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Are You Prepared?

Precautions for Healthcare Organizations: Coronavirus Disease 2019 (COVID-19)



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Too shy? You can also:

Call us at 855-427-0427 or

Email us at support@hcp.md



“He who cures a disease
may be the skillfullest, but
he that prevents it is the
safest physician.”

– Thomas Fuller

BREAKING NEWS FIRST!!

COVID-19 BREAKING NEWS

Coronavirus (COVID-19) has dominated the news these last few months. Each day, new updates come out about COVID-19 and what it means for businesses, employees, and individuals.

COVID-19 is a serious global infectious disease outbreak with more than 222,000 cases and over 9,100 deaths worldwide.

Real Time Reporting : <https://www.arcgis.com/apps/opsdashboard/index.html#/bda7594740fd40299423467b48e9ecf6>

COVID-19 BREAKING NEWS

Healthcare Compliance Pros is tracking this virus by the hour, with Compliance Advisors staying up-to-date with the most recent information about COVID-19 and how it is impacting healthcare entities.



COVID-19 BREAKING NEWS

The White House has issued a statement about “social distancing” to limit all gatherings to 10 people or fewer.



The OCR issued a statement Tuesday, March 17 - OCR will not impose penalties against covered health care providers for the lack of a BAA with video communication vendors or any other noncompliance with the HIPAA Rules that relates to the good faith provision of telehealth services during the COVID-19 nationwide public health emergency.

COVID-19 – What is a Coronavirus?

According to the World Health Organization (WHO), a coronavirus is a type of virus that is transmitted from animals to humans.

- When a new strain first infects humans, it is known as a “novel coronavirus”.

COVID-19 was first discovered in 2019 and is a novel coronavirus.

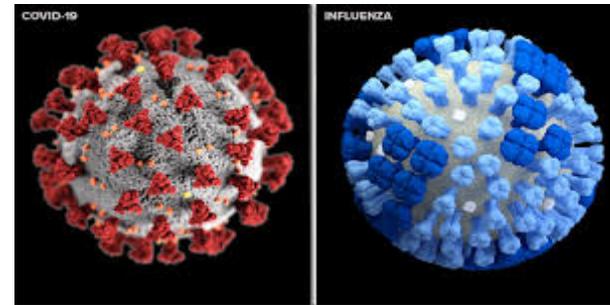
Other illnesses caused by coronaviruses include:

- Severe Acute Respiratory Syndrome (**SARS**)
- Middle East Respiratory Syndrome (**MERS**)

How is COVID-19 Different from other outbreaks?

Much is still unknown, but COVID-19 seems to spread faster than the 2003 SARS.

Both COVID-19 and the flu cause similar symptoms, but the flu is caused by different strains of influenza viruses, whereas COVID-19 is caused by a single virus.



How is COVID-19 Different from other outbreaks?

How is COVID-19 Spread?

The virus is spread from person to person through small respiratory droplets, rather than the air. This, is why the CDC has been stressing the importance of handwashing, the use of antimicrobial gels, and maintaining a safe distance from individuals who are symptomatic.

Masks are unnecessary if you are not unwell or looking after someone who is sick.

The flu typically requires closer contact (e.g., through a sneeze or talking).

Common Symptoms

COVID-19

- Fever
- Cough
- Shortness of Breath

INFLUENZA

- Fever
- Chills
- Cough
- Sore throat
- Runny / Stuffy Nose
- Muscle / Body Aches
- Headaches
- Fatigue
- Vomiting
- Diarrhea

Number of Illnesses and Deaths - Updating

Real time reporting

COVID-19: Over 222,000 reported cases

Over 9,100 deaths

Over 80,000 recovered patients

Again, for real-time reporting, we recommend following the John Hopkins University (JHU) Center for Systems Science and Engineering (CSSE) found here:

<https://www.arcgis.com/apps/opsdashboard/index.html#/bda7594740fd40299423467b48e9ecf6>

Similar Disease Prevention Strategies

Since the disease does spread similarly to the flu, much of the guidance and tools from the CDC include similarities to influenza planning and preparedness including:

- Proper hand-washing procedures
- Effective cleanliness standards issued by the CDC

Employers should work with local and state health departments to ensure appropriate protocols and guidelines are followed.

