CBAS TEMPORARY ALTERNATIVE SERVICES (TAS)
PRESENTERS

California Department of Aging
Community-Based Adult Services Branch

- Jill Sparrow, Chief
- Denise Peach, Chief Emeritus
- Eden Rosales, Manager
HOUSEKEEPING

• Webinar is being recorded and will be posted on the CDA website
  https://www.aging.ca.gov/Providers_and_Partners/Community-Based_Adult_Services/#pp-tr

• Q & A throughout the webinar (submit questions via the webinar “Questions” box)
**WHAT WE’LL COVER TODAY**

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Governor Newsom – March 4th Emergency Declaration, series of Executive Orders

DHCS requests of CMS for 1135 Waivers - Flexibility

CDPH – All Facilities Letters (AFL) - COVID-19 safety practices, ADHC Flexibility
  - AFL 20-34 Highlights – Temporary waiver of specified statutory/regulatory requirements for ADHCs
    - Allows for flexibility of all Basic ADHC services and staff roles
    - No individual flexibility requests required

DHCS – All Plan Letters (APL) – Direction to the Managed Care Plans

CDA – All Center Letters (ACL) – Guidance to CBAS Providers Regarding CBAS Temporary Services
STATE GUIDANCE RELATED TO CBAS

- March 3 - CDPH AFL 20-17
- March 18 - CDA ACL 20-03
- March 21 - Executive Order N-35-20
- March 23 – CDPH AFL-20-27.1
- March 23 – CDA ACL 20-04 (revised)
- March 26 – CDA ACL 20-05
- March 26 - CDPH AFL 15-29

- March 26 – DHCS APL 20-007
- March 27 – CDA ACL 20-06
- April 2, 2020 - CDPH AFL 20-34
- April 13, 2020 - ACL 20-07
- 1135 Waiver Letters to CMS requesting flexibility during emergency:
  DHCS (3-19-2020)
  CDPH (3-24-2020)
We’re ALL in this together – state departments, managed care plans, providers, communities.

We need to be flexible and innovative as we reimagine and redesign services to support those at highest risk of COVID-19.

For CBAS, those at highest risk are the participants, families, and caregivers we have long served, who are now sheltering in place and have new needs and risks.

Keeping everyone safe is our highest priority!

THE TAKE AWAY’S
CBAS TEMPORARY ALTERNATIVE SERVICES (TAS)

WHAT IS IT?

- Short-term, modified service delivery approach
- Allows certified CBAS providers to deliver essential services to participants most at risk during the COVID-19 outbreak
- Telephonic and telehealth services, limited individual in-center activities, and in-home services for CBAS participants
- Person-centered services provided based on the assessed health needs identified in participants’ current Individual Plan of Care (IPC), identified through subsequent assessments; and noted in the health record.

**NOTE:** Providers must consider the participants’ most urgent needs and deliver them in the safest possible manner. Providers may serve participants in person ONLY when absolutely necessary and when using infection control measures to protect participants and staff to reduce exposure to COVID-19.
All CBAS TAS providers are required to do the following:

✓ Maintain phone and email access for participant and family support, to be staffed a minimum of 6 hours daily, during provider-defined hours of services, Monday through Friday.

✓ Provide a minimum of one service to the participant or their caregiver for each authorized day billed.
   This service could include a telehealth (e.g., telephone, live video conferencing, written communication via text or email) contact, a service provided on behalf of the participant, or an in-person “door-step” brief well check conducted when the provider is delivering food, medicine, activity packets, etc.

✓ Conduct a COVID-19 wellness check and risk assessment for COVID-19 at least once a week, with greater frequency as needed.
All CBAS TAS providers are required to do the following (cont.):

✓ **Assess participants’ and caregivers’ current needs** related to known health status and conditions, as well as emerging needs that the participant or caregiver is reporting.

✓ **Respond to needs and outcomes** through targeted interventions and evaluate outcomes.

✓ **Communicate and coordinate** with participants’ networks of care supports based on identified and assessed need.

✓ **Arrange for delivery or deliver supplies** based on assessed need, including, but not limited to, food items, hygiene products, and medical supplies. If needs cannot be addressed, staff will document efforts and reasons why needs could not be addressed.

*Services provided on behalf of the participant include care coordination such as those listed above*
Providers must:

**Staff CBAS TAS with a:**
1) Program Director
2) Registered Nurse(s), and
3) Social Worker(s) to carry out all CBAS tasks.

And

**Have additional staff as needed to:**
- Address the number of participants served and their identified needs
- Assist in the delivery of services required for CBAS TAS participation
- Fulfill provider’s CDA approved *CBAS TAS Plan of Operation.*
Some points to remember:

All staff must function within their scope of practice, qualifications, and abilities.

Staff are not expected to convene at the center but must have methods to be able to work collaboratively as a team from remote locations.

CDA will review the Plan of Operation to ensure that staff levels are adequate to the number of participants served.
• Do I only need to retain a Program Director, one nurse, and a social worker?

• Can social work assistants and LVNs provide services if an RN or MSW is available (remotely) to supervise/consult?
Participants who have previously been approved or are in the process of approval

These participants will be considered “continuing” participants and may only require additional authorization for CBAS TAS if their treatment authorization period is expiring. Providers will need to work with their contracting MCPs, or DHCS for fee-for-service participants, regarding processes for reauthorizations.

New participants may be enrolled.

