



OPERATIONAL MEMO

TITLE:	COVID-19 COMMUNICATION FOR SUPERVISION REQUIREMENTS FOR CLASS B LICENSED HCBS PROVIDERS
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	MARCH 23, 2020
DIVISION AND OFFICE:	BENEFITS AND SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	PERSONAL CARE, HOMEMAKER, RESPITE, IN-HOME SUPPORT SERVICES
KEY WORDS:	COVID-19, HCBS PROVIDERS, SUPERVISION
OPERATIONAL MEMO NUMBER: HCPF OM 20-023	
ISSUE DATE: MARCH 24, 2020	
APPROVED BY: BONNIE SILVA	

HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to provide guidance to licensed Home and Community-Based Services (HCBS) waiver providers offering personal care, homemaker, In-Home Support Services, and Respite on temporary changes to supervision requirements in response to COVID-19.

In addition, there are a list of actions members and providers shall take to help prevent COVID-19 from spreading in a residence or provider setting. All recommendations in this document are based on guidelines provided by the Centers for Disease Control (CDC).

Effective March 24, 2020, the following supervision requirements for licensed class B agencies providing unskilled personal care, homemaker, respite, or In-Home Support Services (IHSS) shall be followed:

1. **Supervision should be flexible** to the needs of the member. Document any changes in the member record.

2. **Supervisory visits** and recertification visits may be conducted via phone, video conference, telecommunication or in-person.
 - a. If there is a safety concern with the services, the agency must make every effort to conduct an in-person assessment.
3. **New member assessments or change in condition reassessments** may be conducted via phone, video conference, telecommunication or in-person.
4. **Care plans may be modified** at the request of the member or representative to best meet the needs of the member. Please document any changes in the member record.
5. **The agency shall ensure** that skills learned or tested elsewhere can be transferred successfully. This review of skills must be done before the agency assigns a new attendant into a new member care situation. Any skills that may be utilized by the attendant must be evaluated by the supervisor/supervising nurse and documentation of this evaluation must be maintained.
 - a. The review of skills may be performed by the supervisor/supervising nurse verbally or via video demonstration by the attendant.
 - b. The review must include an evaluation of the step by step process for how the attendant is to safely carry out the task(s).
 - c. A review of skills is not necessary for currently employed attendant staff who are being newly assigned to members who will be receiving care and services which were previously evaluated by the supervisor/supervising nurse.
6. **The agency shall ensure** for the attendant supervision that member care and treatment are delivered in accordance with a plan of care that addresses the member's status and needs.
 - a. The supervisor/supervising nurse may evaluate the delivery of care and services by telephone and/or video conference with the attendant and member. The results of the supervisory visit must be documented by the supervisor/supervising nurse.
 - b. The supervisor/supervising nurse **MUST** conduct an in-person supervisory visit to evaluate member complaints related to the delivery of care by attendant staff when such concerns cannot be successfully addressed remotely by telephone and/or video.

GENERAL FINDINGS

Background on COVID-19: COVID-19 is the disease caused by novel Coronavirus virus 2019 that first emerged in Wuhan, Hubei Province, China. COVID-19 is a respiratory illness that can spread from person to person through respiratory droplets.

The situation with this outbreak is evolving rapidly with new information being learned daily. The CDC is working closely with federal, state, and local health departments. We will issue additional guidance as it is available. The document is current with CDC guidance as of 3/12/20. Visit the CDC website for the latest updates:

<https://www.cdc.gov/coronavirus/2019-nCoV/index.html>

How it Spreads: The coronavirus is thought to spread mainly from person to person, between people who are in close contact with each other (defined as within about six feet), and through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the main way the virus spreads. [Learn more about how COVID-19 spreads.](#)

Symptoms: The main symptoms are fever, coughing, and shortness of breath, just like the flu. Currently, CDC believes that symptoms may appear in as few as two days or as long as 14 days after exposure. There is no reliable way to distinguish coronavirus symptoms from symptoms caused by the common flu, as both diseases can cause fever, coughs, and pneumonia in severe cases. A doctor may consider a flu test first, unless the person has been in close contact with someone who tested positive for COVID-19. Close contact is within six feet of someone for a prolonged period, such as through caring for, visiting, or sharing a room with someone who has the virus and being coughed on. Here is more information on symptoms.

Treatment: Currently, there are no vaccines or antiviral medications to prevent or cure COVID-19, however scientists are currently working on both. Comfort measures should be provided to help relieve symptoms.

