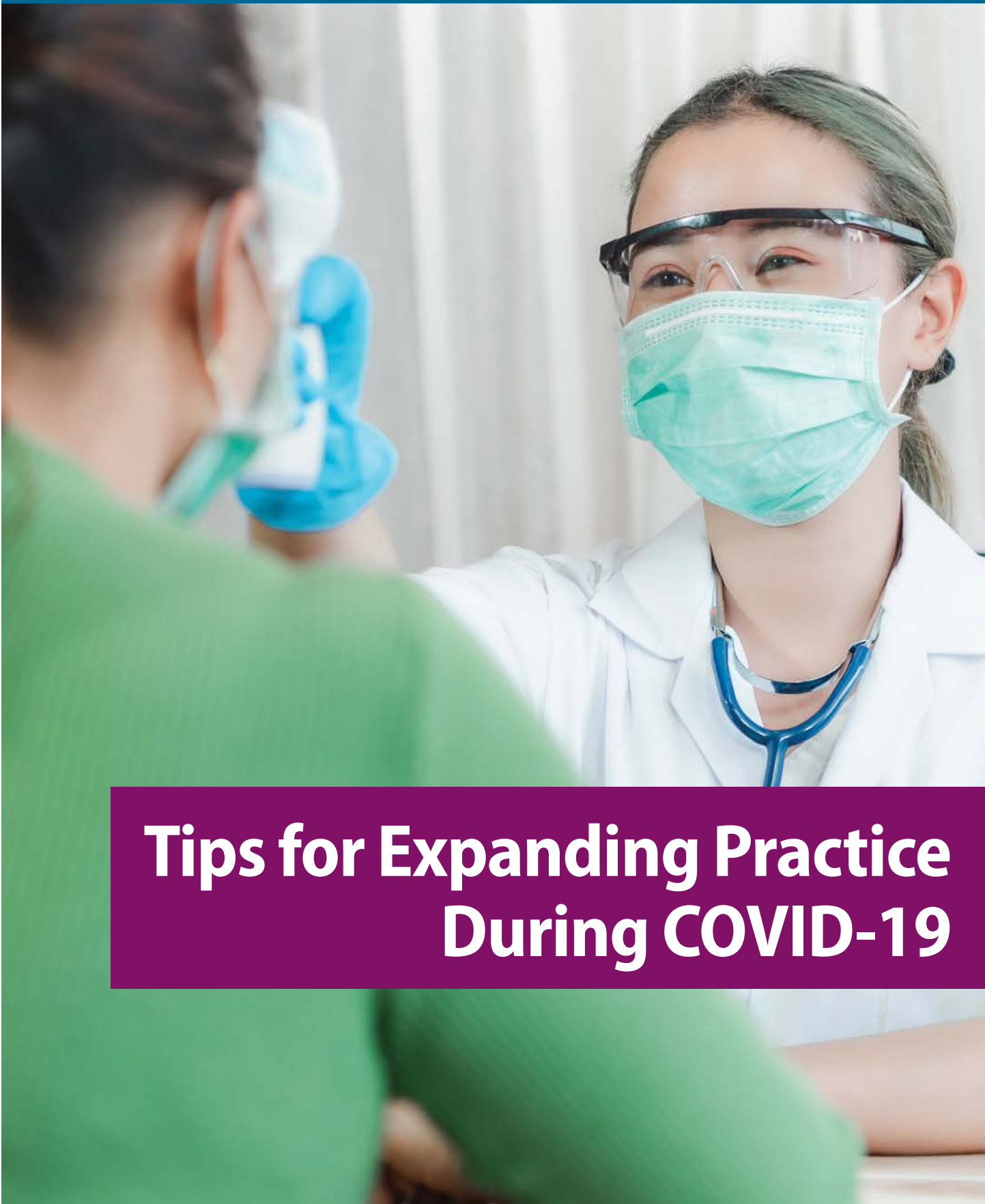




MASSACHUSETTS  
MEDICAL SOCIETY

June 2020

Including Phase 1 and Phase 2: Cautious Guidance  
DPH Reopen Approach for Health Care Providers  
(Providers that are Not Acute Care Hospitals)



**Tips for Expanding Practice  
During COVID-19**

# Acknowledgments

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## ***Tips for Expanding Practice During COVID-19* was created and is updated regularly by the MMS Department of Practice Solutions and Medical Economics**

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*This is not legal advice. Each practice should exercise its own independent judgment regarding whether, when, and how to expand operations.*

