

Coronavirus Disease 2019 (COVID-19):
Guidance for Community Participation Support Providers in
Counties in the Green Phase of the Process to Reopen
Pennsylvania
ODP Announcement 20-089

AUDIENCE:

All interested stakeholders

PURPOSE:

To provide guidance for Community Participation Support (CPS) providers on planning, policy development, and communication for reopening facility-based services in counties in the Green Phase of Governor Wolf's [Process to Reopen Pennsylvania](#).

DISCUSSION:

On May 27, 2020, ODP released [ODP Announcement 20-062 Facility-Based CPS Readiness Tool](#), which provided an assessment tool for CPS providers to address areas related to infection control, and individual and staff readiness prior to reopening facility-based CPS in counties in the Green Phase.

Infection control protocols for COVID-19, including physical/social distancing requirements, may result in a reduced overall capacity at a CPS facility. In order to meet the needs of the individuals they serve, providers should consider expanding hours and days of service (examples: cohort individuals into morning and afternoon shifts with cleaning in between shifts; or cohort individuals based on days, such as one group on Monday-Wednesday, cleaning Wednesday evening, and serving a second cohort Thursday – Saturday).

A provider that will be unable to support all of the individuals who desire to return to facility-based services should offer individuals alternative community-based services, including remote services support in their private home instead of facility-based CPS.

If the above approaches still do not result in adequate capacity to serve all individuals served prior to the COVID-19 pandemic who desire to return to service, the provider should establish a policy for determining the order in which individuals will be able to return to facility-based services, apply this policy equitably, and communicate the policy to individuals, families, Supports Coordinators and Administrative Entities (AEs).

When determining the order in which individuals should return to facility-based services, ODP encourages providers to consider the following:

- If the individual lives with family and if the family relies on CPS services to support the individual.
- If the individual has struggled, including with isolation, because the individual has been unable to receive facility-based services.
- If the individual has a high desire to return to facility-based services.

Providers should post their plan for how they will provide facility-based services on a publicly accessible website or inform individuals they serve that the plan is available by request. The plan should include the actions that the provider has taken to protect individuals' health and safety during the COVID-19 pandemic. Providers should include in their plan, the policy for determining the order for individuals to return to facility-based services.

A provider is not required to issue the written notice required by 55 Pa. Code § 6100.304 if the provider is unable to deliver the authorized amount of CPS services due to restrictions related to COVID-19.

Instead, a team meeting should be held to discuss changes to the individual's Individual Support Plan (ISP) and if CPS services will be reduced or suspended, the provider is responsible for alerting the AE. **The AE will issue a letter (see attached) to the individual that includes a description of the changes to services in the ISP and explain that when the current COVID-19 restrictions are fully lifted and all individuals can resume receiving CPS services as authorized in their ISPs prior to the COVID-19 pandemic, each individual will be able to have their facility-based CPS services restored if desired.**

Additionally, as required by the limited conditions for service termination outlined in 55 Pa. Code § 6100.303, providers may not issue termination notices to individuals who have expressed an unwillingness to resume CPS services during the COVID-19 pandemic due to health concerns.

Attachment:

- CPS Reduction/Suspension Notification Letter Template for AEs