Similar Disease Prevention Strategies

How it Pertains to PPE:

- Cleaning staff should wear disposable gloves for ALL tasks in the cleaning process.
- Gloves should be removed after cleaning a room and hands must be washed immediately after gloves are removed.
- Cleaning staff should immediately report breaches in PPE such as a tear in their glove or any potential exposure.
- Normal preventative actions must be taken when remote working including hand washing allowing touching one's hands, eyes, or mouth.

What's the Risk?

OSHA has said employers who have not prepared for pandemic events should prepare themselves and their workers as far in advance as possible of potentially worsening outbreak conditions.

A lack of continuity planning can result in a cascade of failures as employers attempt to address challenges of COVID-19 with insufficient resources and workers who might not be adequately trained for jobs they may have to perform under pandemic conditions.

Start with Infection Control Procedures

Infection Control Procedures are a major focus from the CDC, WHO, health departments, and most recently – the Centers for Medicare & Medicaid Services (CMS) on actions to prevent the spread of coronavirus:

“All health care providers must immediately review their procedures to ensure compliance with CMS’ infection control requirements, as well as the guidelines from the Centers for Disease Control and Prevention (CDC)”, said CMS Administrator Seema Verma.

OSHA is Proposing Infectious Disease Rulemaking

Employees in health care and other high-risk environments face long-standing infectious disease hazards such as TB, influenza and MRSA, as well as new and emerging infectious disease threats (e.g., COVID-19).

- OSHA is considering the need for a standard to ensure that employers establish a comprehensive infection control program and control measures to protect employees from exposures to infectious agents that can cause significant disease.
- OSHA believes that a standard is needed because transmission-based infection control guidelines, though readily available, are not consistently followed.

How to Prepare +

Symptoms & Testing +

If You Are at Higher Risk +

If You Are Sick +

Frequently Asked Questions

Travel +

Cases & Latest Updates +

Schools, Workplaces &
Community Locations +

Healthcare Professionals +

Healthcare Facilities +

Health Departments +

Laboratories +

Communication Resources +

✉ Get Email Updates

To receive email updates about
COVID-19, enter your email
address:

Get Your Clinic Ready for Coronavirus Disease 2019 (COVID-19)

Get ready! Steps you take to prepare your clinic for flu also can help protect your patients and healthcare workers from COVID-19.

Before Patients Arrive

- Prepare the clinic.
 - Know which of your patients are at higher risk of adverse outcomes from COVID-19.
 - Consider and plan for providing more telemedicine appointments.
 - Know how to contact your health department.
 - Stay connected with your health department to know about COVID-19 in your community. Step up precautions when the virus is spreading in your community.
 - Assess and restock supplies now and on a regular schedule
- Communicate with patients.
 - Ask patients about symptoms during reminder calls.
 - Consider rescheduling non-urgent appointments.
 - Post signs at entrances and in waiting areas about prevention actions.
- Prepare the waiting area and patient rooms.
 - Provide supplies—tissues, alcohol-based hand rub, soap at sinks, and trash cans.
 - Place chairs 3–6 feet apart, when possible. Use barriers (like screens), if possible.
 - If your office has toys, reading materials, or other communal objects, remove them or clean them regularly.

Train and prepare your staff now.

- Ensure that clinical staff know the right ways to put on, use, and take off PPE safely.
- Recognize the symptoms—fever, cough, shortness of breath.
- Implement procedures to quickly triage and separate sick patients.
- Emphasize hand hygiene and cough etiquette for everyone.
- Ask staff to stay home if they are sick.
- Send workers home if symptoms develop at work.

CDC Information

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/clinic-preparedness.html>

Infection Control Procedures for Healthcare Organizations

CMS, OSHA, health departments, etc. often defer to the CDC when providing guidance.

Because of COVID-19, the CDC released interim infection prevention and control guidance.

The CDC defines infection control procedures as administrative rules and engineering controls, environmental hygiene, correct work practices, and appropriate use of personal protective equipment (PPE). All are necessary to prevent infections from spreading during healthcare delivery.

