



# COVID-19 Recovery Response Assessment

## Healthcare Organizations

AREA	QUESTIONS
<p><b>Resumption of Elective Procedures &amp; Other Service Lines</b></p>	<ul style="list-style-type: none"> <li>● How can healthcare organizations (“Organizations”) safely increase elective surgery and procedure volumes once restrictions are lifted?                             <ul style="list-style-type: none"> <li>○ Have state or local restrictions on elective surgeries been loosened or lifted?</li> <li>○ Have relevant Medical Boards provided guidance on the resumption of elective services?</li> <li>○ Has the Organization’s geographic region met the Gating Criteria announced by the White House on April 16, 2020 and referenced in <a href="#">CMS’s Recommendations</a> for Re-opening Facilities to Provide Non-emergent Non-COVID-19 Healthcare: Phase 1?</li> <li>○ Does the Organization have the capacity to establish a Non-COVID Care (“NCC”) zone to care for patients’ non-COVID healthcare needs?</li> </ul> </li> <li>● How can Organizations safely staff practitioners who may have been delegated to other service lines for COVID-19 purposes?</li> <li>● Has the Organization implemented policies and procedures to prioritize types of patients and surgical/procedural care and high-complexity chronic disease management in determining which delayed procedures will be performed and in what order and/or groupings?</li> <li>● How can primary care providers prepare to safely resume normal volumes of office visits?</li> </ul>
<p><b>Protective Measures for Workforce</b></p>	<ul style="list-style-type: none"> <li>● Personal Protective Equipment (PPE)                             <ul style="list-style-type: none"> <li>○ What PPE should healthcare providers who have continued to work or are returning to work be required to wear?</li> <li>○ Which, if any, non-clinical staff should be required to wear PPE, and if so, under what circumstances?</li> <li>○ How and by whom is PPE distributed and accounted for?</li> </ul> </li> </ul>



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	<ul style="list-style-type: none"> <li>○ Does the Organization have a sufficient supply of PPE to care for non-COVID patients and staff, while retaining an adequate reserve supply of PPE for a potential second wave of COVID-19 patients?</li> <li>○ What measures should the Organization take to secure the adequacy and security of its supply chain for PPE, testing, and other necessary supplies? What policies and procedures are necessary to implement or compliment these measures?</li> <li>○ Who is responsible for monitoring the Organization’s supply chain for PPE, testing, and other necessary supplies?</li> <li>● Policies and Procedures             <ul style="list-style-type: none"> <li>○ Have policies and procedures for clinical and non-clinical staff use and conservation of PPE been re-evaluated?</li> <li>○ How will new policies concerning the use of PPE be communicated, and how will the workforce be trained on how to use and conserve PPE?</li> </ul> </li> <li>● Should sanitation policies and protocols be reassessed to ensure there is a plan for thorough cleaning and disinfection of spaces and equipment to be used for patients with non-COVID care needs?</li> <li>● When a vaccine is developed to treat COVID-19, may Organizations require all employees to be vaccinated before entering the workplace?</li> <li>● What travel restrictions are in place for employees, and do they need to be modified in light of developing conditions?</li> </ul>
<p><b>Protective Measures For Patients and Visitors</b></p>	<ul style="list-style-type: none"> <li>● Does the Organization need to re-evaluate its policies and procedures for when visitors will be allowed into its facilities?             <ul style="list-style-type: none"> <li>○ If so, should the Organization require patients and visitors to undergo COVID-19 screening and wear their own cloth masks as a condition of entering the Organization’s facilities?</li> <li>○ If so, should the Organization evaluate what social distancing procedures (consistent with state and local rules and guidelines) should be implemented throughout NCC zones to protect patients and staff, such as separating waiting room chairs by 6 ft, limiting the number of persons in any public facility space, and limiting patient visitors and the circumstances under which patients may have visitors?</li> </ul> </li> <li>● Has the Organization ensured that the sanitation policies and procedures described above also apply to public spaces, including waiting rooms?</li> </ul>



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<p><b>Employer Considerations: Determining Who Should Return to Work and When</b></p>	<ul style="list-style-type: none"> <li>• Which employees should be required to be physically present at their place of work?</li> <li>• Is a phased approach to re-entering the workplace advisable, and if so, what will that entail?</li> <li>• Should non-clinical employees who are able to telecommute be required to continue to do so initially, regardless of whether they have been exposed or have symptoms, to help facilitate continued social distancing protocols?</li> <li>• What accommodations should be made for employees at high risk of complications from COVID-19?                             <ul style="list-style-type: none"> <li>○ What if an employee is not at high-risk but fears coming to work?</li> </ul> </li> </ul>
<p><b>Employer Considerations: Keeping Diagnosed, Symptomatic and Exposed Employees Out of the Workplace</b></p>	<ul style="list-style-type: none"> <li>• What testing, isolation, and contact-tracing protocols are in place to proactively monitor the health of clinical and non-clinical employees?</li> <li>• What policies and procedures are in place for when an employee is diagnosed with COVID-19 or exhibits symptoms, and do those need to be modified?</li> <li>• What policies and procedures are in place if an employee reports having been exposed to someone who likely has/had COVID-19, and do those need to be modified?</li> <li>• How can Organization leaders adequately inform co-workers of potential exposure while protecting the privacy of the infected employee?</li> <li>• What policies will be implemented or updated to determine when an employee with confirmed or suspected COVID-19 may return to work?                             <ul style="list-style-type: none"> <li>○ When should symptomatic healthcare providers return to work?</li> <li>○ When should symptomatic non-clinical staff return to work?</li> <li>○ Should the Organization require a doctor's note or serology test, or is a waiting period enough?</li> </ul> </li> </ul>



