

COVID-19 Updates

Colorado Department of Health Care Policy & Financing

April 10, 2020

Overview

Colorado Department of Public Health & Environment (CDPHE) Update

- Greg Schlosser, Branch Chief

Update on COVID-19 status in Colorado Crisis Standard of Care

- Dr. Lisa Latts, Chief Medical Officer

Budget Update

Progress & Looking Ahead

New Department Guidance Issued

- Bonnie Silva, Office of Community Living Director

Questions/Feedback

- Responses to top question of last week and opportunity for new questions and answers



COLORADO
Department of Public
Health & Environment

Update

- Personal Protective Equipment (PPE)
- State Emergency Operations Center (SEOC)
- Survey priorities - Immediate jeopardy complaints, infection control related concerns
- [Medical Surge Concept of Operations](#)
- Home health & hospice essential services
- State and federal waivers
- [HEMSD COVID-19 Blog](#)

Reminder: Personal Protective Equipment

- HCPF has Dedicated 8 Staff @ 25 hours/week
- If you or your organization are experiencing a shortage or outage of personal protective equipment (masks, gloves, gowns, etc.) to conduct essential or life saving functions during this crisis, please reach out to your **local emergency manager** or **local public health department**.

[Find Your Local Community Emergency Manager](#)

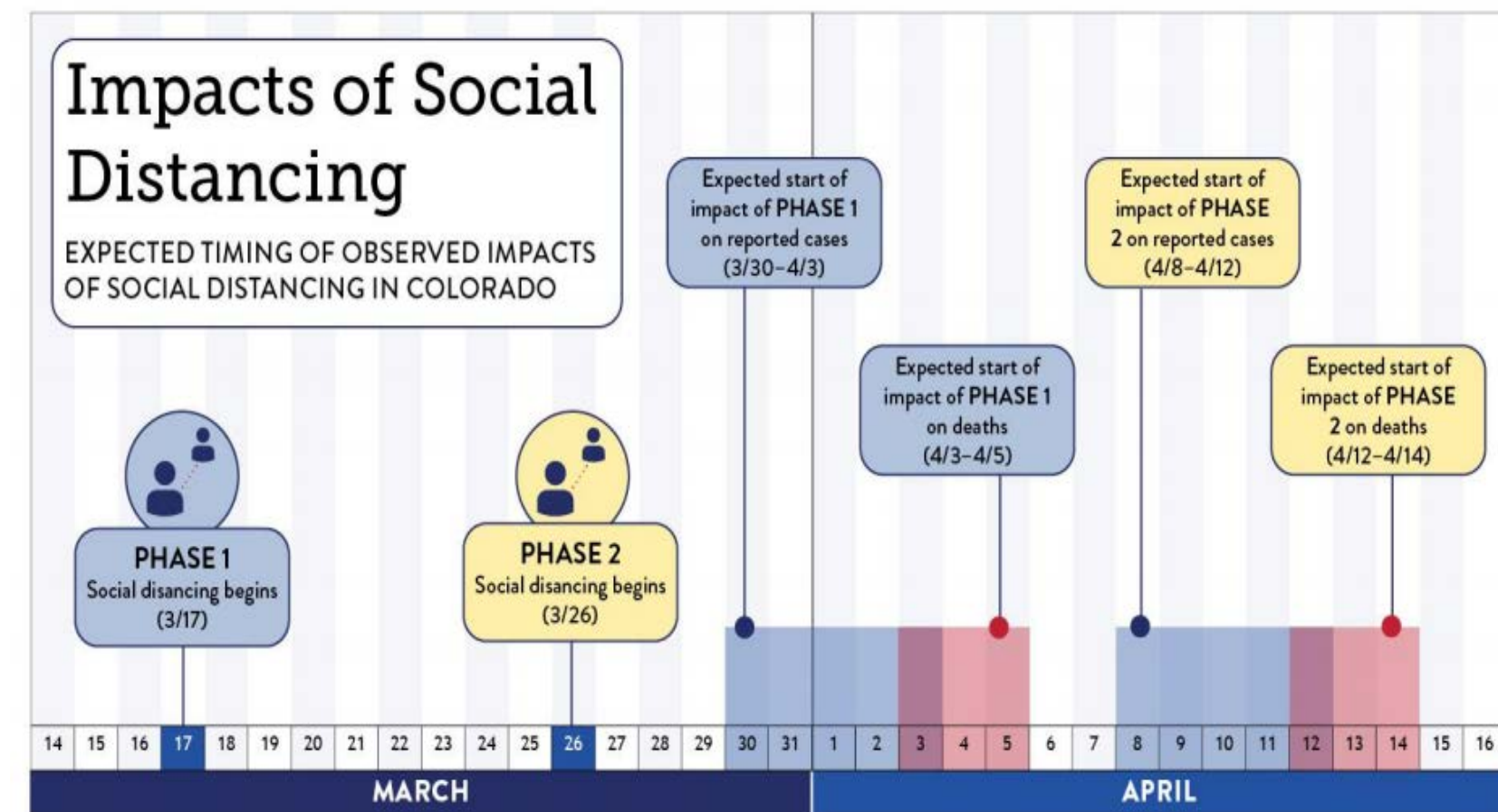
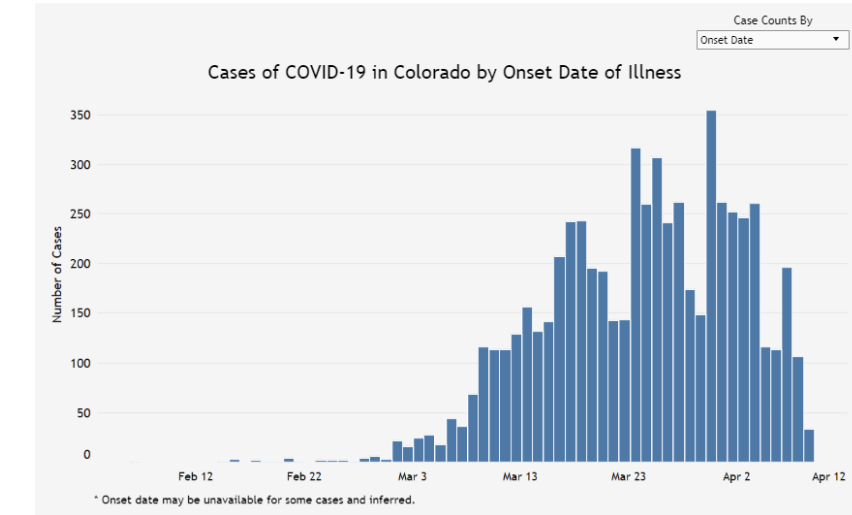
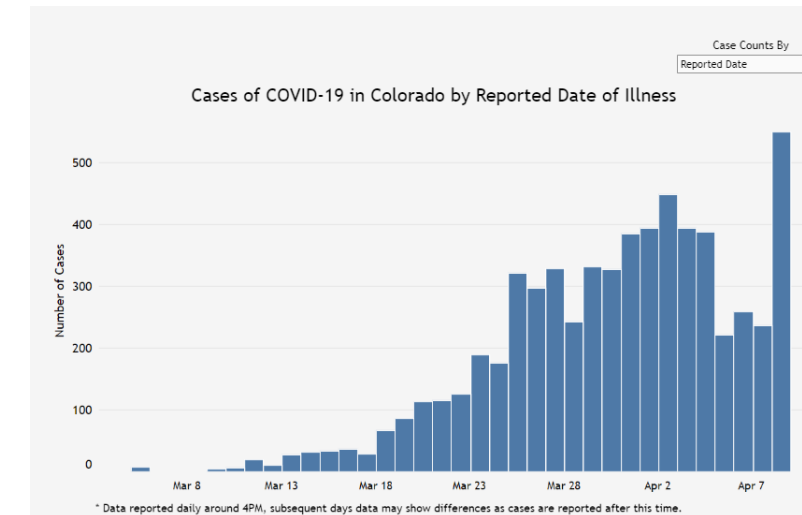
[Find Your Local Public Health Department](#)

