PICA 2020 COVID-19 Office Reopening Checklist

In response to the COVID-19 pandemic, many healthcare providers are now looking at moving from significantly reduced in-office encounters to gradually phasing into increased patient interactions. In the weeks and months to come, as the pandemic begins to recede, providers will likely have questions about how best to reopen. The unprecedented nature of the COVID-19 outbreak might make navigating this process confusing and stressful, so we have developed the following checklist to help guide you through these uncharted waters.

Yes	FU	NA	STATE AND LOCAL CONSIDERATIONS	Comments/Assignment
☐	☐	☐	Use your states and local governmental offices for guidance.	
☐	☐	☐	Consider a phased opening (e.g., half of normal capacity at first) based on patient demand, staffing, and supplies. See **Proposed State or Regional Gating Criteria**.	
☐	☐	☐	**CDC Recommendations for Evaluating and Testing Persons for Coronavirus Disease.**	
☐	☐	☐	**CDC Clinical Questions about COVID-19: Questions and Answers.**	
Yes	FU	NA	OPERATIONS	Comments/Assignment
☐	☐	☐	Check for updated information from the **Centers for Disease Control and Prevention** (CDC), **Occupational Health and Safety Administration** (OSHA), **Enforcement Guidance for Recording Cases of Coronavirus Disease** (USDL), **Centers for Medicare & Medicaid Services** (CMS), and other authoritative and regulatory agencies on a daily basis for updated recommendations.	
☐	☐	☐	Reinstate any professional liability, general liability, or other relevant business insurance policies and programs that were suspended during the closure.	
☐	☐	☐	Specifically, to your professional liability carrier, notify them about changes to practice (e.g., resuming full-time service, returning to original scope of practice, or permanently adding telehealth services).	
☐	☐	☐	Contact OSHA authorities for mandatory reporting of employee exposure to COVID-19 that results in a positive test. See OSHA's **Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19)**.	
☐	☐	☐	Review changes to billing procedures and billing codes for health insurance plans that the practice accepts.	
☐	☐	☐	Confirm readiness of office support service providers (e.g., cleaning crew, laundry service).	
☐	☐	☐	With assistance of legal counsel, evaluate and update all contracts for appropriate changes based on lessons learned from pandemic-related issues.	
☐	☐	☐	Evaluate your practice's tax return preparation status.	

Yes	FU	NA		Comments/Assignment
☐	☐	☐	Determine whether billing procedures for health insurance plans you accept have changed during your closure.	
Yes	**FU**	**NA**	**INFECTION CONTROL**	Comments/Assignment
☐	☐	☐	Employers of healthcare workers are responsible for following applicable OSHA requirements, including OSHA's Bloodborne Pathogens **(29 CFR 1910.1030**), Personal Protective Equipment (**29 CFR 1910.132**), and Respiratory Protection (**29 CFR 1910.134**) standards. See the **Standards** page for additional information on OSHA requirements.	
☐	☐	☐	Check credible resources, such as the CDC and your state's department of health, on a daily basis for new or revised infection prevention and control recommendations.	
☐	☐	☐	Review CDC's guidance for **Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes**, or **cleaning and disinfecting your facility**, and properly sanitize the office before reopening. **Disinfectants for Use Against SARS-CoV-2**	
☐	☐	☐	Review the cleaning vendor contract for expectations.	
☐	☐	☐	Identify the cleaning schedule moving forward.	
☐	☐	☐	Follow CDC's **return-to-work guidelines** for healthcare workers.	
☐	☐	☐	Verify that returning employees are in good health, that they were not recently exposed to COVID-19, or that they have been appropriately quarantined before returning.	
☐	☐	☐	For employees previously exposed to COVID-19, take their temperature upon entry to the office each day. No-touch thermometers are recommended. Have the employees wear masks.	
☐	☐	☐	Maintain social distancing as necessary. Do not permit congregating in communal areas.	
☐	☐	☐	Re-educate staff on infection control protocols and any other essential practice policies/procedures, including: The **use of PPE** (e.g., donning and doffing techniques). **Hand hygiene** (e.g., washing and avoiding face touching). **Respiratory hygiene.**	
☐	☐	☐	Ensure sufficient supplies of soap, alcohol-based rub, and paper towels are available for reception, waiting areas, patient care areas, and restrooms.	
☐	☐	☐	CDC-approved protocols for **collecting, handling, and testing clinical specimens.**	
☐	☐	☐	Review settings on refrigerators used to store medications and testing supplies. Confirm the temperatures have not registered outside the normal recommended range for proper storage.	
Yes	**FU**	**NA**	**COMMUNICATIONS**	Comments/Assignment
☐	☐	☐	Update your patient portal, website, email, and other communication modes to alert patients that the practice has reopened. Have patients call for appointments to inform initial staffing needs and hours. Depending on need,	