On May 18, 2020, the Baker Administration released its Phase 1 plan for reopening Massachusetts. [Phase 1 is part of a four-part phased opening. Phase 1 requirements must be met to proceed to Phase 2. Attestation forms for Phase 1 must have been completed and a cumulative attestation for Phases 1 and 2 will also be needed in order to proceed with Phase 2.](#)

Building off the Phase 1 Guidance, the DPH issued further guidance for how health care providers that are not acute care hospitals can resume in-person provision of additional services and procedures in **Phase 2: Cautious** without jeopardizing health system capacity or the public health standards that are essential to protecting health care workers, patients, families, and the general public beginning on **June 8, 2020**. This guidance does not apply to emergency care, which has been ongoing and will continue without limitation. The DPH recognizes the importance of ensuring that this guidance promotes equitable access to care, including high-priority preventive care, across all communities and patient populations, including low-income communities, communities of color, children, and individuals with disabilities. In addition, health care providers **must attest** to and continue to be in compliance with the public health and safety standards described in Phase 1 Guidance, including specific criteria related to a) personal protective equipment, b) workforce safety, c) patient safety, and d) infection control and with Phase 2 Guidance.

The initial and ongoing implementation of this guidance is contingent on Massachusetts meeting a range of relevant capacity and public health metrics. Ongoing performance on these measures will inform additional reopening decisions for future phases (DPH Phase 2 Cautious Guidance).<sup>1</sup>

The following document, which will be updated regularly, is meant to provide tips for physicians' offices as they continue to expand operations. The goal is to allow practices to serve their patients and care for their staff in a trusting and safe manner.

An earlier version of this document is available that includes only Phase 1 Reopening Guidance. To access the earlier version of this document, please click [here](#).

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## SECTION 1: KEY STEPS TO CONSIDER FIRST

### 1. Assess the Supply of Personal Protective Equipment and Cleaning Supplies

The federal [Centers for Disease Control and Prevention \(CDC\)](#) and the [Massachusetts Department of Public Health](#) have released guidance around the use, conservation, and distribution of personal protective equipment (PPE). For the most recent Comprehensive PPE Guidance from the Department of Public Health,

please click [here](#). For a list of vendors offering relevant hygienic and protective supplies for the workplace, please click [here](#). In addition, health care providers must meet the following three standards related to PPE supply:<sup>2</sup>

1. Health care providers must ensure that they have adequate supply of PPE and other essential supplies for the expected number and type of procedures and services that will be performed. To meet this requirement, providers may not rely on additional distribution of PPE from government emergency stockpiles.
2. Health care providers must take reasonable steps to maintain a reliable supply chain to support continued operations.
3. Health care providers must develop and implement appropriate PPE use policies for all services and settings in accordance with DPH and CDC guidelines.

Designate a staff member to keep your office up to date on PPE and cleaning supply guidelines and requirements. For a list of disinfectants that qualify for use against COVID-19, please click [here](#).

### 2. Determine Practice Need or Availability to Perform COVID-19 Testing

Whether to perform COVID-19 testing may depend on practice specialty, location, and supplies, particularly appropriate PPE. If your practice will not be performing testing, ensure that your staff members know where to send patients for proper testing. For a comprehensive list of COVID-19 testing sites in Massachusetts, please click [here](#) for information.

### 3. Determine Services That Will Be Performed in the Medical Practice, and Those That Will Be Performed via Telehealth

If the statewide criteria and public health and safety standards have been met in accordance with the [Phase 1 Guidance](#), a health care provider may incrementally begin in-person delivery of in-person elective, non-urgent procedures and services, including routine office visits, subject to the following requirements and limitations. Health care providers must establish and adhere to a written prioritization policy for Phase 2 non-urgent care and scheduling. Health care providers must use their clinical judgment and their prioritization policy to determine which in-person services meet the criteria

<sup>1</sup> [www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download](http://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download)

<sup>2</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

outlined below for in-person services in Phase 2. The prioritization policy should promote equitable access to care for all populations, without regard for patient's insurance type.

