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*Department of Health Care Finance Informational Bulletin*

**DATE:** March 31, 2020

**FROM:** Ieisha Gray  
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**SUBJECT:** **Fourth COVID-19 Update for Long Term Care Providers**

The purpose of this informational bulletin is to provide ongoing guidance to our long-term care providers on Medicaid's response to the Coronavirus Disease 2019 (COVID-19). **This bulletin contains new information on Medicaid eligibility, temporary service delivery changes during the PHE, and guidance from DC Health regarding quarantine after known or suspected exposure of staff or beneficiaries. Please read this message in its entirety.**

As you are aware, information is rapidly changing as we continue to learn more about COVID-19, and DHCF strives to ensure that our provider community remains informed accordingly. We anticipate sending bulletins on a weekly or semiweekly basis throughout the public health emergency (PHE).

- **Preservation of Medicaid eligibility.** DHCF and DHS have issued yearlong extensions to all Medicaid enrollees typically required to actively recertify their eligibility in the Medicaid program, including waiver enrollees. At this time, extensions have been or will be issued for individuals due to recertify eligibility in March, April, May or June 2020. Additional extensions may be issued during the PHE to ensure medical coverage is preserved for current enrollees. More information is available in DHCF's [transmittal](#) issued Friday, March 27. While eligibility is preserved, long-term care application packets **must** be completed for all waiver renewals. Please adhere to the following guidance under these unique reenrollment circumstances:
  - Case managers must complete and submit application packets for all waiver renewals.
  - At this time, DHCF and DHS will waive the required beneficiary signature on the LTC application.
  - Liberty continues to process and complete all assessments and attestations and one must be completed prior to the completion and submission of the LTC application, as is standard practice.
  - Case managers must complete, review and submit all person-centered service plans (PCSPs) once the application submission is complete.
- **Proposed flexibilities sought in Appendix K, 1135 waiver, and other emergency authorities.** As described in previous communications, DHCF is seeking from CMS authority to waive certain program requirements and implement emergency operations to ensure continued access to care, active care coordination, and the health and safety of both our beneficiaries and our providers. **DHCF expects the effective date of these requests to align with the Mayor's declaration of the PHE** and these changes would remain in effect until the public health emergency declaration is rescinded. These flexibilities include:
  - Waiver of physician/APRN signature on POF requesting initial assessment and reassessments
  - Conduct of assessments through remote, web-based or telephonic means
  - Waiver of beneficiary signature on LTC applications for EPD waiver renewals

- Conduct of person-centered service planning and care coordination visits by case managers, SMW support brokers, and supervisory nursing staff through remote, web-based or telephonic means
- Payment flexibilities for personal care aide services facilitating additional staffing, overtime pay and other mechanisms to address potential workforce shortages
- Payment flexibilities for ADHPs to facilitate conduct of some ADHP services through remote, web-based or telephonic means

Please note that for all of these flexibilities, LTCA will continue to provide updates, including specific operational guidance on service documentation and policy compliance as it is available. As you await more guidance, please ensure all work is documented and rely on DC Care Connect for information-sharing and care coordination across providers.

- **Staff or beneficiary COVID infections.** If a staff member, beneficiary, or beneficiary's household member tests positive for COVID infection, please contact DC Health immediately for guidance. Additional resources you should consult include
  - DC Health [Guidance for Healthcare Personnel Monitoring, Restriction and Return to Work](#)
  - DC Health guidance for patients and home health aides about [home quarantine](#)
  - DC Health guidance about [testing, testing sites & testing priorities](#)
  - **For aides exposed or infected who may be employed by multiple agencies,**
    - Correspond closely with other agencies when staff have been exposed or infected.
    - Inform DHCF; as a last resort, DHCF can examine claims records to identify other agencies with which the aide may be affiliated.
- **Important reminders & information.** As noted in previous communications, please adhere to the following guidance:
  - **Organized gatherings of groups of beneficiaries.** We ask our Medicaid providers to comply with directives from [CDC](#) and [DC government](#) regarding [gatherings and social distancing](#).
  - **Telehealth.** Please note that providers must be approved telehealth providers to implement the services billable under our telehealth regulations; for example, a physician may obtain a telehealth designation on her license in order to provide consultations to other hospitals who have fewer physicians of her specialty. If your agency is not so designated, we ask that you comply instead with the temporary flexibilities offered by the changes described above. DHCF will provide billing guidance for how to submit and be reimbursed for telephonic or remote services such as case management monthly visits, ADHP services, supervisory nursing visits, and any other services deliverable under remote modalities.
  - **Provider oversight, monitoring, enrollment & reenrollment.** While DHCF will temporarily suspend on-site Medicaid monitoring and oversight survey activities, providers are reminded that routine remote monitoring, new provider enrollments and reenrollments, and other provider oversight functions continue.
  - **Providers' emergency preparedness plans must be reviewed and updated.** Please ensure your agency has updated its continuity of operations plans, staffing plans, standard infection control protocols and staff training in them, and other key elements of your agency's plan.
  - **Ensure staff traveling through jurisdictions with stay-at-home orders possess work identification or other documents indicating their essential employee status.** Ensure your staff, including personal care aides, nurses, social workers, case managers and support brokers, carry documentation of their work status; this can likely be achieved by an employee badge or a letter issued for this purpose.
  - **OAH continues to process fair hearing appeals and hearings.** OAH has suspended in-person hearings at this time, but may contact beneficiaries and listed contacts regarding scheduling hearings by phone. The office has advised that electronic (email) contact is preferable to phone

contact at this time, and please continue to copy [LTC.FairHearings@dc.gov](mailto:LTC.FairHearings@dc.gov). New filing forms are also available on the landing page of DC Care Connect.

As always, we extend our thanks for your continued partnership and commitment to the care and safety of District residents in these challenging and unprecedented circumstances. We will continue to be in touch with updated information as it becomes available.