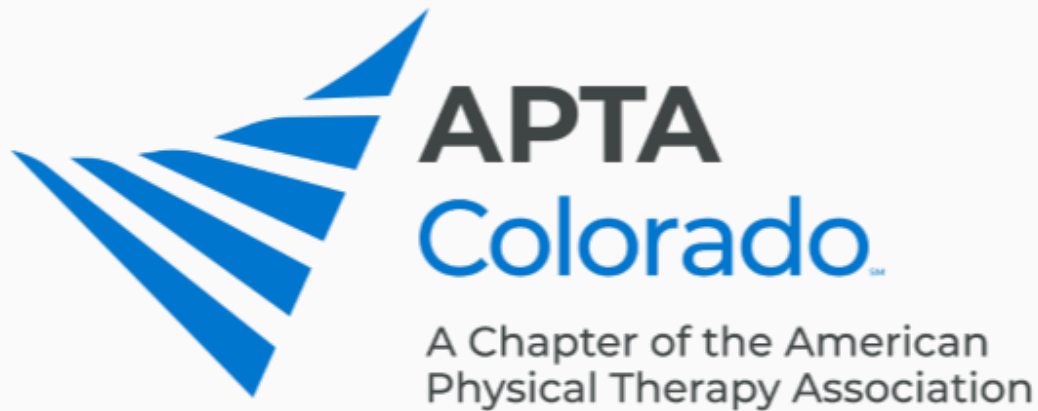


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November 13, 2020

COVID Dial – Public Health Order 20-36 – Chapter Recommendations

On November 2nd the Colorado Department of Public Health and the Environment (CDPHE) issued [Public Health Order 20-36](#) in response to Governor Polis [Executive Order D 2020 235](#). The executive order superseded and replaced Executive Orders Concerning: Protect Our Neighbors, Safer at Home in the Vast, Great Outdoors and Stay at Home and Established Directives for the COVID-19 Dial Framework.

APTA CO is currently working with regulators and the Governor's office to obtain clarity on the requirements for Physical Therapists in the delivery of patient/client care during the current and ongoing COVID-19 pandemic in response to the directives in the EO and the PHO. The current surge in cases is placing high demands on regulators and we are seeking to stay in

communication with key decision makers.

APTA CO encourages all members and physical therapist practitioners in Colorado to be familiar with PHO 20-36 and EO D 2020 235, and to have ready and easy access to the COVID Dial Dashboard

- <https://covid19.colorado.gov/data/covid-19-dial/covid-19-dial-dashboard> .

The Dashboard provides the current status for each county in Colorado on the COVID Dial and by extension the key metrics for current accumulated infection, positivity and hospital admissions which are the key determinants for the current Dial level – green, blue, yellow, orange or red.

As it relates to the current delivery of PT services and the use of PPE, we note that there are two levels of personal contact outlined in the PHO: **close, direct personal contact and low personal contact** with consideration to PHO 20-36. We do note that these have not been specifically defined so APTA CO is putting forth these general recommendations based upon our interpretation of the intent of close, direct personal contact or low personal contact:

Close, direct personal contact: the provision of care where the patient and the provider are in an enclosed space, with direct interaction, that would allow for the transmission of disease due to any of the following:

- Prolonged interaction over 15 minutes or.
- Face to face contact such as with cranio-facial interventions or.
- High intensity exercise interaction with increased ventilation or.
- Sustained supine interventions in the upper half of the body or.
- Managed interactions where body fluid/respiration direct contact is likely such as chest interventions, wound care, pelvic direct care interventions or dry needling

Recommendation: for close, direct personal contact interventions during the COVID-19 pandemic, a medical grade mask is to be worn and gloves used which are unique for each patient.

Low personal contact: the provision of care which does not meet the standard set for close, direct personal contact.

Recommendation: for limited personal contact interventions a cloth face covering is required during the current COVID-19 pandemic; gloves are optional based upon the determination of the provider for the care being provided.

APTA CO further notes that with the new COVID Dial, and the alignment of the protect your neighbors, safer at home and stay at home guidelines, there is concern for PT service delivery under the Red Level – Stay at Home, as it relates to Limited Healthcare Services (LHS - which includes physical therapists). We are in communication with regulators as it relates to the separation of Limited Healthcare Service providers under Stay at home – Level 5/red.

There is a division between those LHS services which are provided under medical, dental or veterinary referral and those which are not. As PT services are provided in both circumstances as direct access healthcare providers, we believe that we are in both categories. We are seeking clarification as it is available, at this time, in advance of the potential of any county entering into level 5/red – Stay at Home category.

At this time APTA CO recommends each practitioner and practice consider if their patient population/clients fall under one or both of these categories for LHS as provided by a physical therapist, and to self-determine the options for delivery of care in person.

Finally, APTA CO recommends that all providers seek to be in contact or aware of local health department regulations as the local health department regulations may be slightly different than those published in PHO 20-36.

Sincerely,



Cameron W. MacDonald
APTA Colorado President



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