

Criteria for Resuming Services

II (d). Independent Affiliates/Private Community Providers

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Resuming Services for Independent Affiliated/Private Community Providers in Ambulatory Clinics

Disclaimer:

Trinity Health is providing you with the information in this Section II d to inform you of decisions made and guidance provided by Trinity Health related to its hospitals and practices and may be of value to you in the decisions you must make as you resume or reopen your practice. These resources do not, and are not intended to, provide legal advice, or to eliminate the need for you to consult your own advisors or to make your own decisions regarding what is best for you and your practice.

Trinity Health and your local Trinity Health hospital/clinically integrated network ("Trinity Health Hospital") want to make resources available to you that may help you make decisions to ensure a safe environment for the care of your patients and you. This guidance is provided by Trinity Health and your local Trinity Health Hospital for physicians and clinicians who are in independent practices in the communities we serve.

This guidance represents the best thinking of Trinity Health's clinical leadership and incorporates external resources and recommendations. It is offered to support physicians and practice managers as you consider how to provide patient care in your offices safely during the COVID-19 pandemic and going forward. Separately, information is shared regarding your Trinity Health Hospital's resumption of service process and, specifically, how we are ensuring a safe environment for you and your patients. As a reminder, all physicians and practices can access the Trinity Health COVID-19 resources website, which is updated regularly.

II (d) 1. Independent Affiliated/Private Community Providers in Ambulatory Clinics— Ambulatory Office Visits and Procedures

Telehealth Visits, Ambulatory In-Office Visits, and Non-Urgent Surgery/Procedures

As part of our plan to resume services, we will continue to provide telehealth visits in addition to resuming in-office visits and in-office procedures. Reference CDC and local/state guidance on resuming operations.

Telehealth Overview

Telehealth is the use of electronic information and telecommunication technologies to extend care when the provider and patient are not in the same place at the same time. In most cases, a phone or a device with internet connection is everything needed for the patient to participate in a telehealth visit. A telehealth visit enables the patient to do the following:

- Talk with the provider or care team member live over the phone or video chat
- Send and receive messages from the provider or care team member using chat messaging, email, secure messaging, and secure file exchange
- Use remote patient monitoring so the provider or care team member can check vital signs and other test results to stay informed on your progress and adjust a treatment plan.



For more information on telehealth resources for patients and providers, please visit: https://telehealth.hhs.gov/

Telehealth Visits

Telehealth remains a preferred platform for Trinity Health, and we have included guidance for your consideration. Independent affiliates/private community providers should seek guidance appropriate for their practices.

Conducting telehealth visits should be through secure platforms. During the initial phases of the COVID-19 pandemic, practices and providers were <u>not</u> required to use secure platforms. In the recovery phase, Trinity Health has advised employed practices and providers to transition to secure platforms.

Trinity Health System Office has developed a standard for all employed physician groups to use Zipnosis for asynchronous telehealth visits with a phone step-up. QliqSoft is now the Trinity Health standard for video visits, allowing for real-time (synchronous) telehealth visits between patients and providers. Please refer to the CMS telehealth site for a list of approved telehealth vendors. Please refer to the HHS site on guidance on implementing telehealth in your practice

Telehealth visits remain our preferred method for seeing patients who do not require or prefer an in-person visit. Care should be provided at a safe distance and use telehealth as appropriate per the CDC COVID-19 telehealth guidance. Delivery of telehealth services should comply with Trinity Health's Integrity and Compliance privacy and legal requirements.

- Upon initial contact with the office, patient portal registration is offered and encouraged for bidirectional communication.
- Communication through text, email and video technology should be through secure platforms.
- During the COVID-19 pandemic, MGPS practices and providers were <u>not</u> required to use secure platforms. In the recovery phase, MGPS practices and providers are transitioning to secure platforms which are required.

In-Person Visits

Trinity Health remains open for all patients who would like to have an in-person appointment or for whom an in-person appointment is more appropriate. In-office primary care and specialty care visits are available. We encourage all well children and adolescents to have an in person visit for immunization catch-up and to stay current on CDC vaccination recommendations. Independent affiliates/private community providers should seek guidance appropriate for their practices.