To report issues in
obtaining PPE please
notify:

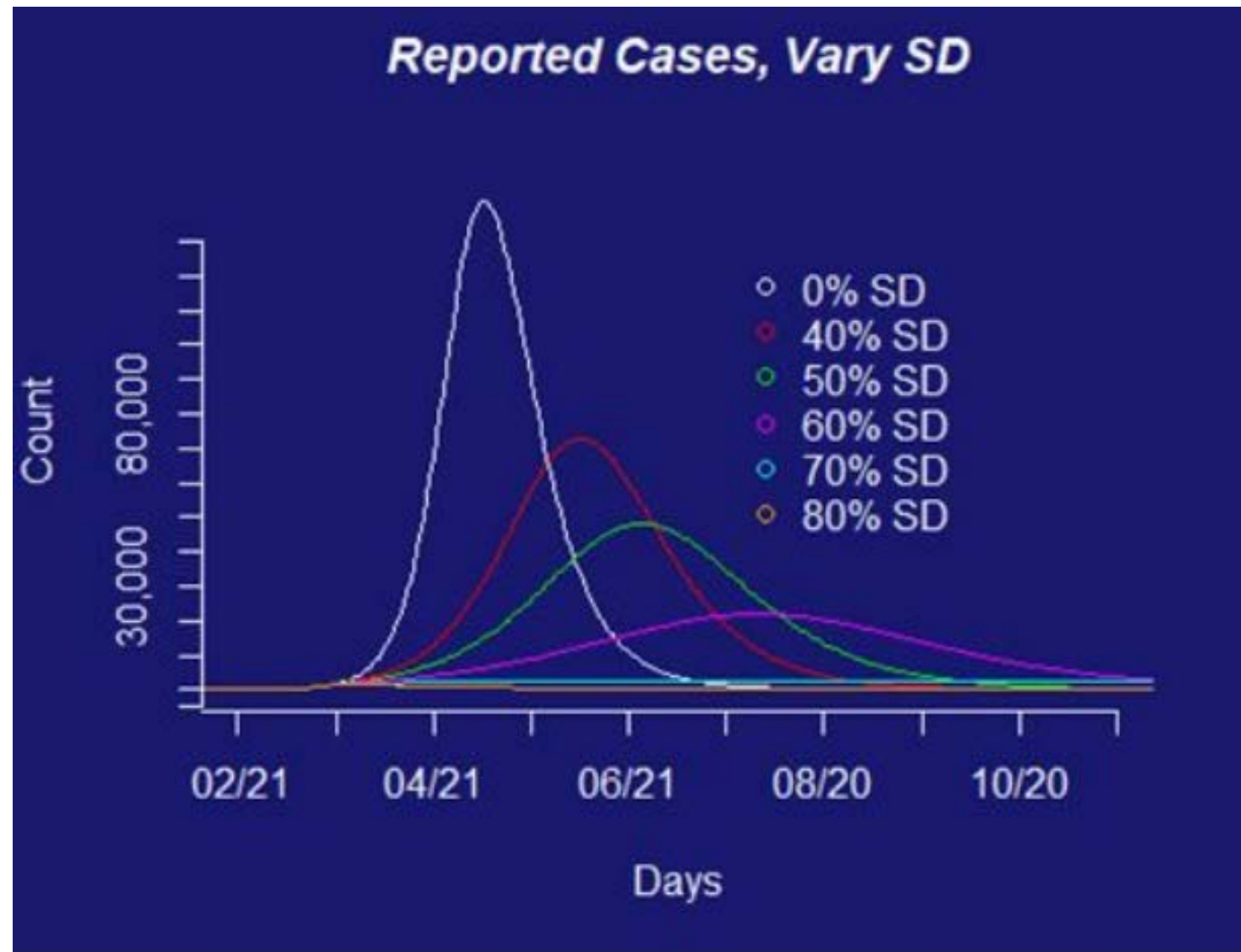
Sadie Martinez
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COVID-19 in Colorado

