

Coronavirus Disease 2019 (COVID-19):

Temporary Closure of Older Adult Daily Living Centers, Structured Day Habilitation, and Licensed Facilities Where Community Participation Support Is Provided Due to Community Spread or When Staff or Individuals Are Diagnosed with COVID-19, and the Process for Reopening Facilities

ODP Announcement 20-101 UPDATE

AUDIENCE:

- Providers of Facility-Based Community Participation Support (CPS)
- Operators of Adult Training Facilities licensed under 55 Pa. Code Chapter 2380
- Operators of Vocational Facilities licensed under 55 Pa. Code Chapter 2390
- Operators of Older Adult Daily Living Centers licensed under 6 Pa. Code Chapter 11
- Providers of Facility-Based Day Habilitation in the Adult Autism Waiver (AAW)
- Providers of Adult Daily Living Services
- Supports Coordination Organizations (SCOs)
- Service Coordination (SC) Entities
- Community Health Choices Managed Care Organizations (CHC-MCOs)
- Living Independence for the Elderly (LIFE) Provider Organizations
- Administrative Entities (AEs)
- Area Agencies on Aging (AAAs)
- Other interested parties

PURPOSE:

To provide temporary closure guidance to Older Adult Daily Living Centers, Structured Day Programs, LIFE Day Centers, Adult Training Facilities and Vocational Facilities related to the community spread of COVID-19 or when **more than one** individual or staff member is diagnosed with COVID-19 and spent 15 minutes or more in the facility within a 24 hour period starting 2 days prior to symptom/illness onset, or for asymptomatic individuals, 2 days prior to the test specimen collection date, until the time the person is isolated. Additionally, this announcement describes the process for reopening facilities using the Community Participation Support and Older Adult Facility Reopening Tool and provides guidance for mitigating the spread of COVID-19 in facilities. Updates appear in **red**.

DISCUSSION:

The Department of Human Services (DHS) and the Pennsylvania Department of Aging (PDA) are working together to provide stakeholders with guidance on the community spread of COVID-19 and recommendations on when the settings listed under the purpose section should close. This guidance is intended to build on COVID-19 mitigation strategies within the service delivery system.

I. Thresholds for Community Spread

Community Transmission

For the purposes of this communication, "community transmission" is measured by the polymerase chain reaction (PCR) percent positivity rate; which is reported by the Pennsylvania Department of Health (PA DOH) as the percentage of people that test positive for COVID-19 out of the total of everyone who was tested for COVID-19 within a county. The PCR percent positivity rate provides the threshold for the three levels of community transmission (low, moderate, substantial) by county. Older Adult Daily Living Centers, LIFE Day Centers, Adult Training Facilities and Vocational Facilities can use the following chart to guide decision-making on further modifying operations or temporary closure if the county in which they are located meets the moderate or substantial threshold for community spread.

Thresholds for Community Spread

Level of Community Transmission in the County	PCR Percent Positivity (Most Recent 7 Days)	Recommended Facility Operational Status
Low	<5%	Remain open or reopen if previously closed and low threshold is met continuously over a 14-day period
Moderate	5% - 10%	Facilities may choose to close, stay closed, remain open, or reopen if previously closed. If a facility remains open or reopens while the level of community transmission is moderate, it is recommended that the facility increase mitigation measures related to COVID-19 including, but not limited to: (1) inform participants with high risk needs of the “moderate” level of community transmission designation; (2) consider reduction in the number of service days to provide for additional cleaning; (3) reduce, or at a minimum, not expand current capacity; (4) make alternative transportation plans for anyone using public transit or multi-passenger vehicles with passengers from multiple locations.
Substantial	>10%	<p style="color: red;">If less than 70% of active participants in the program are fully vaccinated:</p> <ul style="list-style-type: none"> • Close or remain closed until the level of community transmission returns to and remains in low or moderate for 14 days. <p style="color: red;">If 70% or greater of active participants in the program are fully vaccinated:</p> <ul style="list-style-type: none"> • Facilities may choose to close, stay closed, remain open, or reopen if previously closed. If a facility remains open or reopens while the level of community transmission is substantial, it is recommended that the facility increase mitigation measures related to COVID-19 including, but not limited to: (1) inform participants with high risk needs of the “substantial” level of community transmission designation; (2) consider reduction in the number of service days to provide for additional cleaning; (3) reduce, or at a minimum, not expand current capacity; (4) make alternative transportation plans for anyone using public transit or multi-passenger vehicles with passengers from multiple locations.

