REOPENING YOUR PRACTICE IN THE WAKE OF COVID-19: RISK MANAGEMENT CONSIDERATIONS FOR PLAY THERAPISTS
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IMPACT OF CORONAVIRUS (COVID-19)

- Varied Regulations (stay-at-home, shelter-in-place, mandated masks in public, etc.)
- Offices, clinics closed down
- Hospitals restricted non-emergent visits/appointments
- Changing practice: patients seen via telehealth versus in person

REOPENING CONSIDERATIONS

• CDC/Federal Government Opening Guidelines

• Local Orders (state, regionally within state)

• Risk Management Considerations for Play Therapists
  – Follow Current CDC Guidelines, Applicable State/Federal Regulations (whichever is most restrictive), check APT guidance/website
  – If employed by a clinic or hospital, know if policies/procedures have changed

RISK MANAGEMENT CONSIDERATIONS WHEN REOPENING

• Should you reopen?
• Health & safety of you, your staff, and your patients
• Implement changes, safety precautions to reduce risk
RISK MANAGEMENT CONSIDERATIONS WHEN REOPENING

• Consider your comfort level when reopening
• Determine your risk
• Determine your patients’ risk
• Open office or visits via telehealth?
• Part-time hours?
DEVELOP NEW OR REVISED OFFICE POLICIES AND PROCEDURES

- Use of Personal Protective Equipment (PPE)
- Revised/new infection control procedures
- Social distancing guidelines
- How many individuals can be in the office at the same time?
- Waiting area requirements/patient check-in process

PRE-SCREENING OF PATIENTS/PARENTS/ACCOMPANYING ADULTS

• Telephone Pre-Screening (with adult with legal authority and/or patient)
  – Temperature check (at time of scheduling, before he/she leaves house for appointment). Should include the accompanying parent/adult
  – Ask questions about:
    ▪ Travel to certain high-risk areas
    ▪ Contact with someone known to have had COVID-19
    ▪ Whether the person has been under quarantine and when
• Remind the patient and his/her accompanying parent/adult not to come into the office if he/she has:
  – A fever
  – Shortness of breath
  – Coughing
  – Gastrointestinal issues and/or
  – Other symptoms associated with COVID-19

• Screening Upon Arrival
• Ensure parent/adult has legal authority to sign documents upon arrival
• New patients
STAFF TRAINING

- Prior to reopening, meet with staff
- Address questions, concerns, discuss ideas/strategies
- Ensure they are aware of new or revised policies/procedures
STAFF SCREENING

• Consider screening staff each work day
• Issues pertaining to COVID-19 such as:
  — Symptoms
  — Travel
  — Contacts
• If potential exposure, follow CDC recommendations
• Staff should be aware how to notify the office if they are ill
• Develop a tracking log

- Determine if PPE is indicated
- Review/follow Occupational Safety and Health Administration (OSHA) guidance
- Develop an Infectious Disease Preparedness and Response Plan

CLEANING

• Implement a routine cleaning policy
  – Review and follow OSHA’s guidelines
  – The Environmental Protection Agency (EPA) has a list of cleaning products effective against COVID-19
  – Determine how the office will be sanitized
  – Ensure staff is aware of the process and know who is responsible

FACILITY CONSIDERATIONS

• Avoid patient-to-patient contact
  – Separate entrances, when possible
  – Limit how many are in the office at the same time
  – Request that patients wait to enter the office until the time of their appointment

• Determine if your office needs to be rearranged
  – Rearrange chairs, if indicated
  – Remove items
  – Use toys that can be wiped down after each use

• Alter payment procedures
REPORTING

• Know how to report a potential COVID-19 case/exposure
• Be aware of how to contact local public officials if:
  – You suspect a patient/staff member may have COVID-19
  – You were notified that a patient/staff member was in your office and has been diagnosed
  – There was exposure to your office

PATIENT NOTIFICATION

• Develop and mail a letter to all patients (with minors, to their parent/legal guardian) and include:
  – Changes in your practice
  – Safety precautions that the office is taking
  – Explanation that the office will be implementing phone pre-screening for each scheduled appointment
  – New policy for check-in, waiting areas, screening

• Update your website

• Post notices on the door and in the office
ADDITIONAL PATIENT CONSIDERATIONS

• Consider prioritizing patients based on need
• Know responsibilities under the Americans with Disabilities Act

Sources: National Network Information, Guidance, and Training on the Americans with Disabilities Act, “What is the Americans with Disabilities Act (ADA)?” https://adata.org/learn-about-ada; ADA Title III Regulation 28 CFR Part 36.03
ADDITIONAL PATIENT CONSIDERATIONS: REPORTING OBLIGATIONS

• Know the rules in your state and if the patient is in another state, know the rules in that state

• All states require allied healthcare professionals to report suspected child abuse

• Be aware of signs:
  – Change in demeanor
  – Withdrawn behavior
  – Bruising
  – Change in appearance
  – Weight loss, indication that the minor is hungry

• Document thoroughly

• Know how to contact your state child abuse and neglect hotline

• Know local/community resources
TELEHEALTH

- Consider telehealth, when possible
- Know if you can engage in telehealth in your state
- If your patient is located in another state, know the rules in that state
- Be aware of current emergency orders regarding telehealth
- Be up-to-date if the rules change
RISKS WITH TECHNOLOGY

• Be aware of new/emerging risks
• Know relaxed privacy rules (HIPAA/states)
• Have a security system in place to minimize security breaches
• Exercise due diligence

FBI WARNING: ZOOMBOMBING

• “Do not make meetings or classrooms public. In Zoom, there are two options to make a meeting private: require a meeting password or use the waiting room feature and control the admittance of guests.

• Do not share a link to a teleconference or classroom on an unrestricted publicly available social media post. Provide the link directly to specific people.

• Manage screensharing options. In Zoom, change screensharing to ‘Host Only.’

• Ensure users are using the updated version of remote access/meeting applications. In January 2020, Zoom updated their software. In their security update, the teleconference software provider added passwords by default for meetings and disabled the ability to randomly scan for meetings to join.

• Lastly, ensure that your organization’s telework policy or guide addresses requirements for physical and information security.”

THIRD PARTY CONSIDERATIONS

- Ensure your vendors respect your office practices
  - If you require PPE/social distancing, vendors entering/exiting your office should do the same
- Maintain open communication with vendors
- Review vendor contracts
INFORMED CONSENT

- Addendum to Informed Consent Document
- Consult with your legal advisor
INFORMED CONSENT: MINORS, SPECIAL CIRCUMSTANCES

• Ensure the person consenting has authority

• When indicated, ask for documents

• Unless emergent, wait to initiate treatment until received
CONCLUSION

• It is important to stay connected and informed
• Be knowledgeable regarding pertinent regulations/rules
• Be aware of guidance from the APT, the CDC, and federal and state governments
• Consult with colleagues
• Minimize risk to you, your staff, patients and families
• Seek guidance
THANK YOU

For our Allied Healthcare COVID-19 Resource page, please visit:
https://www.trustrms.com/Resources/COVID-19-Resources

For our Allied Healthcare Blog and Articles, please visit:
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