- For all services, patients can contact the office, and we will ensure they receive the
 appropriate appointment in the appropriate care setting. Additionally, the use of in-home
 support is available in place of in-person clinic visits. This includes: remote monitoring
 equipment (BP cuff, thermometer, scale, glucometer)
- Outreach for social influencers of health (SIOH)
- Video dialogue with care team members including: RN, Social worker, pharmacist, community health worker and other non-provider care team members



 Home visits are available to those requiring in home care services such as home health, palliative care, and hospice care.

Outreach to Patients

It is important to conduct routine outreach to patients to ensure their care needs are met. As your practice is resuming services, consider the following outreach strategy.

Identify and contact:

- Patients who canceled appointments.
- Patients who the Primary Care Provider (PCP) or Specialty Care Provider (SCP) practice canceled and did not reschedule.
- Patients who had been advised to schedule a follow-up appointment with their PCP or SCP and did not.
- Patients who were in the process of being seen by a SCP for ongoing treatment and appointments were canceled (e.g., patient with a mass needing evaluation by a surgeon, positive PAP smear).
- Patients who have outstanding diagnostic tests or procedures (e.g., echocardiograms, colonoscopy, MOHS surgery, elective surgeries, and discipline-specific).
- Patients for chronic condition management.
 - Appropriate lab testing (e.g., HgbA1c for diabetes).
- Patients for preventative health visits, including:
 - Adult, pediatric, and adolescent visits well checks, anticipatory guidance, immunizations, and preventive health screening (e.g., breast cancer screening mammograms, colorectal cancer testing, cervical testing, etc.).
 - Medicare Annual Wellness visits.
- All children who are overdue for vaccinations. Per CDC and American Academy of Pediatrics guidance, we should resume vaccinations of all children

In-Office Surgery/Procedures and Procedures at Trinity Health Facilities Guidance

Despite the COVID-19 pandemic, treatment for some patient disease processes cannot be postponed indefinitely. The guidance that follows is intended to assist providers in resuming surgeries/procedures as guided by local and state policy. It is important to be aware of procedures that can be performed are dependent on the availability of staffing, supplies and COVID-Free Zones (well clinics). COVID-Free Zones are areas where we provide care only for people not known to have COVID-19 or COVID symptoms.

There will be variability among providers as to the timing of procedures based on the local incidence of COVID-19. Providers should follow local and state guidance when resuming services for non-urgent procedures. Surgery/procedures must be aligned with applicable municipal, county, and state health authority regulations and executive orders as well as payor and accreditation requirements and federal law.

Trinity Health offers the following guidance to assist providers in determining when to resume **in-office** procedures:



- Ensure facilities in the immediate area can receive patients safely.
- Prior to implementing the start-up of any procedures, all areas should be cleaned according to CDC guidelines.
- All in office procedures for well patients must be performed in a COVID-Free Zone (Well Clinic)
- All in office procedures for patients with known COVID19 or Persons Under Investigation (PUIs), please coordinate with your local HM with appropriate location for service.
- It is recommended not to resume surgical procedures until adequate PPE and medical surgical supplies are available. This determination must be made in coordination with your supply vendor and/or Trinity Health facility.
 - All patients and colleagues must always be masked. Refer to Trinity Health's <u>Ambulatory Masking Policy</u>.

Trinity Health offers the following guidance to assist providers when performing **procedures at a Trinity Health facility**:

- Coordinate with Trinity Health facilities prioritizing cases, OR block times and related processes.
- Provide enough lead time from a scheduled/re-scheduled patient for pre-operative testing to be completed refer to hospital policy.
- Understand any new scheduling processes and pre-procedure testing requirements and paperwork; incorporate into workflow.

Testing Laboratory and Radiology

Resuming routine diagnostic testing must be aligned with applicable municipal, county and state health authority regulations and executive orders as well as with payor and accreditation requirements and federal law. Please check with your local Trinity Health laboratory and radiology locations regarding testing and requirements.

