Pennsylvania Living Independence for the Elderly (LIFE) Provider Guidance Related to COVID-19

Issued by the Department of Human Services (DHS), Office of Long-Term Living (OLTL)

*The information below is updated as of 4/6/20. As additional questions and information are received, this document will be updated. For more up-to-date information please subscribe to the PW, LIFE Listserv and visit the Pennsylvania Department of Health’s Website at www.health.pa.gov.

Q1: Are all Pennsylvania LIFE day centers closed?
A: Yes, per the direction from DHS on March 16, all LIFE day centers are to be closed effective March 17, 2020 and will remain closed until further notice. The purpose of the closure is to avoid congregate settings and to practice social distancing.

Q2: Are the entire LIFE provider locations to be closed or does the closure only apply to the “day center”?
A: The closure applies to the day center portion only. LIFE Provider Organizations (POs) should use discretion when utilizing the clinic and therapy areas to see participants. Please follow social distancing practices, your infection control policies and follow the Centers for Disease Control and Prevention (CDC) guidelines for Health Care Facilities. Use of telehealth is encouraged.

Q3: Can new LIFE enrollments be done telephonically and if Interdisciplinary Team (IDT) assessments are needed, can they be done at the clinic?
A: Yes, LIFE POs can perform telephonic assessments for new enrollments and utilize the clinic for IDT assessments.

Q4: How can LIFE POs obtain personal protective equipment (PPE)?
A: The Pennsylvania Department of Health (DOH) has shared resources on obtaining PPE. As additional PPE becomes available, this will continue to be communicated to LIFE POs.

Q5: How does Pennsylvania’s stay at home order affect LIFE POs?
A: LIFE POs continue to be responsible for all Medicaid, Medicare, Part D and behavioral health services for their participants because they are life-sustaining services, which are not included in the Governor’s order for non-life-sustaining businesses to close. This means that all life-sustaining services, including personal assistance services (PAS), meals, therapies, skilled nursing services, etc. still need to be provided to LIFE participants. The LIFE PO is encouraged to be creative in delivery of these services.

Q6: Should the LIFE PO be doing in-home reassessment visits?
A: At this time, the LIFE PO should not be doing in-home reassessment visits unless there is a trigger event that would require a change in services. POs who are postponing participant 6 month and annual assessments at this time should be documenting the reason as “COVID-19.”
Q7: Does the LIFE PO need to maintain and/or increase in-home services to provide for care needs of the LIFE participants since they are not at the center?
A: The LIFE PO should maintain and/or increase in-home services to ensure continued safety and health needs are met by the LIFE participants. **At this point there should be no reductions to service plans for current participants.**

Q8: How are LIFE POs to be reviewing home environments for safety, including during pre-enrollment assessments? Are we able to do virtual tours?
A: During this time of limited face-to-face contact, DHS encourages LIFE POs to be creative in how they review a home environment for safety. A virtual home tour would be an example.

Q9: Is there a waiver of the signature requirement for use of telehealth or do you need a physical signature? Does the LIFE PO need to receive a physical signature on the “consent form” or can they use verbal consent and then document?
A: DHS is encouraging the expanded use of telehealth services to LIFE participants to minimize face-to-face contact. Written consent is not required to use telehealth, but verbal consent over the phone should be obtained and recorded.

Q10: If a LIFE PO suspects that a consumer is exhibiting signs and symptoms of COVID-19 and needs transported to get tested, what would OLTL recommend be done?
A: If a LIFE PO suspects that a consumer needs to be tested for COVID-19, the LIFE PO should arrange for transport to a testing center and should treat the situation as any other potential infection disease case. The LIFE PO is responsible for the care and safety of their participants and should take whatever action is deemed necessary to ensure continued safety. Further guidance from DOH can be found at this link: [https://www.health.pa.gov/topics/disease/coronavirus/Pages/Symptoms-Testing.aspx](https://www.health.pa.gov/topics/disease/coronavirus/Pages/Symptoms-Testing.aspx)

Q11: If a LIFE PO suspects or has confirmed a case of COVID-19, do we need to notify the Department?
A: If a LIFE PO has identified a suspected case of COVID-19 within the LIFE PO staff, contracted staff, or the participant population they should immediately notify DOH. If a LIFE PO identifies a confirmed case of COVID-19 they should track these on a spreadsheet, and notify DOH of any concerns related to caring for these participants.

Q12: Are services offered by LIFE POs considered life-sustaining services and therefore exempt from the Governor’s directive asking for the closure of all non-essential businesses?
A: Long-term services and supports providers (INCLUDING LIFE POs) offer services that maintain participant daily living requirements in a multitude of essential ways and those providers are expected to continue offering those services through the COVID-19 crisis period. For LIFE POs, these life-sustaining services must be provided outside of the day center environment.

Please submit additional questions to RA-PWLIFE@pa.gov