The health care provider's prioritization policy for scheduling and delivery of Phase 2 services must include the following six requirements:

1. Health care providers should continue to prioritize the use of telehealth services where clinically appropriate and feasible for a given patient. During the COVID-19 pandemic, many practices successfully made the switch to seeing patients via telehealth. For more information on telehealth, please visit the [Telehealth and Virtual Care](#) section of the MMS COVID-19 website.
2. For in-person services and procedures, health care providers should prioritize high-priority preventive services, pediatric care and immunizations, and urgent procedures that would lead to high risk or significant worsening of the patient's condition if deferred, as described in [Phase 1 Guidance](#).
3. Health care providers should then identify and prioritize the patients and services that, based on the clinical determination of the hospital or hospital system and its providers, are most critical and time sensitive. In identifying patients and services and making its clinical determination, the health care provider should prioritize patients and services that meet the following criteria:
  - a. Patients with acute illnesses that cannot be addressed through telehealth
  - b. Patients with chronic illness, including but not limited to those that put patients at higher risk for complications from COVID-19
  - c. Patients with behavioral health conditions, disability, and/or risk factors related to social determinants of health, without regard for patient's insurance type
  - d. Adult preventive care clinically necessary to be performed in-person (including screening/diagnostic procedures)
  - e. Patients with progressive conditions that will worsen without surgery or other intervention, or whose symptoms negatively affect their quality of life or ability to perform daily activities
  - f. Patients needing in-person visits to monitor health status or assess progression of illness
4. Health care providers should consider deferring certain non-essential, elective procedures and services such as those that do not meet the prioritization criteria previously mentioned and which are likely to produce high concentrations of respiratory droplets (aerosolization) and/or that could require or result in the use of a significant level of certain health care system resources (e.g., PPE and pharmaceutical supplies in short supply; transfusions; general hospital, ICU, and/or post-acute admissions).
5. Health care providers may provide in-person group treatment for behavioral health within the following parameters:
  - a. Telehealth and/or in-person one-on-one treatment should be prioritized in lieu of group therapy when clinically appropriate
  - b. In-person group treatment should only be utilized when, in the clinical judgment of the provider, the benefit significantly outweighs the risks for the participants, taking into account each individual's circumstances and medical and social risk factors
  - c. No more than six people may be present in a single group treatment session or room, including participants, facilitators and/or treatment providers
  - d. Rooms must be configured to ensure social distancing of at least six feet
  - e. No food or drink may be served
  - f. No physical contact or sharing of materials during a session
  - g. In-person group treatment sessions should be limited to the minimum amount of time that the provider determines is clinically effective (e.g., 60–90 minutes or less)
  - h. Providers must adhere to all other public health and safety standards described in this guidance and any other relevant guidance from the CDC and DPH
6. Health care providers should not deliver the following services in Phase 2 and should postpone scheduling to future phases: 1) elective cosmetic procedures, and 2) day programs (DPH Phase 2 Guidance).<sup>3</sup>

During Phase 2, health care providers should take steps to cautiously and incrementally resume non-essential, elective invasive procedures and services.<sup>4</sup>

Specifically, for all non-essential, elective invasive procedures and services, providers must attest to

<sup>3</sup> [www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download](http://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download)

<sup>4</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

monitoring patient volume in each facility, clinic, or office setting where such procedures and services are performed and must schedule patient visits in order to ensure:

1. Ongoing compliance with the public health and safety guidelines in [Phase 1 Guidance](#) (Section IV) including, but not limited to, standards related to PPE supply and use, restricting the number of health care workers in the treatment space to those individuals necessary to complete the service or procedure for the patient, screening patients in advance of a service or procedure, administrative and environmental controls that facilitate social distancing, such as minimizing time in waiting areas and minimizing contact between patients through scheduling modifications
2. Ongoing compliance with [CDC requirements](#) and other public health guidance regarding environmental infection controls, which include specific requirements to suspend the use of all examination, procedural, and surgical areas in-between procedures for a mandated timeframe necessary for sufficient air changes to remove airborne contaminants,<sup>5</sup> prior to the thorough cleaning and disinfection of the room and equipment, as required in the [Phase 1 Guidance](#)

*Providers should postpone any non-essential, elective procedure or service if these safety standards cannot be met.*

#### 4. Workforce and Patient Safety Concerns

Practices should have policies and procedures to reschedule patients and to communicate the practice's safety precautions and expectations about patient and visitor and patient caregiver visits including entering the practice, masking, and other considerations. This may vary specialty to specialty. Health care providers must adopt policies that address health care worker safety and well-being. The facility or office must ensure social distancing for providers and staff to the maximum extent possible.<sup>6</sup> [It is advisable to create a plan for assessing staff for exposure to or symptoms of COVID-19 and guidelines for staying home when feeling ill.](#) If staff members fall ill, follow the [CDC guidelines for returning to work](#), and plan as best as possible for [absences and alternative coverage](#). This may include cross-training staff to ensure needs are met when staff members become ill and cannot return to work.

For additional details on these issues, see [Section 2: Operations Management](#), [Section 3: Staff Management and Safety](#), and [Section 4: General Safety Considerations](#).