COVID-19 testing

Providers should develop a protocol addressing testing requirements and frequency for testing patients based on local guidance and availability of testing. This protocol should be reviewed and updated as CDC and local guidance is updated.

- An assessment of the availability of COVID-19 tests, including turnaround time for test results, should be performed by each provider with the intention of developing a patient testing protocols for non-urgent surgery/procedure patients.
 - Health care worker testing must be available for those who are symptomatic.
- Conduct any pre-procedure COVID-19 testing outside of designated COVID Free Zones and consistent with Trinity Health and CDC guidance. COVID-Free Zones are areas where we provide care only for people not known to have COVID-19 or COVID symptoms.
- All COVID positive patients, PUIs and persons with infectious symptoms must have testing only in non-COVID Free Zones (Sick/FURI clinic) locations.
- Follow pre-COVID guidance for point of care testing and pre-operative testing.



Personal Protective Equipment (PPE)

This is the Trinity Health Ambulatory Clinic PPE Guidance. If you are interested in learning more on how to prolong the use of PPE, reach out to your local Trinity Health Hospital Infection Control Department.

Trinity Health has developed guidance for PPE use in a COVID-Free Zone (well clinics) and a non-COVID Free Zone.

All colleagues at COVID-Free Zones (well clinics) and non-COVID Free Zones (Sick/FURI Clinics) should wear appropriate PPE and masks.

Providers should not resume ambulatory office visits and procedures or elective surgical procedures until they have adequate PPE and medical surgical supplies appropriate to the number and type of office visits and procedures to be performed. Ensure adherence to standard precautions, including droplet precautions and use of eye protection.

Facility policies for PPE should account for the following:

- Adequacy of available PPE, including supplies required for a potential second wave of COVID-19 cases.
- All policies and training should remain consistent with CDC and Trinity Health guidance.

PPE and Masking for COVID-Free Zones (Well Clinics)

In order to manage mask usage, and to protect our outpatient clinic colleagues and patients, adherence to the following guidelines is required in outpatient offices.

COVID-Free Zone PPE Guidance:

*All colleagues must perform hand hygiene at regular intervals or when hands become soiled. Colleagues must also perform hand hygiene before and after each encounter with a patient.

Role	Required PPE for COVID Free Zone
Colleague (greeter/screener)	Procedural mask
Reception	Procedural mask
Medical Assistant (Rooming, no direct care)	Procedural mask
Nurse (no direct care, triage)	Procedural mask
Nurse or Medical Assistant (patient care)	Procedural mask (other PPE as indicated by
	standard precautions)
Provider (evaluating patients)	Procedural mask (other PPE as indicated by standard precautions)
Patient & Persons Accompanying Patient	Patient and persons accompanying patients must wear a mask. If they do not have one, a cloth mask will be provided.

PPE and Masking for non-COVID Free Zones (Sick/FURI Clinics) Patients:

- If patient arrives in obvious distress, a clinical person must be contacted immediately, and a procedural or surgical mask must be provided to patient if they do not have one. **Discourage the patient from returning to the vehicle.**
- Upon arrival, if the patient is not wearing a mask, ask the patient to put on a mask. Patients may NOT enter the office unmasked.



• Anyone accompanying the patient will be asked to wait in the vehicle.

Colleagues:

• Always wear proper PPE, as recommended by clinic infection control – stay current!

Non-COVID-Free Zone PPE Guidance:

Role	Required PPE for non-COVID Free Zone
Colleague (greeter/screener)	Procedural mask; face shield or eye protection
Reception	Procedural mask and face shield or eye protection; perform hand hygiene before and after each encounter with a patient
Medical Assistant (Rooming, no direct care)	Procedural mask, face shield or eye protection, gloves
Nurse (no direct care, triage)	Procedural mask
Nurse or Medical Assistant (patient care)	Procedural mask, face shield or eye protection, gloves and disposable or reusable gown
Provider (evaluating patients)	Procedural mask, face shield or eye protection, gloves and disposable or reusable gown
Patient & Persons Accompanying Patient	Patient and persons accompanying patients must wear a mask. If they do not have one, a cloth mask will be provided.
Colleague (greeter/screener)	Procedural mask; face shield or eye protection

II (d) 2. Independent Affiliated/Private Community Providers in Ambulatory Clinics— Office and Ambulatory Clinic Operations

COVID-19

Below are the Trinity Health actions and tasks required and recommended to safely care for patients. Independent affiliate and community providers are welcome to consider and adopt this guidance.