Steps to Prevent COVID-19 Include:

- **Handwashing:** Reinforce with your participants, staff, and visitors' best practices for handwashing:

- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use a hand sanitizer that contains *at least* 60% alcohol.
- Always wash your hands with soap and water if your hands are visibly dirty.
- Remind your staff to be extra vigilant when cleaning, performing housekeeping, and preparing food
- **Follow cough, sneeze and distance etiquette:** Avoid touching your eyes, nose, and mouth. This makes it more difficult for the virus to get from a surface to you. Cover coughs and sneezes with a tissue, then dispose of it immediately in a trash can, preferably one with a touchless lid opener.
- **Cleaning:** Frequently clean commonly touched surfaces and objects daily, like tables, countertops, light switches, doorknobs, elevator buttons, phones, handrails, cabinet handles and other surfaces using cleaning products according to the manufacturer's instructions. Residents in their own apartments or homes can use the same cleaners or wipes in their residences as they usually do. [The EPA has posted a list of antimicrobial products](#) registered for use against the virus.
- **Add more cleaning stations.** Station hand wipes or alcohol-based hand sanitizer in common assembly areas, such as living areas, exercise areas, game rooms, lobby, and living areas. Consider putting a bottle on all the dining room tables. Provide visual alerts providing instruction on hand hygiene, respiratory hygiene and cough etiquette. Provide a cleaning station with alcohol-based hand sanitizer, tissues, and a trash can for persons entering your building. Step up your infection control. These preventive measures may help avert an outbreak or spread of COVID-19 as well as other illnesses. [Review these important steps.](#)
- **Post signs at entrances instructing visitors not to visit** if they have (1) fever or symptoms of a respiratory infection (e.g., cough, sore throat, or shortness of breath). (2) International travel within the last 14 days, or (3) contact with an individual with COVID-19. Consider having visitors sign visitor logs in case contact tracing becomes necessary.
- [Monitor your staff and manage health care workers with symptoms of respiratory illness.](#) Implement sick leave policies that are non-punitive, flexible, and consistent with public health policies that allow ill Health Care Professional (HCP) to stay home.

As part of routine practice, ask your staff (including consultant personnel) to regularly monitor themselves for fever and symptoms of respiratory infection. Remind staff to stay home when they are ill. If a staff member develops fever or symptoms of respiratory infection while at work, they should immediately put on a facemask, inform their supervisor, and leave the workplace.

Communicate and Stay Informed: Communicating with your participants and participant's families, staff and visitors is critical. The more you communicate, the less likely they are to be stressed and speculate. Participants, families, and staff may still come to you with concerns based on misinformation. Rumors can spread like wildfire and incorrect information can do a lot of damage. Refer them to credible information such as the CDC website or the [CDPHE website](#).

1. **Reassure participants.** If participants express concern, listening and validating concerns before offering advice or tips on precautions can help people through this process. If participants ask about face masks, explain the CDC does not advise people to use face masks unless they are advised to do so by their health care provider or public health official.
2. **Reassure families.** Let families know that you have a plan and inform them of precautions being taken in your facility/office to protect their loved ones (and them), including visitor restrictions and actions participants and families can take to protect themselves in the center.
3. **Educate** participants, family members and visitors about prevention practices, response, and precautions implemented within the community to protect them and their loved ones, and actions they can take to protect themselves in their residence. [Share the latest information about COVID-2019](#).
4. **Post educational materials** about COVID-19 that explain why infection control precautions are necessary.
5. **Train.** Hold staff training on sources of exposure, prevention, recognizing symptoms, response when an outbreak has been identified, and communication protocols. Make sure staff get the message to monitor and report any symptoms they or the participants have, and that all managers on duty know how to contact your local or state public health department if concerns arise.
6. **Communicate with your staff.** Review policies on sick leave and time off. Tell staff to speak up and stay home if they are not feeling well. You may want to check in at the beginning of work shifts to ask how staff are feeling. This applies to any temporary, on-call employment services and third-party health care providers as well. Review policies with the agency and in person when any other worker arrives. Keeping an infectious disease out of the community is worth the time.