- 6,202 cases
- 1,221 hospitalized
- 226 deaths
- 56 counties
- 58 facilities
- US: 467K
- Worldwide: 1.62M cases



Effect of Social Distancing



Phase 2 Social Distancing Scenarios	Approximate date ICU threshold (2,000 beds) is reached
0% Efficacy	April 13
40% Efficacy	April 23
50% Efficacy	April 29
60% Efficacy	May 15
70% Efficacy	N/A
80% Efficacy	N/A

COVID-19 Crisis Standards of Care

CSC Development

- GEEERC with CDPHE develops standards and recommends to the governor
 - Recommendations for Hospitals, PPE, EMS
 - Creates liability protection for providers operating under CSC
- Governor accepts recommendations by Executive Order
- CMO of CDPHE activates executive order
 - Has activated PPE and EMS as of 04/10/20
- Decisions made by CSC team - not treating provider

EMS, PPE and Hospital CSC

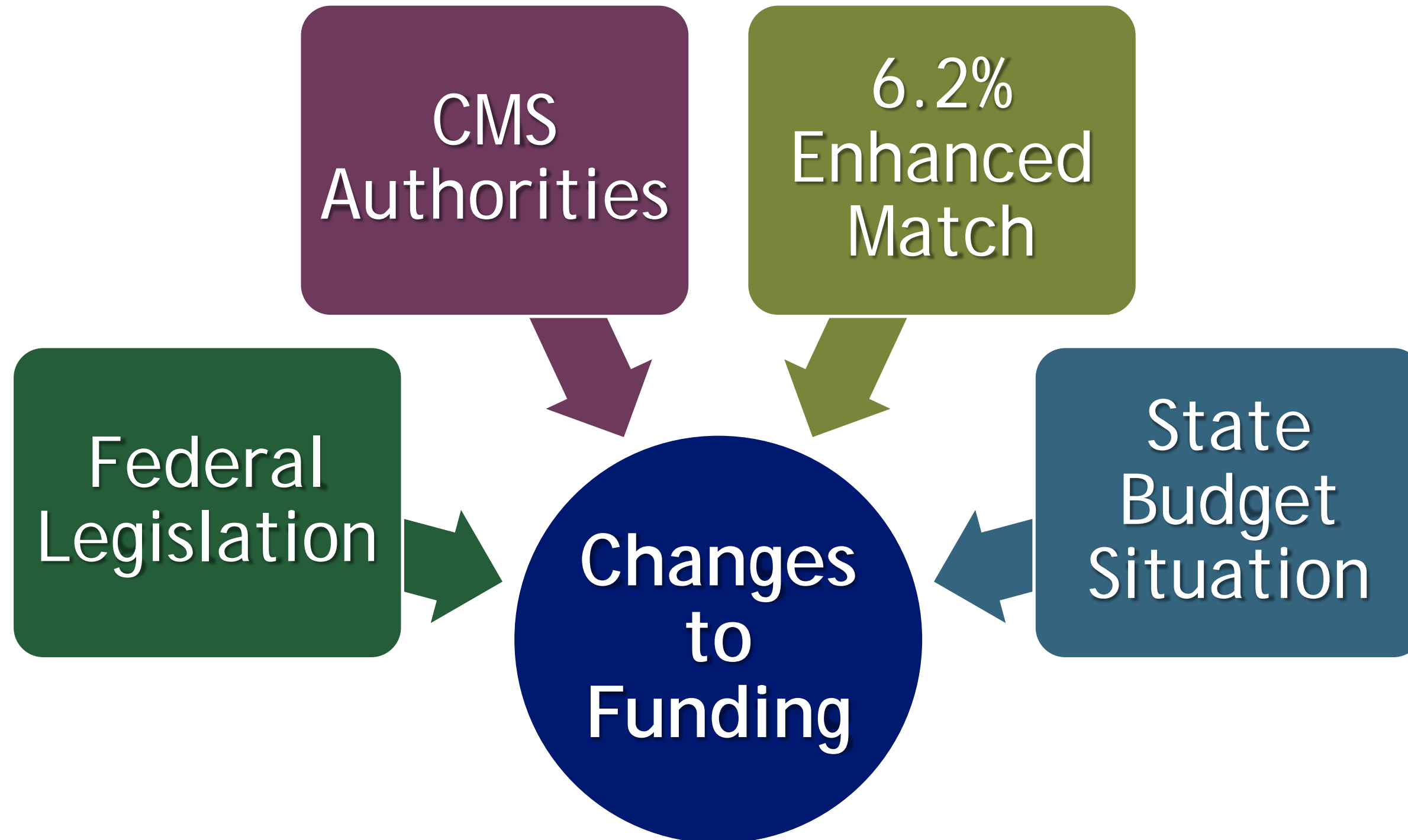
- EMS:
 - Restrict transport and use of services to most severely ill
 - Limit exposure to infection to protect scarce EMS/PPE resources
- PPE:
 - Extended use or limited reuse of scarce PPE
- Hospitals
 - Allow for prioritization of those most likely to survive given scarce resources

