

From: The Cleveland TGA Ryan White Part A Office
Cuyahoga County Board of Health

Date: 4/9/2020

To: Cleveland TGA Ryan White Part A Funded Providers

This policy memo is to inform you of changes to Cleveland TGA Ryan White Part A processes in response to ongoing efforts in the COVID-19 response. Our number one priority is the safety and health of our clients that we serve and the providers serving those clients. With that in mind, we will be allowing greater flexibility with certain processes and documentation. Please see below for changes effective immediately during this COVID-19 response:

- **Certification and Recertification:** During the COVID-19 response, providers will have the flexibility to conduct certification and recertification processes electronically or via phone. If providers utilize electronic means, please mindful of any considerations of HIPAA/encryption.
- **Attestations of Income:** Must be completed with a new program enrollment or during a re-certification appointment. If the Income Attestation is completed verbally with a client during a new program enrollment, the client must provide documentation of income during the next enrollment. Subrecipients assume the risk of recouping any HRSA RWHAP funds utilized for clients ultimately determined to be ineligible, and instead charge an alternate payment source, or otherwise ensure that funds are returned to the CCBH and ultimately HRSA RWHAP. If there is no change in income, attestation may be obtained over the phone or electronically.
- **Attestation of Insurance:** The Health Insurance Attestation may only be used for a client who is re-certifying existing program eligibility and no changes have occurred with the insurance carrier. Provider should ensure that the insurance plan information is correct in CAREWare. If there is no change in insurance, verbal attestation may be obtained over the phone or electronically. If there is a change in insurance, documentation of insurance can be provided electronically.
- **Attestation of Residency:** Must be completed with a new program enrollment or during a re-certification appointment. If the Residency Attestation is completed with a client during a new program enrollment, the client must provide documentation of residency in the 6-county TGA during the next enrollment. Subrecipients assume the risk of recouping any HRSA RWHAP funds utilized for clients ultimately determined to be ineligible, and instead charge an alternate payment source, or otherwise ensure that funds are returned to the CCBH and ultimately HRSA RWHAP. If there is no change in residency, verbal attestation may be documented over the phone or electronically.

Case Management

- **Psychosocial Assessment:** A complete Psychosocial Assessment (PSA) is required, at minimum, once every 12-months, with an update at 6-months. This requirement will remain, but as a response to COVID-19, the Cleveland Part A program is allowing the annual PSA to be completed by phone.

- **Individualized Service Plans:** An initial Individualized Service Plan (ISP) is required within 30-days of program enrollment and must be updated at least every 6 months. These requirements will remain, but as a response to COVID-19, the Cleveland Part A program is allowing ISPs to be completed by phone, and without a client signature. Provider can sign on behalf of client.
- **Housing Activities/Assessment:** Activities and assessments funded through Ryan White Part A non-medical case management- housing service category can be completed by phone when appropriate, as a response to COVID-19.
- **Housing Service Plans:** As part of the non-medical case management-housing service category, housing plans may be completed by phone, and without a client signature, as a response to COVID-19. Provider can sign on behalf of client.
- **Releases of Information:** The Ryan White Part A sub-recipient agency must continue to ensure the proper release of information (ROI) is in the client record before sharing client information with the designated service providers. If a Release of Information is not available, the Part A Office encourages sub-recipient agencies to allow for verbal releases until the time is appropriate to obtain a ROI signed by the client, or authorized representative. When obtaining a verbal release of information, it is important to follow best practices and ask validating questions (such as asking the client their date of birth) to ensure the intended client is who the professional is speaking to.

Service Plans

The Cleveland TGA has several service categories where a service plan may be put together for a client. These may include mental health or medical nutrition, for example. In these cases, provider can work with the client to create the plan over the phone or electronically. If the plan requires client signature, the provider can sign on behalf of client.

Services Provided in a Group Setting

The Cleveland TGA has several categories where services may be conducted in a group setting, such as support groups, group therapy sessions, etc. During the COVID-19 response, agencies will have the flexibility to cater these services to a more one-on-one format in a virtual platform in order to adhere to social distancing mandates.

The Part A Office requests that if any of the above exceptions/changes are made, the client record/appropriate forms must contain clear documentation on the form. For example, if a medical case manager completes an annual Psychosocial Assessment and Individualized Service Plan over the phone with the client, the documentation must clearly note this, and reference that the appointment was completed by phone as a precaution for COVID-19. Example Language: "Conducted PSA and ISP via phone with client as a precaution for COVID-19 during public health emergency." Documents are still expected to be uploaded into CAREWare, with the same timeline of 3 days after the date of service. Should this requirement be a problem, a specific plan needs to be approved by the Part A office for your agency.

Also, the Part A office requests that if your agency has made any decisions about limiting services, changing hours, closures, etc., we ask that you please notify the Cleveland Part A office as soon as possible.

The COVID-19 response is a challenging and fluid situation. The Cleveland Part A office will continue to evaluate the situation and may continue to make additional changes as needed, which will be communicated to you as quickly as possible.

During this COVID-19 response, the Cleveland Part A office thanks you for your commitment to still provide critical and high-quality services to clients. If you have any questions or concerns regarding this policy memo, please reach out to Melissa Rodrigo at mrodrigo@ccbh.net.