

Certified Community Residential Services Businesses Supporting Individuals through the Covid-19 Crisis

Frequently Asked Questions – September 20, 2021

The response provided in this FAQ is valid under the current Proclamation and is subject to change if new orders or clarifications are provided by the State Federal or Local Authority.

Thank you for submitting your many questions. Below are responses to questions regarding the Proclamation by the Governor 21-14.1 on COVID-19 Vaccination Requirement:

- 1. What are the deadlines for each vaccine?** The definition of “fully vaccinated” accounts for the 14 days after the second dose, meaning employees of SL/GH/GTH providers and AL/CH providers should receive the second dose by Oct. 4th, 2021.
 - The Moderna vaccine requires 28 days between doses. Its first dose should have been administered by September 6th.
 - The Pfizer vaccine requires 21 days between doses. Its first dose should have been administered by September 13th.
 - The Johnson & Johnson vaccine requires only one dose. Its first dose must be administered by October 4th.
- 2. Where can I look for information on vaccines?** COVID-19 vaccine Information and FAQs is available from [the Department of Health \(DOH\)](#) and [the governor's office](#).
- 3. Is there a shortage of vaccine?** Information on COVID-19 vaccine supply and distribution can be found [here](#). You can find information on COVID vaccines available near you on the [Washington COVID Vaccine Finder](#).
- 4. I had COVID-19 and believe I have natural immunity. Do I still need to be fully vaccinated?** The proclamation does not provide an exemption for individuals who have previously been infected with COVID-19. Experts do not yet know how long you are protected from getting sick again after recovering from COVID-19 and recommend getting vaccinated regardless of whether you already had COVID-19 or not. People can get sick with COVID-19 again after they've already had it. In [this study](#) from the CDC, individuals who were previously infected with the COVID-19 virus (SAR-CoV-2) are twice as likely to be reinfected than those who are fully vaccinated.
- 5. Will there be an extension of the vaccine deadline if staff are in the process of being fully vaccinated?** An extension on the October 18th deadline is not expected at this time.
- 6. If a staff person has lost their immunization card, and received the dose at a disappearing clinic (non-permanent) is there a one stop place that they can request a new copy?**
Vaccine Records: To get your copy, visit [MyIRMobile.com](#) to sign up for free. If you already

have a MyIRaccount set up, you are all set! For language assistance, or additional help getting your records, please call 833-VAX-HELP (833-829-4357) or contact by email at waisrecords@doh.wa.gov.

- 7. If a staff person or employee is in the process of being vaccinated but not yet fully vaccinated on October 18th, are they terminated, suspended, or laid off?** As a contractor, you should consult with your legal counsel, your human resources department, or Labor & Industries for guidance. More information on this subject can be found on FAQs from the [DOH](#) and the [governor's office](#).
- 8. May I hire an unvaccinated individual who is required to be vaccinated under the proclamation and train them remotely or allow them to engage in other work remotely until they are fully vaccinated?** Staff hired to work for Certified Community Residential Service and Support Providers must be fully vaccinated no later than October 18th unless granted an accommodation due to medical or religious exemption. More information on this subject can be found on FAQs from the [DOH](#) and the [governor's office](#). After October 18th staff must be fully vaccinated prior to their start date. Internally, DSHS HRD has advised and supported conditional offers of employment based on being fully vaccinated on the start date.
- 9. What accommodations are DSHS providing for employees with exemptions?** DSHS accommodations are covered under [Administrative Policy 18.26 Disability Reasonable Accommodation](#).
- 10. How do I accommodate employees, volunteers, and contractors who ask for a medical or religious exemption?** Follow [this guidance](#) from the DOH:
 - Work with your legal counsel to set options for accommodations. You can read more about vaccines and accommodations on the [U.S. Equal Employment Opportunity Commission website](#).The [governor's FAQ](#) has specific guidance and templates you may find useful.
- 11. Can an unvaccinated staff member who is exempt from the vaccination requirement due to an accommodation still provide direct client care?** As a contractor, you should consult with your legal counsel, your human resources department, or Labor & Industries for guidance. More information on this subject can be found on FAQs from the [DOH](#) and the [governor's office](#).
- 12. How should I document medical and religious exemptions?** No specific exemption form is required, but you may use the [Disability-Related \(Medical\)](#) and [Religious Exemption Form](#) Templates for state employees as a starting point. Employers should document their decisions for employees. Supported living, Group Home, and Group Training Home providers must complete the 21-14.1 Employer Declaration form attesting that all of their staff are either vaccinated or have an accommodation per [this letter](#) from AL TSA. As a

contractor, you should consult with your legal counsel, your human resources department, and Labor & Industries for guidance on how to document medical and religious exemptions.