For group purchasing information of supplies or PPE please access this link: Group Purchasing Link

Cleaning: Enforce the standard process for cleaning rooms

Note: Ensure staff are trained and focused on high touch surfaces for cleaning:

- Exam tables
- Doorknobs
- Light switches
- Coffee pots and reusable dishware
- Elevator buttons if office practice or clinic is in multi-story facility
- Countertops
- Handles used to operate handwashing sinks,
- Workstations / desks, e.g., reception areas and common use horizontal work areas
- Phones



- Keyboards
- Toilets
- Touch screens
- ATM machines
- Clipboards used for patient registration
- Soap, sanitizer and paper towel or tissue dispensers
- Sinks and faucets

Always follow the directions on the label of any disinfectant to ensure safe and effective use of the product. Many product labels recommend keeping the surface wet for a specific amount of time. The label will also list precautions such as wearing gloves and making sure you have good ventilation during use of the product. Keep all disinfectants out of the reach of children.

• Consult with your Trinity Health hospital infection prevention team for additional guidance.

Supplies: Recommendations based on Trinity Health and CDC guidance and OSHA's standards (29 CFR 1910).

- Boxes of disposable tissues.
- Single-use towels for use throughout the office.
- No-touch waste baskets and disposable liners
- Alcohol-based hand rub for entrance, reception, waiting, patient care and restroom areas.
- Personal protective equipment (see above)
- Appropriate disinfectant for environmental cleaning.

Please see the Disinfectant Wipe Alternative- Ambulatory guideline for more information.

<u>Alternate Substitute Disinfectant Wipes for Disinfection of Inanimate Surfaces (Including Disinfectant Grid)</u>

Business Operations Processes

- Consider new procedures for registration e.g., paperless/online prior to arrival
 - Protocols for paperless and online registration prior to arrival
 - Protocols for patients waiting in their cars until called for their appointment
 - If a waiting room must be used, install controls to reduce or eliminate exposures by shielding staff and other patients from infected individuals. Examples, plexiglass on registration desk, exam room accommodations for sick patients, marks on floor where patients should stand, one-way lines to promote social distancing, removing furniture, magazines, toys in a pediatric office, etc.
- Consider extended hours/days:
 - o to catch up on patient visits or
 - o to accommodate patient needs or preferences
 - o to encourage social distancing



Communication

Communication with patients is critical in order to keep them updated with new practice processes and prepare them to come into the office. Key messages can be most effectively shared by using multiple means of communication: email, website, letters, phone calls, etc.

• Include the message to patients that they should call the office prior to arrival if they have any respiratory symptoms or fever.

Below are examples of Trinity Health communication documents that may be adopted to fit the needs of your practice. Feel free to use your own letterhead, logo, etc.

- Call Center Script
- Front Desk and Registration Script
- Letter to Patient Balance Seeker
- Letter to Patient Willful Endurer
- On Hold Message Script
- Robocall Script
- Recovery Intranet Message
- Direct Mailer
- Handout to Patients
 - Signage:
 - All colleagues, patients, and persons accompanying patients will be screened for respiratory symptoms and fever prior to entry into the clinic.
 - Educational materials will be displayed regarding correct respiratory hygiene and cough etiquette.
 - Educational materials will be displayed regarding handwashing (e.g., in restrooms; staff areas).
 - Links to signs for doors, point of entry, etc.: <u>COVID-19 Resources.</u> (See Restrictions and Signage section.)

Entry to Point of Service

Clinic Arrival & Entry

To ensure we are not introducing known COVID-19 into the waiting room and to enforce social distancing, it is strongly recommended to have a colleague whose function is to greet patients at entry, take patient temperature and ask screening questions, and then to direct patient to ensure they are at the appropriate location.

