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Physician's Office Guide to Reopening

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As many parts of the country see lower and stable incidence rates of COVID-19, medical practices are taking steps to reopen or expand clinical services within their physical offices. This guide provides practical advice for reopening and expanding safely during unprecedented times.

General Considerations

- Follow federal, state and local requirements and guidance documents. Each jurisdiction has its own set of requirements and they are regularly being updated. Continue to stay apprised of new information and adjust accordingly.
- Open incrementally following a step-by-step approach to allow the medical practice to quickly identify and address challenges as they arise.
- Develop a modified patient schedule to permit only minimal daily in-person office visits. This may involve a modified work day with more time to turn over examination rooms and between patient visits.
- Limit patient companions to individuals whose participation in the appointment is necessary.
- Ask patients, their companions and employees to wear masks at all times (where clinically appropriate).

Telehealth; In-office Encounters

- Clinical services should continue to be provided via telehealth where appropriate. Confirm payor reimbursement protocols.
- For in-office patient visits, staff should call the patient the day before their appointment to review the practice's reopening protocols and orally screen the patient for COVID-19 symptoms.

Testing

- When a patient arrives for their appointment, the patient and their companion should be screened for COVID-19 symptoms prior to entering the office. A questionnaire may be helpful. Checking individual's temperature may be a good practice.
- All staff should be screened for COVID-19 symptoms and provide immediate notice to the practice manager if the individual has been exposed to anyone who has tested positive for COVID-19.

Personal Protective Equipment (PPE) and Other Supplies

- Ensure adequate availability of PPE for physicians and staff. If possible, have supplies delivered to the office before the office opens, during lunch break or after hours to minimize deliveries and visitors to the office.
- Regularly inspect, maintain and replace PPE.
- Provide training to staff on how to use, wear, take off and dispose of PPE correctly.
- Provide masks to patients and visitors to the practice who do not have one.

Workforce

- Staff who do not need to be present in the office should stay home and work remotely.
- Employees should come back to the office in phases, working alternating days or shifts to reduce the number of people in the office at any given time.
- Communicate personal health requirements clearly to employees. Employees should not come to work if they have COVID-19 symptoms or have been in direct contact with a person who has tested positive for the virus.

Facility Considerations

- Ensure waiting rooms are set up to allow for social distancing, including opening additional waiting areas if feasible, spacing chairs six feet apart, and installing clear plastic shields between staff and patients
- Post signs throughout the office and at the entrances reminding patients of social distancing policies.
- Consider rearranging open work areas to allow employees to work at a distance from each other.
- Visitors to the practice such as vendors, salespersons and suppliers should be strictly limited. Visitors who must enter the practice (e.g., for necessary repairs or deliveries) should be scheduled during a time when no patients and few staff will be present.
- To the extent possible, maximize the distance between the patient chair and provider chair to avoid any unnecessary exposure. Distancing should be maintained for all non-touch interactions between provider and patient.

Safety Measures and Sanitation Protocols

- Establish cleaning schedules and protocols to clean shared spaces such as kitchens and bathrooms.
- Ensure patient waiting and reception areas are cleaned regularly.
- Provide hand sanitizer, tissues and gloves in patient waiting areas.
- Provide employees with no-touch trash cans, hand sanitizer and disinfectant wipes to allow employees to regularly wipe down surfaces.
- Post hand-washing signs in restrooms.

Medical practices should continually review federal, state and local requirements and guidance and evaluate options to ensure the safety of providers, staff, patients and any visitors. Remain flexible to continue to enhance safety protocols. Unlike turning on a light switch when full light is instantaneous, it is very unlikely that any medical practice will revert to their same patient volume and protocols immediately. Most medical practices will gradually expand capacity – and patients and staff need to feel safe when visiting the office. Be cautious when reopening an office or expanding capacity.

Saul Ewing Arnstein & Lehr attorneys can help health care providers navigate the challenges of providing health care services during the COVID-19 pandemic. For questions about how to implement a safe reopening plan, please reach out to the authors of this article.

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