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<p><b>Employer Considerations: Sick Leave</b></p>	<ul style="list-style-type: none"> <li>• Do sick leave policies need to be reviewed and revised?</li> <li>• What paid sick leave benefits must Organizations provide to employees? Should additional paid leave be provided to encourage sick employees to stay home?</li> <li>• May an Organization advance vacation time and/or paid time off to employees to cover COVID-19 absences?</li> <li>• When may an Organization require an employee to use vacation time and/or other paid time off for absences related to COVID-19?</li> <li>• What state leave laws apply, and have they changed due to COVID-19?</li> </ul>
<p><b>Employer Considerations: Hiring</b></p>	<ul style="list-style-type: none"> <li>• How should the Organization assess its hiring needs for COVID and non-COVID care?</li> <li>• How will interviews occur (in person or remotely)?</li> <li>• May an Organization consider an applicant’s past exposure to or contraction of COVID-19 when making a hiring determination?                         <ul style="list-style-type: none"> <li>○ May an Organization screen job applicants for symptoms of COVID-19 (such as through questions or temperature-screens) during the hiring process?</li> <li>○ May an offer be conditioned on the absence of such symptoms or a negative COVID-19 test?</li> </ul> </li> </ul>



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<p><b>Control and Spillage Issues Related to Protected Health Information (PHI) During Transitions</b></p>	<ul style="list-style-type: none"> <li>● Have HIPAA obligations changed? What is the status of the CMS Section 1135 Waiver and its applicability?</li> <li>● How should Organizations collect and retain PHI and biometrics of returning employees in connection with onsite COVID-19 mitigation measures?</li> <li>● Has the Organization implemented any telehealth platforms, technology, policies, or procedures for which it bypassed its normal security and privacy assessments to respond quickly to the pandemic?             <ul style="list-style-type: none"> <li>○ If so, does the Organization need to re-assess those technologies and platforms?</li> <li>○ If so, will the re-assessment apply to the entire facility, or only to a NCC zone?</li> </ul> </li> <li>● Should Organizations update data privacy and security policies and procedures for employees who are continuing to work on-site, are returning to work, are continuing to work remotely, or are furloughed?             <ul style="list-style-type: none"> <li>○ What should Organizations do to protect the security of the technology, devices, and data collected from a separating or furloughed employee?</li> <li>○ How will the new policies be communicated, and what training will employees receive concerning technology, devices and data security?</li> </ul> </li> <li>● How can Organizations monitor third party vendors who may now have new security vulnerabilities, including additional staff working remotely?</li> </ul>
<p><b>Preparing For Resurgence</b></p>	<ul style="list-style-type: none"> <li>● Does the Organization have a sufficient stockpile of PPE to address a resurgence of COVID-19 or the outbreak of another infectious pandemic?</li> <li>● Does the Organization have a technology, cybersecurity, and privacy crisis response plan?             <ul style="list-style-type: none"> <li>○ What changes in policies and procedures should be made to an Organization's crisis response plan so it can better respond to future pandemics or in case of a COVID-19 resurgence?</li> </ul> </li> </ul>



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	<ul style="list-style-type: none"> <li>• What infrastructure should an Organization have in place to quickly return non-essential, non-clinical staff to remote work if needed?</li> <li>• What infrastructure should an Organization have in place to control infection among and between essential clinical staff and patients?</li> </ul>
<p><b>Post-Pandemic Planning</b></p>	<ul style="list-style-type: none"> <li>• Should Organizations plan a temporary transition to telehealth and alternate sites that are allowed under federal waivers but may not be allowed to continue to operate post-pandemic?</li> <li>• How can Organizations develop revenue cycle strategies to quickly reduce built up A/R after the pandemic?</li> </ul>

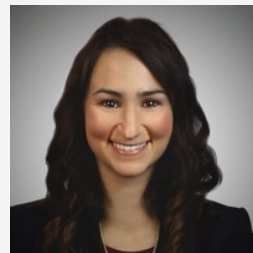
## Healthcare Organizations: K&S COVID Key Contacts



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