Infection Control Procedures for Healthcare Organizations

The following are infection control procedures **based on CDC recommendations**; however, we are discussing what is reasonable for healthcare practices such as orthopaedic offices:

Minimize the risk for Exposures

Measures should be implemented before patient arrival, upon arrival, and during the visit:

- When scheduling appointments, instruct patients and any visitors that accompany them to call ahead if they have symptoms of respiratory infection and to take preventative action. Consider posting this instruction on your website.
- Have dedicated room(s) for patients that have symptoms of suspected COVID-19 or other respiratory infections that are isolated away from other waiting patients.

Minimize the risk for Exposures

- Ensure rapid triage of patients with symptoms of suspected COVID-19 or other respiratory infection.
- Provide supplies for respiratory hygiene and cough etiquette.
- Consider signs and posters at the entrance and in strategic places (e.g., waiting areas, elevators, cafeterias) to provide patients, visitors and employees with instructions about hand hygiene, respiratory hygiene, and cough etiquette.
- Practice the recommended social distancing by limiting gatherings to fewer than 10 persons at a time. Check on possible different requirements from local and state governments.

THE PRESIDENT'S **CORONAVIRUS GUIDELINES** FOR AMERICA

15 DAYS TO SLOW THE SPREAD

Listen to and follow the directions of your **STATE AND LOCAL AUTHORITIES**.

IF YOU FEEL SICK, stay home. Do not go to work. Contact your medical provider.

IF YOUR CHILDREN ARE SICK, keep them at home. Do not send them to school. Contact your medical provider.

IF SOMEONE IN YOUR HOUSEHOLD HAS TESTED POSITIVE for the coronavirus, keep the entire household at home. Do not go to work. Do not go to school. Contact your medical provider.

IF YOU ARE AN OLDER PERSON, stay home and away from other people.

IF YOU ARE A PERSON WITH A SERIOUS UNDERLYING HEALTH CONDITION that can put you at increased risk (for example, a condition that impairs your lung or heart function or weakens your immune system), stay home and away from other people.



For more information, please visit

CORONAVIRUS.GOV

DO YOUR PART TO SLOW THE SPREAD OF THE CORONAVIRUS

Even if you are young, or otherwise healthy, you are at risk and your activities can increase the risk for others. It is critical that you do your part to slow the spread of the coronavirus.

Work or engage in schooling **FROM HOME** whenever possible.

IF YOU WORK IN A CRITICAL INFRASTRUCTURE INDUSTRY, as defined by the Department of Homeland Security, such as healthcare services and pharmaceutical and food supply, you have a special responsibility to maintain your normal work schedule. You and your employers should follow CDC guidance to protect your health at work.

AVOID SOCIAL GATHERINGS in groups of more than 10 people.

Avoid eating or drinking at bars, restaurants, and food courts — **USE DRIVE-THRU, PICKUP, OR DELIVERY OPTIONS.**

AVOID DISCRETIONARY TRAVEL, shopping trips, and social visits.

DO NOT VISIT nursing homes or retirement or long-term care facilities unless to provide critical assistance.

PRACTICE GOOD HYGIENE:

- *Wash your hands, especially after touching any frequently used item or surface.*
- *Avoid touching your face.*
- *Sneeze or cough into a tissue, or the inside of your elbow.*
- *Disinfect frequently used items and surfaces as much as possible.*

CORONAVIRUS.GOV

School operations can accelerate the spread of the coronavirus. Governors of states with evidence of community transmission should close schools in affected and surrounding areas. Governors should close schools in communities that are near areas of community transmission, even if those areas are in neighboring states. In addition, state and local officials should close schools where coronavirus has been identified in the population associated with the school. States and localities that close schools need to address childcare needs of critical responders, as well as the nutritional needs of children.

Older people are particularly at risk from the coronavirus. All states should follow Federal guidance and halt social visits to nursing homes and retirement and long-term care facilities.

In states with evidence of community transmission, bars, restaurants, food courts, gyms, and other indoor and outdoor venues where groups of people congregate should be closed.