Providers will need to consult with their contracting MCPs, or DHCS for fee-for-service, for guidance regarding the process for enrollment of any new participants.
Providers must document all minimum services required under CBAS TAS, as well as all services indicated in their CDA approved *CBAS TAS Plan of Operation*.

NOTE: This includes customary administrative records (e.g., staff timesheets, transportation logs, TAS Plan of Operation) AND participant health records.

Documentation to be included in **participant health records** includes but is not limited to:

- Care plans, action plans, and targeted interventions that have been modified as participants’ needs change
- Services provided, including date, type of service, and name/signature of person providing
- Notes reflecting ongoing assessment of participant needs and progress with care plans
For CBAS providers admitting and serving new participants during CBAS TAS, the health record must include at least a:

- Telehealth assessment
- Care plan

NOTE: Providers should maintain existing processes with MCPs and DHCS for electronic communications and signatures.
QUESTIONS

- Formats for TAS assessments and care plans – e.g., can they come in form of progress notes?

- Traditional CBAS IPCs and the role of TAS ‘action plans’ and ‘targeted interventions’?

- Are reassessments and a care plan needed from every MDT member? Including PT, OT, RD, ST?
CBAS TAS – REIMBURSEMENT

Providers will receive their existing per diem rate from their contracting managed care plans and DHCS fee-for-service, providing they:

- Meet all requirements for CBAS TAS participation, and
- Provide a minimum of one service* to the participant or their caregiver for each authorized day.

*This service could include a telehealth contact (e.g., telephone, live video conferencing, written communication via text or email), an in-person “door-step” well check conducted when the provider is delivering food, medicine, activity packets, etc., or care coordination on behalf of the participant.
Reimbursement will temporarily work as follows:

- The required CBAS center staff must be available to all CBAS participants **during the specified hours for phone and/or email contacts** initiated by CBAS participants and caregivers.
- Reimbursement for CBAS TAS is retroactive to March 16th, 2020.
- Providers pending approval for CBAS TAS as described in ACL 20-07 may begin billing immediately.
- The claims format, information contained therein, coding, and submission process will remain the same.
- Payments will be subject to recoupment/cancellation if participation requirements for CBAS TAS are not met in good faith.

NOTE: If a participant or caregiver requests to be disenrolled from the program or refuses all services after attempts to reengage them in CBAS TAS during this period, they may be considered on hold until the return of traditional CBAS or discharged, as appropriate, based on existing discharge requirements. The provider may not bill for those individuals unless services are provided.
Providers wanting to participate in CBAS TAS will need to submit the following to CDA for review and approval:

- CBAS TAS Plan of Operation Form (CDA 7012)
- CBAS TAS Provider Participation Agreement (CDA 7013)
- Updated Staffing/Services Arrangement Form (ADH 0006)

*Form has minor revisions to the instructions to account for staffing and operational changes during this time.*

NOTE: Forms & instructions are posted on CDA’s website.
Providers wishing to participate in CBAS TAS must submit forms to CDA by Monday April 20, 2020.

- CDA will:
  - Expedite review of requests and communicate with providers to resolve any outstanding questions or concerns
  - Notify providers and MCPs of approvals and effective dates

Providers that are unable to meet the filing deadline should contact CDA regarding a possible extension.

Providers that fail to submit the required forms for participation in CBAS TAS or provide acceptable plans of operation will not be approved for CBAS TAS. CDA will notify those providers and their contracting MCPs of their status.
SUBMISSION PROCESS

• Complete and submit the TAS application by uploading to your center’s POC folder within the Peach Provider Portal.

• Go to: https://providerportal.aging.ca.gov using your Google Chrome internet browser.

• Additional instructions are located in the TAS Application Instructions.

• Complete instructions for managing your Peach Provider Portal account can be found on the CDA webpage.
WHEN CAN CBAS TAS BE PROVIDED?

- NOW and until further notice
- Effective dates for service will be:
  - March 16th, 2020 after the Governor’s Orders, or
  - The date they are scheduled to begin in the future, if services have not yet begun.

*Services provided prior to March 16th, 2020, are subject to regular CBAS standards and processes.*

- CDA will notify providers and MCPs of CBAS TAS approval. Effective dates for commencement of CBAS TAS for each provider will be certified by CDA in the revised *CBASTAS Provider Participation Agreement.*
CDA will conduct ongoing monitoring of CBAS TAS with:

✓ Regular calls to providers to ensure phone and email are readily available, to monitor the provider’s Plan of Operation, and offer assistance

✓ Requests for administrative and participant health records for the purpose of data collection and verifying that CBAS TAS requirements are met

Providers must report to CDA changes of staffing, changes to their TAS Plan of Operation and unusual incidents.
CDA WILL...

- Develop FAQs to address questions raised during this webinar and beyond
- Release further ACL guidance based on changing circumstances
- Provide additional webinar updates/training as needed
- Continue to partner with CAADS to get assistance with process development, to hear from providers about best practices and share them
- Participate in regular webinars and calls where we hear and learn from providers about experiences “on the ground”
- Continue to partner with DHCS, CDPH, and managed care plans to ensure consistent policy guidance, ensure program integrity, and respond to this changing environment
CLOSING THOUGHTS AND QUESTIONS
Thank you for joining us today and for the good work you’re doing for the people we all serve.

Please keep flexibility and safety foremost in mind as you support our participants during these difficult times.

We’re all in this together.

Thank you.
## CDA CONTACT INFORMATION

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