If you suspect someone in your facility/office may have COVID-19

If a participant exhibits symptoms associated with the coronavirus, take the following steps:

- **Place the person in a private room with a closed door.** Wait for guidance from the health department. Minimize the number of people who enter the room; ideally ONE healthcare person should be assigned or dedicated to working with that participant. This minimizes the risk of transmission to other participants and staff.
- **Notify your local public health department or contact your state health department.** To contact the Colorado Department of Public Health and Environment Call Center at 303-692-2700.
- **Follow HIPAA guidelines** and protect the confidentiality of the individual wherever possible.
- **Wear appropriate Personal Protective Equipment** during close contact with someone in your community that may have COVID-19. Follow health department guidance and [check this CDC page to prepare](#). Currently, the CDC recommends standard, contact and droplet precautions, and using (1) facemasks (2) gowns; (3) gloves, and; (4) eye protection. If you do not have this equipment, check with neighboring health facilities or contact your local health department if you are experiencing shortages. [The CDC has a plan in place to mitigate shortages](#)
- **If a physician recommends transport to a hospital** or treatment center, notify the hospital in advance that the person you're bringing may be suspect of having COVID-19 so they can get their infection prevention plan into action. Similarly, notify EMS or an ambulance service in advance that the person they are transporting may be suspect of having COVID-19 so EMS personnel can be prepared.
- **Clean the room, disinfect surfaces and any equipment** you used on the suspected participant before using it again.

Be Prepared:

1. **Update** emergency and outbreak plans, and practice or reinforce uncertain areas.
2. **Learn more about** how healthcare facilities can [Prepare for Community Transmission](#).

3. **Review security practices:** Go over or create new visitor policies for changing circumstances. You may need to ask participants, staff, and family about travel or exposure to persons with COVID-19. Establish a single entrance to the community. Travel advisories are changing, but generally, you'll want to ask about any travel in the past 30 days as well as any planned travel by participants. The CDC has [travel advisory guidelines](#) that list the changing levels of restrictions.
4. **Talk with suppliers & vendors** asking if they have any COVID-19 plans in place. If this is not already part of your emergency plan, sketch out a scenario of what you'd do if they couldn't enter your community and act as needed to prevent that outcome.
5. **Routinely review and follow the guidance of your local and state health departments.** This is the communication most critical to health. Viruses appear in clusters, so they're best fought on the local level. Follow protocols given for state and local jurisdictions.
6. **Check supplies** of tissues, touchless trash cans, hand sanitizer, soap, gloves, food, linens, and personal protective equipment.
7. **Keep working on the basics of infection prevention.**
8. **Check your staff's level of cross training and develop plans for staffing shortages.** This may occur when transmission in the community is identified.
9. **Review and update your communication plans.** Identify who on your staff will be a spokesperson for your center if you are contacted by a member of the media. Ensure that all staff are aware of who this is and how to reach them.
10. **Protect your employees.** As you work to protect participants and employees, staying in compliance with employment law is important. Consult the [CDC Guidance for Business and Employers](#) and [OSHA guidance](#) for preventing workplace exposure.
 - Review The U.S. Equal Employment Opportunity Commission's [Americans with Disabilities Act Pandemic Preparedness Guidance](#), and the [OSHA pandemic factsheet](#).
 - An outbreak could also trigger policies around the Fair Labor Standards Act and the Family Medical Leave Act. The [Society for Human Resources Management, SHRM](#), has a coronavirus FAQ page that can help.
11. Explore alternatives to face-to-face triage and physician visits.
12. **Review best practices for social distancing.**
 - Group activities/services would need to stop.

- Practice social distance by keeping about three feet between yourself and anyone coughing or sneezing.
13. **Follow the guidance** issued by state and local health departments.
 14. **Review medication management processes for emergencies.** Follow policy for medications in a congregate care environment as you would for the flu.
 15. **Have a plan for suspending prospective participant tours and limiting new admissions in the event of an outbreak in your community.**

Additional References for this document & Resource Links

- [Recommendations for Long-Term Care Facilities](#) (CDC)
- [Steps Healthcare Facilities Can Take Now to Prepare for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [FAQS for Healthcare Providers Regarding Medicare Billing and Payment](#) (CMS)
- [Coronavirus Preparation and Response Toolkit](#) (Argentum)
- [Interim Health Care Infection Prevention and Control Recommendations for Patients Under Investigation for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [Handwashing Video](#) (Ecolab)
- [Information Regarding COVID-19](#) AHCA/NCAL (American Health Care Association / National Center for Assisted Living)
- [Handwashing 101](#) (ServSafe)

Follow the [CDC website](#) to keep up with the general trends and what's happening. Communicating with your [state health department](#) and watching local news will help you with specifics.

Attachment(s):

None

Department Contact:

HCPF_HCBS_Questions@state.co.us

Department COVID-19 Webpage:

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information, please call the CDPHE Call Center at 303-692-2700.

For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email COHELP@RMPDC.org, for answers in English and Spanish (Español), Mandarin (普通话), and more.