

## **Coronavirus Disease 2019 (COVID-19):**

### **Operational Recommendations for Long-Term Service and Support (LTSS) Providers**

In response to growing concerns about the spread of COVID-19 and its potential impact on the delivery of services to individuals receiving LTSS, the Department of Human Services, Office of Long-term Living (OLTL) has developed the following operational recommendations for LTSS providers. **Information will be updated and released on a recurring basis as new information becomes available.**

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 \(DOH\)](#) and [the U.S. Centers for Disease Control and Prevention \(CDC\)](#). 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, OLTL is collaborating with the Centers for Medicare and Medicaid Services (CMS) to make emergency amendments to its Community HealthChoices (CHC) and OBRA Waiver in response to COVID-19. The amendments under development provide for flexibility that may be necessary to continue ensuring the health and safety of CHC participants. The types of modifications and flexibility OLTL is seeking include but are not limited to the following areas: remote/telephonic service coordination; revised processes for level of care and annual redeterminations; person centered service planning; and where certain services can be provided. Additional information about the amendments will be provided in subsequent releases of this document.

### **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.
- Staying home if sick.

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

**All OLTL 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.

**Resources for Infection Control Practices:**

- Long Term Care Facility Visitation Guidance: <https://www.cms.gov/files/document/qso-20-14-nh-revised.pdf>
- 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/index.html>

- CMS Guidance for Home Health Agencies:  
<https://www.cms.gov/files/document/qso-20-18-hha.pdf>
- CMS Guidance on Use of Respirators for Health Care Personnel:  
<https://www.cms.gov/files/document/qso-20-17-all.pdf>

**Recommendation #3: Report all suspected cases of COVID-19 to DOH and OLTL and/or the participant's CHC-MCO**

Suspected cases should always be reported first to DOH at 1-877-PA-HEALTH. For OLTL and the CHC-MCOs to be responsive to the needs related to COVID-19, timely information from the provider community is essential. If staff or a person for whom you provide services appears to be symptomatic or tests presumptively positive for COVID-19, please notify the CHC-MCOs or the appropriate OLTL program area for non-CHC participants using the contact information below. In addition, providers should also contact DOH.

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

It is strongly recommended that providers contact the three CHC-MCOs and OLTL 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 an Adult Day or Structured Day Habilitation Program;
- Reducing or eliminating the provision of community-based activities;
- Restricting individuals' abilities to receive services based on health status; and
- Restricting visitors in nursing facilities, Personal Care Homes or Assisted Living Residences.

OLTL is monitoring the COVID-19 situation closely and is prepared to modify expectations for compliance with contacting OLTL before making any changes to your business practice, on a case-by-case basis should emergency conditions present. By contacting the CHC-MCOs and OLTL, providers may be able to implement the most effective strategy for maintaining continuity of operations during COVID-19 outbreak.

Providers may contact the CHC-MCOs and OLTL using the following contact information to notify OLTL of a proposed change in business practice and/or seek guidance related to a proposed change.

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### CHC-MCO and OLTL Contact Information

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| AmeriHealth   | 1-855-235-5115  | <a href="mailto:AmeriHealthCHCRegulatory@amerihealthcaritas.com">AmeriHealthCHCRegulatory@amerihealthcaritas.com</a> |
| PA Health and Wellness                                    | 1-844-626-6813  | <a href="mailto:PHWLiaison@PaHealthWellness.com">PHWLiaison@PaHealthWellness.com</a>                                 |
| Keystone First  | 1- 855-332-0729 | <a href="mailto:AmeriHealthCHCRegulatory@amerihealthcaritas.com">AmeriHealthCHCRegulatory@amerihealthcaritas.com</a> |
| UPMC  | 1-844-833-0523  | <a href="mailto:chc@upmc.edu">chc@upmc.edu</a>   |
| OLTL – HCBS Providers                                     | 1-800-932-0939  |  |
| OLTL – Nursing Facilities                                 | 1-800-932-0939  |  |
| OLTL – LIFE providers                                     | 1-800-932-0939  |  |
| OLTL – Personal Care Homes and Assisted Living Residences | 1-866-503-3926  | <a href="mailto:RA-pwarlheadquarters@pa.gov">RA-pwarlheadquarters@pa.gov</a>   |

#### **Recommendation #5 LTSS Residential Providers Should Follow State and Federally-Issued Guidance**

Nursing facilities, assisted living facilities, personal care homes, and residential habilitation providers should follow the guidance issued by DOH, CDC, and CMS, including monitoring and restricting visitors: <https://www.cms.gov/files/document/qso-20-14-nh-revised.pdf>

#### **Recommendation #6: Document any actions that 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 Person-Centered Service Plans and substantiate claims for services rendered in an alternative manner due to a COVID-19.

OLTL and the CHC-MCOs will provide technical assistance with the kind of evidence that should be maintained when providers contact OLTL 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 adult day center. Provider B should retain the official notice from County Health Department A as evidence to support the closure.
- **Correspondence and other records demonstrating inability to meet required staffing requirements.** Example: Provider A's provider-employed direct care workers (DCW) 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. 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.

### **Recommendation #7: Stay Informed**

- DOH 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 long-term services and support 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 OLTL Nursing Facility Listserv, please visit <http://listserv.dpw.state.pa.us/Scripts/wa.exe?SUBED1=oltl-nursing-facilities&A=1>
  - To subscribe to the OLTL CHC Listserv visit <http://listserv.dpw.state.pa.us/oltl-community-healthchoices.html>

- To subscribe to the OLTL Service Coordinators Listserv visit <http://listserv.dpw.state.pa.us/oltl-service-coordinators.html>
- To subscribe to the OLTL PA LIFE Providers Listserv visit <http://listserv.dpw.state.pa.us/oltl-pa-life-prvdrs.html>
- To subscribe to the OLTL Home Community Waiver Providers Listserv visit <http://listserv.dpw.state.pa.us/home-community-waiver-prvdrs.html>
- To subscribe to the OLTL Nursing Home Transition Listserv visit <http://listserv.dpw.state.pa.us/nursing-home-transition-prvdrs.html>
- COVID-19-specific information can be found at:
  - The DOH's Coronavirus Update Page - <https://www.health.pa.gov/topics/disease/Pages/Coronavirus.aspx>
  - The CDC's Coronavirus Page - <https://www.cdc.gov/coronavirus/2019-ncov/>