



BEST PRACTICES

Risk Management Action Items Related to COVID-19 Preparedness

- Compose an Action Plan that covers the necessary measures that the facility / community will take to protect its residents from exposure of the virus
 - NOTE: While this is an excellent tool to be used to defend against claims of negligence in preventing the spread of the virus, YOU MUST BE IN COMPLIANCE WITH THE ACTION PLAN or it will do more harm than good in the defense of any potential claim
 - An Action Plan must be accompanied by documentation and evidence that demonstrates that the Plan was followed
- Be mindful of the increasing demand for medication and PPE supplies
 - Reach out to the local Health Department and appropriate state agency for assistance and guidance with supply procurement
 - Document these efforts to prove you were taking action – this will reduce or mitigate any liability and will be valuable information for state survey purposes to prevent citations/deficiencies
 - Remain proactive in procuring supplies and PPE in an effort to maintain a steady supply of required items – document these efforts
- OSHA considerations
 - Ensure that there is adequate supply of PPE for employees
 - Be aware of reporting and recordkeeping guidelines for claims related to employee illnesses
- Understand the REQUIREMENT of immediately reporting suspected cases to the Health Department
 - Ensure that the phone number of your local Health Department is posted in as many locations as possible – take photos as evidence of this
- Consider coordinating an “Emergency Response Team” of qualified staff to respond to the care and reporting requirements of new, suspected cases.
- Print and post (in as many locations as possible) placards and signage from the CDC’s website regarding the virus, any restrictions to visitation (if the visitor is suffering from any form of respiratory illness), and infection prevention recommendations
 - Take photos of the signage and postings to document this effort to keep staff, residents, and family informed about the virus and how to reduce the possibility of exposure to and spread of the virus
- Monitor adherence of staff to infection control protocols
 - Conduct refresher infection control in-services with all staff – document this education
 - Increase the frequency of infection control monitoring/audits
 - Quickly address any breaches in infection control practices
 - Document all audits of infection control practices (times/dates/name of auditor/findings)



- Provide hand sanitizer in as many locations as practical, and document this action
- Consider designating a person or a team of people who will be “on the ground” and tasked with being responsible for infection control education and auditing
- Staffing
 - Ensure your facility/community has enough workers available and on standby to pick up shifts if a scheduled employee calls in or in the event that the needs of the resident population require additional staffing
 - Remind staff of your Policies and Procedures for call-offs and consistently enforce this policy
 - Provide accommodations such as a sleep surface and access to showers for employees who are required to work extended shifts
- Sign up for information alerts from your local Health Department, CDC, CMS, etc. to remain abreast of any developments regarding the virus
- PROACTIVE, early action and response to information from the CDC, Health Department, etc. is crucial.
 - Ensure that all information is timely delivered to all STAFF, RESIDENTS, FAMILY MEMBERS, and ALLOWED VISITORS
 - This can be accomplished by in-house postings and by sending out letters that detail the facility’s/community’s efforts to prevent the exposure of residents to the virus
 - Provide information to educate about how to prevent spreading the virus to others
 - Implement suggested protocols for authorized visitors
 - Ensure that alternative methods for residents and families to communicate are offered, such as Skype, Facetime, etc. if appropriate
- Develop a COVID-19 Response Repository of Documentation
 - Make this the central location for maintaining photographs, communications, audits, etc.
 - This may become an important tool in PROVING measures being implemented during this time.

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.