The following example illustrates this revised guidance:

When there is a substantial level of community transmission, it is recommended that the facility remain closed for two (2) consecutive weeks **if less than 70% of active participants in the program are fully vaccinated**. A facility may reopen on day 15 after the second consecutive week of low or moderate level of community spread. Providers may elect to remain closed in counties with moderate levels of community spread to promote the health and safety of individuals and staff.

January 2021							January 2021							February 2021													
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Dec 27	28	29	30	31	Jan 1, 21	2																					
12/27 - 1/1																											
	3	4	5	6	7	8	9																				
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						Substantial	Closed																				
1/10 - 15	10	11	12	13	14	15	16																				
	Closed	Closed	Closed	Closed	Closed	Low or moderate	Closed																				
1/17 - 22	17	18	19	20	21	22	23																				
	Closed	Closed	Closed	Closed	Closed	Low or moderate	Reopen																				
1/24 - 29	24	25	26	27	28	29	30																				
1/31 - 2/5	31	Feb 1	2	3	4	5	6																				

Should a facility remain open or reopen, it is recommended that the provider review the health risks of the individuals the provider serves and the behavioral risks (e.g. ability to tolerate masks, hand hygiene, social distancing) of COVID-19 transmission for the individuals the provider serves. Providers should review the COVID-19 mitigation strategies used during transportation and service provision to determine whether additional COVID-19 mitigation strategies need to be implemented as result of an increase in community transmission in the county where the provider operates. Providers should develop plans to protect the health and safety of their staff and the individuals they serve, as well as the families of staff and of the individuals served, that include the following:

- Changes to the method of service delivery and how staff will be deployed (e.g., remote versus in-person, in-home versus in congregate settings);
- Enhancements to existing or implementation of additional COVID-19 mitigation strategies in alignment with applicable COVID-19 guidance; and
- Communication of changes the provider has made to individuals, families, Supports Coordinators, and any other affected providers.

Vaccination Status

An individual is considered fully vaccinated 2 weeks after receiving the second dose in a 2-dose vaccine series, or 2 weeks after receiving one dose of a single-dose vaccine.

If a provider needs to determine the percentage of active participants in a program who are fully vaccinated, the provider can request that a program participant voluntarily disclose whether the program participant has been vaccinated. Because providers cannot compel program participants to provide information on their vaccination status, providers need to explain to program participants that disclosure of their vaccination status is voluntary, and they do not need to provide a vaccination card as proof of vaccination. If a program participant responds that the program participant is not vaccinated, the provider may not ask why the program participant is not vaccinated because this could result in a program participant believing the program participant must disclose protected health information. Providers may not require that a program participant be vaccinated to receive services.

Notification

Utilizing the information published by the PA DOH in the [COVID-19 Early Warning Monitoring System Dashboard](#); PDA, the Office of Long-Term Living (OLTL), and the Office of Developmental Programs (ODP) will jointly publish a weekly **Thresholds for Community Spread Report** that identifies the level of community transmission in the county. Providers are responsible to review the report weekly and make any necessary changes according to the status of their county. The publication of the Threshold for Community Spread Report will follow publication of the PA DOH’s updated Dashboard numbers, which is available on Friday of each week. A provider is expected to implement the recommended facility operational status by the following Monday.

PDA	Will send weekly Thresholds for Community Spread Report directly to providers.
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OLTL	Will send weekly Thresholds for Community Spread Report directly to providers, Service Coordinators and Community Health Choices-Managed Care Organizations (MCOs).
ODP	Will send weekly Thresholds for Community Spread Report to AEs, SCOs and providers via the ODP listservs.