#### 5. Evaluate Sanitization and Cleaning Processes

Health care providers must have an established plan for thorough cleaning and disinfection of all common and procedural areas, including in-between patient encounters in treatment rooms, which may require hiring environmental services staff and reducing patient hours to allow for more frequent cleaning.<sup>7</sup> In Phase 2, practices are required to have ongoing compliance with [CDC requirements](#) and other public health guidance regarding environmental infection controls, which include specific requirements to suspend the use of all examination, procedural, and surgical areas in-between procedures for a mandated timeframe necessary for sufficient air changes to remove [airborne contaminants](#) prior to the required thorough cleaning and disinfection of the room and equipment (DPH Phase 2 Reopening Guidance).<sup>8</sup>

#### 6. Educate Staff about Operating Procedures

Before returning to work, it will be important to communicate clearly with staff members, so they are well educated on all new procedures for cleaning and patient care. Also, educate appropriate staff about any changes in billing and other operational areas.

#### 7. Stay Current on Information from State and Local Health Departments

Assign a staff person to continue to monitor local and state public health departments for further guidance. Click [here](#) for local departments.

#### 8. Attestation Form Requirements

Before delivering the services described in Phase 2 Reopening Guidance, health care providers must first attest, on a [form](#) prescribed by the Department of Public Health to continuing to meet all Phase 1 criteria and standards, and three additional conditions for **Phase 2: Cautious**:

1. The health care provider has established a prioritization policy for scheduling and delivery of Phase 2 non-urgent care in accordance with this guidance and is making clinical determinations about service provision in a manner consistent with health equity principles in such policy and this guidance.
2. The health care provider is monitoring patient volume for non-essential, elective invasive procedures and services, in each facility, clinic, or office setting where such procedures and services are performed and is scheduling patient visits in a manner consistent with this guidance.

<sup>5</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>6</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>7</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>8</sup> [www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download](http://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download)

3. The health care provider is in compliance with CDC requirements and other public health guidance regarding environmental infection controls, which include specific requirements to suspend the use of all examination, procedural, and surgical areas in-between procedures for a mandated timeframe necessary for sufficient air changes to remove airborne contaminants, prior to the thorough cleaning and disinfection of the room and equipment, as required in the [Phase 1 Guidance](#) (DPH Phase 2 Reopening Guidance).<sup>9</sup>

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## SECTION 2: OPERATIONS MANAGEMENT

### 1. Review Scheduling Blocks and Adjust as Necessary

Adjustments in scheduling blocks will need to be made to ensure proper physician distancing and cleaning occurs before and after each appointment. Considerations will also need to be made for physicians conducting a portion of their duties via telehealth.

Beginning in Phase 2 of Reopening, health care providers must establish and adhere to a written prioritization policy for Phase 2 non-urgent care and scheduling. Health care providers must use their clinical judgment and their prioritization policy to determine which in-person services meet the criteria outlined below for in-person services in Phase 2. The prioritization policy should promote equitable access to care for all populations, without regard for patient's insurance type.

The health care provider's prioritization policy for scheduling and delivery of Phase 2 services must include the following six requirements:

1. Health care providers should continue to prioritize the use of telehealth services where clinically appropriate and feasible for a given patient. During the COVID-19 pandemic, many practices successfully made the switch to seeing patients via telehealth. For more information on telehealth, please visit the [Telehealth and Virtual Care](#) section of the MMS COVID-19 website.
2. For in-person services and procedures, health care providers should prioritize high-priority preventive services, pediatric care and immunizations, and urgent procedures that would lead to high risk or significant worsening of the patient's condition if deferred, as described in [Phase 1 Guidance](#).

3. Health care providers should then identify and prioritize the patients and services that, based on the clinical determination of the hospital or hospital system and its providers, are most critical and time sensitive. In identifying patients and services and making its clinical determination, the health care provider should prioritize patients and services that meet the following criteria:
  - a. Patients with acute illnesses that cannot be addressed through telehealth
  - b. Patients with chronic illness, including but not limited to those that put patients at higher risk for complications from COVID-19
  - c. Patients with behavioral health conditions, disability, and/or risk factors related to social determinants of health, without regard for patient's insurance type
  - d. Adult preventive care clinically necessary to be performed in-person (including screening/diagnostic procedures)
  - e. Patients with progressive conditions that will worsen without surgery or other intervention, or whose symptoms negatively affect their quality of life or ability to perform daily activities
  - f. Patients needing in-person visits to monitor health status or assess progression of illness
4. Health care providers should consider deferring certain non-essential, elective procedures and services such as those that do not meet the prioritization criteria above and which are likely to produce high concentrations of respiratory droplets (aerosolization) and/or that could require or result in the use of a significant level of certain health care system resources (e.g., PPE and pharmaceutical supplies in short supply; transfusions; general hospital, ICU, and/or post-acute admissions).
5. Health care providers may provide in-person group treatment for behavioral health within the following parameters:
  - a. Telehealth and/or in-person one-on-one treatment should be prioritized in lieu of group therapy when clinically appropriate
  - b. In-person group treatment should only be utilized when, in the clinical judgment of the provider, the benefit significantly outweighs the risks for the participants, taking into account each individual's circumstances and medical and social risk factors