- Mask all patients upon arrival.
- Colleagues must also wear masks.
- Patient drop-off and escort must meet colleague at the designated entry area.
 - This is specific to each office and the office staff is responsible for communicating this location/area with patients while scheduling the appointment.



- Patients arriving via public transportation are escorted immediately to the exam room after COVID-19 screening and masking.
- Patient is instructed to wait in vehicle until called/texted* to be roomed; if parking lot
 waiting is not applicable, the patient is escorted to clinic waiting area where social
 distancing is enforced. *If patient does not have a mobile device, a staff member will
 notify them.
- After visit, patient escorted to exit.
- Considerations also need to be in place for pick-up of patients.

Screening

- Consider following the guidance provided: <u>Screening at Facility Entrances</u>
- If screening is positive for the patient or person accompanying patient, provider must be
 notified immediately to direct patient to the most appropriate site of care (e.g., tele visit,
 FURI site, testing site, ED) Colleagues identify patient and provide masks if necessary
- The colleague screening set-up must include adequate PPE for all persons designated to use the CFZ entry, as well as signage the aligns with the Ministry Communications Plan.
- Anyone presenting with the following symptoms, the practice should call 911 immediately:
 - Trouble breathing
 - Persistent pain or pressure in the chest
 - New confusion or inability to arouse
 - Bluish lips or face
 - *This list is not all-inclusive.
- If screening is positive for the patient or person accompanying patient, provider must be notified immediately to direct patient to the most appropriate site of care.

Circulation Routes (Ambulatory or Medical Office Buildings (MOB))

To continue to promote social distancing, Trinity Health has designated "circulation routes" to minimize and manage the flow of people traversing the building. Please work with your building manager to implement appropriate protocols. The following are provided for your consideration:

- Single point of entry for all buildings for screening.
- Colleague screens and directs patient flow to all clinical services.
- Directional signage.
- Wayfinding guides, including stanchions with ropes and taped routes on floors.
- Social distancing markers on the floors.
- Ideally, banks of elevators will be dedicated for patient use.

Reception, Waiting & Restrooms

- We recommend a hand sanitizer/dispenser in the waiting room.
- Every effort should be made to eliminate or minimize waiting. The quantity of furniture is to be reduced and spaced at least 6 feet apart in alignment with social distancing requirements.
- Discontinue the use of toys, magazines and other shared items in waiting room areas.



Every effort should be made for verbal or virtual check-in and check-out. When this is
not possible, shared items such as pens, clipboards, phones, etc. must be wiped down
with approved disinfectant between each use.

II (d) 3. Independent Affiliated/Private Community Providers in Ambulatory Clinics— COVID-Free Zone and Non-COVID Free Zone

To reduce the risk of spread of COVID-19, CMS recommends the creation of separate areas for non-COVID-related care. Trinity Health has adopted the CMS recommendation. **COVID-Free Zones are areas where we provide care only for people not known to have COVID-19 or COVID symptoms.** Implementation of these zones will depend on the ability to create a separate physical zone, availability of testing and PPE, and regulatory guidance from the local regional and state policy.

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II (d) 4. Independent Affiliated/Private Community Providers in Ambulatory Clinics—Regulatory Guidance

We recommend everyone to stay up-to-date with local, state, and federal regulations.

Planning Considerations

- Adherence to regulatory and other guidance for non-COVID-19 health care.
- Review and revision of policies and procedures to include COVID-19 considerations (e.g., pre-op checklist documentation, time-out scripts, etc.).
- Continued review of regulatory guidance and recommendations from professional societies and organizations to ensure policies, plans and care delivery is meeting current requirements.

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II (d) 5. Independent Affiliated/Private Community Providers in Ambulatory Clinics—Regulations for Persons Accompanying Patients

As a result of the COVID-19 pandemic and updated guidance from the CDC and CMS, it is required and Trinity Health policy that Trinity Health facilities restrict persons accompanying patients. Clear communication of this policy should be given at the time of booking the appointment and appointment reminder. You may consider and adopt this guidance for your practice.