CSC Triage System

- Tiered approach for allocating scarce resources:
 - Tier 1 - objective blinded triage score - combines measures of **severity of acute illness** (the likelihood of surviving weeks) with **measures of chronic illness** (the likelihood of surviving months to years). In the event of a tie: 2.
 - Tier 2 consideration for pediatric patients, healthcare workers, and first responders. In the event of a tie: 3.
 - Tier 3 special considerations include pregnancy, life-years saved, and the multiplier effect (e.g. single caregivers). In the event of a tie: 4
 - Tier 4 - lottery system for allocation
- Triage decisions will NOT be based on estimated quality of life

Budget Update

Budget Complexities



Progress and Looking Ahead

Key Outstanding Federal Approvals

Appendix K

- *Staffing Flexibility* in Residential Settings
- Exclusion of *Professional Medical Information Page (PMIP)* at *BOTH* Annual and Continued State Review
- Retainer Payments for *Residential*

1135 Waiver

- *Waive Signatures* for LTSS Eligibility
- Enhanced Payments for *Fiscal Management Services (FMS)*
- Waive Service *Every 30-Day* Rule
- Allow for *Bulk Home Meal Delivery*
- Enhanced Payments for *Single Entry Points*

Disaster State Plan Amendment

- *Sick Time* for CDASS Attendants
- Enhanced Payments for *Nursing Facilities (NF) & Intermediate Care Facilities (ICF)*
- *Waive Level of Care Assessments* for NF Transfers
- *Waive PMIP* for Home Health, PACE, NF, and ICF
- Enhanced Payments for *Community Centered Boards*
- *Suspend IMD Status*
- *Staffing Flexibility* for NF, ICF, ACF
- *Alternative Location* Flexibility for ICF

Implemented Changes Services

- Added flexibility to most HCBS benefits for virtual delivery or alternate settings, including certain therapies
- Provided guidance on how to implement telemedicine in Nursing, Intermediate Care, and Alternative Care Facilities
- Allowed legally responsible person to provide Community Connector service

In Process and Exploring Services

In Process

- Allow legally responsible person to provide previously authorized Homemaker and Supported Community Connector
- Allow a family member or spouse to provide previously authorized Homemaker and Personal Care

Exploring

- Allow paid sick time for CDASS Attendants
- Expand Home Delivered Meals
- Add in-home respite for Community Mental Health Services waiver
- Exceed Youth Day Services limit for Children's Extensive Support waiver
- Exceed respite limit
- Enhance payments

