

Coronavirus Disease 2019 (COVID-19): Operational Guidance and Recommendations for Providers of Intellectual Disability and Autism Services

ODP Announcement 20-019

AUDIENCE:

All Stakeholders

PURPOSE:

In response to growing concerns about the spread of COVID-19 and its potential impact on the delivery of services to individuals with an intellectual disability or autism, the Department of Human Services (DHS), Office of Developmental Programs (ODP) has developed the following **operational guidance** and **recommendations** for providers of intellectual disability and autism services.

DISCUSSION:

Information will continue to be shared and disseminated going forward to address questions and concerns that have been brought to our attention. We continue to monitor information from [the Pennsylvania Department of Health](#) and [the U.S. Centers for Disease Control and Prevention](#). Guidance developed by DHS will be centrally located on [this page](#), which will be updated as additional guidance becomes available. We encourage you to continue to consult these resources for updates on COVID-19, information on staying healthy, and updates on the situation in Pennsylvania.

Additionally, ODP is collaborating with the Centers for Medicare and Medicaid Services (CMS) to make emergency amendments to its Home and Community-Based Waivers in response to a COVID-19 outbreak. The amendments under consideration provide for flexibility that may be necessary to continue ensuring the health and safety of ODP waiver participants. The types of modifications and flexibility ODP is seeking include but are not limited to the following areas: suspension of the Community Participation Supports requirements for time in community settings; staffing requirements; service

location size limitations; remote/telephone for supports coordination; and where certain services can be provided. Additional information about the amendments will be provided in subsequent releases of this document.

Guidance

The following changes in business practices for providers may be implemented immediately, are time-limited, and do not require notification to ODP or Administrative Entities (AEs).

Supports Coordination Organizations (SCOs)

ODP is providing the following guidance to SCOs regarding **Supports Coordination Monitoring** and Individual Support Plan (**ISP**) **Team Meetings** (i.e. annual reviews, critical revisions, six-month reviews, and ad hoc planning meetings).

Effective immediately and until further notice, ODP is permitting SCOs to choose to conduct Supports Coordination Monitoring and ISP Meetings remotely; using phone or video conferencing solutions. When either of these responsibilities are completed *in place of a required face to face meeting*, the Supports Coordinator should document the occurrence in a corresponding service note.

Community Participation Support/Day Habilitation Providers – Time in Community

ODP is providing the following guidance for all Community Participation Supports providers regarding requirements for time in the community during the Coronavirus (COVID-19) outbreak.

Until further notice, the requirement that providers support each individual at least 25% of time in community settings is suspended. Providers do not need to meet the twenty-five percent (25%) of time in the community requirement during the emergency and should evaluate potential risk and exposure by individual and community activity (i.e. walks in the park or neighborhood likely to be low risk for exposure). For ID/A waivers, ISP Teams do not need to complete variances when individuals will not spend 25% of their time in the community on average per month during this time.

Providers should ensure staff adherence to already implemented industrial hygiene procedures and implement additional infection control measures as recommended by PA Department of Health and the Centers for Disease Control for all workstations, sensory areas (including materials and devices), durable medical equipment, etc.

Where this change will require revisions to service authorizations for individuals to account for additional time in facility settings, providers should contact the applicable SCOs.

Residential and Community Participation Support Providers – Limiting Visitors

ODP is providing the following guidance for residential providers (i.e. Residential Habilitation and Life Sharing) regarding **actions that can be taken to limit visitors** during the COVID-19 outbreak. **Until further notice, residential providers should refer to the Long Term Care Facility (LTCF) Visitation Guidance** found at the following MyODP location: <https://palms-aws3-repository.s3-us-west-2.amazonaws.com/Communications/ODP/2020/Long+Term+Care+Visitation+Guidance.pdf>

How should Community Participation Support/Day Habilitation facilities monitor or limit visitors?

Facilities should screen visitors for the following:

1. International travel within the last 14 days to restricted countries. For updated information on restricted countries visit: <https://www.cdc.gov/coronavirus/2019-ncov/travelers/index.html>
2. Signs or symptoms of a respiratory infection, such as a fever, cough and sore throat.
3. Has had contact with someone with or under investigation for COVID-19.

If visitors meet any of the above criteria, facilities may restrict their entry to the facility.

How should Community Participation Support/Day Habilitation facilities monitor or restrict facility staff?

The same screening performed for visitors should be performed for facility staff (numbers 1, 2 and 3 above).