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<sup>9</sup> [www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download](http://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download)

- c. No more than six people may be present in a single group treatment session or room, including participants, facilitators, and/or treatment providers
  - d. Rooms must be configured to ensure social distancing of at least six feet
  - e. No food or drink may be served
  - f. No physical contact or sharing of materials during a session
  - g. In-person group treatment sessions should be limited to the minimum amount of time that the provider determines is clinically effective (e.g., 60–90 minutes or less)
  - h. Providers must adhere to all other public health and safety standards described in this guidance and any other relevant guidance from the CDC and DPH
6. Health care providers should not deliver the following services in Phase 2 and should postpone scheduling to future phases: 1) elective cosmetic procedures, and 2) day programs (DPH Phase 2 Guidance).<sup>10</sup>

## 2. Prepare the Waiting Room with Physical Distancing and Spacing Considerations

Providers must demonstrate adherence to social distancing and relevant guidelines from the Massachusetts DPH and CDC regarding [infection control and prevention](#) to maintain a safe environment for patients and staff. Providers must adopt administrative and environmental controls that facilitate social distancing, such as minimizing time in waiting areas by asking patients to wait outside until their appointment begins. Providers must have signage to emphasize social restrictions (i.e., distancing, coughing etiquette, wearing of mouth and nose coverings, hand hygiene) and must provide liberal access to hand sanitizer for patients and staff.<sup>11</sup> In waiting and exam rooms, chairs should be appropriately spaced and items such as magazines and toys should be removed. Providers must require that all patients and companions wear mouth and nose coverings. However, the provider may consider waiving the requirement for mask and nose coverings for patients and/or companions in special circumstances.

In addition, you may want to consider adding barriers such as plexiglass between patients and staff. Check-in and checkout processes may best be modified to allow for the fewest possible people in the waiting area.

Solutions might include remote check-ins or check-ins in the examination room, and/or notification to the patient in the car when the exam room is ready. If possible, consider having a one-way flow through the office (i.e., one door for entrance and one for egress). Where possible, designate separate spaces for COVID-19 cases and non-COVID-19 cases. Additional resources are available here: [Outpatient and Ambulatory Care Settings: Responding to Community Transmission of COVID-19 in the United States](#).

## 3. Determine How the Practice Will Handle Visitor and Patient Caregiver Volume

Providers must develop policies permitting patient companions only in special circumstances or otherwise in adherence with DPH and CDC guidance when necessary for the patient's well-being. Special circumstances and populations may include end-of-life care, pre-natal/labor and delivery, pediatric patients, and other special populations such as patients with disabilities, or patients with intellectual or developmental disorders (e.g., autism, Down syndrome, etc.), or populations as otherwise identified by the DPH. These policies must be accessible to patients seeking care. Providers must require that all patients and companions wear mouth and nose coverings. However, the provider may consider waiving the requirement for mask and nose coverings for patients and/or companions in special circumstances.<sup>12</sup> Consider technology solutions for including more people in the visit but remotely.

## 4. Communicate Clearly with Patients about Practice Changes

It is important to communicate with patients about new safety protocols and appointment changes and to do so clearly and effectively. Some guidance may require patients to make changes to their routines, so communicating clearly and early about necessary safety precautions will ensure patients are prepared and properly informed.

Practices could utilize their patient portals, websites, and social media to communicate new procedures, expectations, and limitations. In addition, practices should post signage in the office asking patients to respect social distancing measures, masking, and any other protocols.