Implemented Changes

Case Management

- Allowed for [virtual assessments](#)
- Changed [100.2 authorization from 6-months to 1-year authorization](#) for new assessments
- Accept [eSignatures or snail mail](#) signatures
- Provided guidance on [what to do if an agency closes or suspends services](#)
- Provided guidance on how to [document COVID-19 as critical incident](#)
- Suspended [PASRR for 30 days](#) for new admissions

In Process and Exploring Case Management

In Process

- Additional changes to Professional Medical Information Page (PMIP) requirements

Exploring

- Allow flexibility on ULTC 100.2 for individuals transferring between nursing facilities
- Temporary changes to the Notice of Adverse Action (803) process for Case Management Agencies
- Enhanced payments for Case Management Agencies

Implemented Changes

Providers and Workforce

- Added flexibility to PASRR requirements
- Suspended Aide supervision requirement for home health agencies
- Modified Nursing Facility staffing requirements
- UPDATED: Allowed for retainer payments for certain HCBS services
- Provided guidance for what residential providers should do if they have a suspected or confirmed case of COVID-19
- Suspended in-person inspections of Host Homes

In Process and Exploring Providers and Workforce

In Process

- Expand eligible providers across HCBS waivers and HCA/Hospice Providers
- Modify Intermediate Care and Alternative Care Facilities staffing requirements
- Retainer payments for prevocational and supported employment

Exploring

- Enhanced rates for residential, personal care, and homemaker services
- Enhanced rates to Nursing and Intermediate Care Facilities
- Enhanced Financial Management Service (FMS) payments
- Suspend IMD status
- Allow for alternative locations for Nursing and Intermediate Care Facilities

Previous Guidance

Case Management Agencies

Operational Changes

- OM 20-018 *(superseded by OM 20-034, next slides)*
- [OM 20-019](#)
- [OM 20-027](#)

PASRR Changes

- [IM 20-015](#)
- [OM 20-030](#)

Critical Incident Reporting for COVID-19

- [OM 20-022](#)

Facilities and PACE

Infection Control And Prevention of COVID-19 in Nursing Homes (CMS)

- [CMS QSO-20-14-NH](#)

Telemedicine in Nursing Facilities

- [OM 20-032](#)

HCBS Providers

Long-term Care and Congregate Settings

- [OM 20-017](#)

Day Program Service Providers

- IM 20-017 *(superseded by OM 20-039, next slides)*

HCBS Therapy Services

- [OM 20-020](#)

Guidance for Program Closures Due to COVID-19

- OM 20-021 *(superseded by OM 20-039, next slides)*

Guidance for Class B Providers

- [OM 20-023](#)

Changes to Benefits & Services (Table)

- [OM 20-024](#)

Telemedicine

- [Temporary Policy](#)

Non-medical Transportation

- [OM 20-031](#)

All COVID-19 related memos can be found here:

www.colorado.gov/hcpf/covid-19-provider-information

New Guidance Issued

New Guidance Issued



[OM 20-034](#)

[OM 20-035](#)

[OM 20-036](#)

[OM 20-037](#)

[OM 20-038](#)

[OM 20-039](#)

All COVID-19 related Memos can be found here: www.colorado.gov/hcpf/covid-19-provider-information

OM 20-034

Supersedes OM 20-018

TITLE: UPDATED CASE MANAGEMENT OPERATIONAL CHANGES IN RESPONSE TO COVID-19

Updated Authorization Timelines and Documentation

- Initial and Continued Stay Review assessments completed by phone or other electronic modality are authorized for up to 1 year.
- The member or their legal representative may sign the assessment paperwork by electronic signature, as outlined in [Operational Memo 20-027](#), or through postal mail.
- For SIS and ICAP Assessments completed by telephone or other electronic modality, the CMA will document details regarding the administration of the assessment in the Benefits Utilization System (BUS) log note section. The case manager should complete an in-person review at the next scheduled six-month contact.
- HCBS assessments that were completed by phone or other electronic modality must receive a face to face visit at their next six-month contact.
- Case Managers will continue to utilize the BUS for Critical Incident Reporting (CIRs) within one business day of notification as outlined in [Operational Memo 20-022](#).