- Staff who have signs and symptoms of a respiratory infection should not report to work.
- Any staff that develop signs and symptoms of a respiratory infection while on-the-job, should:

Immediately stop work, put on a facemask and self-isolate at home;

- Inform the appropriate supervisor, and include information on individuals, equipment and locations the person came in contact with; and
- Contact and follow the local health department recommendations for next steps (e.g., testing, locations for treatment).

Recommendations

Recommendation #1: Exercise and promote hygienic practices.

The best way to prevent illness is to avoid being exposed to COVID-19. Providers should remind staff that chances of exposure can be reduced by:

- Washing hands often with soap and water for at least 20 seconds especially after being in a public place, or after blowing noses, coughing, or sneezing.
- Using a hand sanitizer that contains at least 60% alcohol if soap and water is not readily available. People should cover all surfaces of hands and rub them together until they feel dry.
- Avoiding touching eyes, nose, and mouth with unwashed hands.
- Covering mouths and noses with a tissue when coughing or sneezing or using the inside of their elbow.

- Cleaning AND disinfecting frequently touched surfaces daily. This includes tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
- If sick, stay home.

Recommendation #2: Review your agency back-up plan and infection control procedures.

All ODP providers are strongly encouraged to:

- Review internal infection control protocols and emergency backup plans for events in which a provider does not have adequate staffing to meet individuals' health and safety needs.
- Evaluate staff adherence to provider infection control protocols.
- Evaluate capacity to implement emergency backup plans in the event staffing is impacted by the COVID-19 virus.

For questions or technical assistance related to emergency plans, providers may contact Doug Trahey, ODP Emergency Preparedness Coordinator, at dtrahey@pa.gov.

Recommendation #3: Report all suspected or confirmed cases of COVID-19 to ODP

For ODP to be responsive to the needs related to COVID-19, timely information from the provider community is essential. Providers should follow Department of Health (DOH) guidance for evaluation, testing, and reporting related to staff or a beneficiary suspected of having COVID-19 available [here](#).

If staff or a person for whom you provide services is suspected to have COVID-19 or tests presumptively positive for COVID-19, please notify the ODP Regulatory Administration Unit at RA-PW6100REGADMIN@pa.gov.

Recommendation #4: Contact ODP before making any changes to your business practice whenever possible.

Except for the guidance provided above related to remote Supports Coordination and the suspension of the CPS requirements for time in community settings, it is strongly recommended that providers contact ODP before making any changes to their business practices in response to COVID-19. Examples of changes in business practices include, but are not limited to:

- Suspending services at a service location such as temporarily closing a day program.
- Eliminating the provision of community-based activities.
- Restricting individuals' abilities to receive services.

ODP is monitoring the COVID-19 situation closely and is prepared to modify expectations for compliance on a case-by-case basis should emergency conditions require actions. By contacting ODP, providers may be able to implement the most effective strategy for maintaining continuity of operations during a COVID-19 outbreak.

SCOs do not need to inform ODP or AEs of business practice changes using remote/telephone to conduct SC Monitoring and Individual Support Plan (ISP) Team Meetings.

CPS providers do not need to inform ODP or AEs of reduction in support in community settings.

Providers may contact the appropriate ODP Regional Office or email the ODP Regulatory Administration Unit at RA-PW6100REGADMIN@pa.gov to notify ODP of a proposed change in business practice and/or seek guidance related to a proposed change.

ODP Regional Office Contact Information

<p>Central Regional Office Phone: 717-772-6507 Fax Number: 717-772-6483</p> <p><u>Counties/Joinders</u> <u>Represented:</u> Adams/York, Bedford/Somerset, Blair, Cambria, Centre, Columbia/Montour/Union/Snyder, Cumberland/Perry, Dauphin, Franklin/Fulton, Huntingdon/Mifflin/Juniata, Lancaster, Lebanon, Lycoming/Clinton, Northumberland</p>	<p>Northeast Regional Office Phone: 570-963-4749 Fax Number: 570-963-3177</p> <p><u>Counties/Joinders</u> <u>Represented:</u> Berks, Bradford/Sullivan, Carbon/Monroe/Pike, Lehigh, Luzerne/Wyoming, Northampton, Schuylkill, Susquehanna/Lackawanna, Tioga, Wayne</p>
<p>Southeast Regional Office Phone: 215-560-2242 Fax Number: 215-560-3043</p> <p><u>Counties/Joinders</u> <u>Represented:</u> Bucks, Chester, Delaware, Montgomery, Philadelphia</p>	<p>Western Regional Office Phone: 412-565-5144 Fax Number: 412-565-5479</p> <p><u>Counties/Joinders</u> <u>Represented:</u> Allegheny, Armstrong/Indiana, Beaver, Butler, Cameron/Elk, Clarion, Clearfield/Jefferson, Crawford, Erie, Fayette, Forest/Warren, Greene, Lawrence, McKean, Mercer, Potter, Venango, Washington, Westmoreland</p>

Providers should also inform **all applicable Administrative Entities (AEs)** of any changes in business practice that impact individuals after contacting ODP.

