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ACL 20-14

Date: June 25, 2020
To: Community-Based Adult Services (CBAS) Center Administrators and Program Directors
From: California Department of Aging (CDA) CBAS Branch
Subject: CBAS Temporary Alternative Services (TAS) Guidance on Provision of In-Center Services

Purpose

This ACL reiterates and clarifies CDA guidance issued since the beginning of the COVID-19 outbreak in March 2020, regarding expectations for CBAS TAS providers when delivering in-person services. It provides additional framework of both requirements and best-practice recommendations for providers currently providing and/or those planning to begin offering services in the center.

Background

ACL 20-07 defined CBAS TAS as services delivered individually in the center, in participant homes, and services provided via telehealth or other telephonic means. CBAS TAS approved centers have been open throughout the COVID-19 emergency, with some delivering services in person, both at the center and in participant homes. In the early days of the COVID-19 emergency, CDA issued strict guidance to CBAS TAS providers regarding how and when in-person services could be delivered, including that in-person services would be allowable only as essential and when they could be delivered safely to protect participants and staff from increased risk of virus spread. Additionally, ACL 20-06 provided guidance regarding individual versus congregate services, emphasizing the prohibition of delivery of services provided in groups.

The guidance in ACLs 20-06 and 20-07 is still in effect. In March and April of 2020, the state, managed care plans, and providers worked together to develop the CBAS TAS model without the knowledge and experience we have today. This ACL reflects new learnings from which to build on previous guidance.

Adding to guidance provided in ACLs 20-06 and 20-07, this ACL reflects:

- New public health guidance for COVID-19 risk reduction

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- The current changing environment where counties have begun gradual relaxing of stay-at-home orders, more participants and caregivers have growing urgency for services, and more providers are considering delivery of services in the center to be responsive to these changes
- CDA requirements for providing in-center services, including submission of a modified [CBAS TAS Plans of Operation \(CDA 7012\)](#) and the [CBAS TAS In-Center Services Checklist \(CDA 7015\)](#)

NOTE: CBAS TAS providers continue to deliver essential services to individuals who are among the highest risk for severe COVID-19 illness and death. As regions around the state begin to relax stay-at-home requirements despite continuing COVID-19 infections statewide and uncertainty regarding future disease spread, it is critical that CBAS TAS providers remain vigilant in our most important mission – to protect participants and staff from COVID-19 exposure and illness and provide necessary services and supports to participants and caregivers through this outbreak.

Core Requirements for CBAS TAS In-Center Service Delivery

As operators of licensed health facilities (Adult Day Health Care centers) serving some of the most vulnerable people in the state, CBAS TAS providers must meet high standards for safety and infection control. To ensure these high standards, CBAS TAS providers currently delivering or planning to deliver services in the center must do the following:

1. Continue to follow guidance regarding in-person services outlined in ACLs 20-06 and 20-07. Additionally, since March 2020 when ACLs were issued, public health guidance has focused on physical distancing of at least six-feet and wearing of facial coverings (masks) as ways to reduce risk of virus spread. This additional guidance should be followed when participants are served in person.
2. Meet federal, state, and local authority requirements for public health and workplace operations. Local health authority requirements may differ from federal and state and may change based on local disease spread and health care delivery system capacity. **Providers must ensure ongoing compliance with local requirements in addition to federal and state.**

The state currently requires all businesses in California to do the following before reopening:

- a. Perform a detailed risk assessment and create a site-specific protection plan.
- b. Train employees on how to limit the spread of COVID-19, including how to screen themselves for symptoms and when to stay home.

- c. Set up individual control measures and screenings.
 - d. Put disinfection protocols in place.
 - e. Establish physical distancing guidelines.
3. Develop a detailed written plan for safe in-center service delivery that addresses all aspects of care such as adequate facilities, workforce, personal protective equipment (PPE), supplies, communication, and infection control.
4. Submit a modified [CBAS TAS Plan of Operation \(CDA 7012\)](#) to notify CDA of your CBAS TAS status with regards to in-center service delivery **if you were not previously approved for service delivery in the center per your original TAS Plan of Operation**. Prior approval by CDA is required for any CBAS TAS provider that was not previously approved for service delivery in the center per their TAS Plan of Operation.

NOTE: All CBAS TAS providers that are currently approved for in-center services or seeking CDA approval to provide in-center services, must complete the [CBAS TAS In-Center Services Checklist \(CDA 7015\)](#) and submit it through the CDA Peach Provider Portal.

Recommendations

Optimization of telehealth and doorstep services continues to be recommended to minimize the need for in-center services. In-center services should only be provided to participants as clinically appropriate, delivered in the shortest amount of time necessary to provide the needed service and minimize time the participant is outside the home, and delivered only by providers that have the resources to safely provide such care.

Providers currently delivering or planning to begin in-center services should read and adopt practices described in the following links:

[Centers for Disease Control \(CDC\) – Guidance for Non-Emergent Care](#)

[California Department of Public Health \(CDPH\) Order of the State Public Health Officer, May 7, 2020](#)

[CDPH website for COVID-19 updates and guidance](#)

[CDPH COVID-19/Guidance-for-Face-Coverings 06-18-2020](#)

[COVID-19 – Statewide Industry Guidance to Reduce Risk](#)

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Additionally, the California Association for Adult Day Services (CAADS) has offered excellent webinar training in universal precautions. CDA recommends that providers and staff who have not participated in this training contact CAADS at (916) 552-7400. Some managed care plans have indicated they will expect evidence of completion of such training from their contracted CBAS TAS providers going forward.

CDA thanks CAADS staff and provider representatives for their collaboration and hard work designing and sharing their valuable tools and webinars.

Summary

To reiterate, CBAS TAS providers are **not** required to deliver services in the center at this time. Additionally, CDA recognizes that providers may feel pressure in this changing environment to begin or expand in-center services. We urge you to deliver services **only** as essential and if they are not feasible to perform remotely. Decisions regarding delivery of in-center services should be driven by participants' assessed needs and the provider's ability to meet requirements specified in this ACL.

Questions

Please contact the CBAS branch if you have any questions: (916) 419-7545; cbascda@aging.ca.gov.