- 13. What if a staff member who obtains an exemption later tests positive for COVID-19 and exposes other staff and clients?** You must follow all [Safe Start](#), DOH, and CDC guidelines to protect employees and clients.
- 14. Can I require clients to be fully vaccinated?** Providers must inform clients/legal reps about the vaccine. Clients/legal reps are the only entities that can make the decision on accessing the vaccine.
- 15. Are community residential providers expected to confirm the vaccination status of other contracted providers, such as Nurse delegators, SOTP, Staff/Family Consult?** No, if the provider is contracted with DSHS, DDA will receive confirmation of their vaccination status. However, if the provider sub-contracts for services, the community residential provider must verify the sub-contractor's vaccination status.
- 16. Are employment vendors and home care agencies exempt from this mandate?** Yes, per the [governor's proclamation](#), employment vendors and home care agencies are exempt.
- 17. Can I ask to see the vaccination card of visitors, volunteers, and other providers who enter the client's home?** For visitors to a client's home, follow [Safe Start guidelines](#) for screening. Supplemental guidance
- 18. How do I know if DDA staff or contractors (Nurse delegators, SOTP, etc.) are fully vaccinated?** If a staff person or contractor is employed or maintains their contract after October 18th, they will be in compliance with the vaccine mandate. DDA will follow DOH guidance on accommodations. Contractors will determine what is a reasonable accommodation for themselves.
- 19. What can an agency do if we do not have enough staff to meet the client's needs?** Providers should follow their own contingency plans for staffing shortages, including possible use of natural supports before making changes to household arrangements:
 - Family who can take the client for a short-term visit
 - Administrative or other staff who can provide client support
 - Live-in staff model
 - Combine households
 - Congregate settings, such as hotels or offices

All changes to housing arrangements must be approved by the client and/or guardian and involve your Resource Manager. If changing locations, evaluate your screening process for necessary modifications to accommodate the new environment.

- 20. What flexibility is available for household configurations?** A variety of creative options may be considered during this staffing emergency as allowed by CMS under authority of the waiver Appendix K and 1135 waiver. Under this provision, some direct care services may be provided in a congregate setting. If a change of location is deemed appropriate, make sure to modify your screening steps for the new setting.
- 21. Can I support more than four clients in a single residence?** Providers should consider the support level of clients when considering alternate configurations or combining households, ensuring that at least one staff is present for supervision. When making such changes, please keep your Resource Manager informed.
- 22. Who approves change to household configurations?** The client, their guardian or legal representative, and the provider must agree upon changes to housing arrangements. When altering household configurations, please keep your Resource Manager informed.
- 23. Can I request home modifications for accessibility of a client after a change to household configuration?** Yes. You can follow the typical approval process for environmental adaptations. Please consider the potential duration of household configuration changes when discussing with your Resource Manager.
- 24. How can I utilize remote services to support clients during a staffing crisis?** DDA is current reviewing remote supports as a possible option for support levels 1, 2, 3A, and 3B. There will be more to come on this topic.
- 25. Can clients live temporarily with a staff person or agency employee?** If the client and/or guardian agree to the terms of the arrangement, everyone in the employee's home is vaccinated, and this arrangement is reflected in the client's PCSP, the client may temporarily stay with a direct care worker under CMS approved emergency flexibility under authority of the waiver Appendix K.
- 26. Can Supported Living clients in a temporary joined housing configuration share food stamps?** No, federal regulation prohibits sharing of food stamps.
- 27. If clients temporarily combine households, how do I cover the rent from the absent households?** It is important to divide client's cost equitably per 388-101D-1235. If a house remains vacant during this time you may be able to submit a request for Shelter expense per [DDA Policy 6.11 Residential Allowance Requests](#).

