

Coronavirus Disease 2019 (COVID-19):

Notifying Designated Persons and Providers of an Individual's COVID-19 Exposure or Diagnosis

ODP Announcement 20-086: UPDATE

AUDIENCE:

Providers of Residential Habilitation, Life Sharing, Community Participation Support or Day Habilitation services
Administrative Entities
Individuals and Families
All other interested stakeholders

PURPOSE:

This communication provides guidance to Residential Habilitation, Life Sharing, Community Participation Support and Day Habilitation providers, as well as Administrative Entities (AEs), regarding whom to notify when an individual has been diagnosed or has symptoms and has been tested for COVID-19, or has been in close contact with someone who has been diagnosed with COVID-19. **Updates appear in red.**

DISCUSSION:

In previously published Announcements (i.e. 20-049 and 20-065), the Office of Developmental Programs (ODP) outlined provider requirements for completing an incident in Enterprise Incident Management (EIM) when an individual is tested for COVID-19 due to the presence of symptoms or receives notification of a positive test result.

The following guidance will further assist providers and AEs to develop protocols for managing plans to mitigate the spread of COVID-19. Further, this guidance will help

inform individuals and families of ODP's expectations for providers regarding notification requirements.

The term "close contact" for the purposes of this communication is defined as being within 6 feet of another person for 15 minutes, or being directly exposed to respiratory secretions (e.g., cough or sneeze)

Residential Habilitation and Life Sharing

All Residential Habilitation and Life Sharing providers that render services through ODP that have not already done so, must have conversations with the individuals they serve in the home regarding whether the individual would like their designated persons to be notified of any of the following circumstances, and if so who he or she would like notified if:

- The individual is diagnosed with COVID-19.
- The individual is tested for COVID-19 because he or she is exhibiting symptoms of COVID-19.
- The individual is at high risk of being diagnosed with COVID-19 because he or she has been in close contact with someone who has been diagnosed with COVID-19 (such as having close contact with a roommate, staff member, friend, family, or someone in the community).

Pursuant to 55 Pa. Code § 6100.186(b) and (c), the provider is responsible for ensuring that relatives, friends, and other persons designated by the individual have maximum involvement in the individual's life as desired by the individual. The individual's preferences to involve, or not to involve, family, friends, or others, must be honored for each activity and for each incidence of potential involvement.

Therefore, the provider should have conversations to determine the individual's preferences in the event he or she is suspected to have, does have, or is in close contact with someone who has COVID-19. The provider must document this information and ensure it is accessible to the person(s) responsible for notifying designated persons.

Notification Process When an Individual is Diagnosed with COVID-19

When the provider becomes aware that an individual residing in the home is confirmed to have COVID-19, the provider must notify the persons designated by the individual within 24 hours of learning of this information. If the provider experiences an unforeseen

circumstance that would make notification within 24 hours impossible, such as a loss of power that impacted internet and cell phone communication, this must be documented.

- During the conversation, or in the written notification, the provider should outline:
 - The steps that will be taken to ensure the individual's health and safety, including recommendations from a health care professional who is knowledgeable about the individual's health care needs.
 - The plan for mitigating the spread of COVID-19 in the home.
 - How the provider will continue to facilitate communication between the individual and designated persons when possible.
 - How the provider will update designated persons on the status of the individual.

Notification Process When an Individual Has Had Close Contact with Someone Diagnosed with COVID-19

- When the provider learns that there is a confirmed case of COVID-19 in the home (either another individual who is receiving services or staff who has worked with the individual) or that the individual has had close contact with someone who is confirmed to have COVID-19, the provider must notify the persons designated by the individual within 24 hours of learning of this information, if possible.
- The notification must not include any personal identifying information of who has been diagnosed, including the individual's relationship to the affected person.
 - In alignment with the guidance issued by the [PA Department of Health](#), designated persons are informed when the individual has been in close contact with someone who is diagnosed with COVID-19 while infectious, but who the diagnosed person is cannot be disclosed.
- During the conversation, or in the written notification, the provider should outline the process for:
 - Consulting medical professionals about COVID-19 treatment, mitigation strategies, etc.
 - Testing the individual, if applicable.
 - Conveying information about test results.

- Mitigating the spread of COVID-19 in the home.
- Updating designated persons on the status of the individual.

- Residential providers should continue to follow the Long-Term Care Guidance for Screening and Infection Control established by the Centers for Disease Control and Prevention (CDC) found at <https://www.cdc.gov/coronavirus/2019-ncov/hcp/long-term-care.html>.

- When the provider learns that there is a confirmed case of COVID-19 in the home (either an individual who is receiving services or staff who has worked with the individual) or that an individual has had close contact with someone who is confirmed to have COVID-19, and there are multiple individuals living in the home, all individuals residing in the home must be notified.
 - The provider must have a conversation with the individuals about what it means for someone living in their home to have a confirmed case of COVID-19.
 - The provider should provide education, information, and support so that the individual(s) understand their risk.
 - Individuals should be given information on what they should do and the support they will receive to separate themselves from others who have not been exposed, how to monitor themselves for illness, and should be made aware that they could possibly spread the infection to others even if they do not feel sick.
 - Individuals should be given information on any additional steps that will be taken to keep them safe.

