



BEST PRACTICES

Caring for Residents & Employees During the COVID-19 Outbreak

Even though your organization has always had the required Infection Control Program in place, your team had very little time to prepare for the rapid escalation of the COVID-19 outbreak. Many senior living communities have yet to encounter their first positive test result, but how long will it be before your first resident is diagnosed with this virus? And how will your organization respond?

Below is an outline of strategic measures the CDC recommends in response to COVID-19 crossing your facility's threshold:

- Strict Adherence to Standard and Transmission-Based Precautions
 - Enforce Hand Hygiene by residents and staff
 - Train or retrain staff on proper techniques
 - Audit compliance with training
 - Enforce Infection Control Policies and Procedures
 - Provide Personal Protective Equipment (PPE)
 - Ensure staff are trained on the proper and necessary use of PPE, including disposal of used PPE to prevent exposure and self-contamination
 - Updated guidelines recommend the use of facemasks if an adequate supply of respirators is not available
 - N95 respirators (or respirators with higher levels of protection) are recommended for and should be preserved for use of more invasive care of the resident during which the HCP's susceptibility to exposure is increased
 - When the supply chain is restored, residents with known or suspected COVID-19 should be provided with respirators
 - Goggles, gloves, and gowns need to be available to the specific caregivers caring for infected residents
 - CMS has instructed state surveyors not to issue citations to facilities who run out of PPE despite their best *documented* efforts to maintain an adequate supply of PPE. The CDC's website provides tips and ideas for maximizing a limited supply of PPE
- Resident Placement within the Facility
 - Providers should consider designating of a specific unit, hall, or set of rooms that can be set aside for the care of residents who have contracted the virus (this could potentially limit exposure to other HCPs and help conserve PPE)
 - Each affected resident should be placed in a private, single-person room with the door kept closed
 - Each resident should have a dedicated, private bathroom



- Prepare for staffing needs and have backup staff on standby
- Limit transfer of residents outside of their rooms to only when medically necessary
- Avoid transferring an affected resident to another room while they are being treated for COVID-19
- Implement a Comprehensive Environmental Infection Control Program
 - When possible, utilize dedicated medical equipment for residents with COVID-19
 - Any equipment that must be shared with other residents must undergo cleaning and disinfection per the manufacturer's instructions and the facility's policies and procedures
 - Disinfect high-touch surfaces at least daily with an EPA approved disinfectant
 - Audit environmental cleaning to ensure compliance with infection control procedures
- Implement a Process for Reporting and Communicating with Other Health Care Facilities and with Public Health Authorities
 - Communicate and team up with your local public health authority
 - Contact your local health department for assistance with procuring PPE and necessary supplies, especially when there is a concern of shortage; document this action
 - Consider designating only one or two people from your facility to be in communication with public health authorities to streamline the communication process
 - If transfer of a resident who is suspected to have COVID-19 becomes necessary, ensure that the receiving health care facility is made aware that the resident may be infected with the virus.

Employee/Staff Considerations

Management should post placards and signage throughout the facility, including in employee breakrooms, next to timeclocks, at nurses' stations, at entryways, etc. that reinforce the need for infection control measures, such as proper hand hygiene, coughing etiquette, and other means for controlling the spread of infection. The CDC is an excellent resource for free posters that can be printed and displayed throughout your facility.

If an employee begins to exhibit symptoms of COVID-19, they should be directed to self-quarantine and refrain from coming to the facility. They should be encouraged to seek medical treatment if their symptoms cannot be managed at home. The affected employee should not be identified, as this would constitute a violation of their privacy rights.

Senior living facilities should also be screening their employees for signs and symptoms of infection with COVID-19. CMS is directing employers to conduct screenings of staff for fever and respiratory symptoms at the beginning of their shift, every shift. The screening should also include questions about the employee's possible exposure to COVID-19 outside the facility. Employers need to be diligent in this screening process, taking care to document the completion and findings of each screening.



If an employee begins to show signs of illness during their shift, they should be instructed to immediately don a facemask, and they should be removed from the presence of residents and any other staff. This event should also be immediately communicated to the person(s) responsible for reporting actual and suspected cases of COVID-19 for your facility. The employee should be sent home to self-quarantine or seek medical assistance, as appropriate, based on the employee's risk level.

While it is important to enforce your facility's policies regarding absenteeism and call-off protocols in an effort to be as well-staffed as possible, the CDC is recommending employers be flexible and non-punitive in accommodating employee absences related to illnesses potentially related to COVID-19. Employers may also want to consider relaxing the requirement for a doctor's excuse from an employee who is missing work due to illness, helping to ease an already burdensome patient load on emergency rooms, urgent care centers, and other health care providers. Prior to permitting an employee to return to work, CDC's guidelines regarding an employee returning to work should be followed. Please refer to the CDC's website for more comprehensive information regarding return to work protocols.

Legislative Measures

New legislation drafted in response to the COVID-19 outbreak continues to evolve and be amended. A few highlights of the most recent version of the Families First Coronavirus Response Act (FFCRA) are as follows:

- FMLA is expanded to cover an employee absence that is necessitated by the need for the employee to care for a child (or children) whose school or day care provider has closed in response to the COVID-19 outbreak as long as the employee has been employed with the employer for more than 30 days.
- Employees who need to take more than 10 days off from work related to the COVID-19 outbreak are entitled to 2/3 of their usual rate of pay for the remainder of their FMLA eligibility. This FMLA benefit is capped at \$200/day, however, up to a total of \$10,000, at which point no further pay is available to an employee who remains off work under this FMLA provision. Additionally, the employee must use their paid time off benefits to cover the first 10 days away from work.
- Additional information regarding pay and paid time off benefits related to the COVID-19 outbreak should be researched as necessary and as changes to legislation are enacted.

We have compiled a number of resources in a centralized location and encourage you to check these on a routine basis as information and legislative measures are very fluid. These can be accessed [here](#).

For any additional questions you may have regarding your organization's response to the COVID-19 outbreak, please consult with the CDC, your local Health Department or other public health authority, and the EEOC. Your AssuredPartners team of insurance professionals stand ready to assist you, as well.

The information provided is not intended as legal advice and should not be relied upon in lieu of your own legal guidance. Information regarding your insurance coverage and overall preparedness, can be addressed with your local AssuredPartners broker.