Community Behavioral Health: Provider Notice
Continuation of Operations Plan for
Bed-Based Treatment Settings During the COVID-19 Pandemic
April 3, 2020

The Coronavirus Disease 2019 (COVID-19) pandemic has impacted the Philadelphia community and has resulted in a Shelter in Place order in an effort to control the spread of infection and to prevent the overburdening of our healthcare system. In these unprecedented times, Community Behavioral Health (CBH) remains committed to ensuring our members’ behavioral health needs continue to be met and are addressed appropriately.

As part of CBH’s efforts to ensure continuity of care and access to essential bed-based treatment during the COVID-19 pandemic, CBH expects the following bed-based treatment setting providers to develop and implement a Continuation of Operations Plan (COOP):

- Acute Inpatient (AIP)
- Extended Acute Care (EAC)
- Clinically Managed Residential Services (ASAM 3.1, 3.3, and 3.5)
- Medically Monitored Intensive Inpatient Services (ASAM 3.7)
- Medically Managed Intensive Inpatient Services (ASAM 4)
- Residential Treatment Facilities for Children and Adolescents (RTF)
- Residential Treatment Facilities for Adults (RTFA)

Providers are expected to incorporate both a Clinical and Public Health approach to ensure individuals in need of bed-based services are able to access appropriate behavioral health treatment during the COVID-19 pandemic while also focusing on member and staff safety and minimizing transmission of the virus. Providers should include the following in the COOP:

- Staff training on COVID-19, focused on respiratory infectious disease prevention and control, and internal infectious disease policy and procedures
- Plan to ensure adequate staffing
- Plan for decontaminating environmental surfaces and ensuring the facility is sanitized
- Limiting visitors
- Nature and frequency of screening for staff and members
- Triage process of positive screens
• Access to on-site physical health consultation
• Plan to accept for admission and treat COVID+ members with mild or no COVID symptoms
• Protocol for individuals who test positive for COVID-19
• Presence of collaboration with local medical facilities regarding management of patients with positive screens in need of emergent/acute medical care
• Protocol for individuals who were in contact with someone who tested positive for COVID-19, are exhibiting symptoms, or are awaiting COVID-19 test results
• Plan to educate individuals receiving services and implement respiratory disease practices including (but not limited to) hand washing and social distancing

Providers who have submitted a COOP are asked to resubmit an updated COOP which includes the above elements. Providers are encouraged to seek guidance from the Pennsylvania Department of Health, Philadelphia Department of Public Health, and/or the Centers for Disease Control and Prevention. The following resources include best practice guidelines pertaining to COVID-19:

• SAMHSA TAP 34: Disaster Planning Handbook for Behavioral Health Treatment Programs
• CDC Coronavirus Disease 2019 (COVID-19) Interim Infection Prevention and Control Recommendations
• National Council for Behavioral Health’s COVID-19 Guidance for Behavioral Health Residential Facilities
• WHO Infection Prevention and Control During Healthcare When COVID-19 is Suspected

Providers must submit their Continuation of Operations Plan to Amal El-Nageh, Manager of Provider Network Management, at amal.el-nageh@phila.gov by 5:00 p.m. on April 10, 2020.