Office of Developmental Programs  
Home and Community Based Services (HCBS)  
At-A-Glance Reopening Guide by Phase  
Issued: 6/10/2020

<table>
<thead>
<tr>
<th>Governor’s Re-Opening Phase</th>
<th>ODP Domain</th>
<th>Operation Implementation</th>
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</thead>
</table>
| Green                       | Regulatory suspensions for Ch. 55 Pa Code 2380, 2390, 6100, 6400, 6500 | For service locations in green phase counties, provider must resume the following activities that are suspended in red and yellow phase counties within 30 days of county designation as green:  
  • Annual individual physical examinations and biennial staff physical examinations should be scheduled for the first available date (examination may be conducted remotely).  
  • Orientation and annual training activities. |
|                             | Licensing Inspections | Resume on-site, in-person annual inspections unless extenuating circumstances related to the COVID-19 pandemic exist.  
  Providers will be given at least 30 days’ notice prior to the Office of Developmental Programs (ODP) commencing an on-site annual inspection.  
  Licensing staff will follow the provider’s COVID-19 symptom screening process.  
  Licensing staff will continue to follow Center for Disease Control (CDC) and Pennsylvania Department of Health (DOH) guidance for personal protective equipment (PPE)/mask use. |
| Quality Assessment and Improvement (QA&I) | | Outstanding corrective action plans (CAPS) and directed corrective action plans (DCAPs) for CY3 must be completed in timeframes specified by the administrative entity (AE) or ODP.  
  ODP will be implementing an interim QA&I process in FY2020-2021. Interim process is entirely remote including individual interviews. |
| Investigations Completed by Certified Investigators | | Resume face-to-face investigations by certified investigators following instructions for screening and mask use. |

Please use the link below for the most accurate information about the Governor’s plan to Reopen Pennsylvania:  
https://www.governor.pa.gov/process-to-reopen-pennsylvania/
If pre-interview screening results lead to a determination that an individual who needs to be interviewed has tested positive for COVID-19, is exhibiting symptoms of COVID-19, or has had contact with someone who tested positive for COVID-19:
  - Conduct the interview remotely (video methods are preferred but telephone interviews can be conducted if video methods are not feasible) and obtain written statements.
  - Coordinate investigation activities completed by other entities such as protective services or law enforcement.

<table>
<thead>
<tr>
<th>IM4Q</th>
<th>Face-to-face interviews not completed by March 17, 2020 continue to be suspended through the end of FY2019-2020. IM4Q for FY2020-2021 interview format still to be determined.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIS™ and PA Plus</td>
<td>Assessments will resume but be conducted remotely via video until further notice.</td>
</tr>
</tbody>
</table>

**AE Processes**

AEs that are located in counties in green phase must resume the following activities:
  - Provider orientation classes – Attendees must also reside in a county that has been designated as green. Registration should be prioritized by operational needs, if capacity is limited.
  - Face-to-face intake/eligibility.

Encourage large meetings continue to be conducted remotely given the contact with vulnerable populations.

Follow instructions for screening and mask use.

**Supports Coordination Organizations (SCOs)**

Continue to use remote means for most individual monitoring and meetings.

Resume face-to-face monitoring or team meetings when the supports coordinator (SC) has been unable to effectively provide wellness checks and monitoring or the individual/family has indicated a preference for face-to-face monitoring or team meetings, and the SC, individual and any other participants who will be physically present reside in a county that has been designated as green.

Follow instructions for screening and mask use.
Residential service providers should continue to follow all guidance issued for staff and resident screening for COVID-19 symptoms and infection.

Initiate planning for people who were relocated to return to the residential home. If an individual chooses not to return to the residential home permanently or for an extended period of time, planning must occur to determine what services are needed to support the individual in the home where they are currently residing.

Support for residents to access the community should resume in limited scope. Activities must be allowed as stipulated in the green phase and all appropriate steps must be taken for the individual to safely engage in the activity.

Community activities and necessary supports for those activities should be established using the [ODP Individual Transition Guide](#).

Outdoor activities aimed at wellness are highly encouraged.

