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Community-Based Adult Services Branch
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ACL 21-02

Date: March 5, 2021
To: Adult Day Health Care (ADHC) / Community-Based Adult Services (CBAS)
Center Administrators and Program Directors
From: California Department of Aging (CDA) CBAS Branch
Subject: Provision of ADHC / CBAS Services in the Center

Purpose

This All Center Letter (ACL) is to remind ADHC / CBAS providers that the policy directives in [ACL 20-14 "CBAS Temporary Alternative Services \(TAS\) Guidance on Provision of In-Center Services"](#) are still in effect due to the public health emergency (PHE), until revoked by CDA. Providers may not deliver services in the center unless they meet all requirements specified in ACL 20-14.

Phased Transition to Congregate Services

COVID-19 cases and deaths statewide are decreasing, and the numbers of vaccinations administered to eligible individuals including ADHC / CBAS participants and staff are increasing which are very hopeful signs moving forward. Given these positive signs, CDA in collaboration with ADHC / CBAS providers, the California Association for Adult Day Services (CAADS), the Alliance for Leadership and Education (ALE), and state and managed care partners is in the process of planning for the return of congregate center services. Meanwhile, providers are currently able to deliver remote and limited in-center services under the provision of ACL 20-14.

CDA is planning a phased transition of all ADHC / CBAS centers and participants to congregate center services before the public health emergency is tentatively expected to end December 31, 2021. CDA will issue an ACL soon that identifies revisions to the expectations and requirements for staffing, assessment and care planning, documentation, service delivery and facility readiness moving forward. The ACL will include the processes that providers need to complete for CDA to certify/approve the center's readiness to transition to congregate center services and will identify clear start and end dates for this transition.

Because CBAS TAS flexibilities authorized by the federal Centers for Medicare and Medicaid Services (CMS) were originally set to expire on March 12, 2021, the state

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Department of Health Care Services (DHCS) is working with CMS to extend these flexibilities, to an unspecified date later this year. Regardless of a new extension date, it is imperative that ADHC / CBAS providers begin planning **now** for the transition to congregate center services while these CBAS TAS flexibilities are still in place, so participants and staff can receive the benefit of congregate services as soon as they are safe and feasible to provide.

In summary, CDA will issue further guidance soon on the phased transition to congregate center services. Please continue to promote vaccinations among eligible participants and their caregivers, as well as staff, and adhere to current public health practices that reduce transmission so that a return to congregate center services can be accomplished safely and as quickly as possible.

Questions

Please contact the CBAS branch if you have any questions: (916) 419-7545;
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