

## COVID-19 Continuity of Operations Plan

### SUMMARY

The Colusa County Department of Health and Human Services (DHHS) is committed to continuing all essential services. We are working to mitigate the impacts of staffing shortages. **Be advised that this document is a plan that is being updated on a continuous basis as conditions change.**

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## BACKGROUND

On March 15, 2020, the Centers for Disease Control and Prevention (CDC) released guidance advising that for the next 8 weeks, events consisting of 50 people or more should be postponed or cancelled. Furthermore, CDC advised social distancing of 6 feet or more during face-to-face contact with people. These guidelines will necessitate a temporary change in the way we do business to ensure public safety.

On March 17, 2020, the Colusa County Office of Education announced the closure of all Colusa County schools beginning March 18<sup>th</sup>, as a preventative measure to help stop the spread of COVID-19.

On March 19, 2020, the Colusa County Public Health Officer issued a Public Health Directive advising community members to avoid groups larger than 100. It also requires groups between 25 and 100 people to implement all of the COVID-19 mitigation measures as listed in the Directive.

On March 19, 2020, Governor Newsom issued Executive Order N-33-20, ordering all individuals living in the State of California to stay home or at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors, critical government services, schools, childcare, and construction, including housing construction.

<https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>

On April 10, 2020, the Colusa County Public Health Officer issued a Public Health Directive to extend and expand upon Shelter-in-Place Order dated March 20, 2020. The Order directs businesses and governmental operations to cease non-essential operations at physical locations, and prohibits all non-essential gatherings and non-essential travel.

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## Eligibility & Employment Services

The Health and Human Services Department administers CalWORKs, CalFresh, Health Care Programs and General Assistance, which is currently operating at a 31% vacancy rate. The CalWORKs location, Colusa WORKs administers CalWORKs, Housing and Welfare to Work Programs, which is currently operating at a 33% vacancy. Plans we developed modify our service delivery in compliance with CDC recommendations will also need to take in consideration the current staffing shortages.

## MANDATES

The Department of Health Care Services (DCHS) and California Department of Social Services (CDSS) both have released letters related to business operations during COVID-19:

- [Medi-Cal Eligibility Division Information Letter I-20-06](#)
- [Medi-Cal Eligibility Division Information Letter I-20-07](#)
- [ACWDL 3 12 20 CalWORKs, CalFresh, Housing and Homelessness, Refugee Cash Assistance](#)
- [ACWDL 3 19 20 Interim Housing and Homeless Program Guidance](#)
- [ACWDL 3 27 20 CalFresh and CalWORKs Implementation of EO N 29 20](#)
- [ACWDL 3 30 20 CalWORKs Guidance for Employment Services](#)
- [ACWDL 3 31 20 Interim Housing and Homelessness Program Guidance](#)

- [ACWDL 4 2 20 CalFresh Temporary Waiver to support Timely Processing of Applications](#)
- [ACWDL 4 2 20 CalFresh Implementation of Families First Coronavirus Response Act](#)
- [Medi-Cal Eligibility Division Information Letter I 20-08 Follow Up Guidance to I 20-07](#)
- [ACWDL 4 14 20 EBT Online Purchasing](#)
- [ACWDL 4 15 20 Treatment of Rebates under the CARES Act for CalFresh, CalWORKs](#)
- [ACWDL 4 21 20 CalFresh Treatment of Unemployment under the CARES Act](#)
- [ACWDL 4 22 20 CalFresh Verification Requirements and Treatment of Reports of Job Loss/Zero Income](#)
- [California Department of Healthcare Services ACWDL 4 27 20 Provision from the Federal COVID-19 Relief and Economic Security Act](#)

In summary, the letters advised:

- Flexible verification standards for programs and temporary good cause request from meeting certain program requirements.
- Face to Face Interviews to telephone interviews or no interview required depending on temporary program requirements.
- Informing customers of services that are available and promoting Self Service Options (C4Yourself, telephone and drop box) to access program benefits.
- Strongly encouraged mail delivery of Electronic Benefit Transfer (EBT) cards, pick up by request daily at 3 pm.
- Flexibilities in CalWORKs Homeless Assistance and other Housing Programs in interview and application requirements including duration of assistance issued.
- Temporarily stop the processing of annual Renewals (REs) and Recertifications (CalWORKs, CalFresh and Health Care Programs) for a 90 day delay.
- Temporarily stop the processing of Semi-Annual Reports (SAR 7s) until further notice. Income Reporting Threshold (IRT) still applies during the SAR reporting period.
- Stop all Non-Compliance for CalWORKs/Welfare to Work noting Good Cause.
- Stop all Sanctions for CalWORKs/Welfare to Work with a completed WtW 29, Request to Stop Sanction due to Good Cause.
- Exemption of the CalWORKs 48-Month Time Clock for March 1 through June 30<sup>th</sup>, 2020.
- EBT Online Purchasing available through Amazon and Walmart.
- CARES Act Rebates and Unemployment compensation and how this impacts CalFresh, CalWORKs and Health Care Programs.
- CalFresh Verification requirements for job loss/zero income.

## **OPERATIONS PLAN**

### **Eligibility**

Our Health and Human Services Department, located at 251 East Webster, Colusa, CA 95932 and Colusa WORKs located at 144 Market Street, Colusa, CA 95932, administers CalWORKs, CalFresh, General Assistance, Health Care Programs, Foster Care, Aid to Adoptions and Housing Program assistance.

Our lobbies are closed however, appointments are available upon request. We conduct EBT Card pick up daily at 3 pm located at 251 East Webster Street, Colusa, CA 95932.

Customers can apply for services, and manage their case, anytime online:

- C4Yourself at [www.c4yourself.com](http://www.c4yourself.com) or the mobile app for program application and assistance.

- Covered California at [www.coveredca.com](http://www.coveredca.com) for Health Care Program application and assistance.
- GetCalFresh at [www.getcalfresh.org](http://www.getcalfresh.org) for the CalFresh program application and assistance.

Application packets and a variety of forms in English and Spanish are also available for pick up at door area located at 251 East Webster Street, Colusa, CA 95932.

Application packets can be submitted by:

- Drop box and Mail Slot available at each location.
- Fax to (530) 458-0492
- Mail to 251 East Webster Street, Colusa, CA, 95932

Current customers can check their CalWORKs or CalFresh balance, report a lost or stolen EBT card, or request a replacement EBT card, by calling (877) 328-9677 or going online at [www.ebt.ca.gov](http://www.ebt.ca.gov). Many additional services are available on the EBT website.

Current customers can check their benefits, case status, and reports due using our Integrated Voice Response (IVR) system by calling (877) 410-8805 if they have enrolled. Customers can enroll by calling their Eligibility or Employment Specialist.

To enforce the social distancing requirements set by CDC, and temporarily alleviate some of the workload due to staffing shortages, all non-emergency contact will be conducted by telephone or mail.

All interviews can be conducted by telephone. Documents will be mailed to applicants where a signature is required. Telephonic signature is available for a variety of program documents.

Workers are available by telephone Monday – Friday, 8:00 AM – 4:30 PM at (530) 458-0250 locally. Workers will be making extra effort to answer all incoming calls immediately, and return missed calls within one business day, as we anticipate an increase to phone calls during this time.

EBT cards will be mailed, with the exception of qualified emergency applications or emergency replacements where the customer has requested to pick up. EBT pick up will be daily at 3 pm located at 251 East Webster Street, Colusa, CA 95932.

Applications for emergency requested program services can be made electronically, over the phone or submitted in one of the drop off locations listed as our lobbies are temporarily closed.

Qualified emergency applications will be served within state mandated timeframes:

- CalWORKs Homeless Assistance, same day, date received.
- CalWORKs Immediate Need same day, date received.
- CalFresh Expedited Services within three days of date received (weekends count as one day)
- Medi-Cal Emergencies, same day or next working day of date received.

In-person emergency applications for CalWORKs Immediate Need and Homeless Assistance will be interviewed over the phone to meet processing timelines. CalFresh Expedited Services applications, regardless of application method, may be interviewed by telephone, within three business days from

date application is received. Medi-Cal Emergencies do not require an interview and can be processed immediately upon receipt of application.

Every effort will be made to serve non-emergency applications within the following state mandated timeframes:

- CalWORKs 45 days
- Medi-Cal 45 days
- CalFresh 30 days

NOTE 1: It is not anticipated that Disaster CalFresh or CalFresh replacement benefits will become available in response to COVID-19.