Communicate changes in policy and protocols to individuals and families.

Visitation with small numbers of friends and family with proper social distancing and following instructions for mask use. Follow guidance provided in [ODP Announcement 20-066](#).

Maintain an awareness of infectious disease outbreaks that should inform risk, screening and mitigation strategies in the provision of service due to travel of staff/individuals/visitors.

For providers that established space or vacant homes, maintain physical quarantine/isolation areas in case of another outbreak of COVID-19.

Maintain additional stock of PPE in case of another COVID-19 outbreak.

Provide ongoing training, exercises, and planning for best practices related to infectious disease containment and mitigation.
| **HCBS Reopening Guidelines Reference for Green, Yellow, and Red Phases** | If Community Participation Support (CPS) or Day Habilitation services in community and licensed facility locations are available, service status may return to Residential “With Day.”

Follow instructions for screening and mask use. |
| --- | --- |
| **CPS and Day Habilitation Community** | CPS and Day Habilitation services in the community may resume. Activities must be allowed as stipulated in the green phase, and all appropriate steps must be taken for the individual to safely engage in the activity.

Visitation with small numbers of friends and family using proper social distancing and following instructions for mask use.

Activities in the community may not include more than 3 participants as currently approved in the Consolidated, Community Living, Person/Family Directed Support and Adult Autism waivers.

If possible, groups should include the same group members each day, and the same staff providers should remain with the same group every day.

Providers and Individual Support Plan (ISP) teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:

- The size of the vehicle and ability to separate passengers in the vehicle
- Whether all the passengers live together or have been grouped for regular daily contact with one another
- Each passenger’s tolerance for wearing a mask while in the vehicle
- The health and behavioral support needs of each person transported and how they interact with others in the vehicle

All surfaces of the vehicle must be cleaned using a disinfectant after each use.

Outdoor activities aimed at wellness are highly encouraged.

CPS and Day Habilitation services can continue to be rendered remotely or in private homes when individuals are not ready to resume activities in the community or licensed facility locations. |
| **CPS and Day Habilitation Facility** | Variances are not required to be completed when the 25% threshold for involvement in community activities is not achieved.

Within 45 days of the county moving to the green phase, variances must be completed when an individual enrolled in an ID/A waiver needs more than 14 hours a day of CPS, In-Home and Community Support and/or Companion services.

Follow instructions for screening and mask use. |
| **Transportation Trip** | Providers are permitted to reopen but must follow screening, social distancing and infection control protocols. See ODP [Announcement 20-062](https://example.com/announcement) “ODP/Administrative Entity (AE) Facility Based Community Participation Supports Readiness Tool for COVID-19”. The Facility Based Community Participation Supports Readiness Tool for COVID-19 should be completed with the AE that is the lead for the service location.

Use the Facility Based Community Participation Supports Readiness Tool to make decisions about visitation in the facility.

Follow instructions for screening and mask use. |

Transportation services may be provided to access the community as allowed in the green phase and consistent with the plan established by using the ODP Individual Transition Guide.

Providers and ISP teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:

- The size of the vehicle and ability to separate passengers in the vehicle
- Whether all the passengers live together or have been grouped for regular daily contact with one another
- Each passenger’s tolerance for wearing a mask while in the vehicle
- The health and behavioral support needs of each person transported and how they interact with others in the vehicle

All surfaces of the vehicle must be cleaned using a disinfectant after each use. |
| **Small Group Employment Services** | Follow instructions for screening and mask use.  

Consider operating in smaller groups to allow for social distancing on the job site and while on the van or bus.  

Providers and ISP teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:  

- The size of the vehicle and ability to separate passengers in the vehicle  
- Whether all the passengers live together or have been grouped for regular daily contact with one another  
- Each passenger’s tolerance for wearing a mask while in the vehicle  
- The health/behavioral support needs of each person transported and how they interact with others in the vehicle  

Instead of gathering at the facility, consider alternate methods such as transporting directly from the participants’ homes to the job site and back to their homes.  

All surfaces of the vehicle must be cleaned using a disinfectant after each use.  

