

MEMORANDUM

TO: County Mental Health Programs, Behavioral Health Service Providers, Primary Contractors, Behavioral Health Managed Care Organizations

FROM: Valerie J. Vicari
Acting Deputy Secretary *Valerie J. Vicari*
Office of Mental Health and Substance Abuse Services

RE: Guidance from the Department of Human Services (DHS), Office of Office of Mental Health and Substance Abuse Services (OMHSAS) regarding Coronavirus Disease 2019 (COVID-19)

DATE: March 14, 2020

In response to growing concerns about the spread of COVID-19 and its potential impact on the delivery of services to individuals and families OMHSAS has developed the following operational recommendations for counties and providers of behavioral health services

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](#) and [the U.S. Centers for Disease Control and Prevention](#). 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.

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.
- If sick, stay home.

Recommendation #2: Review your agency emergency preparedness plan and infection control procedures.

All counties and providers are strongly encouraged to:

- Review internal infection control protocols and emergency preparedness 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 preparedness plans in the event staffing is impacted by the COVID-19 virus.

For questions or technical assistance related to emergency plans, counties and providers may contact the appropriate regional office.

OMHSAS Regional Office Contact Information:

Central Regional Field Office Phone: 717-705-8395	Northeast Field Regional Office Phone: 570-963-4335
Southeast Regional Field Office Phone: 610-313-5844	Western Regional Field Office Phone: 412-565-5226

Recommendation #3: Report all suspected cases of COVID-19 to OMHSAS

For OMHSAS to be responsive to the needs related to COVID-19, timely information from the county and provider community is essential. Staff should follow Pennsylvania Department of Health (DOH) guidance for evaluation, testing, and reporting related to staff or a beneficiary suspected of having COVID-19 available [here](#). If staff or a person for whom you provide services is suspected to have COVID-19 or tests presumptively positive for COVID-19, please notify the appropriate regional office.

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

It is strongly recommended that counties and providers contact OMHSAS and any applicable Behavioral HealthChoices Managed Care Organization before making any changes to your 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 or temporarily closing programs.
- Closing county offices.

OMHSAS is monitoring the COVID-19 situation closely and is prepared to modify expectations for compliance on a case-by-case basis should emergency conditions present. By contacting OMHSAS, providers may be able to implement the most effective strategy for maintaining continuity of operations during COVID-19.

Providers may contact the appropriate regional office to notify OMHSAS of a proposed change in business practice and/or seek guidance related to a proposed change.

Recommendation #5: Document what actions were taken and maintain evidence for why actions were taken.

Counties and providers should document any changes to their operations related to 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

OMHSAS will provide technical assistance with the kind of evidence that should be maintained when counties or providers contact OMHSAS 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 program for one week. 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 ratios or response times.** Example: Provider A's employees 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. As a result, Provider A is out of compliance with required staffing ratios. 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 #6: Stay Informed

- COVID-19-specific information can be found at:
 - The Pennsylvania Department of Health's Coronavirus Update Page - <https://www.health.pa.gov/topics/disease/Pages/Coronavirus.aspx>
 - The Centers for Disease Control and Prevention's Coronavirus Page - <https://www.cdc.gov/coronavirus/2019-ncov/>
- The Pennsylvania DOH holds press briefings every day to announce the latest efforts and updates on the commonwealth's response to COVID-19. Counties and 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>.
- 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.
 - Please go to: http://listserv.dpw.state.pa.us/Scripts/wa.exe?SUBED1=omhsas_general_listserv&A=1 to sign up for the OMHSAS General Listserv, if you are not already subscribed.

Resources for Infection Control Practices

- 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/healthcare-facilities/prevent-spread-in-long-term-care-facilities.html>
- CMS Guidance for Home Health Agencies: <https://www.cms.gov/files/document/qso-20-18-hha.pdf>
- CMS Guidance on Respirators for Healthcare Personnel:
<https://www.cms.gov/files/document/qso-20-17-all.pdf>