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ACL 20-04, REVISED

Date: March 23, 2020
To: Community-Based Adult Services (CBAS) Center Administrators and Program Directors
From: California Department of Aging (CDA) CBAS Branch
Subject: Temporary Community-Based Adult Services (CBAS) In Response to COVID-19 Public Health Emergency – Guidance Forthcoming, PENDING CMS Approval

Purpose

This All Center Letter (ACL) is to notify you that CDA will be issuing policy guidance in the form of an ACL, pending CMS approval for the temporary provision of CBAS services, including telephonic and in-home, in lieu of congregate services.

Guidance for Provision of CBAS Services Pending CMS Approval

Congregate services provided inside centers are no longer allowed, effective March 19, 2020, per [Governor Newsom's Executive order](#). Individual services, determined to be essential to the participant's well-being, may be provided in center with proper precautions.* Please reference the [California Coronavirus Disease 2019 \(COVID-19\) Health Care System Mitigation Playbook](#) for additional mitigation strategies.

CDA is currently awaiting CMS approval regarding the temporary provision of CBAS services, including telephonic and in-home, in lieu of congregate services provided at CBAS centers. The Department of Health Care Services (DHCS) submitted a request for program flexibility on March 19, 2020.

This pending guidance is being developed in response to public health stay at home and social distancing guidance and the Governor's directives resulting from the COVID-19 outbreak. The ACL will outline mechanisms for providing services to currently authorized CBAS participants now remaining at home. It will outline service options that may be delivered by CBAS providers in lieu of traditional CBAS center services during the period of this current public health emergency. Finally, the ACL will address the anticipated approval and reporting requirements necessary for reimbursement of these temporary services.

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Our goal is to continue to partner with CBAS providers, enabling you to remain operational and redesign service delivery to your participants during this time of COVID-19 emergency.

Questions

Again, these emergency policy changes are forthcoming, PENDING approval from CMS. Further guidance will be provided when available. CDA understands CBAS providers will have a number of questions, and we are working to obtain answers and share soon. We thank you in advance for your continued partnership and efforts to meet the needs of the participants we all serve.

Please contact the CBAS branch if you have any questions: (916) 419-7545;
cbascda@aging.ca.gov.

*Please see Addendum for additional information pertaining to individual in-center and congregate services.

Addendum

The purpose of this addendum is to further define the temporary provision of individual services in lieu of congregate services at CBAS centers.

As stated in ACL 20-04, per [Governor Newsom's Executive order](#), March 19, 2020, congregate services provided inside centers are no longer allowable. Individual services, determined to be essential to the participant's well-being, may be provided in-center with proper precautions.

Definitions of Individual and Congregate

Individual: Of or related to an individual, intended for one person. Existing as a distinct entity, separate. A single human being as contrasted with a social group.

Congregate: Services provided in a group. To collect into a group or crowd, assemble.

Examples of Acceptable and Prohibited Means of Service

Below are examples of acceptable and prohibited means of service:

Individual In-Center – Acceptable:

- Individual coming to the center to receive services from CBAS staff in a singular, sequential manner – e.g., as in a doctor's office or clinic
- Individual coming to the center to pick up supplies, meals, receive wound care, receive assistance with a shower, etc.

Congregate - Prohibited:

- Participants assembling and receiving services in groups – e.g., traditional CBAS group services of more than one, being served in the same space at the same time