virginia Department of Health
Office of Licensure and Certification**

Hospice Advisory regarding Medical Direction

Many hospice providers are experiencing increasing difficulty in complying with 12 VAC5-391-330.B. *Medical direction*, which requires hospice medical directors to "have admitting privileges at one or more hospitals or nursing facilities that provide inpatient services..."

Many hospitals, however, are changing their business model regarding physician admitting privileges and are now requiring community based physicians to share in on-call coverage or to have a designated number of inpatient contacts per year.

This change has caused many hospice providers to have concerns about their ability to maintain ongoing compliance with this regulation. Hospices are reporting that their medical directors, many of whom are semi-retired and who serve on a volunteer basis, cannot meet these more stringent requirements to maintain their admitting privileges. Hospice providers have expressed concern that with their Medical Directors not having admitting privileges that they will not be able to maintain compliance, despite the fact that the medical director meets all of the other regulatory requirements.

Therefore, the Office of Licensing and Certification has determined that hospice providers complying with subsections A and C.1-6 of 12VAC5-391-330 will be in compliance, regardless of the physician maintaining admitting privileges to the local hospital.