Follow instructions for screening and mask use. |
|---|---|
| **Supported Employment** | All services should continue to be provided remotely whenever possible.  

An individual’s re-engagement in employment and the support necessary to allow the individual to return to work should be established by using the ODP Individual Transition Guide.  

Follow instructions for screening and mask use. |
| **In-Home and Community Support, Community Support (AAW) and Companion** | Within 45 days of the county moving to the green phase, resume 40/60 limitations on overtime and relatives providing services.  

All community activities must be allowed as stipulated in the green phase and all appropriate steps must be taken for the individual to safely engage in the activity. |
| Behavior Consultation, Therapies and All Other HCBS | Within 45 days of the county moving to the green phase, variances must be completed when an individual enrolled in an ID/A waiver needs more than 14 hours a day of CPS, In-Home and Community Support and/or Companion services. Follow instructions for screening and mask use. |
| Respite Camp | A Respite Camp must comply with all applicable CDC and DOH guidelines and, for camps in Pennsylvania, operate in accordance with the [Wolf Administration’s Summer Camp and Recreation Guidance](https://pa.gov/1716/), including the Pennsylvania Department of Health’s Frequently Asked Questions. Respite Camps must develop a written health and safety plan that follows the CDC guidance for Youth and Summer Camps and post the plan on the camp’s publicly available website prior to providing services. The Organized Health Care Delivery System (OHCDS), Agency With Choice (AWC) and/or AE are responsible for reviewing the plan prior to including or authorizing the service on the ISP to ensure the Respite Camp has met all CDC and DOH guidelines. |
Governor’s Reopening Phase Operational Level | ODP Domain | Operation Implementation
--- | --- | ---
Yellow | Regulatory suspensions for Ch. 55 Pa Code 2380, 2390, 6100, 6400, 6500 | All regulatory suspensions under Governor’s Wolf’s Proclamation of Disaster Emergency continue.

Requirements for individuals to receive annual physical examinations and staff to receive biennial physical examinations are suspended.

**ODP Announcement 20-032** suspended the requirement to include “the application of person-centered practices, community integration, individual choice and assisting individuals to develop and maintain relationships” as part of the initial orientation and annual training requirements for provider staff.

**ODP Announcement 20-032** suspended the requirement to provide minimum numbers of hours of annual staff training.

**ODP Announcement 20-034** established a provisional process for obtaining Federal Bureau of Investigation (FBI) criminal history record checks in recognition of the fact that many FBI clearance sites necessary for completion of such checks were closed in response to the COVID-19 pandemic.

| Licensing Inspections | Some face-to-face annual inspections and inspections as a result of a complaint may occur. |
Remote licensing inspections for complaint and verification of corrective action. The Department of Human Services (DHS) is also considering conducting some annual renewal inspections remotely through virtual means. More information about this will be forthcoming prior to any use of remote inspections for annual renewals.

**QA&I**

Provider CAPS and DCAPS for C1Y3 resume with completion timeframes determined by AE on case-by-case basis.

AE and SCO CAPS and DCAPS must be completed within 45 day of the county where the AE or SCO is located being designated as yellow.

ODP will be implementing an interim QA&I process in FY2020-2021. Interim process is entirely remote including individual interviews.

**Investigations Completed by Certified Investigators**

Critical investigations will continue using remote methods/telephone whenever possible.

**IM4Q**

Face-to-face interviews not completed by March 17, 2020 continue to be suspended through the end of FY2019-2020.

IM4Q for FY2020-2021 interview format still to be determined.

**AE Processes**

Provider orientation classes suspended.

Remote intake/eligibility only.

**SCOs**

Supports coordination provided by telephone or video conferencing solutions following the guidance issued in [ODP Announcement 20-019](#).

**Residential**

Residential services should continue to follow all guidance issued for staff and resident screening for COVID-19 symptoms and infection.

Strategies to limit number/rotation of staff in home should be continued or implemented.
| **CPS and Day Habilitation**<br>**Community** | Visitation restrictions in residential homes are at the discretion of the residential provider and should include risk assessment of individuals who reside in the home. Visitor screening for COVID-19 must be implemented. Alternative forms of contact with family and friends is expected if in-person visitation is not possible.