<sup>10</sup> [www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospital-health-care-provider-guidance/download](https://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospital-health-care-provider-guidance/download)

<sup>11</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>12</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)



## 5. Pre-screening Patients and Any Visitor They Must Bring for COVID-19

Providers must have a [written protocol](#) in place for screening all employees for symptoms of COVID-19 prior to entering the facility or office. Providers must have a process for screening patients and companions for symptoms of COVID-19 prior to entering the facility or office. Providers must have policies and procedures for screening patients in advance of a service or procedure, including policies and procedures for [testing patients](#) for COVID-19 when medically appropriate as well as for determining whether a procedure should go forward if a patient tests positive.<sup>13</sup> Please visit the [CDC's website](#) for more information on recommendations around preventing the spread of COVID-19. Consider keeping a log with names and contact information. Additional resources in this area include [Interim Infection Prevention and Control Recommendations for Patients with Suspected or Confirmed Coronavirus Disease 2019 \(COVID-19\) in Healthcare Setting](#) and [Interim Clinical Guidance for Management of Patients with Confirmed Coronavirus Disease \(COVID-19\)](#). In addition, consider the following guidance:<sup>14</sup>

1. **When the Patient Arrives for Check-In:** Ask patients and anyone accompanying them if they have symptoms of respiratory infection or any other COVID-19 symptoms, have traveled recently, or have had contact with anyone with COVID-19 or exposure to COVID-19.
2. Have a protocol for a patient who arrives with any respiratory symptoms or other COVID-19 symptoms without providing advance notice.
  - a. Mask and isolate the patient in a space set aside for this purpose. Consult with clinical staff to determine next steps (this may include redirection patient to emergency department, urgent care, testing center, or being seen in the practice).
3. Before all office visits, contact patients to advise them:
  - a. Call the office in advance if they have respiratory symptoms or other COVID-19 symptoms before the appointment.
  - b. Come to the appointment alone.
    - i. If someone must come with them, he or she will be screened for symptoms.
    - ii. Instruct them not to bring minor children if possible, unless the child is the patient.

- c. Adhere to office protocols for masking, cough etiquette, and hand hygiene.
- d. How to check-in (e.g., from their car, then wait in the car), changes to which entrance to use, and any other information they need.

## 6. Establish an Isolation Process for Staff

Practices would do best to establish policies for [COVID-19-positive staff, staff with COVID-like symptoms, and staff with COVID-19 exposure](#). Two additional resources in this area are [Criteria for Return to Work for Healthcare Personnel with Confirmed or Suspected COVID-19 \(Interim Guidance\)](#) and [Interim U.S. Guidance for Risk Assessment and Public Health Management of Healthcare Personnel with Potential Exposure in a Healthcare Setting to Patients with Coronavirus Disease 2019 \(COVID-19\)](#).

## 7. Estimate Staff Needed Based on Patient Volume

Anticipate variable patient volume and adjust staffing accordingly. Respecting social distancing will likely involve bringing physicians and staff back in smaller numbers depending on practice needs. Options for this include telecommuting for certain personnel or placing physicians and staff on rotating teams. More information can be found here: [Strategies to Mitigate Healthcare Personnel Staffing Shortages](#).

## 8. Update Communication Plans

Now is the time to update in-office communication plans and systems. Create an emergency contact list, distribute to staff, and place copies in key locations throughout your office. The list should include contact information for your local and state health departments.<sup>15</sup>

## 9. Medication Shortages

Physicians should be prepared for there to be potential medication shortages due to potential supply chain issues that may alter their normal prescribing pattern or in office treatments.

## 10. Maintain Equipment

Practices may consider the necessity to maintain their equipment and how this will affect their day-to-day operations (for example, equipment not working, repairs taking longer than normal, and implications for social distancing).

<sup>13</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>14</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

<sup>15</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

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## SECTION 3: STAFF MANAGEMENT AND SAFETY

### 1. Consider Flexible Options for High-Risk Staff

Given that health care workers are at higher risk for exposure and infection, consider shifting higher-risk workers to roles that minimize their risk to exposure to COVID-19 and also help the practice in this challenging time.

### 2. Attend to the Emotional and Physical Needs of Staff

Be on the lookout for signs of exhaustion, depression, stress, and similar issues in all staff. Be sensitive of additional considerations like childcare and eldercare needs. For resources regarding staff wellness during this time, please visit the [Physician and Health Care Professional Wellness section of the Massachusetts Medical Society's COVID-19 website](#).

### 3. Consider Flexible Work Schedules for Staff (including Working Remotely) and Update Written Policies about Sick Time, etc.

Consider flexible work schedules and develop or re-evaluate a written policy regarding paid or unpaid personal leave, sick time, earned time and return to work protocols.