[Links: OM 20-034](#)
[OM 20-018](#)

OM 20-035

TITLE: OPERATIONAL INFORMATION FOR HCBS RESIDENTIAL SERVICES PERTAINING TO COVID19

Summary of CDC Guidance to be followed in Residential Settings if a Resident has a suspected or Confirmed Case of COVID-19

- Contacting resident's healthcare provider at signs of symptoms and implementing instructions for medication and care.
- Separate other residents and pets from person, including bedroom and bathroom use, when possible. When contact is required, use facemasks and other PPE, if available.
- Prohibit visitors who do not have an essential need to be in the home.
- Ensure shared spaces have good airflow.
- Frequently clean all "high-touch" surfaces and wash laundry thoroughly.

Limit Visitors, Outings, and Leaving the Home

- Members and providers should comply with all issued orders, such as the [Governor's Executive Order](#) directing Coloradoans to stay home
- Families, guardians and/or other natural supports will no longer be able to take members on community outings or visits outside of the residence unless the families, guardians and/or other natural supports choose to keep the person in their home for a fourteen (14) day symptom-free quarantine period prior to returning the residence.
- HCPF understands the importance of maintaining contact and fostering connection with family, friends, and the community. HCPF encourages the use of technology to allow members to connect with their families, guardians and/or natural supports, or community resources (i.e. ARC Advocate) via video chat (Apple FaceTime or Zoom).

[Link: OM 20-035](#)

OM 20-036

TITLE: COVID-19 COMMUNICATION FOR SUSPENDING INPERSON INSPECTIONS FOR HCBS HOME MODIFICATION AND INDIVIDUAL RESIDENTIAL SUPPORT SERVICES—HOST HOME SETTINGS

In line with guidance from the federal Centers for Medicare and Medicaid Services (CMS), the Department and Division of Housing (DOH) are **suspending all in-person inspections until further notice.**

- DOH may continue to conduct inspections of Home Modifications and Home Accessibility Adaptations through video conferencing, submitted photos, phone calls, and document review, when appropriate.
- DOH will determine the appropriateness of remote inspection. Projects not suitable for remote inspection will be inspected in person at a later date.
- DOH is **still available** to assist members, providers, and case managers in grievance resolution remotely.
- DOH will resume in-person inspections of IRSS—Host Home settings at a later date.

[Link: OM 20-036](#)

OM 20-037

TITLE: COMMUNITY CENTERED BOARDS AND SINGLEENTRY POINTS OPERATIONAL CHANGES IN RESPONSE TO COVID-19

CCBs and SEPs shall postpone, or use video or telephone conferencing for the following contractually required meetings:

- Long Range Plan and Annual Public Forum - CCBs
- Board of Directors Meetings - CCBs
- Family Support Service Program Evaluation and Meeting - CCBs
- Family Support Council Meetings - CCBs
- Community Advisory Committee Meetings - SEPs

The Department may extend the deadline on contractually required meetings that cannot be conducted remotely and any associated deliverable by up to 90 days.

[Link: OM 20-037](#)

OM 20-038

TITLE: TEMPORARY TRAINING AND CERTIFICATION OF NURSE AIDES

The Department of Health Care Policy and Financing (HCPF), in collaboration with the Colorado Department of Public Health and Environment (CDPHE), is authorizing temporary **changes in the training and certification for nurse aides in nursing facilities** per the [COVID-19 Emergency Declaration Blanket Waivers for Health Care Providers](#) (retroactive effective date of 3/1/2020).

- “CMS is waiving the requirements at 42 CFR 483.35(d) (with the exception of 42 CFR 483.35(d)(1)(i)), which require that a SNF and NF may not employ anyone for longer than four months unless they met the training and certification requirements under §483.35(d)...”