Provider Engagement and Tracking

PDA	<ul style="list-style-type: none"> ○ Providers of Older Adult Daily Living Services will notify PDA of center closures and reopenings. The notification shall be made orally within 24 hours, and a written report submitted within 3 working days. ○ PDA will track center closure dates and projected reopening rates internally.
OLTL	<ul style="list-style-type: none"> ○ LIFE Provider Organizations will notify OLTL of center closures and reopenings. The notification shall be made orally within 24 hours, and a written report submitted within 3 working days. ○ Providers of Adult Daily Living Services will notify the participant’s SC for participants served under the OBRA waiver and the CHC-MCO for participants served under CHC of any closures and projected reopening dates. The notification shall be made orally within 24 hours, and a written report submitted within 3 working days. ○ The SC or CHC-MCO should track closures and projected reopening dates to ensure coordination of services for participants. ○ Providers of Adult Daily Living Services in CHC and the OBRA Waivers should notify the participant’s SC or CHC-MCO of any reopening plans.
ODP	<ul style="list-style-type: none"> ○ CPS providers will notify ODP and the AEs by completing a site level incident report in EIM within 24 hours of the closure, in accord with the incident management bulletin. ○ AEs will engage each provider with a program located in a county with a substantial level of community spread. ○ AEs will track closures and projected reopening dates. ○ AEs will work with providers to develop reopening plans in conjunction with the Community Participation Support and Older Adult Facility (CPS/OAF) Reopening Tool and updated facility COVID-19 plan.

Additional Considerations

The guidance does not supersede standards imposed by a county or local jurisdiction that are stricter than the standards set forth in this document.

II. Temporary Closure of Older Adult Daily Living Centers, Structured Day Habilitation, and Licensed Facilities Where Community Participation Support Is Provided When Staff or Individuals Are Diagnosed with COVID-19

If only one individual or staff member has tested positive for COVID-19, the program may choose to remain open. If a second individual or staff member tests positive for COVID-19 within 14-days of the first case, it is recommended that the program closes. This 14 day period is based on guidance from [PA-HAN 513](#) and [PA-HAN 538](#).

Recommendations for Closure

To mitigate the spread of COVID-19 in Older Adult Daily Living Centers, Structured Day Programs, Adult Training Facilities and Vocational Facilities, temporary program closure is recommended in the following situations:

Situation	Temporary Closure Guidance
Within a 14 consecutive day period, more than one staff member who rendered services or individuals who receive services: (1) tested positive for COVID-19, (2) is asymptomatic and (3) does not know the date of exposure to COVID-19.	The facility should close if the staff or individuals were present in the setting at any point starting 48 hours before the test date.
Within a 14 consecutive day period, more than one staff member who rendered services or individuals who receives services: (1) tested positive for COVID-19 (2) is asymptomatic and (3) knows the date of exposure to COVID-19.	The setting should close if the staff or individuals were present in the setting at any point starting 48 hours after the diagnosed person was exposed to COVID-19.

<p>Within a 14 consecutive day period, more than one staff member who rendered services or individuals who received services:</p> <ul style="list-style-type: none"> (1) exhibits symptoms of COVID-19¹ and (2) subsequently tested positive for COVID-19. 	<p>The setting should close if the staff or individuals were present in the setting at any point starting 48 hours prior to the time the person started exhibiting symptoms of COVID-19.</p>
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Closure Guidance:

- The provider closes the setting for 14 calendar days starting from the date that the provider was notified of the second COVID-19 diagnosis.
- If a provider received guidance from the DOH or the local Department of Health that the setting can re-open in less than 14 days, the provider may choose to do so, while following the reopening guidance.
- The provider should encourage individuals and staff who were present in the setting within a 24 hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the person is isolated to quarantine at home for 14 days.
- Back-up plans to ensure the health and welfare of all individuals impacted by the closure of the setting must be implemented.

Notification of closure activities must be provided to the parties listed below:

Setting	Notify
<p>Facility-Based Community Participation Support</p>	<ul style="list-style-type: none"> • Individuals who receive services in the facility • Supports Coordinators of individuals who receive services in the facility • AEs • ODP Regional Office

¹ Providers are responsible for keeping up-to-date about COVID-19 symptoms. A current list of symptoms is available at <https://www.health.pa.gov/topics/disease/coronavirus/Pages/Symptoms-Testing.aspx>.