NOTE 2: The Able-Bodied Adults Without Dependents (ABAWD) work rule for the CalFresh program will not go into effect April 1, 2020 as an injunction has been granted. Please note that Colusa County is exempt from the ABAWD work rules at this time.

NOTE 3: We will not be able to host a 2020 Census Questionnaire Assistance Center until the CDC guidance related to social distancing and group gatherings has been lifted or changes significantly.

### **Employment Services**

Our Colusa WORKs/Employment Services department, located at 144 Bridge Street, Colusa, CA 95932, administers the CalWORKs Ongoing assistance and Welfare-to-Work (WTW) component of the CalWORKs program as well as Housing Program assistance.

Office-wide, we will implement precautionary guidelines including:

- 6 foot social distancing protocol,
- Good practices (such as no shaking of hands, using gloves, sanitizing surfaces, etc.),
- No attendance at 'gatherings' of 50+ or 10+ if in a risk category (meetings, trainings, etc.), and,
- Encouraging staff to stay home if ill (approval of Department Leave).

Since cubicles at Colusa WORKs do not meet the 6 foot criteria but do have cubicle wall separation, any worker with concerns about staff proximity to one another or a worker who comes to work and appears to be symptomatic can be relocated to protect other staff in the office.

Our lobby will be updated as follows:

- Signage at entrance door about options Self Service Options
- Increase cleaning of commonly touched surfaces for staff

### Provisions for WTW clients

*Appointments:* All Welfare to Work appointments will be conducted by telephone.

Employment Specialists will contact participants who are currently in the following status:

- Non-Compliance status for failure to participate or make progress in an assigned activity.
- Sanction due to failure to cooperate or participate in an assigned activity.

### Client Activities

*Appraisals/Orientations and OCAT:* Appraisals/Orientations and OCAT appointments will be conducted by telephone interview. The option to cancel or reschedule the telephone interview will be granted for Good Cause, and notated accordingly.

*Educational activities:* Local colleges are moving to online classes. Clients in college classes will be contacted by their worker to determine supportive services needs and/or provision of good cause if classes are cancelled altogether.

*Childcare:* Clients with children at home due to school closures or daycare closures who cannot participate shall be given good cause for not participating during the time the school is not in session.

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## **Child Welfare Services**

The following plan gives instruction for CWS in order to remain responsive and respectful of health and safety of our staff and community. Our reception area was closed on March 20, 2020. Signage is up routing all visitors to use the main entrance of the DHHS building for assistance.

### **Attendance at Trainings, Conferences and Meetings**

- Staff will not attend any training, including out-of-county training or conferences, until further notice.
- Child and Family Team meetings will be conducted via teleconference.
- Internal staff meetings will be limited in size to allow for recommended social distancing.

### **Resource Family Approval**

- Applications will be accepted through the mail and all conversations will be completed over the phone.
- Any scheduled HVs will be postponed. Social worker will document that the postponement was due to COVID-19
- Social workers will not fingerprint applicants until further notice.

### **Any RFA Placement**

- Prior to making a placement in any RFA home (including FFA's), or a 309 placement, the social worker will ask the following questions:
  - Do you or anyone in your household have the following symptoms:  
Shortness of breath or difficulty breathing? Fever? Cough?

- Are you living with someone or have you encountered someone who has been told they have coronavirus or told to quarantine/isolate?
- If the Resource Family answers yes to any of these questions, the social worker will let the RF know that placement cannot be made at this time.
- Social worker will notify their supervisor that the placement cannot occur.

### **Youth placed out of state**

Social workers or Supervisors will not travel out-of-state to complete face-to-face contacts, but will reach out to CDSS for assistance. CDSS has stated they will work with other states in which youth are placed (for both group homes and Non-Minor Dependent/foster care placements) to ask for their assistance with face-to-face visits. Counties are reminded to be similarly flexible with other states who ask for assistance with children placed here in California.

### **Youth in College**

Social workers will reach out to youth attending college to ensure they have the resources needed to remain supported while they are out of school and to help ensure that they are able to return to their campuses if they need to leave.

### **Visitation**

- All in person visits will be suspended until further notice. Social workers will schedule teleconference visits.
- Staff will contact both caregiver and parents and notify them of this change.
- Staff will document in CWS/CMS that the in-person visit did not occur because CWS was following their Continuance Operation Policy during COVID-19.

