



September 18, 2020

Dr. Randall Williams
Missouri Department of Health and Senior Services
912 Wildwood
PO Box 570
Jefferson City, MO 65102-0570

Dear Dr. Williams:

As the country continues to grapple with the ongoing COVID-19 epidemic, Missouri hospice providers also continue to be denied entry into long-term care facilities resulting in their non-ability to care for their hospice patients.

As a follow-up to our previous letter addressing this issue, we wanted to bring your attention to the September 17, 2020 [CMS Guidance - QSO-20-39-NH](#). The information contained in this memorandum supersedes and replaces previously issued CMS guidance and recommendations regarding visitation.

The guidance specifically addresses visitor testing, compassionate care visits, outdoor visitation, indoor visitation, **required visitation**, access to the long-term care ombudsman, federal disability rights laws and protection & advocacy programs, **entry of health care workers** and other providers of services, communal activities and dining and survey considerations.

During this pandemic, after many comments from families and providers, CMS has recognized that visitation should be person-centered, consider the residents' physical, mental, and psychosocial well-being, and support their quality of life. **We could not agree more!**

Specifically related to the following section and due to the ongoing denial of hospice workers entry into many Missouri long-term care facilities, we respectfully request that the Division of Regulation and Licensure and the Bureau of Home Care and Rehab Standards immediately send a memo to all long term care facilities and hospice agencies and specifically address and make clear the CMS guidance related to allowed entry of hospice workers, social workers, and clergy.

Entry of Health Care Workers and Other Providers of Services

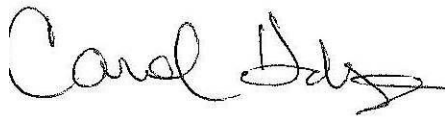
Health care workers who are not employees of the facility but provide direct care to the facility's residents, **such as hospice workers**, Emergency Medical Services (EMS) personnel, dialysis technicians, laboratory technicians, radiology technicians, **social workers, clergy** etc., **must be permitted to come into the facility** as long as they are not subject to a work exclusion due to an exposure to COVID-19 or show signs or symptoms of COVID-19 after being screened. We note that EMS personnel do not need to be screened so they can attend to an emergency without delay. We remind facilities that all staff, including individuals providing services under arrangement as well as volunteers, should adhere to the core principles of COVID-19 infection prevention and must comply with COVID-19 testing requirements.

We feel that without specific direction from DHSS, many long-term care facilities may continue to follow their current restrictions.

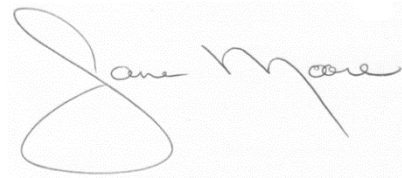
We also request that the Required Visitation and Compassionate Care sections also be highlighted to address many ongoing issues related to the denial of hospice workers and/or families. Many of the patients have months or less to live. Family and friend interaction is so very important to these individuals.

Thank you for your swift attention to this matter. We look forward to hearing from you soon.

Respectfully,

A handwritten signature in black ink, appearing to read "Carol Hudspeth". The signature is fluid and cursive, with a large initial "C" and a stylized "H".

Carol Hudspeth
Executive Director
Missouri Alliance for Home Care

A handwritten signature in black ink, appearing to read "Jane Moore". The signature is cursive, with a large initial "J" and a stylized "M".

Jane Moore
CEO
Missouri Hospice & Palliative Care Association

Cc: Shelly Williamson
Lisa Coots
Bill Koebel
David Lanigan
Craig Schnieders
Governor Parson
Lieutenant Governor Kehoe
Elizabeth Henningfeld (CMS)