



Missouri Department of Health and Senior Services

P.O. Box 570, Jefferson City, MO 65102-0570 Phone: 573-751-6400 FAX: 573-751-6010
RELAY MISSOURI for Hearing and Speech Impaired and Voice dial: 711

Randall W. Williams, MD, FACOG
Director



Michael L. Parson
Governor

APS 20-10

March 27, 2020

**MEMORANDUM FOR DIVISION OF SENIOR & DISABILITY SERVICES
ADULT PROTECTIVE SERVICES STAFF**

From: Kathryn Sharp Sapp, Bureau Chief
Division of Senior and Disability Services
Bureau of Policy & Staff Development

Subject: Coronavirus (COVID-19) Procedural Clarification Update

COVID 19 continues to have an impact on every aspect of life. Work on the front line for the Section of Adult Protective Services (APS) staff is profoundly impacted as we strive to keep staff and those we serve safe both from abuse, neglect, exploitation and from transmission of this virus. Further clarification of APS procedures is required following feedback from field staff, which includes:

- Waiving Face-to-Face Contact Clarification
- Clients Located in Facilities
- Suspension of Signing the Privacy Practices Acknowledgement Form and Safety Plan forms

Waiving Face-to-Face Contact Clarification

As mentioned in previous memos [APS-20-07](#) and [APS-20-09](#), APS staff shall not conduct face-to-face visits, including home visits, except in specific circumstances and following supervisory consultation. At this point, **face-to-face contacts are only being completed in very extreme situations** and none shall occur without consultation with the supervisor or manager.

In most situations, the face-to-face contact/home visit requirement will be waived. However, the investigations must be continued by PSU and SIU staff, regardless of whether the face-to-face contact was waived. In order to meet the statutory mandate to conduct a prompt and thorough investigation, PSU and SIU staff must complete necessary interviews and collect appropriate evidence and/or documentation while practicing social distancing.

Staff Concerns Regarding Face-to-Face Contacts:

When discussing the possible need for a home visit, staff must share any and all extenuating circumstances, which may include concerns of risks of exposure. Staff should make their supervisor aware if they feel they or a member of their household may have any underlying health conditions or are otherwise immunocompromised which may place them at higher risk if exposed.

Clients Located in Facilities

Staff shall respect and follow procedures set by hospitals, nursing homes, and other facilities regarding face-to-face contact/visits. Staff shall attempt to make contact with eligible adults located in such facilities

www.health.mo.gov

Healthy Missourians for life.

The Missouri Department of Health and Senior Services will be the leader in promoting, protecting and partnering for health.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER: Services provided on a nondiscriminatory basis.

by phone. If this is not possible, staff shall ensure the adult is located in the facility and safe by talking to a facility staff member, such as a nurse or social worker, or other collaterals via phone. The requirement for a face-to-face contact will *most often be waived* by the supervisor in this situation.

Suspension of Signing Privacy Practices Acknowledgement Form and Safety Plan forms

Effective immediately, staff are no longer required to have the eligible adult sign the Privacy Practices Acknowledgement form, also referred to as the HIPAA form. Staff need to make the client aware of the privacy practices by phone and note the receipt of verbal acknowledgement on the form.

Staff will continue to complete or attempt to complete the Safety Plan with the client *by phone*. Effective immediately, the form does not require a client's signature. Staff shall document the date and time the form was completed with the client on the signature line, in lieu of a signature. The Safety Plan does not need to be mailed to the client unless he/she specifically requests a copy. Staff shall attempt to provide all referrals/phone numbers to the client by phone. However, if the client needs resources mailed to them, staff may include the Safety Plan when mailing requested resources.

[The Safety Plan Forms Instructions – 1707.00](#) has been updated to provide illustration on completing the form electronically.

NECESSARY ACTION:

1. Review this memorandum and policy revisions with all APS staff.
2. All questions should be cleared through normal supervisory channels and directed to: Amanda Veltrop at APSPolicy@health.mo.gov or by calling 573-526-0714.

APS Manual Revisions:

1707.00 Safety Plan Forms Instructions – Updated