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## SECTION 4: GENERAL SAFETY CONSIDERATIONS

### 1. Maintain Physical Distancing and Hygiene at All Times

Phase 1 Reopening Guidance instructs that health care providers must demonstrate adherence to social distancing and relevant guidelines from the DPH and CDC regarding [infection control and prevention](#) to maintain a safe environment for patients and staff. In addition, health care providers must adopt administrative and environmental controls that facilitate social distancing, such as minimizing time in waiting areas by asking patients to wait outside until their appointment begins to the greatest extent possible. For any waiting patients, social distancing and face coverings must be in place.<sup>16</sup>

Staff members need to be trained on proper hand and face hygiene, proper disinfection of office equipment,

and how to use personal protective equipment. In addition, consider the following guidance:<sup>17</sup>

- Practices must ensure that hand hygiene supplies are readily available in every location.<sup>18</sup>
- Train all patient care personnel on the proper sequencing of [donning](#) (putting on) and [doffing](#) (removing) PPE (see CDC's [printable illustration](#)).<sup>19</sup>
- Stay informed about current guidance from the [DPH](#) and [CDC](#) on conventional, contingency, and crisis standards for PPE in short supply.<sup>20</sup>

### 2. Continue to Use Telehealth, Whenever Possible

Continue to use telehealth, whenever possible and appropriate. Phase 2 Reopening Guidance indicates that health care providers should continue to prioritize the use of telehealth services where clinically appropriate and feasible for a given patient (DPH Phase 2 Reopening Guidance).<sup>21</sup>

### 3. Require Face Coverings for All Patients and Staff

Health care providers and other staff must wear at least surgical facemasks at all times, consistent with the [DPH's Comprehensive PPE Guidance](#).<sup>22</sup> Health care providers must have signage to emphasize public health measures.<sup>23</sup> Those that are performing or assisting in aerosolized procedures will need N95 masks. Click [here](#) for CDC general guidance regarding face coverings. Health care providers must require that all patients, companions, and visitors wear mouth and nose coverings as consistent with DPH guidance. However, the health care provider may consider waiving the requirement for mask and nose coverings for patients and/or companions in special circumstances consistent with applicable guidance.<sup>24</sup>

### 4. Adhere to Strict Cleaning and Sterilization Processes

Health care providers must have an established plan for thorough cleaning and disinfection of all common and procedural areas, including in-between patient encounters in treatment rooms, which may require hiring environmental services staff and reducing patient hours to allow for more frequent cleaning.<sup>25</sup>

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<sup>16</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>17</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

<sup>18</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

<sup>19</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

<sup>20</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

<sup>21</sup> [www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download](https://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download)

<sup>22</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>23</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>24</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>25</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](https://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

Practices must ensure that there is adequate time built in between patient appointments to properly sterilize exam rooms, bathrooms, check-in and checkout spaces, and all other surfaces in practice. Staff members may familiarize themselves with the [CDC Guidelines for Cleaning and Disinfecting of Community Facilities](#) and the [Guidelines for Disinfection and Sterilization in Healthcare Facilities](#). In addition, determine everything that needs to be disinfected and follow [CDC advice for COVID-19 disinfection procedures](#) including disinfecting noncritical medical devices (e.g., blood pressure cuffs, other equipment, and surfaces as well as keyboards, mouse devices, touchpads, and microphones for dictation) with an EPA-registered disinfectant using the label's safety precautions and use directions. Remember to observe correct contact time as indicated by manufacturer's instructions for use. For more on disinfecting, visit [Occupational Safety and Health Administration Control and Prevention](#).

## 5. Personal Protective Equipment

Providers must develop and implement appropriate PPE use policies for all services and settings. All providers should continue to follow the most recent guidelines issued by the DPH<sup>26</sup> and the CDC as they relate to PPE usage, including updated guidelines released after this document.

All workers must have appropriate PPE to perform the service/procedure. If appropriate PPE is not available to protect the health care worker, the service/procedure should be cancelled. Health care providers and staff must wear surgical facemasks always. Providers must ensure that they have taken reasonable steps to maintain a reliable supply chain to support continued operations.