Enforcing Hand Hygiene

Studies show that some healthcare providers practice hand hygiene less than half of the time they should!

- With heightened concerns over the coronavirus, proper hand hygiene is extremely important to reduce the risk of infection:
- Medical facilities should include proper signage as it relates to providers, employees, and patients.

So, what is proper hand hygiene?

Hand Hygiene

Proper hand hygiene means using alcohol-based hand sanitizer (ABHS) before and after all patient contact, contact with infection material, and before putting on and upon removal of PPE.

Hand hygiene can also be performed by washing with soap and water for at least 20 seconds, however, ABHS is preferred since it is more effective than soap at killing potentially deadly germs. ABHS is also easier to use and may improve skin conditions with less irritation than soap and water.

Be sure that hand hygiene supplies are readily available in every location!

Personal Protective Equipment

Appropriate PPE is essential and is an OSHA requirement. All healthcare personnel must understand how to prevent self-contamination; proper disposal of PPE and where PPE is in your facility. PPE that should be accessible in most facilities include:

- Gloves – make sure proper sizes are available and employees know how to use and dispose of.
- Gowns – recommended upon entry in a room where a patient is suspected of having coronavirus.

Personal Protective Equipment

PPE that should be accessible in most facilities include:

- Respiratory Protection – fit tested NIOSH certified disposable N95 filtering respirators are preferred when in a patient room or care area where a patient is suspected of having coronavirus.
- Eye Protection – CDC recommends goggles or a face shield when entering a patient room or care area where a patient is suspected of having coronavirus.

Manage Visitor Access and Movement

- Visitors must be restricted from entering a room or area of known or suspected COVID-19 patients.
- Visitors should sign in at the front desk, then be escorted into the facility.
- All visitors should follow respiratory hygiene and cough etiquette precautions while in common areas of the facility.

Monitor and Manage Ill and Exposed Healthcare Personnel

Facilities and organizations providing healthcare should implement sick leave policies for healthcare care personnel that are non-punitive, flexible, and consistent with public health guidance.

Healthcare personnel who have a respiratory disease like COVID-19 should stay home if they are sick (except to get medical care).

Healthcare personnel with known exposure to COVID-19 should consult with public health authorities (e.g., local health department).

Training and Education

All healthcare personnel should be:

Provided with job- or task-specific education and training on preventing transmission of infectious agents, including refresher training.

Medically cleared, trained, and fit tested for respiratory protection device use (e.g., N95 filtering facepiece respirators), or medically cleared and trained in the use of an alternative respiratory protection device (e.g., Powered Air-Purifying Respirator, PAPR) whenever respirators are required.

Training and Education (cont.)

All healthcare personnel should be :

Educated, trained, and have practiced the appropriate use of PPE prior to caring for a patient, including attention to correct use of PPE and prevention of contamination of clothing, skin, and environment during the process of removing such equipment.

Environmental Infection Control

Dedicated medical equipment should be used for patient care.

- All non-dedicated, non-disposable medical equipment used for patient care should be cleaned and disinfected according to manufacturer's instructions and facility policies.
- Ensure that environmental cleaning and disinfection procedures are followed consistently and correctly.
- Products with EPA-approved emerging viral pathogens claims are recommended for use against COVID-19.
- Routine cleaning and disinfection procedures (e.g., using cleaners and water to pre-clean surfaces prior to applying an EPA-registered, hospital-grade disinfectant to frequently touched surfaces or objects for appropriate contact times as indicated on the product's label) are appropriate for COVID-19 in healthcare setting.

Reporting Procedures

Your organization should have implemented mechanisms and policies that promptly alert key facility staff such as your healthcare personnel, about known or suspected COVID-19 patients.

Communicate and collaborate with public health authorities.

Promptly notify state or local public health authorities of patients with known or suspected COVID-19.

Facilities should designate specific persons within the healthcare facility who are responsible for communication with public health officials and dissemination of information to healthcare personnel.

What's in your preparedness and response plan?

