



BRADLEY P. GILBERT, MD, MPP
DIRECTOR

State of California—Health and Human Services Agency
Department of Health Care Services



GAVIN NEWSOM
GOVERNOR

PPL No. 20-01

To: Medi-Cal Subacute Care Program Providers

Subject: Guidelines for the Medi-Cal Subacute Care Unit during the COVID 19 pandemic

The purpose of this Policy and Procedure Letter (PPL) is to provide guidance to providers participating in the Medi-Cal Subacute Care Program during the State Emergency due to the outbreak of the novel coronavirus known as COVID-19.

Due to the concern for the health and safety of Medi-Cal subacute beneficiaries, the Department is not presently considering waiving Medi-Cal subacute staffing minimums. Additionally, the Department has placed a hold on the lifting of Bans of Admissions, bed increases, and new applications until further notice. However, the Department will:

- Suspend ongoing training requirements as noted in California Code of Regulations (CCR), title 22, section 51215.5(i). However, the provider must still orient and evaluate any staff working in the Medi-Cal Subacute Care Unit PRIOR to that staff providing direct patient care.
- Allow providers to cover CNA staffing hour shortages with excess licensed staffing hours, as long as the CNA staffing hour shortages and licensed staffing hour excesses (licensed hours in excess of required minimums noted in CCR, title 22, section 51215.5(e)) occur on the same day and the licensed staffing hour excesses are used to provide CNA care including, but not limited to, ADLS and turning and positioning of beneficiaries.
- Allow, at pediatric subacute care units only, reduction in the number of Service Coordinator/Social Worker (SW) staffing hours required by 51215.8(j), which may result in an increase in the number of RNs available to provide direct patient care. However, the provider must contact the Department's Subacute Contracting Unit to propose SW staffing hour levels and ensure that beneficiaries are not adversely affected by this proposal.

If your facility elects to utilize any of the above regulation flexibilities, you must complete and submit a Medi-Cal Subacute Flexibility Request for approval by the Department. Your flexibility request is not approved until the Medi-Cal Flexibility Request is returned

to you signed by the Contracting Officer. All approved Flexibiity Requests will be posted to the Department website.

If your facility cannot provide adequate care for Medi-Cal subacute beneficiaries due to a lack of available staff, please immediately contact the Department so that an alternative contracted location may be identified for relocation of beneficiaries.

This PPL will cease to be in effect upon the termination of the State of Emergency, at which time providers will resume to adhere to the above-listed requirements. DHCS will issue a subsequent PPL notifying all providers of the exact date the State of Emergency has ended.

Nothing stated in this PPL shall supersede any state or federal regulations or statutes.

If you have any questions concerning this PPL, please contact Ms. Corinne Mallonee, Subacute Contracting Unit, by phone at (916) 345-7870 or by e-mail to Corinne.Mallonee@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY KATIE BROOKS

Katie Brooks, Branch Chief
Safety Net Financing Division
Department of Health Care Services