



April 10, 2020

MEMORANDUM

TO: Ambulatory Surgical Facilities

FROM: Gwen C. Thompson
Director of Healthcare Quality

SUBJECT: Guidance for Licensed Ambulatory Surgical Facilities to Enroll as Hospitals

On March 13, 2020, Governor Henry McMaster issued Executive Order No. 2020-08, which declared a State of Emergency in South Carolina based on the determination that the 2019 novel coronavirus (“COVID-19”) was an imminent public health threat. Subsequently, on March 17, 2020, Governor McMaster issued Executive Order No. 2020-10, which directed state agencies to take appropriate actions regarding provisions of existing regulations that in any way prevent, hinder, or delay necessary action in coping with the emergency. On March 28, 2020, Governor McMaster issued Executive Order No. 2020-15, which further extended the State of Emergency.

On April 3, 2020, the Centers for Medicare & Medicaid Services (“CMS”) issued a [memorandum](#) regarding ambulatory surgical facilities (“ASFs”) wishing to temporarily enroll as hospitals during the COVID-19 Public Health Emergency (“PHE”). During the COVID-19 PHE, CMS is allowing all Medicare-enrolled ASFs to enroll as hospitals and provide both inpatient and outpatient hospital services to help address the urgent need to increase hospital capacity to take care of patients. The Department of Health and Environmental Control (“DHEC”) recognizes this memo and will expedite requests from licensed ASFs in South Carolina wishing to temporarily enroll as hospitals.

As part of the process to become temporarily enrolled as a hospital, ASFs must complete an attestation statement. **The attestation statement requires, in part, the entity to affirm that the ASF may enroll as a hospital provided that it is not inconsistent with the state’s emergency preparedness or pandemic plan.**

An ASF in South Carolina wishing to temporarily enroll as a hospital during the COVID-19 PHE must receive the required approvals outlined in the abovementioned CMS memo prior to submitting a request to DHEC for approval.

Once an ASF has the approval from CMS, then the ASF must email their CMS approval to ACC-HealthReg@dhec.sc.gov using the email subject line “**Subject: ASF Enrollment as Hospital**” in order to ensure the expedited review of the request. DHEC will approve ASFs via email to operate as hospitals upon review of the facility’s approval from CMS.

This memorandum expires upon the expiration of the State of Emergency and is subject to modification or revocation at DHEC’s discretion.