<p>Facility-Based Day Habilitation (Adult Autism Waiver)</p>	<ul style="list-style-type: none"> • Individuals who receive services in the facility • Supports Coordinators of individuals who receive services in the facility • ODP Regional Office
<p>Older Adult Daily Living Services</p>	<ul style="list-style-type: none"> • Individuals who receive services in the facility • Service Coordinators of individuals who receive services in the facility • AAAs • The individuals' MCOs
<p>Structured Day Habilitation</p>	<ul style="list-style-type: none"> • Individuals who receive services in the facility • Service Coordinators of individuals who receive services in the setting • OLTL • The individuals' MCOs

III. Reopening Guidance

When an Older Adult Daily Living Center, Structured Day Program, LIFE Day Center, Adult Training Facility or Vocational Facility is closed due to **more than** one staff **member** or individual testing positive for COVID-19, the impacted provider should complete the Community Participation Support and Older Adult Facility (CPS/OAF) Reopening Tool (attached) prior to reopening. The Reopening Tool will help facilitate agency planning and policy development, and guide decision making for technical assistance and the involvement of other available resources (e.g. PA DOH, Regional Congregate Care Assistance Teams [RCAT]).

When an Older Adult Daily Living Center, Structured Day Program, LIFE Day Center, Adult Training Facility, or Vocational Facility is closed due to substantial community spread, the impacted provider should use the CPS/OAF Reopening Tool to review its infection control protocols and mitigation strategies and to ensure that all returning staff and individuals are

prepared to implement the protocols and strategies upon return to the facility. The completed Reopening Tool may be sent to the designated oversight office listed below **for informational purposes.**

Completing the Reopening Tool

- **Section 1 – Provider Details:** Complete this section by responding to each field. Providers should identify the oversight office. For “dual licensed” Older Adult Day and Adult Training facilities, PDA regional licensing representatives are the designated oversight office. A completed copy of the tool should also be sent to the respective AE.
- **Section 2 - Reason for Temporary Closure:** Complete this section by checking all reasons/details that apply to the closure. Responses will assist with determining the need for technical assistance and locating additional resources (ex. DOH, RCAT)
- **Section 3 – Reopening Activities:** Complete this section by reviewing each “Reopening Area,” describing policy modifications, and checking each area as “complete.” Providers should mark “N/A” (not applicable) if the reopening area has not impacted the provider’s current COVID-19 plan.
- **Section 4 – Oversight Review:** The identified oversight office will complete this section after reviewing (1) information provided in the Reopening Tool and (2) the provider’s updated COVID-19 plan. Oversight offices will provide additional technical assistance as requested and needed.

Once complete, the provider submits the Reopening Tool electronically to the designated oversight office as follows:

- ODP – Submit electronically to designated AE
- OLTL – Submit electronically to the following address: RA-PWLIFE@pa.gov
- PDA – Submit electronically to the designated regional licensing representative

The oversight office will review and respond to the provider’s submission within 48 hours. The oversight office will either indicate that the facility has addressed and updated areas of the reopening guidance or schedule time to discuss the Reopening Tool results, including the identification of a need for additional support or technical assistance.

IV. Guidance for Mitigating the Spread of COVID-19 in Older Adult Daily Living Centers, Structured Day Habilitation, and Licensed Facilities Where Community Participation Support Is Provided

Consistent with Centers for Disease Control and Prevention (CDC) guidance for adult day services ([Guidance for Adult Day Services Centers](#) and [Participants at Adult Day Services Centers and Their Caregivers](#)) the following is recommended:

- Staff should not work at the program and participants should not attend the program if they meet one of the following:
 - Have symptoms of COVID-19
 - Are being evaluated for COVID-19, including having a pending COVID-19 test
 - Have been diagnosed with COVID-19 within the past 10 day or longer if the staff member or participant has severe or critical illness or if they are immunocompromised
 - Have had close contact with a person with COVID-19 during the prior 14 days
- Providers should promote adherence to CDC [infection prevention and control strategies](#) and guidance provided by PA DOH, including the guidance on infection prevention and control included in [PA-HAN 524](#), and **guidance provided by the program offices. Infection prevention and control strategies include, but are not limited to,** mask wearing, hand washing, social distancing, health screening, ventilation of indoor spaces, prioritization of outdoor activities, installing physical barriers and guides, staggering pick-up/drop-off times, providing alternatives to public transportation, and modifying the physical layout of the program.
- Providers should reinforce infection prevention and control strategies using signs and messages throughout their facility, including:
 - Displaying visual posters with instructions for maintaining 6-ft physical distancing, wearing masks, taking daily temperatures, and monitoring for other COVID-19 symptoms. Free print and digital resources are available on the CDC's [COVID-19 communications page](#).
 - Developing signs and plain language messages in alternative formats (for example, large print, Braille for people who have low vision or are blind).
 - Developing signs and messages in the preferred language(s) of staff and participants. Providers can use [COVID-19 easy to read resources](#), if needed.
 - Using tape markings on floors to help staff and participants to maintain distancing.
 - Placing directional arrows to establish the flow of traffic.
 - Designating different doors for entering and exiting center/rooms, if possible.
 - Posting signs in highly visible locations (e.g., at building entrances, in restrooms) that promote everyday protective measures and describe how to

- stop the spread of germs by properly washing hands and properly wearing masks.
- Using reminders for staff and participants to monitor for COVID-19 symptoms.
- Broadcasting regular announcements on reducing the spread of COVID-19 on public address system, if available.
- Including messages (for example, training videos for staff, periodic guidance letters for participants to take home) about behaviors that prevent spread of COVID-19 when communicating with staff, participants, and others who may be in the facility.
- If a staff member or participant experiences COVID-19 symptoms while at the program, the provider should do the following:
 - Isolate staff and participants in an isolation room or area (preferably with access to a dedicated restroom).
 - Ensure that isolated staff or participants are wearing masks, are at a distance of 6 feet or greater from others, and are supervised.
 - Prepare a list of all individuals who have been in close contact with the sick staff member or participant.
 - Notify an emergency contact regarding the sick staff member's or participant's symptoms
 - Arrange safe and accessible transportation home for the staff member or participant or if the staff member or participant is experiencing severe symptoms, arrange emergency transport to a healthcare facility.
 - Close off areas used by a sick staff member or participant and not use these areas until after cleaning and disinfecting them; this includes surfaces or shared objects in the area, if applicable.
 - Wait as long as possible (at least several hours) before cleaning and disinfecting and ensure safe and proper use of cleaning and disinfection products.
 - Close off areas used by the person who is sick.
 - Open outside doors and windows to increase air circulation.
 - Increase ventilation and wear a mask (in addition to other protection needed for safe use of cleaning and disinfection products) while cleaning and disinfecting.
 - Clean and disinfect all areas used by the staff member or participant who is sick, such as offices, bathrooms, and common areas.

V. Attachment

*Community Participation Support and Older Adult Facility (CPS/OAF) Re-opening Tool
(Version 2)*

VI. Appendix

A. ODP Community Participation Support Reopening Matrix

Facility Status	Reason	Provider Action	Technical Assistance
Closed	CPS facility did not reopen since initial March closure	Review and complete the Facility Based Community Participation Supports Readiness Tool for COVID-19	→ Administrative Entities
Closed	→ More than one staff member or individual tests positive within 14-days of the test	Complete the CPS and Older Adult Day Program Reopening Tool	→ Administrative Entities → Pennsylvania Department of Health for contact tracing
Closed	→ County exceeds community spread threshold AND less than 70% of active participants are fully vaccinated	Complete the CPS and Older Adult Day Program Reopening Tool	→ Administrative Entities for informational purposes
Open	<ul style="list-style-type: none"> • No positive tests, or • Only one individual or staff member has tested positive within 14 days of the test, or • low/moderate community spread, or 	Continue to monitor weekly County Community Spread via the Early Warning Monitoring System Dashboard and keep program/facility COVID-19 plan up-to-date.	→ Administrative Entities

	<ul style="list-style-type: none">• Substantial community spread AND 70% or greater of active participants are fully vaccinated		
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