



**CABINET FOR HEALTH AND FAMILY SERVICES
DEPARTMENT FOR MEDICAID SERVICES**

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Governor

Division of Community Alternatives
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To: 1915(c) Home and Community Based Services Waiver Case Managers, Service Advisors and Support Brokers

From: Pam Smith
Director, Division of Community Alternatives

Date: July 12, 2022

Re: Participants Visits and COVID-19

The Department for Medicaid Services (DMS) is reminding case managers/support brokers/service advisors they can resume in-person visits with 1915(c) Home and Community Based Services (HCBS) participants as appropriate. The widespread availability of precautionary measures such as vaccines and face masks means in-person visits can be conducted safely for many participants. Case managers/support brokers/service advisors should consider in-person visits if:

- The case manager/support broker/service advisor has not seen the participant in-person in the past six months or more.
- The case manager/support broker/service advisor needs to see the participant in person to assure their health, safety, or welfare or has identified a potential issue that cannot be fully evaluated using telephonic or virtual options.
- The participant and/or the participant's guardian (if applicable) desires to return to in-person case management/support broker/service advisor visits or is better able to participate during in-person visits.

Since the start of the pandemic and the shift to virtual visits, monitoring of incident reporting found multiple cases of alleged abuse, neglect, and/or exploitation against participants. Investigations into several of the incidents revealed that in-person visits could have led to the identification of potential issues or the need for additional supports that would mitigate harm to the participant.

It is still crucial to protect Kentucky's most vulnerable populations from COVID-19, but it must also be done in a person-centered manner that balances protection with overall health, safety, welfare monitoring, and freedom of choice. Other factors to consider with in-person visits include:



- Vaccination statuses of the participant, the case manager/support broker/service advisors, and any other individuals who plan to attend the meeting.
- Health conditions or other factors that put the participant at higher risk for COVID-19.
- Participant's ability to follow Centers for Disease Control mask guidelines.
- Any recent exposure to COVID-19 or the participant's current health (i.e. are they symptom-free?).

When meeting with participants in-person, case managers/support brokers/service advisors should take steps to reduce the risk of COVID-19 by following Centers for Disease Control guidance regarding masks and in-person gatherings. For example, if a participant and case manager/support broker/service advisors feel more comfortable meeting outside you could consider holding your visit on the porch or patio of a participant's residence.

Kentucky's COVID-19 Appendix K amendment for HCBS waivers is still in effect. Appendix K allows telephonic and virtual visits; however, **it does not prohibit in-person visits**. In-person visits allow the case manager/support broker/service advisor to make observations about the participant's home environment and well-being that cannot otherwise be noted using virtual or telephonic options, such as cleanliness or how it smells. If conducting a face-to-face visit virtually, the participant should be on-camera and be seen clearly. The case manager/support broker/service advisor should observe the participant's condition, ask detailed questions, and request to see anything that can give them a clear idea of the participant's health, safety, and welfare.

Appendix K will remain in place for up to six months after the federal public health emergency is discontinued. There will be a transition period for providers to return to normal waiver operations. DMS will issue guidance once a final date for the end of the federal public health emergency is determined.

If you have questions, please contact the state operating agency for the waiver(s) you serve:

- ABI, ABI LTC, or MIIW
Department for Medicaid Services
(844) 784-5614
1915cWaiverHelpDesk@ky.gov
- HCB
Department for Aging and Independent Living
(877) 315-0589
dailhcb@ky.gov
dail.pds@ky.gov
- MPW or SCL
Department for Behavioral Health, Developmental and Intellectual Disabilities
Contact your Quality Administrator

Sincerely,



Pam Smith
Director, Division of Community Alternatives