Yes	FU	NA		Comments/Assignment
			consider shorter hours, longer appointment times, and evening or weekend hours.	
☐	☐	☐	Verify with your answering service that all calls/messages have been communicated to the practice.	
☐	☐	☐	Ensure outgoing messages reflect that the practice is open again and include any changes to office hours.	
☐	☐	☐	Acknowledge patient deaths that occurred due to any cause (including COVID-19). Update all patient health records as needed.	
☐	☐	☐	Post signage in appropriate languages at the entrance of the office to instruct patients with respiratory symptoms and/or fever to notify staff immediately via telephone before entering the office.	
☐	☐	☐	Follow up on labs, films, tests, and specialist referrals made prior to the closure, results received while office operations were suspended, or services provided via telehealth. Ensure that patients completed, or are in the process of completing, studies. Review lab reports that arrived via EHR or other communication mode for critical or urgent follow-up issues.	
Yes	FU	NA	**DOCUMENTATION**	Comments/Assignment
☐	☐	☐	Thoroughly document your pandemic circumstances, decisions, and any actions taken to ensure patient care and patient/staff safety.	
☐	☐	☐	If you had limited or no access to your EHR system during your office closure, add any notes to patients' records that were not entered. You may be able to accomplish this by scanning your handwritten notes or emailing those notes into your EHR system.	
☐	☐	☐	Reorient staff to your practice's documentation policies and privacy/confidentiality protocols.	
Yes	FU	NA	**SUPPLIES**	Comments/Assignment
☐	☐	☐	Be suspicious of any offers of PPE, testing, and medication discounts for bulk or group purchase due to fraudulent actors trying to take advantage of the crisis and its aftermath.	
☐	☐	☐	Verify that you have sufficient supplies, either in the practice or readily available, to care for your patients. Be prepared for shortages and delays in supply deliveries.	
☐	☐	☐	Begin to create a stockpile of emergency supplies and establish a rotation schedule.	
☐	☐	☐	Verify that all biomedical equipment inspections are up to date (e.g., automated external defibrillators, diagnostic equipment, radiological equipment, etc.).	
☐	☐	☐	Inventory and check for outdated medications.	
Yes	FU	NA	**BUILDING AND SYSTEMS**	Comments/Assignment
☐	☐	☐	Run tests on the office fire and security alarm systems prior to opening the office to ensure they are functioning normally. Notify your central station monitoring company prior to the tests.	
☐	☐	☐	Ensure exit signs, smoke detectors, sprinklers, and fire extinguishers are in good working condition according to local fire codes.	