Community Participation Support and Day Habilitation COVID-19 Notification Process

Each Community Participation Support or Day Habilitation provider must implement a notification plan to alert AEs when any staff or individuals receiving services are diagnosed with, or have had close contact with, someone diagnosed with COVID-19. The plan must also include notification of any staff, individuals receiving services and emergency contacts as follows:

Situation	Who Must Be Notified
Staff or an individual who received services was asymptomatic, diagnosed with COVID-19, and the <u>date of exposure to COVID-19 is unknown.</u>	Staff and individuals who received services and had or may have had close contact with the staff or individual diagnosed with COVID-19 at any point starting <u>2 calendar days before the test date.</u> Emergency contacts for impacted participants must be notified as well.
Staff or an individual who received services was asymptomatic, diagnosed with COVID-19 and the <u>date of exposure to COVID-19 is known.</u>	Staff and individuals who received services and had or may have had close contact with the staff or individual diagnosed with COVID-19 at any point starting <u>2 calendar days after the diagnosed person was exposed to COVID-19.</u> Emergency contacts for impacted participants must be notified as well.
Staff or an individual who received services <u>exhibited symptoms of, and was tested for, COVID-19.</u> (Notification is required upon learning that testing occurred and not after the staff or individual received his or her test results.)	Staff and individuals who received services and may have close contact with the staff or individual who exhibited symptoms and was tested for COVID-19 at any point starting <u>48 hours prior to the time the person started exhibiting symptoms of COVID-19.</u> Emergency contacts for impacted participants must be notified as well.

To ensure proper communication occurs, the emergency contact information for each individual receiving Community Participation Support or Day Habilitation in accordance with 55 Pa. Code §§ 2390.104 and 2380.171 must be reviewed and confirmed as soon as

possible.

The notification must not include any personal identifying information of who has or is suspected of having COVID-19, including his or her relationship to the individual. In alignment with the guidance issued by the [PA Department of Health](#), emergency contacts are informed that the individual may have been exposed to someone who is diagnosed with COVID-19 while infectious, but are not able to disclose who the diagnosed person is.

The following should be included in the provider's plan for responding to COVID-19:

- How the Community Participation Support or Day Habilitation provider will mitigate the spread of COVID-19 at the program.
- How and when the Community Participation Support or Day Habilitation provider will update the necessary parties of any further information for the specific case of COVID-19.
- When it is not feasible or safe for an individual to receive services in a facility, a plan to continue to provide Community Participation Support or Day Habilitation to the individual in an alternative location, such as the individual's private home, if requested.

COVID-19 response plans should be made available to every individual receiving Community Participation Support or Day Habilitation and their emergency contacts as soon as possible to ensure they are aware of the steps that will be taken to notify them in any of these instances. Providers are also requested to utilize the Provider Staff COVID-19 Tracking Form, the user guide and access information that accompanied ODP Announcement 20-071.

Please reference resources on the [PA Department of Health's](#) website, as well as the COVID-19 resources page on [myodp.org](#) and <https://aidinpa.org/> for additional information that could help educate and inform the individuals, as well as their family members, friends, and others about COVID-19.

Administrative Entity Notification Responsibilities

AEs are responsible for continuing to monitor reports in EIM for any individuals who have symptoms of, and are tested for, COVID-19 or who have been diagnosed with COVID-19. When the AE receives a report for either of these scenarios through EIM, it is responsible for reviewing the individual's Individual Support Plan (ISP) and determining

what other services the individual has been receiving. **The AE must notify** providers in accordance with the following:

Situation	Who Must Be Notified
Individual who received services was asymptomatic, diagnosed with COVID-19, and the <u>date of exposure to COVID-19 is unknown.</u>	Providers that rendered services to the individual at any point starting <u>2 calendar days before the test date.</u>
Individual who received services was asymptomatic, diagnosed with COVID-19 and the <u>date of exposure to COVID-19 is known.</u>	Providers that rendered services to the individual at any point starting <u>2 calendar days after the diagnosed individual was exposed to COVID-19.</u>
Individual who received services <u>exhibited symptoms of, and was tested for, COVID-19.</u> (Notification is required upon learning that testing occurred and not after the individual received his or her test results.)	Providers that rendered services to the individual at any point starting <u>48 hours prior to the time the person started exhibiting symptoms of COVID-19.</u>

The AE must coordinate timely notification with the local DOH department, where one exists. Otherwise, the AE must contact the providers of those other services within 24 hours of receiving the EIM report. The AE will inform the provider that the individual has either tested positive for COVID-19 or is symptomatic for, and has been tested for, COVID-19 and discuss next steps to be taken by the provider, including assessing exposure, identifying staff and/or individuals that may have been exposed and determining a plan to contact individuals and staff. **The AE shall remind the providers to ensure they maintain confidentiality of the person who is positive with COVID-19 or symptomatic for COVID-19.** The AE will follow-up with the provider as needed to confirm that the steps discussed have been taken and that appropriate notifications have been made in accordance with this communication.

The AE can provide additional technical assistance as requested by the provider.