

# HEALTHCARE ADVISORY

## Public Health Guidance for Healthcare Providers from ADHS and the CDC



### WHAT YOU NEED TO KNOW

On April 22, 2020, Arizona Governor Doug Ducey issued [Executive Order 2020-32](#), which allows hospitals, healthcare facilities, medical providers, and dental offices that meet certain criteria to apply for approval from the Arizona Department of Health Services (ADHS) to resume elective surgeries delayed under [Executive Order 2020-10](#). Approved providers may resume elective surgeries beginning on May 1, 2020. The [application](#) is available on the ADHS website. ADHS also issued an [informational fact sheet](#) outlining the steps to take in applying for such approval. If a provider receives approval to resume elective surgeries, the provider must retain any records related to the approval for one year.

### STEPS TO TAKE

As providers get ready to resume elective surgeries and continue to provide other medical services, they should carefully review public health guidance from ADHS and the Centers for Disease Control and Prevention (CDC) to help reduce the risk of COVID-19 exposure and spread. Notwithstanding Executive Order 2020-32, ADHS and the CDC recommend that providers use telemedicine whenever possible and consider delaying elective procedures and appointments that cannot be performed through telemedicine.

### PUBLIC HEALTH GUIDANCE

**GENERAL GUIDANCE.** Healthcare providers and facilities operators should:

- Actively screen anyone and everyone for fever and symptoms of COVID-19 before they enter the facility, including staff, patients, family members, vendors, and other visitors. ADHS has issued guidance on a [screening protocol](#).
- Limit visitors to only those essential for patient well-being and care.



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- Consider advising or requiring everyone entering the facility to wear a cloth face covering regardless of symptoms. If the face covering must be touched for any reason, hand hygiene procedures should be implemented immediately before and after.
- Limit points of entry and manage visitors; prevent congregation and limit the touching of surfaces.
- Routinely disinfect common areas and regularly touched surfaces.
- Emphasize hand hygiene and take steps to ensure everyone adheres to respiratory hygiene and cough etiquette. The CDC has issued [visual aids](#) on hygiene practices.
- Install physical barriers at reception areas (glass, plastic windows).
- Ensure proper use of personal protection equipment (PPE) and conduct an inventory of available PPE.
- For inpatient providers, consider ICU capability and surge capacity, and also consider removing students and learners from patient care to lessen risks of exposure and reduce the amount of PPE needed.
- For outpatient providers, consider using telemedicine to treat patients with chronic conditions and for wellness visits. They also should consider adding COVID-19 to the provider's diagnostic arsenal.

**TRIAGE GUIDANCE.** In conducting triage, providers should:

- Prioritize COVID-19 triage and segregate patients with possible or confirmed COVID-19 from everyone else. The CDC has issued a [healthcare provider checklist](#) for arrival and transport of patients with possible or confirmed COVID-19, and ADHS has issued a [clinician fact sheet](#) with information on identifying COVID-19 symptoms.
- Install barriers to limit contact with patients at triage, limit the numbers of staff providing patient care, and prioritize respirators for aerosol-generating procedures.
- Incorporate questions about COVID-19 symptoms into daily assessments of all admitted patients and prioritize testing for patients with suspected COVID-19 who require admission to a hospital or congregate care setting (e.g., nursing home).
- When scheduling appointments for patients requesting evaluation for COVID-19, use nurse-directed triage protocols to determine if an appointment is necessary or if the patient can be managed from home. Patients with mild respiratory symptoms should stay at home. If the patient must come in for an appointment, have the patient call beforehand to inform triage personnel so that appropriate preventive actions can be taken.
- Set up separate, well-ventilated triage areas and place patients with suspected or confirmed cases of COVID-19 in private rooms with the door closed and with private bathrooms (whenever possible).

**MANAGING AND MONITORING HEALTHCARE WORKERS (HCW):**

- CDC guidance on HCW exposure is available [here](#).
- ADHS guidance on HCW exposure is available [here](#).

- HCWs should actively monitor themselves for symptoms. All HCWs and other workers should be screened before their shifts.
- HCWs with suspected COVID-19 should be prioritized for testing.
- HCWs and other workers with COVID-19 symptoms should stay at home and follow quarantine procedures consistent with public health guidance. The CDC has issued guidance on [return to work criteria](#). The ADHS website has additional information about [quarantine procedures](#).
- Any HCW or other worker who develops symptoms consistent with COVID-19 should immediately put on a face mask (if not already wearing one), cease all patient care activities, and begin a quarantine protocol consistent with public health guidance.
- Healthcare providers should implement sick leave policies that are nonpunitive, flexible, and consistent with public health guidance.

## EMPLOYER COMPLIANCE

As businesses reopen and employees are recalled to the workplace, significant compliance and liability concerns may arise. Most healthcare employers are governed by state and federal nondiscrimination statutes and privacy laws. Even a good-faith effort to protect the general workforce may result in impermissible discriminatory actions or violations of privacy protections. Employee accommodations, leave requests, contracts for employment, and collective bargaining agreements all raise significant compliance concerns. Healthcare employers should carefully assess their current policies and contracts when preparing to reopen and while continuing to operate, paying special attention to the public health guidance from the ADHS and the CDC.

## ADDITIONAL RESOURCES

- The CDC has issued [infection prevention and control guidance](#) for medical facilities and healthcare providers, and the CDC website has additional [resources and guidance](#).
- ADHS has issued preparedness letters to [hospitals](#) and [primary care providers](#).
- The ADHS website has additional [resources and guidance](#).
- The CDC has issued [infection prevention and control guidance](#) for dental offices and [guidance for providing dental care during COVID-19](#).
- The CDC has issued [guidance on PPE](#) and [optimizing PPE supply](#).
- ADHS also has issued [guidance on PPE](#) and [optimizing and conserving PPE](#).

## QUESTIONS

Sherman & Howard is here to help healthcare providers and facilities gain clarity and to provide guidance on reopenings. Contact our team [here](#).

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