				Comments/Assignment
☐	☐	☐	If possible, install engineering controls (e.g., plexiglass barriers) to reduce or eliminate exposure to infected individuals. Consider laminating paper signage or placing signage in plastic sleeves for routine cleaning, adding automatic door openers and air curtains, and replacing electrical switches with motion sensors, where practical.	
☐	☐	☐	Add touchless faucets, flushometers, soap dispensers, and paper towel dispensers.	
☐	☐	☐	Ensure information technology (IT) systems are fully functional and that your electronic health record (EHR) system and office were secure during closure. Be aware of increased cyberattacks as a result of hackers trying to take advantage of this crisis.	
☐	☐	☐	Run a scan on all electronic systems to ensure no breaches have taken place during this crisis.	
☐	☐	☐	Consider establishing one-way ingress/egress routes for office visits, if possible.	
☐	☐	☐	Contact your medical waste management vendor to resume waste disposal services.	
Yes	**FU**	**NA**	**PATIENT SELECTION AND SCHEDULING**	**Comments/Assignment**
☐	☐	☐	Determine the services you will be able to perform safely and those that will be handled via telehealth, where applicable.	
☐	☐	☐	Establish exceptions/special considerations for high-risk patients and train staff on the process.	
☐	☐	☐	Evaluate your current patient educational information to reflect any changes in process or information.	
☐	☐	☐	Establish patient screening processes for COVID-19. Plan to maintain telehealth appointments for any symptomatic patients until they are well for at least two weeks.	
☐	☐	☐	Review patients for recent hospitalizations and discharge summaries that arrived via EHR, mail, or other communication mode.	
☐	☐	☐	Determine how best to handle uninsured/previously insured patients. Create a plan to avoid abandonment; if you plan to see them and bill them, consider at what rate; if you do not plan to see them, ensure you are not violating any contractual or legal obligations by discharging patients. Consult legal counsel related to applicable federal and state laws; consider the patient's clinical status. Terminating a relationship at a critical juncture in care is not advised.	
☐	☐	☐	Consider the patient's clinical status. Terminating a relationship at a critical juncture in care is not advised.	
☐	☐	☐	Schedule patients to ensure social distancing. Encourage patients and person(s) accompanying the patient to call when they arrive in the parking lot then wait in vehicle until called back to meet at office entry door. You may want to keep the main door locked to prevent others from entering.	
Yes	**FU**	**NA**	**TELEHEALTH**	**Comments/Assignment**

				Comments/Assignment
☐	☐	☐	If you used telehealth during the crisis, consider whether you should continue these services following the pandemic, if they will be allowable.	
☐	☐	☐	If you plan to continue offering telehealth services on a new secure platform, determine whether a new patient agreement/consent is necessary. If yes, consider the terms of the agreement, including information about when a virtual visit is appropriate and when an in-person visit is required.	
☐	☐	☐	Review state and federal telehealth laws and regulations, telehealth billing guidelines, and risk management considerations for telehealth.	
☐	☐	☐	Tailor your telehealth practice to evolving guidelines from the Office of Inspector General and U.S. Department of Health and Human Services.	
Yes	FU	NA	**EMPLOYEES & HUMAN RESOURCES**	Comments/Assignment
☐	☐	☐	Establish employee screening processes for COVID-19 (including guidance for self-monitoring for symptoms), and follow CDC guidelines regarding assessment of staff eligibility to return to work.	
☐	☐	☐	Ensure that the office has sufficient personal protective equipment (PPE) to allow staff to perform their job functions in a safe manner.	
☐	☐	☐	Keep in mind that otherwise healthy providers and staff members may not yet be available to return to work. Consider the stress (personal and professional) they might be experiencing because of the pandemic and trying to return to their normal routines. Consider their childcare obligations, including the reopening of daycare centers and schools.	
☐	☐	☐	Assess whether the practice can afford to rehire all employees and review available assistance (e.g., Small Business Administration loans or state loans/grants).	
☐	☐	☐	Ensure that you have sufficient employees to properly staff the office.	
☐	☐	☐	Verify that clinical employees still have active licenses, registrations, and/or certificates.	
☐	☐	☐	Perform background and employment history checks for any new employees hired as a result of staff turnover associated with the closure.	
☐	☐	☐	Thank and praise your team often, and have frequent staff meetings to check on your staff.	