Recommendation #5: Document what actions were taken and maintain evidence for why actions were taken.

Providers should document any changes to their operations as a result of COVID-19 and maintain evidence to support why the changes were made. Doing so will help demonstrate the basis for an action in the event that the appropriateness of the action is questioned after COVID-19 is contained and operations return to normal. It will also support any changes that may need to be made to Individual Plans and substantiate submitted claims for services rendered in an alternative manner due to a COVID-19 outbreak.

ODP will provide technical assistance with the kind of evidence that should be maintained when providers contact ODP in accordance with Recommendation #4. In general, evidence that should be maintained includes, but is not limited to:

- **Orders or notices from local authorities.** Example: County Health Department A imposes a restriction on public gatherings of more than 20 people, forcing Provider B to close its vocational program for one week. Provider B should retain the official notice from County Health Department A as evidence to support the closure.
- **Medical records.** Example: *Individual #1* tests presumptively positive for COVID-19. The provider relocates *Individual #1* and suspends his participation in all community activities until medically cleared by a physician. The provider should maintain copies of the positive test result and medical clearance to support the relocation and suspension of participation.
- **Correspondence and other records demonstrating inability to meet required staffing ratios.** Example: Provider A's provider-employed DSPs are unable to report to work due to COVID-19-related reasons. Provider A attempts to secure temporary staff from three staffing agencies, but each agency reports that they too are experiencing staff shortages. As a result, Provider A is out of compliance with required staffing ratios. Provider A should retain copies of correspondence with each of the three staffing agencies to demonstrate that all possible efforts were made to secure enough staff.

Resources for Infection Control Practices

- COVID-19 Information for at-risk Individuals:
<https://www.health.pa.gov/topics/Documents/Diseases%20and%20Conditions/Coronavirus%20At%20Risk%20Individuals.pdf>
- Strategies to Prevent the Spread of COVID-19 in Long-Term Care Facilities (LTCF) (Source: CDC): <https://www.cdc.gov/coronavirus/2019-ncov/healthcare-facilities/prevent-spread-in-long-term-care-facilities.html>
- CMS Guidance for Home Health Agencies:
<https://www.cms.gov/files/document/qso-20-18-hha.pdf>
- CMS Guidance on Respirators for Healthcare Personnel:
<https://www.cms.gov/files/document/qso-20-17-all.pdf>

Recommendation #6: Stay Informed

- COVID-19-specific information can be found at:
 - The Pennsylvania Department of Health's Coronavirus Update Page - <https://www.health.pa.gov/topics/disease/Pages/Coronavirus.aspx>
 - The Centers for Disease Control and Prevention's Coronavirus Page - <https://www.cdc.gov/coronavirus/2019-ncov/>
- The Pennsylvania Department of Health holds daily press briefings to announce the latest efforts and updates on the commonwealth's response to COVID-19. Providers may watch a free live stream of the daily briefing at noon here: <https://pacast.com/live/doh>. An archive of past briefings is available here: <https://pacast.com/video>.

- As a provider of ODP services, one of the most important steps you can take to stay informed about our program is subscribe to our Listservs. Important announcements, including announcements about COVID-19, are regularly sent over the Listservs.
 - To subscribe to the ODP Stakeholder Listserv, please visit <http://listserv.dpw.state.pa.us/Scripts/wa.exe?SUBED1=odp-stakeholder-community&A=1&X=2167695B2E9C39042A&Y=>
 - To subscribe to the ODP Provider Listserv, please visit <http://listserv.dpw.state.pa.us/Scripts/wa.exe?SUBED1=odp-master-provider-list&A=1&X=2167695B2E9C39042A&Y=>
- The Office of Developmental Programs has also created [a Coronavirus \(COVID-19\) Updates webpage](#) for stakeholders to stay up to date with updates and resources from ODP.