Support for residents to access the community may resume in limited scope. Activities must be allowed in the yellow phase and all appropriate steps must be taken for the individual to safely engage in the activity.

Community activities and necessary supports for those activities should be established using the ODP Individual Transition Guide.

Outdoor activities aimed at wellness are highly encouraged.

Visitation with small numbers of friends and family with proper social distancing and following instructions for mask use.

Follow instructions for screening and mask use.

CPS and Day Habilitation services should continue to be provided in private homes and remotely until there is an individual transition plan for resuming activities. When developing the individual transition plan for resuming activities, the following requirements for community activities must be considered for incorporation into the plan:

- Activities in the community and necessary supports for those activities should be established by using the ODP Individual Transition Guide. Any changes in support need, goals or outcomes that require ISP changes must be discussed with the ISP team
- Activities must be allowed in the yellow phase and all appropriate steps must have been taken for the individual to safely engage in the activity
- Visitation with small numbers of friends and family using proper social distancing and following instructions for mask use is allowable
- Activities in the community may not include more than 3 participants as currently approved in the Consolidated, Community Living, Person/Family Directed Support and Adult Autism waivers |
If possible, groups should include the same group members each day, and the same staff providers should remain with the same group every day.

Providers and ISP teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:

- The size of the vehicle and ability to separate passengers in the vehicle
- Whether all the passengers live together or have been grouped for regular daily contact with one another
- Each passenger’s tolerance for wearing a mask while in the vehicle
- The health and behavioral support needs of each person transported and how they interact with others in the vehicle

All surfaces of a vehicle must be cleaned using a disinfectant after each use.

Outdoor activities aimed at wellness are highly encouraged.

Variances are not required to be completed when the 25% threshold for involvement in community activities is not achieved.

Follow instructions for screening and mask use.

<table>
<thead>
<tr>
<th>CPS and Day Habilitation Facility</th>
<th>Facility-Based CPS or Day Habilitation services are not permitted.</th>
</tr>
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<tbody>
<tr>
<td>Transportation Trip</td>
<td>Transportation services may be provided to access the community as allowed in the yellow phase and consistent with the plan established by using the ODP Individual Transition Guide. Providers and ISP teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:</td>
</tr>
<tr>
<td></td>
<td>• The size of the vehicle and the ability to separate passengers in the vehicle</td>
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<td>• Each passenger’s tolerance for wearing a mask while in the vehicle</td>
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| Small Group Employment | Consider operating in smaller groups to allow for social distancing on the job site and while on the van or bus.  

Providers and ISP teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:  
- The size of the vehicle and the ability to separate passengers in the vehicle.  
- Whether all the passengers live together or have been grouped for regular daily contact with one another.  
- Each passenger’s tolerance for wearing a mask while in the vehicle.  
- The health and behavioral support needs of each person transported and how they interact with others in the vehicle.  

Instead of gathering at the facility, consider alternate methods such as transporting directly from the participants’ homes to the job site and back to their homes.  

All surfaces of the vehicle must be cleaned using a disinfectant after each use.  

Follow instructions for screening and mask use. |
|---|---|
| All Other HCBS | All services should continue to be provided remotely whenever possible.  

An individual’s participation in community activities allowed in the yellow phase and the support necessary to allow the individual to participate in those activities should be established using the ODP Individual Transition Guide.  

