



Information for Home Care Agencies, Home Health Care Agencies and Hospices During COVID-19

March 21, 2020

The Department of Health continues to receive questions from home care, home health care agencies, hospices and associations regarding best practices related to the COVID-19 pandemic. We are providing additional information to help you understand and operationalize the guidance provided by the Governor and the Secretary of Health as well as the Centers for Medicare and Medicaid Services (CMS) and the Centers for Disease Control (CDC). The Department is currently advising the following:

1. Is a home care agency/registry a ‘life-sustaining business’?

Yes. Under the PA Health Care Facilities Act Chapter 8 Section 802.1 a home care agency/registry is identified as a ‘health care facility’ as the agency provides clinically related health care services. Home care agencies/registries are considered essential services under the Governor's order on March 19, 2020.

2. Are hospice workers restricted from nursing homes?

No. Federal guidance for restricting visitation in nursing homes revised 3/13/2020 EXCLUDED hospice workers that provide care and services to nursing home residents from the visitors who are excluded. Hospice workers must adhere to the [CDC guidelines for infection control for health care workers](#).

3. What happens if you run into Personal Protective Equipment (PPE) Shortages?

If you have exhausted all sources for PPE, communicate with the Regional Healthcare Coalition (HHC) in your area. Each HHC has an established coordinator that serves as a resource to you during your response. Information about the HHC and your local contact is available on the Department website at this [link](#).

4. Can flexibility be offered regarding service plan changes, timing, utilization due to changes requested either by consumer or provider?

In the managed care program, Community HealthChoices, and in the fee-for-service home and community-based waiver programs, significant flexibility is available to support services needed during this period. The Pennsylvania Department of Human Services (DHS) has issued guidance to advise the managed care organizations of such flexibility. Specially, services most remain in place for at least three months. Providers should work with their managed care organizations to request this flexibility and have service plans and service configuration altered to support participant needs.



5. How do you handle Missed Visit Reporting for home care agencies when the Direct Care Worker (DCW) is turned away from the consumer's home, or the DCW is ill?

If sick, the DCW should not be working. The home care agency should find a replacement for the DCW. If a DCW is turned away from a consumer's home, the DCW should document that in the consumer's medical record. Per the Department of Human Services, managed care organizations have been given instructions on special reporting during this period for missed shifts. Please consult with the managed care organizations for specific instructions.

6. If the workforce is reduced significantly, e.g., schools are closed or DCWs are ill or self-isolating, will the state or MCOs provide any guidance on how home care agencies should be thinking about reallocating DCWs or prioritizing care to ensure that the most critical needs are being met?

The Department expects that agencies' Emergency Preparedness Plan includes provisions related to staff shortages that may include contracts/agreements with other home care/home health care /hospices or staffing agencies. Agencies should review, assess and prioritize their patients/consumers based on the complexity and frequency of their care needs. Modifications of assignments based on care needs and frequency should be made from most complex to simpler personal care tasks. Notifications and explanations related to changes need to be made with patient/consumer/responsible party.

Additionally, agencies need to ensure that patient/consumer files include emergency back-up supports that are identified and are current. For those patients/consumers utilizing services in Community HealthChoices or the home and community-based waiver programs, agencies must collaborate with the designated Service Coordinator and ensure back-up supports are identified.

For participants enrolled in Community HealthChoices or the OBRA Waiver program, agencies should work with managed care organizations and Service Coordinators on service prioritization of participants and to support agency efforts to identify appropriate resource allocation.

7. What rules or expectations are there when counties (e.g., Montgomery County) are under additional restrictions/guidance? If travel is restricted in a particular community, how do we ensure that home care/home health care and hospice providers are considered healthcare workers and able to provide necessary services?

Home care/home health care is designated a life-sustaining service, and travel restrictions do not apply to those services. All agency staff should be readily identifiable as health care workers as state regulations require staff to wear a badge. The badge includes a photo, the individual's name, title and agency.



Stay informed as this event continues to evolve. Below are useful links for home health and home care agencies:

CMS:

<https://www.cms.gov/files/document/qso-20-18-hha.pdf>

CDC:

<https://www.cdc.gov/infectioncontrol/guidelines/healthcare-personnel/index.html>

DOH:

<https://www.health.pa.gov/topics/disease/Pages/Coronavirus.aspx>