### **Monthly Visits**

- The monthly caseworker visit requirement remains in place, however, CDSS has modified policy to permit such visits to be conducted by videoconferencing in these current extraordinary circumstances. Please document that this was due to COVID-19.

### **Drug testing**

- All drug testing will be suspended until further notice. The only exception would be if ER needs to drug test a parent / caregiver to determine the safety of a child.

### **ER Investigations**

- Only investigate referrals that clearly meet SDM criteria.
- Investigators will wear masks and gloves whenever possible.
- Interviews will be conducted outdoors when possible.
- Drug tests will be completed only when needed to determine the safety of a child.

- If hospitals are allowing contact, social workers may-in some instances-conduct interviews with adults via telephone rather than in person. SW will consult with supervisor for this determination.
- In person visits between detained children and parents/siblings will be suspended. Whenever possible these will be replaced with FaceTime or teleconference visits.
- Placement only with caregivers that pass the question criteria
  - Do you or anyone in your household have the following symptoms:  
Shortness of breath or difficulty breathing? Fever? Cough?
  - Are you living with someone or have encountered someone who has been told they have coronavirus or told to quarantine/isolate?

### **Federal Case Reviews**

- Interviews will be conducted over the phone and then it will be documented that they were not in person due to COVID-19.

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## **Adult Services**

The following plan gives instruction for all Adult Services programs for DHHS in order to remain responsive and respectful of health and safety of our clients and staff.

### **IHSS**

- Counties are still required to conduct face-to-face needs assessment as required by WIC Section 12301.1(b) and MPP Section 30-761.13 for both initial and annual assessments. However, in Executive order N-29-20, effective immediately and until further notice, IHSS reassessments are suspended for 90 days. <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.17.20-N-29-20-EO.pdf>
- For new IHSS applications, social workers will collect and provide information related to the recipients care needs by phone prior to the Face-to Face Home Visit (HV).
- When the social worker calls to set an appointment for the HV, the social worker should explain the following:
  - Purpose of the call and how the call will be conducted.
  - Purpose of the HV (observe the recipient/home and to obtain signed forms)
  - HV has to be completed and forms signed in order for services to be authorized.
  - SW should conduct the telephone interview in the same manner as if they were in the home.
  - The same information will be required to determine service needs
  - Continue to provide recipients with required information
  - Explain the forms that will be taken to the HV visit

- Prior to completing the HV, the social worker will call the recipient and remind them that they had a scheduled appointment. The social worker will state the following:

Our community's health is our highest priority. During the ongoing flu and respiratory illness season, which includes COVID-19, we are prioritizing safety during our home visits. I need to ask you the following questions before I can visit you today.

- Do you or anyone in your household have the following symptoms:  
Shortness of breath or difficulty breathing\*? Fever? Cough?

\* If yes to shortness of breath, ask if the client is having a medical emergency and ask if they need assistance to call 911.

- Are you living with someone or have encountered someone who has been told they have coronavirus or told to quarantine/isolate?

If a recipient answers yes to ANY of the questions: cancel the home visit. Suggest to the recipient/applicant that they should contact their primary care provider to schedule an appointment.

If the recipient/applicant answers no to all three questions then a HV can be completed. The HV should not be a lengthy visit. SW only needs to make quick observations and have the recipient/applicant sign forms.

- Upon arrival at the HV, SW should again explain the purpose of the visit and complete the following:
  - **Quickly observe the household:** check for health and safety risks to recipient and cleanliness of home.
  - **Observe the recipients functional/mental/cognitive ability:** For example: Could they come to the door? Did they remember you were coming and your purpose? Were they appropriately dressed and groomed or did they appear disheveled?
  - **Have them sign documents:** Can they sign the form? Were they able to understand your explanation of the forms?
  - **Was your observation consistent with what the recipient reported in the phone assessment?**
- If a recipient is unwilling to schedule a HV due to Covid-19, social worker will:
  - Document in case notes the attempt to schedule and note the reason for inability to schedule.
  - Document in comment field #4 "cannot visit"
- If the SW cannot see the recipient/applicant for reasons unrelated to Covid-19, then follow standard procedure for inability to complete home visit (e.g. whereabouts unknown, hospital etc.)

