



BRAD LITTLE - Governor
DAVE JEPPESEN - Director

IDAHO DEPARTMENT OF HEALTH & WELFARE

MATT WIMMER - Administrator
DIVISION OF MEDICAID
Post Office Box 83720
Boise, Idaho 83720-0009
PHONE: (208) 334-5747
FAX: (208) 364-1811

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AMENDED March 25, 2020
AMENDED April 15, 2020

MEDICAID INFORMATION RELEASE MA20-15

To: Medicaid Providers of Personal Care Services and Aged and Disabled Waiver Services

From: Matt Wimmer, Administrator

Subject: Service Delivery Flexibilities and Best Practices in Response to COVID-19

**This is an amended IR to remove the time limit of sixty (60) days for direct care staff to complete the fingerprint appointment, and to add language to clarify that alternative format signatures on service plans are acceptable for participants as well as for agency representatives, including Registered Nurses.*

**This IR is further amended effective April 15, 2020, to include information pertaining to spouses and parents of minor children as direct care providers and to provide guidance on the delivery of certain Personal Care Services and Attendant Care via telehealth.*

The Idaho Department of Health and Welfare continues to monitor and prepare for impacts resulting from the 2019 Novel Coronavirus (COVID-19). We are working with the Governor's Office and other state agencies including the Idaho Office of Emergency Management, local public health districts, and healthcare providers around the state, as well as the Centers for Disease Control and other state governments.

Home and community-based services providers face unique challenges associated with COVID-19. To support participant access to services, the Bureau of Long Term Care is temporarily implementing the below changes for providers of **Personal Care Services** and **Aged and Disabled Waiver Services**, effective immediately and continuing until emergency declarations are lifted:

Criminal History Background Checks

Newly hired direct care staff may begin rendering services prior to a completed criminal history background check under the following conditions:

- The Criminal History Background Check application must be submitted prior to rendering services. The application is available at <http://chu.dhw.idaho.gov>.
- The provider must access the iCourt online system to complete a search of any criminal convictions or outstanding warrants associated with the direct care staff. An attestation that this search was conducted *prior* to the direct care staff

rendering care must be included with the employee's file. Instructions for [how to complete this search](#) and an [attestation template](#) can be found on the Bureau of Long Term Care Provider Webpage.

- The provider must advise the Medicaid participant or legal guardian that the direct care staff has not yet completed the Criminal History Background Check to support informed decision-making.

Direct Care Staff Training Requirements

Newly hired direct care staff may begin rendering services prior to completing the training requirements associated with the provider's agency type or service array. Appropriate training as outlined in Idaho Administrative Code (IDAPA), the Medicaid Provider Agreement Additional Terms, or the Skills Matrix (as applicable) must be completed within thirty (30) days of first rendering services. The provider must advise the Medicaid participant or legal guardian that the direct care staff has not yet completed the applicable training to support informed decision-making.

General Provider Compliance and Oversight Activities

Service providers may, at their discretion, implement the following changes to routine compliance and oversight activities. Temporarily implementing these changes will not affect a provider's compliance status during future routine or targeted audit activities.

- **Suspend supervisory on-site visits.** Service providers may conduct oversight or supervisory activities by telephone.
- **Suspend face-to-face service plan development.** Service plans may be developed by telephone, but this must be indicated on the service plan. Please review [Medicaid Information Release MA20-07 – Telehealth](#) for guidance on how to submit claims for services provided via telehealth.
- **Participant signature on the service plan.** Service plans may be signed by the participant after the agency signature if the plan was developed telephonically. Alternative format signatures, such as electronic signatures, are acceptable for participants as well as for agency representatives, including Registered Nurses.

Bureau of Long Term Care Compliance Activities

The Bureau of Long Term Care is suspending oversight and compliance activities outside of the office, including on-site agency reviews.

Participant Eligibility

Participants on the Aged and Disabled Waiver will not lose their program status if they do not receive home and community-based services for a period of thirty (30) days or longer.

Home Delivered Meals

Providers of home delivered meals may suspend requiring a signature of meal delivery verification. The provider is still responsible for verifying delivery using an alternate method, such as delivery driver attestation, acquiring signature confirmation at a later date, or taking a date and time-stamped photograph of the delivery.

The Bureau of Long Term Care has compiled several best practice recommendations to share with providers of home and community-based services. Providers are encouraged to:

- Become familiar with recommendations from the [Centers for Disease Control and Prevention](#) (CDC) and the [Idaho Department of Health & Welfare](#) related to social distancing and personal hygiene. Two courses have been made available to Idaho agencies and direct care staff free of charge through In The Know Caregiver Training, which can be accessed here: [“Understanding Coronavirus”](#) and [“Standard Precautions.”](#) Registration on the webpage is required.
- Ensure that a person-centered approach to services is maintained by communicating with people receiving services, their families and guardians, to keep them updated on how they can stay safe while accessing home and community-based services during this state of emergency.
- Maximize the use of telecommuting and technology, such as WebEx®, Zoom®, or FaceTime®, to facilitate communication amongst agency staff and with participants when possible. Training for Personal Care Services and Aged and Disabled Waiver Services is available as an online module at [In The Know](#).
- Ensure direct care staff are familiar with agency’s emergency response plan in addition to participant-specific back-up plans.
- Use the existing [Significant Change Request](#) process when a change in participant needs or available supports is identified.

For all **Personal Care Services** or **Aged and Disabled Waiver** questions related to provider compliance please contact your Bureau of Long Term Care Quality Assurance Specialist:

Northern Idaho and Twin Falls

Kristopher King, Quality Assurance Specialist
208-287-1174 – Kristopher.King@dhw.idaho.gov

Central Idaho

Zachary Armstrong, Quality Assurance Specialist
208-455-7118 - Zachary.Armstrong@dhw.Idaho.gov

Eastern Idaho

Paula Naegele, Quality Assurance Specialist
208-239-6274 – Paula.Naegele@dhw.Idaho.gov

Quality Assurance Program Manager

Chris Barrott
208-732-1482
Chris.Barrott@dhw.idaho.gov

PROVISIONS EFFECTIVE April 15, 2020:

Spouses and Parents of Minor Children as Direct Care Providers

Personal Assistance Agencies may temporarily employ spouses of adult participants receiving Aged and Disabled Waiver and Personal Care Services and parents of minor children receiving Personal Care Services. This option may be most beneficial for participants that are electing to self-isolate who have a spouse, or parent, who is able to render the care. Agencies may take advantage of the criminal history background check and training flexibilities described above to expedite the hiring process.

Prompting and Cueing Tasks Delivered by Telehealth

Personal Assistance Agencies may provide prompting and cueing tasks by telephone or video call (“telehealth”) for specific participants in accordance with the guidelines established in the BLTC Services Delivered via Telehealth Provider Help Aid. Prompting or cueing via telehealth may only be provided when a participant is unable to access Personal Care Services or Attendant Care services due to the COVID-19 pandemic and with informed consent of the participant and legal guardian, if applicable.

We thank you for your service to Idaho Medicaid participants and appreciate your work to address this public health threat.

MW/cb