



Community Behavioral Health: Provider Notice Continuity of Operations Plan for Community-Based Treatment Providers During the COVID-19 Pandemic August 7, 2020

The Coronavirus Disease 2019 (COVID-19) pandemic continues to impact the Philadelphia Community. The CBH Provider Agreement requires that “in the event of a major disaster or epidemic as declared by the Governor of the Commonwealth, [providers] render all services provided for in this Agreement to the extent practical within the limits of Provider’s facilities and staff which are then available.” CBH, the Office of Mental Health Substance Abuse Services (OMHSAS), and other regulatory agencies have waived several requirements to support provider ability to provide seamlessly through the pandemic. These adjustments include:

- Significant expansion of telehealth reimbursement
- Alternate payment arrangements in lieu of fee-for-service reimbursement
- Waiver of face-to-face requirements for controlled medication prescribing
- Suspension of utilization review

CBH remains committed to ensuring our members’ access to behavioral health treatment and is requesting the following community-based treatment providers submit a Continuity of Operations Plan (COOP):

- Acute Partial Hospital Program (Drug and Alcohol)
- Acute Partial Hospital Program (Psychiatric)
- Assertive Community Outreach Teams
- Children’s Mobile Crisis Teams
- Children’s Mobile Intervention Services
- Clinical Transition Stabilization Services
- Crisis Walk-In Services
- Drug and Alcohol Case Management
- Family-Based Behavioral Health Services
- Federally Qualified Health Center
- Functional Family Therapy

- Intensive Behavioral Health Services
- Mental Health Case Management Services
- Mental Health Outpatient
- Mobile Crisis Intervention Services
- Mobile Psychiatric Rehabilitation
- Non-Fidelity Assertive Community Outreach Teams
- Peer Services
- Substance Use Outpatient (ASAM 1)
- Substance Use Intensive Outpatient (ASAM 2.1)
- Substance Use Partial (ASAM 2.5)

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

COVID-19 Related

- Staff training on COVID-19 focused on respiratory infectious disease prevention and control; include internal infectious disease policy and procedures
- Nature and frequency of screening for staff and members
- Plan to ensure adequate staffing
- Protocol for individuals (staff or members) who were in contact with someone who tested positive for COVID-19, is/was exhibiting symptoms, or is awaiting COVID-19 test results
- Plan to ensure implementation of precautionary measures to prevent disease transmission including (but not limited to) hand washing, use of PPE, social distancing, and decontaminating environmental surfaces
- For levels of care which may include in-home visits, providers should include a plan to educate individuals and household members on infectious disease prevention and control, protocol for COVID-19 screening of household members prior to completing the in-home visit, and require household members wear a face mask during the visit
- Plan to support high-risk members and members who are unable to access telehealth
- Plan to educate and support members whose behavioral health conditions would place them at increased risk for contracting COVID

Telehealth Related

- Overall plan for use of telehealth
- Plan describing how telehealth is used to limit face-to-face contact when possible
- Use of two-way video communication where able
- Supports needed to implement telehealth, including tailoring documentation, staff training, and administrative support for arranging telehealth visits

General

- Plan to maintain compliance with timeliness requirements for appointments, including seven day waits for routine appointments, 24 hours for urgent appointments, and one hour for emergency appointments

Providers who previously 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's TAP 34: Disaster Planning Handbook for Behavioral Health Treatment Programs](#)
- [CDC's Coronavirus Disease 2019 \(COVID-19\) Interim Infection Prevention and Control Recommendations](#)
- [CDC's Coronavirus Disease Healthcare Facility Guidance](#)
- [Ohio Mental Health & Addiction Services COVID-19 and Opioid Treatment Programs](#)
- [Centers for Medicare & Medicaid Services \(CMS\) and Substance Abuse and Mental Health Services Administration \(SAMHSA\): Leveraging Existing Health and Disease Management Programs to Provide Mental Health and Substance Use Disorder Resources During the COVID-19 Public Health Emergency](#)

Providers must submit their Continuity of Operations Plan to Amal El-Nageh, Manager of Provider Network Management, at amal.el-nageh@phila.gov by 5:00 p.m. on August 14, 2020.