

Bibo, Mike

Subject: COVID-19 ICF/DD Guidance

Importance: High

From: Bibo, Mike

Sent: Wednesday, March 18, 2020 9:44 AM

To: **Subject:** COVID-19 ICF/DD Guidance

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Dir. Eagleson:

DHS has said they are going to make Community Day Services (Day Training) whole during their suspension of services, and that they are providing additional funding to CILA's to provide for 24-hours of services. We understand that DHS and HFS are working together to provide guidance for the ICF/DD settings.

Can HFS let us know what additional funding assistance will be provided community-based ICF/DD's & MC/DD's? These programs need additional funding to include, but not limited to, the following:

- ICF/DD - need additional funding to provide for 24-hours of services. The current reimbursement systems assumes individuals will participate in Community Days Services (Day Training) during the day shift, 5-days per week (especially in ICF/DD 16 person or less). Therefore, more staff will be required to provide "Active Treatment" during the day shift.
- ICF/DD 16 person or less – need increased hours of nursing in the compensations rates. Currently, the nursing rates/hrs provide little more than administration/oversight of the Direct Support Personnel (DSP) Medication Administration Program (59 IAC 116 Administration of Medication in Community Settings). Due to health related issues, reimbursement for more nursing is needed.
- ICF/DD's & MC/DD's need additional funding to address:
 - Over-time, due to increased staffing shortages. COVID-19 is placing a greater burden on staffing, than what was already a stressed staffing situation due to low wage rates used in reimbursement rates.
 - Paid Sick Leaves – Government has said that employers should provide paid sick leave:
 - In addition to what the employer typical provides its employees
 - Even when the employee has already used all the sick leave the employer offers
 - Paid FMLA - Government is expanding FMLA Eligibility
 - Lessening the Yr/hrs of service prior to eligibility
 - Using of FMLA for COVID-19 related needs (ie: child care)
 - Definitions of Family

Additionally, we request State & Federal Government:

- Include community-based programs serving individuals with I/DD (including ICF/DD's MC/DD's & CILA's) in the Personal Protective Equipment (PPE) prioritization.
- Suspend the requirement that direct care staff be DSP's. Allow for hiring of CNA's and other front-line staff to provide services during this pandemic.
- Suspend ALL surveys (State & Fed) in community-based programs serving individuals with I/DD (including ICF/DD's MC/DD's & CILA's), except for Infection Control, Abuse, & Neglect.

- IDPH - Suspend ALL Assessment of any Fines as a result of survey(s), in community-based ICF/DD's & MC/DD's.

We are certain that others issues will need to be addressed as we deal with this pandemic.

I can be reached at 309-368-1672, or mbibo@LTCsupport.net, should you want to contact me.

Respectfully,

Mike

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