Follow instructions for screening and mask use. |
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<th>Governor’s Reopening Phase Operational Level</th>
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<tbody>
<tr>
<td>Red</td>
<td>Regulatory suspensions for Ch. 55 Pa Code 2380, 2390, 6100, 6400, 6500</td>
<td>All regulatory suspensions under Governor’s Wolf’s Proclamation of Disaster Emergency in place. Requirements for individuals to receive annual physical examinations and staff to receive biennial physical examinations are suspended. <strong>ODP Announcement 20-032</strong> suspended the requirement to include “the application of person-centered practices, community integration, individual choice and assisting individuals to develop and maintain relationships” as part of the initial orientation and annual training requirements for provider staff. <strong>ODP Announcement 20-032</strong> suspended the requirement to provide minimum numbers of hours of annual staff training.</td>
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Please use the link below for the most accurate information about the Governor’s plan to Reopen Pennsylvania:
HCBS Reopening Guidelines Reference for Green, Yellow, and Red Phases

<table>
<thead>
<tr>
<th>Topic</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>Licensing Inspections</td>
<td>No face-to-face inspections. No annual inspections. Remote licensing inspections for complaint and verification of corrective action.</td>
</tr>
<tr>
<td>QA&amp;I</td>
<td>Provider CAPS and DCAPS for C1Y3 completion timelines suspended. ODP will be implementing an interim QA&amp;I process in FY2020-2021. Interim process is entirely remote including individual interviews.</td>
</tr>
<tr>
<td>Investigations Completed by Certified Investigators</td>
<td>Critical investigations will continue using remote methods/telephone whenever possible.</td>
</tr>
<tr>
<td>AE Processes</td>
<td>Provider orientation classes suspended. Remote intake/eligibility only.</td>
</tr>
<tr>
<td>SCOss</td>
<td>Supports coordination provided by telephone or video conferencing solutions following the guidance issued in <a href="https://www.governor.pa.gov/process-to-reopen-pennsylvania/">ODP Announcement 20-019</a></td>
</tr>
<tr>
<td>Residential</td>
<td>Follow guidance for Long Term Care Facilities on screening, limitations on non-essential, non-medically necessary visitors. Alternative forms of contact with family and friends is expected.</td>
</tr>
</tbody>
</table>

[ODP Announcement 20-034](https://www.governor.pa.gov/process-to-reopen-pennsylvania/) established a provisional process for obtaining Federal Bureau of Investigation (FBI) criminal history record checks in recognition of the fact that many FBI clearance sites necessary for completion of such checks were closed in response to the COVID-19 pandemic.
<table>
<thead>
<tr>
<th>Role</th>
<th>Instructions</th>
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| Consider staff temporarily residing at the home to support individuals. Strategies to limit number/rotation of staff in home should be implemented.  
Contact and update families about newly implemented operations.  
Communicate changes with individuals residing at the home. Implement education strategies as appropriate.  
Follow instructions for screening and mask use.  |
| CPS and Day Habilitation services may be provided in private homes and remotely.  
Outdoor activities aimed at wellness and allowed in counties designated as red are encouraged.  
Transportation should be limited to a single participant and caregiver whenever possible.  
Providers and ISP teams should use the guidance in the Individual Transition Guide to make determinations about the number of people transported on a case-by-case basis. Some factors to consider include:  
• The size of the vehicle and the ability to separate passengers in the vehicle  
• Whether all the passengers live together or have been grouped for regular daily contact with one another  
• Each passenger’s tolerance for wearing a mask while in the vehicle  
• The health and behavioral support needs of each person transported and how they interact with others in the vehicle  
All surfaces of the vehicle must be cleaned using a disinfectant after each use.  
Variances are not required to be completed when the 25% threshold for involvement in community activities is not achieved.  
Follow instruction for screening and mask use.  |
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<th>CPS and Day Habilitation Facility</th>
<th>Transportation Trip</th>
<th>All other HCBS</th>
</tr>
</thead>
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<tr>
<td>Facility based CPS and Day Habilitation services are not permitted.</td>
<td>Transportation services may only be provided for accessing employment or life-sustaining services.</td>
<td>All services should continue to be provided remotely whenever possible.</td>
<td>Only life-sustaining services may be provided face-to-face.</td>
</tr>
<tr>
<td></td>
<td>Transportation should be limited to single participant and caregiver whenever possible.</td>
<td>All surfaces of the vehicle must be cleaned using a disinfectant after each use.</td>
<td>Follow instruction for screening and mask use.</td>
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</table>

Respite Camp

Only allowed when the Department of Community and Economic Development has granted a waiver/exemption for the Respite Camp to conduct in-person operations.