[Link: OM 20-038](#)

OM 20-039

Supersedes IM 20-017 & OM 20-021

**TITLE: UPDATED HCBS PROVIDER RETAINER PAYMENTS AND CASE MANAGEMENT ACTION REQUIRED
FOR CLOSURES RELATED TO COVID-19**

For dates of service beginning March 13, 2020, providers delivering the following HCBS services may utilize service delivery alternatives or bill authorized retainer payments (details about how and when included):

- Adult Day Services
- Day Habilitation
- Day Treatment for the Brain Injury Waiver
- *Prevocational Services (added)*
- *Supported Employment (added)*

Notes about retainer payments (more details in memo):

1. May only be billed when authorized and documented by case managers
2. For units authorized in a member's service plan, but not provided due to the COVID-19 pandemic
3. Units billed shall not exceed the amount, scope, and duration otherwise authorized for the Service provider
4. May not be billed when the member chooses to receive the service from a different service provider or alternative services in lieu of services identified at left
5. Billing requirements outlined in memo linked below

[Link: OM 20-039](#)

Questions and Answers

Top Topics (Providers + CMAs)

Case
Management

Billing

Retainer
Payments

Other Resources

Case Management

What start date can a Single Entry Point (SEP) provide on a ULTC 100.2 Nursing Facility (NF) certification for new admissions?

For new admissions, SEPs will not need a PASRR authorization in order to issue a certification for NF clients admitted on or after March 20, 2020. The start date of the certification for initial admissions shall be the date the client admitted to the NF with Medicaid as the pay source. The Department will be issuing an updated memo.

Case Management

Can a member lose eligibility and be discontinued from HCBS during this current pandemic?

No, members cannot lose Medicaid eligibility. The Department is working with our federal partners to obtain additional information on the Maintenance of Effort (MOE) and how it may apply to HCBS waiver eligibility and/or services. We will share information as it becomes available.

Billing

Can you please confirm that the telehealth location code of "02" is NOT supposed to be applied to HCBS waivers claims? And how long will that be in place?

The Department will be providing guidance next week on how to ensure appropriate capture of location.

Retainer Payments

Have you added more services eligible for retainer payments?

Yes. We have added Prevocational Services and Supported Employment as eligible services for retainer payments, back-dated to March 13. This is only allowable if the service was on the client's PAR during this time period. See [Operational Memo OM 20-039](#) for details about how to get retainer payments authorized and how to bill.

Other Resources

Are there resources to help people self-isolate who may not want to or know how?

The Alzheimer's Association has two online resources that might be helpful:

[COVID-19 Tips for Dementia Caregivers in Long-Term or Community-Based Settings \(Alzheimer's Association\)](#)

[COVID-19 Tips for Dementia Caregivers \(Alzheimer's Association\)](#)

Other Resources

The Department will continue to work on gathering other helpful resources on various topics related to COVID-19. Here are some others we have gathered this week:

- ❖ [Emergency Care Plans for Children with Special Needs](#)
- ❖ [Visual guide to Coronavirus for children with autism](#)
- ❖ [Anxiety & Coping with the Coronavirus - Managing worry - Your Kids' and Your Own](#)
- ❖ [Video - Self-care for Direct Service Providers in a Crisis](#)

The National COVID-Ready Caregiver Certificate Training Program for Frontline Staff

- Provides practical guidance to staff about how to keep themselves and those they care for safe
- Topics include: infection control practices, personal protective equipment, changes to health and safety practices, and tips for managing stress and anxiety
- Draws on current CDC and WHO recommendations and guidance
- Features key experts in healthcare and long-term care

<https://covidcert.nextstep.careers/>

Available through April 17th for free with code:
COCOVIDCERT (enter at checkout)



New Questions?

Stay Engaged

FAQ

<https://www.colorado.gov/hcpf/long-term-services-and-supports-covid-19-response>

Email us

HCPF_HCBS_Questions@state.co.us

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More Information



www.cdc.gov/coronavirus/2019-ncov/



www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page



covid19.colorado.gov



Local Public Health Agencies

www.colorado.gov/cdphe/find-your-local-public-health-agency



www.colorado.gov/hcpf/COVID

Next Steps

Thank You!