**IHSS State Hearings:**

The State Hearings Division has made a determination that effective immediately, all hearings will be completed via phone until further notice.

**Quality Assurance**

Effective immediately all HV's for Quality Assurance should be cancelled and no new HV's scheduled until further notice.

**Public Authority**

Effective immediately, provider orientations will be cancelled. The Public Authority will work with interested providers on a one-on-one basis. The Public Authority will follow direction from the State regarding enrollment requirements.

**PA/PG**

Many placement facilities are not allowing visitors. If a conservatee is scheduled for a case management visit, the Deputy Public Guardian will participate remotely via conference/video call. New referrals will be evaluated with the investigation being conducted primarily by telephone. The Deputy Public Guardian will practice due diligence in attempting to have a in person interview for their court investigation.

**APS**

- State law requires a face-to-face investigation when an elder or dependent adult is in imminent danger and an immediate or 10 day in-person response is necessary to protect the individual's health or safety. (WIC Section 15763 and MPP section 33-510.1- 33-.510.3) APS will evaluate as always, each report of suspected abuse or neglect. They will continue to evaluate if a HV is required.
- APS will review each referral and if it is determined that the person is not at imminent danger of abuse and that an in –person response is not necessary to protect the health and safety of the vulnerable adult that the referral be labeled as a No in-person response.
- WIC Section 15763(a) states that each county must establish an emergency response APS program that will provide in-person response, 24 hours a day, seven days a week to reports of abuse of an elder or dependent adult... for the purpose of providing immediate intake or intervention, or both, to new reports involving immediate life threats and to crises in existing cases. (WIC section 15763 and MPP section 33-510)

- Reports of imminent danger must, however, be responded to in person. As appropriate, APS social workers should practice social distancing when conducting in-person visits and follow any other applicable public health guidance.

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## Administration

### Accounting

1. Budget
  - a. Changes to County Budget deadline of 4/29/20. New deadline to be determined.
  - b. Staff is continuing to work to on County Budgets.
2. Claims
  - a. No changes to deadlines have been provided
  - b. Staff is continuing to work to meet all deadlines currently
  - c. All claims are submitted electronically with e-signatures.
3. Reports
  - a. No changes to deadlines have been provided
  - b. Staff is continuing to work to meet all deadlines
4. Reconciling
  - a. Staff work daily on assigned tasks
5. Daily Accounting
  - a. Staff work daily on assigned tasks
6. Work Plan
  - a. Without special accesses, it would be difficult for staff to work remotely
  - b. In individual cases, some work could be done at home and provided through email to internal staff to complete required data entry.

### Fiscal

1. EBT
  - a. Eligibility Services are reduced to Emergency Needs only.
  - b. EBT room is restricted to assist emergency needs only
  - c. EBT room will be used by one client at a time because of the size of the client area. Notification is marked on the EBT door.
  - d. EBT cards for non-emergency needs are to be sent by mail.
2. Payments
  - a. Requesting be made by drop box or mail
  - b. If insisting on receipt or using cash—gloves are being used and hand washing
3. Benefits processing
  - a. MEDS tickets are emergency needs and can only be done in-house
  - b. Printing all benefit checks including
    - i. Emergency homeless
    - ii. Adding emergency homeless to EBT card
4. Mail
  - a. Will be handled safely by washing of hands
  - b. All workspace utilized to process mail is disinfected every hour

5. Work plan
  - a. Staff in Fiscal are spaced well and are a small group.
  - b. As long as the auditor's office is processing payments, this group would need to work in-house to complete necessary tasks to have payments made including support for clients.
  - c. Mail run would need to continue in order to deliver necessary documentation to the auditor's office, unless provision is made for electronic delivery alone.

**Staff Services & Support**

1. New Employee Orientation
  - a. Being handled as normal
2. Social distancing recommendations will be observed  
Trainings
  - a. Trainings in house will observe size and social distancing recommendations
  - b. Trainings that required travel have been cancelled until further notice
3. Recruiting
  - a. New Applicant Testing
    - i. Working with CShr and Calhr to postpone or waive testing
  - b. Other processes as usual
4. Leave processing
  - a. Being handled as usual
5. Other assignments are being handled as usual