



March 18, 2020

Dr. Rachel Levine, Secretary of Health
Pennsylvania Department of Health
Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

Re: Home-Based Care Providers and COVID-19

Dear Dr. Levine,

As you know, the Pennsylvania Homecare Association (PHA) is a statewide membership association with more than 700 home health, hospice and homecare providers across the Commonwealth. Over the past few weeks, we have worked and collaborated with the Department of Health, Department of Human Services, Department of Aging, OMAP, MCOs, federal agencies, other provider associations and many other stakeholders in planning and now implementing necessary responses to the Coronavirus pandemic.

We appreciate the Department's important work and communication with providers, consumers and others during this time and write specifically to highlight remaining crucial needs to prevent the interruption of services and to support the provider community as it works to protect and support employees and to provide critical services to Pennsylvania's older adults and individuals with disabilities who are receiving care in their homes and communities.

In an effort to consolidate some of our previous communications with the Department of Health and others, we request further guidance and assistance from the Department on the following issues, as soon as possible:

- **Suspension of licensing activities.** We ask that the Department suspend regular licensing-related activities, site visits, and survey activities, except those relating to potential abuse, infection control or critical incidents.
- **Permitting telephone visits.** We ask that telephone communications can substitute for supervisory and other required in-person visits, including the 14-day and 60-day visits required by Pennsylvania law. We also ask for consideration of the suspension of the in-person meeting requirements for hiring staff.

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Pennsylvania Homecare Association

- **Modified training/competency requirements.** We ask that the Department consider increased flexibility on training or competency requirements, in an effort to ensure that qualified, available care personnel remain in the field to provide much-needed care. Appropriate, consumer and patient-specific training must, of course, continue.
- **PPD testing.** We request the temporary suspension of PPD testing requirements, as clinical settings where PPD tests are conducted are over-capacity and potential areas of exposure.
- **Federal background checks.** We have asked for an emergency suspension or modification of federal background check requirements, as provided in the attached letter.
- **Service location areas.** We ask that the Department eliminate any 60-mile limitation on the service area in which providers can provide services.
- **Access to facilities.** Clearer guidance is necessary to all facilities under the licensing/jurisdiction of the DOH to clarify that home health, hospice and homecare providers are healthcare providers, and provided that they follow any facility health screening requirements, be permitted access to facilities to provide critical care and services to residents. Home-based care personnel include hospice (end of life), home health (nurses and therapists), and homecare (direct care workers doing personal assistance services). Health and homecare providers are not visitors and must not be subject to any general restriction on visitors to facilities.
- **Specialized care.** We request additional guidance from the Department to allow agencies to expand on current practices with respect to specialized care and allow caregivers to perform additional, appropriate activities with proper abbreviated training.
- **PPE.** We know that the Department is well aware of shortages of Personal Protective Equipment (PPE), and we understand the critical need for PPE in facilities. This also remains a significant issue for homecare, home health and hospice providers. We are in regular communication with HAP, regional health coalitions and others on this issue, but would appreciate any additional information or guidance that the Department can share. The issue of facility health screenings and required PPE before a provider can enter a facility to provide a critical health or personal assistance services highlights the need for PPE among home-based care providers. The same is true in their work with consumers, who are particularly vulnerable to complications from

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COVID-19, are increasingly concerned about possible infection, and as consumers or other household members test positive for the virus, but remain in need of critical care.

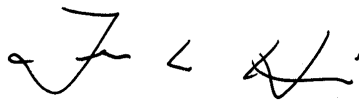
- **Out of state nurses.** We understand that Pennsylvania intends to grant temporary permits to nurses licensed in other states to allow them to practice in Pennsylvania. We look forward to written guidance in the coming days explaining that expansion and any limitations.

Thank you in advance for your review and consideration of these issues. We have shared a number of similar issues and requests with OLTL and the MCOs and are happy to share those with you if it would be helpful. We all know that time is of the essence and that every day brings new challenges and, hopefully, solutions, as we work together through these challenging times.

PHA and our members greatly appreciate the work of and our partnership with the Departments of Health, Human Services, Aging, and many others, as we all work toward solutions that will protect Pennsylvanians in need.

Please let us know how we can be of any additional assistance in your efforts.

Sincerely,



Teri Henning, Esq.
Chief Executive Officer

cc: The Honorable Teresa D. Miller, Secretary, Department of Human Services
The Honorable Robert Torres, Secretary, Department of Aging