If one does not already exist, develop an infectious disease preparedness and response plan that can help guide protective actions against COVID-19. Your plan should cover the following:

1. What circumstances will cause your organization to activate your response plan? For example, an outbreak in your community.
2. Consider and address the level(s) of risk associated with working in the healthcare facility and job tasks workers perform at those sites.
3. Consider and address the other steps that employers can take to reduce the risk of worker exposure to COVID-19 in their workplace

What's in your preparedness and response plan?

4. What functions are critical and needed for continuous operations?
5. Special circumstance policies (e.g., sick leave, employee compensation, return to work, etc.).
6. Explain procedures for handling employee absences during an outbreak.
7. If employees can work from home and how they go about doing so?
8. Plan for keeping operations running during an interruption.
9. How your organization will address temporarily closing should the need arise.
10. How your organization will verify employees can return to work and are no longer contagious (e.g., doctor's note). Will we require a doctor's note?

Remote Work To The Rescue! Keep Your Practice Afloat

COVID-19 has been categorized a pandemic by the World Health Organization, prompting many businesses to instruct their employees to work at home until further instruction from the CDC and The White House.

A work-at-home policy must be created and must address the following:

- Policy on work-at-home requirements such as Internet connection speed, chat & conferencing applications, dedicated workspace, strict routine, disciplined & self-motivated.

Remote Work To The Rescue! Keep Your Practice Afloat

- Policy pertaining sick leave and remote illness. What is the policy for a low symptom virus individual?
- What about PHI? If you have schedulers and billers taking patient information, how can you enforce this information is secured and doesn't open your practice up to a serious audit risk?

HIPAA Considerations for Remote Workers

Employees who work from home must comply with the same privacy and security protocols as employees who work onsite within the facility.

- They must still complete training on your organization's HIPAA Privacy and HIPAA Security training.
- It is critical to determine how remote employees will securely access ePHI, including with unique user ID and strong password requirements.

HIPAA Considerations for Remote Workers

- For example, employees will access cloud based EMR with company issued laptop that is encrypted and requires a unique user ID and password to access. Additionally, it would be advisable to ensure termination procedures (such as automatic logoff after 5 minutes of inactivity) and virus-protection software is installed.
- As is the case with all employees, work from home employees must also only access the minimum necessary information needed to perform his / her assigned tasks. And access and changes to ePHI must be logged.

HIPAA Considerations for Remote Workers

- Employees should also avoid discussing or preventing observation of protected health information with unauthorized individuals.
- If employees require the use of a printer for their work responsibilities, it would be appropriate to provide a shredder in order to comply with required PHI destruction practices.

We Can't Offer Remote Work. What Can We Do?

Not all practices will be capable of allowing their staff to work at home, yet they are unable to keep the practice open with the COVID-19 requirements from the federal, state, and local governments.

Check your insurance policy to see if it includes “business interruption insurance.” This insurance may be able to cover revenue lost during closure requirements related to COVID-19.

We Can't Offer Remote Work. What Can We Do?

The Small Business Administration is providing economic and injury disaster loans up to \$2 million in assistance.

Check with your local and state governments to find out what assistance will be implemented. As rules are changing daily, we recommend checking these websites daily.

Contact your lenders to find out what they will charge during this time. The IRS has already announced a delay in tax payment deadlines by 90 days.

Employers - H/R Sick Leave Benefits During COVID-19?

As each state will have different requirements on what employer's responsibilities are, we recommend following your state's specific guidelines.

Families First Coronavirus Response Act - ???

COVID Risk Assessment

LOW RISK, MEDIUM RISK, HIGH RISK –

What does the CDC say you should do?

The CDC has put together interim guidance intended to assist with assessment of risk, monitoring, and work restriction decisions for Healthcare Personnel (HCP) with potential exposure to COVID-19...

COVID Risk Assessment

High-risk exposure

- Anyone who did not wear a facemask and comes in contact with any patients infected with COVID-19.
- Being in the room with a COVID-19 patient in which respiratory secretions were poorly controlled and providers' eyes, nose, or mouth were not protected.

COVID Risk Assessment

Medium-risk exposure

- Anyone who had prolonged contact with COVID-19 patients.
- For example, HCP who were wearing a gown, gloves, eye protection and a facemask (instead of a respirator) during an aerosol-generating procedure would be considered to have a medium-risk exposure. If an aerosol-generating procedure had not been performed, they would have been considered low-risk.