One Person may be considered to accompany a patient in the ambulatory medical setting under at least one of these special circumstances:

• Person is required for supporting patient, including with activities of daily living such as assisting with ambulation;



- Person has power of attorney or is court-appointed for care of the patient;
- Patient is in serious or critical condition, receiving hospice care, palliative care, or end of life care (compassionate care);
- Person is conducting official government business; and/or
- Person must be a parent, foster parent or appointed guardian of a minor.

Note: If the person accompanying the patient does not meet the above criteria, they should be asked to return to their vehicle and if unable to do so, to wait in the waiting room at an appropriate social distance.

No Person under 14 years of age will be allowed to accompany a patient, unless under special circumstances listed above.

• Patients should be advised NOT to bring children with them to an office visit.

Sick or At-Risk Persons Accompanying Patients Are Not Permitted

No person is allowed to accompany the patient if they have symptoms (fever, shortness of breath, coughing) or other risk factors (travel to endemic area, exposure to confirmed COVID-19 person(s) in past 14 days, pregnant, etc.).

- Anyone with <u>symptoms</u> at the front desk check-in WILL NOT be allowed in patient care areas and WILL be asked to return to their vehicle.
- Patients may be asked to reschedule non-urgent or well care if they or their accompanying person is does not pass the screening test.

Social Distancing in Waiting Rooms and Lobby

It is recommended that patients be directly roomed. However, in instances where this is not possible, social distancing in the waiting room must be adopted and enforced. To prevent waiting room occupancy, offices should implement a "parking lot" waiting room in which patients are registered via a telephone call and called/texted once their exam room is ready.

In the ambulatory space, the following guidelines should be followed:

- Hand sanitizer will be available upon entry of each practice.
- Designated waiting areas should remain empty unless the patient is unable to wait in a vehicle and an exam room is not ready.
- Technology should be utilized to alert patients when it is time to enter the ambulatory area. If the patient does not have a mobile device, a colleague will notify the patient when it's time to enter the office.
- Unless requiring an accompanying person, patients should enter the ambulatory space alone and be taken immediately to an examination room.

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II (d) 6. Independent Affiliated/Private Community Providers in Ambulatory Clinics—Building Infrastructure Systems



Water Safety management

- Prior to resumption of services and building occupancy, assess the duration in which the water systems in the building have not been in use:
 - o If > 2 weeks, flush potable water lines by turning on hot water at fixtures in exam rooms, public restrooms, and at other areas, e.g. point of care lab testing, medication room, etc., and let the water run continuously for at least 10 minutes. Fixtures in Environmental Services (EVS)/janitor closet do not need to be flushed.
 - o If < 2 weeks, no flushing is needed. Resume normal operations.
- Drinking fountain / water Bottle filling station
 - No need to restrict use related to COVID-19
 - o If drinking fountain and or bottle filling station has been unused for > 2 weeks:
 - flush for 2 minutes before bringing back online
 - If building occupancy is low or not in use; recommend periodic flushing by EVS/janitorial services, e.g. at least once/week. If building has been closed, flush drinking fountains and bottle filling stations for 2 minutes prior to re-occupancy of the building
- Ornamental fountain (water feature) decommission and stop use.
- Ice machine: If ice machines not in used for more than 2 weeks perform preventive maintenance, cleaning and disinfection based on the ice machine manufacturer's instructions and remove any charcoal filter if installed.

For more guidance on the following, please refer to the COVID-19 Recovery Guidebook for Resuming Services:

- Water Safety Management
- Heating, Ventilation and Air-conditioning System
- Facility System Reactivation and Regulatory Compliance
- Clinical Support Services:
 - o Portable medical equipment
 - Technology
- Environmental Services

MAINTENANCE & SERVICE VENDORS

Communicate with all vendors, deliveries should only be accepted outside the office. Consider restrictions on vendor access.

Any maintenance and/or service vendors should follow the same masking and screening protocols as patients and persons accompanying patients' policies.