- 28. Will there be any change to my rate if we implement temporary moves during the emergency?** You will not be required to complete a new rate assessment for an emergency move. However, you will need to settle on the amount of money spent in your contract at the end of the year.
- 29. Who can access Rapid Response Team support?** Information on Rapid Response Team prioritization can be found in [this letter](#).
- 30. When can I expect contact from a Rapid Response Manager?** Managers will contact providers within 24 hours to discuss requests, staff availability, need, and assignments. Rapid Response Teams will triage requests based on the above prioritization. Requests that do not meet these priorities will be responded to according to timing and availability of staff available.
- 31. If my nurse delegator is no longer contracted on October 18th, how do I find a new nurse delegator?** Inform the client's DDA Case Manager, who will then follow the referral process for a new nurse delegator.
- 32. Will DDA verify vaccination status of nurse delegators?** DSHS will take contract action on providers who fail to meet the Governor's mandate concerning the vaccine.
- 33. My nurse delegator requested an exemption. If the exemption is granted, how do I ensure the safety of clients served by him/her?** Follow the [Safe Start guidelines](#) for screening visitors.
- 34. Will DDA consider suspending nurse delegation requirements?** For the ongoing safety of our clients, nurse delegation requirements cannot be suspended.
- 35. Is there a way for providers to get information to DDA, RCS, and DOH about the struggles we are having and ideas that providers would like to see implemented?** As always, you can reach out to your Resource Manager for assistance and to consider ideas you have for your particular agency. You can also email DSHSDDAStaffingBrainstorm@dshs.wa.gov with suggestions until October 22nd, 2021. In addition, there is a provider leadership group that meets with HQ weekly that has been sharing some of the struggles the industry has been experiencing. The following representatives are on the call: DDA, RCS and DOH leadership and subject matter experts along with CRSA representatives: Chad Higgman, Scott Livengood, Jenny Lengyel, Amal Grabinski, Robbin Star, and Melissa Johnson, CPPA representatives: Alan Frey and Deirdre Farrison. Providers can reach out to these individuals to share their concerns.

For Alternative Living and Companion Homes Only:

- 36. Does the governor's proclamation apply to Alternate Living and Companion Home Providers?** Yes, Alternative Living and Companion Home providers are subject to the proclamation. Providers must complete the Employer Declaration form for themselves and

turn it into the DSHS contact listed on the first page of their contract. As a contractor, you should consult with your legal counsel, your human resources department, and Labor & Industries for guidance on how to document medical and religious exemptions. More information on this subject can be found on FAQs from the [DOH](#) and the [governor's office](#).

37. What does an accommodation look like for Companion Home providers? Follow DOH and CDC guidelines for reasonable accommodations. DDA will follow DOH guidance on accommodations. Contractors will determine what is a reasonable accommodation for themselves. More information on this subject can be found on FAQs from the [DOH](#) and the [governor's office](#).

38. What is the process if a companion home has a medical or religious accommodation? Companion Home providers received a notice from William Taplin Chief of DSHS Central Contracts and Legal Services "Action Required under Governor's Proclamation 21-14". The notice has instructions and a sample declaration form a Companion Home provider needs to submit to the DSHS Contract Manager identified on the cover page of the CH providers contract by October 18th, 2021. If you operate the healthcare setting in which you work, you must also maintain your own proof and have it available should DSHS request it. DSHS may request additional, updated signed declarations at any time and for any reason.

39. I have a Companion Home. Can we have visitors in the home with children, who are not vaccinated yet?

- A client living in a CH is allowed visitors in the client's home. Vaccination verification is not required for visitors.
- The DOH has recommendations on [Face Coverings and Masks for children](#).
- The DOH has guidelines on [What to do if you were potentially exposed to someone with COVID-19](#).
- The CDC has guidelines to [Prevent Getting Sick](#).

40. I have a Companion Home. Does my respite provider need to be vaccinated? The vaccination mandate does not apply to Individual Providers or Home Care Agency employees who are providing only personal care or respite services in the client's home. However, as the employer, the client may ask to see the respite provider's vaccination card.