COVID Risk Assessment

Low-risk exposure

- Anyone with brief interactions with COVID-19 patients.
- Proper adherence to currently recommended infection control practices, including all recommended PPE, should protect HCP having prolonged close contact with patients infected with COVID-19.

What to do if we're at-risk?

HCP with no direct patient contact and no entry into active patient management areas who adhere to routine safety precautions do not have a risk of exposure to COVID-19 (i.e., they have no identifiable risk.)

CDC does not recommend testing, symptom monitoring or special management for people exposed to asymptomatic people with potential exposures to SARS-CoV-2 (such as in a household), i.e., “contacts of contacts;” these people are not considered exposed to SARS-CoV-2.

Prevent Spread Using Employee Screening During COVID-19

Many employers need assistance understanding when an employee should be sent home to self-quarantine, and what their risk of exposure is.

Example: My spouse traveled; they are asymptomatic. Should I self-quarantine or continue coming into the workplace?

- In this instance, employers can recommend the employee check their temperature 2-3 times daily to reduce risk of infection and exposure to others.
- If the employee has any temperature increase, they must immediately self-quarantine and notify local and state health departments.

Prevent Spread Using Employee Screening During COVID-19

Example: I suspect contact with someone who has COVID-19 symptoms, how should I handle this?

- Employees with exposure should self-quarantine if exposed to the virus

Have your staff check your temperature 2-3 times daily and immediately self-quarantine if the temperature increases.

Telehealth - Breaking News – HIPAA update from White House

Effective immediately, the HHS Office for Civil Rights (OCR) will exercise enforcement discretion and waive penalties for HIPAA violations against health care providers that serve patients in good faith through everyday communications technologies, such as FaceTime or Skype, during the COVID-19 nationwide public health emergency.

What does that mean for your practice?

- We recommend using HIPAA Compliant video communication

Telehealth - Breaking News - HIPAA update from White House

Under this Notice, covered health care providers may use popular applications that allow for video chats, including:

- Apple FaceTime, Facebook Messenger video chat
- Google Hangouts video, or
- Skype

To provide telehealth without risk that OCR might seek to impose a penalty for noncompliance with the HIPAA Rules related to the good faith provision of telehealth during the COVID-19 nationwide public health emergency.

Telehealth - Breaking News – HIPAA update from White House

Providers are encouraged to notify patients that these third-party applications potentially introduce privacy risks, and providers should enable all available encryption and privacy modes when using such applications.

Under this Notice, however, Facebook Live, Twitch, TikTok, and similar video communication applications are public facing, and should not be used in the provision of telehealth by covered health care providers.

Here are some examples of HIPAA Compliant Video Communication

Covered healthcare providers that seek additional privacy protections for telehealth while using video communication products should provide such services through technology vendors that are HIPAA compliant and will enter into HIPAA business associate agreements (BAAs) in connection with the provision of their video communication products.

The following list includes some vendors that represent they provide HIPAA-compliant video communication products and that they will enter into a HIPAA BAA.

Here are some examples of HIPAA Compliant Video Communication

- Skype for Business
- Updox
- VSee
- Zoom for Healthcare
- Doxy.me
- Google G Suite Hangouts Meet

Note: OCR will not impose penalties against covered health care providers for the lack of a BAA with video communication vendors or any other noncompliance with the HIPAA Rules that relates to the good faith provision of telehealth services during the COVID-19 nationwide public health emergency.

HCP COVID-19 Toolkit

Our [new COVID-19 Toolkit](#) includes several key elements needed to address COVID-19 outbreaks and the possibility of remote-based employees.

Contact your compliance advisor to activate the new modules, and to sign up for the COVID Toolkit which includes:

- Handouts
- Training
- Reporting Forms
- Incident Forms
- Webinars
- CDC Updates
- Tip Checklist

Now's your chance, ask away...

Too shy? You can also:

Call us at 855-427-0427 or

Email us at support@hcp.md



Compliance solved.



stress not included.

Training · Assessments · Support