All appropriate staff should be trained on the use of personal protective equipment including donning and doffing. For more information from the CDC about using personal protective equipment, please click [here](#). The state's reopening team is working with the Medical Emergency Response Team (MERT) to produce a list of PPE suppliers. [This information](#) will be provided to the private sector to assist Massachusetts providers and organizations with PPE purchasing.<sup>27</sup>

## 6. Communicating with Patients

Remember to adjust messaging by the front staff, by the answering service, and on voicemail to inform callers of temporary practice changes, expanding practice operations, scheduling for vulnerable populations, rescheduling of non-urgent visits, and opportunities to schedule telehealth sessions. In addition, make sure to clearly state policies for patients who have respiratory infection symptoms or who have been exposed or advised to self-isolate or quarantine on the day of or prior to an in-office appointment. Proactively alert all current patients to these temporary practice changes through online patient portals; automated phone, text, and email appointment reminder systems; and existing website or social media channels.<sup>28</sup>

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## SECTION 5: FINANCIAL MANAGEMENT

### 1. Consider Financial Needs of the Practice and Evaluate Potential Funding Sources

As practices begin to expand operations, it will be very important to ensure necessary funding is available. To this end, practices may want to consider their financial needs and carefully evaluate all funding options, both private and public. For more information about financial resources that can support practices, please see the Massachusetts Medical Society's guide titled "[Financial Resources for Practices During COVID-19](#)."

### 2. Analyze Revenue Streams and Any Outstanding Accounts Receivable

It is important for billing staff to understand revenue streams because payments may have been delayed, denied, or incorrect due to a variety of reasons including payor delays. If practice volume is low and is ramping up, consider redeploying staff to assist in this area. Designate one or two billing staff to be vigilant about the changing rules and guidelines on how to bill for telehealth and COVID-related visits. It is anticipated that lack of consistency and the changing rules will continue well into 2021.

### 3. Speak to Vendors

As soon as practices seek to expand operations, contact your vendors. They may be willing to negotiate new or reduced rates for their supplies and services and extend terms of payment to improve cash on hand in the short term.

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<sup>26</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>27</sup> [www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

<sup>28</sup> [https://betsylehmancenterma.gov/assets/uploads/COVID19Info\\_MedicalOfficePractices.pdf](https://betsylehmancenterma.gov/assets/uploads/COVID19Info_MedicalOfficePractices.pdf)

#### 4. Develop a Budget

As practices move forward reevaluating practice budgets may be helpful. Items to include in this budget are anticipated patient volume, historical collection ratios, and payback of deferments owed. It is recommended that budgets be reviewed on a monthly basis, so practices can adjust as necessary. New budget items such as PPE may need to be accounted for. If feasible, consider adding to the number of MassHealth and Connector plans in which the practice participates to maintain patient-physician relationships.

#### 5. Verify All Patient Insurance and Ensure Contact Information Is up to Date

It is important for staff to contact patients before appointments to update contact information, insurance eligibility, and benefits.

#### 6. Determine How Patient Payments Will Be Accepted

Due to COVID-19 restrictions, the way payments are accepted may need to change. Prior to expanding operations, determine whether payments will be accepted in person or whether they will need to be made online through a payment system or portal.

#### 7. Evaluate Physician and Other Staff Compensation

Previous compensation models may need to be adjusted for all staff.

[American Academy of Ophthalmology — COVID-19 Safety Advice](#)

[American Academy of Otolaryngology — COVID-19 Anosmia Reporting Tool — Guidance for Your Practice](#)

[American Academy of Pediatrics — Critical Updates on COVID-19](#)

[American Academy of Pediatrics — Guidance on Providing Pediatric Ambulatory Services via Telehealth During COVID-19](#)

[American College of Cardiology — COVID-19 Operational Considerations](#)

[American College of Cardiology — Guide to Safely Resume Cardiovascular Procedures and Diagnostic Tests](#)

[American College of Gastroenterology — Joint GI Statement on COVID-19](#)

[American College of Obstetricians and Gynecologists — Infection Prevention and Control in Inpatient Obstetric Care Settings](#)

[American College of Physicians — Practice Management Resources](#)

[American College of Surgeons](#)

[American Medical Association — COVID-19: Frequently Asked Questions](#)

[American Optometric Association — Post-COVID Guidance](#)

[American Society of Clinical Oncology — COVID-19 Patient Care Information](#)

[Massachusetts Medical Society COVID-19 Webpage](#)

MMS Tips for Expanding Practice During COVID-19 was in part adapted from the following guidelines and documents:

Massachusetts Department of Public Health Guidance Phase 1 Reopen Approach for Health Care Providers (Providers that are Not Acute Care Hospitals)

[www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download](http://www.mass.gov/doc/dph-phase-1-reopening-non-acute-care-hospital-health-care-provider-guidance-may-18/download)

Massachusetts Department of Public Health Guidance Phase 2 Reopen Approach for Health Care Providers (Providers that are Not Acute Care Hospitals)

[www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download](http://www.mass.gov/doc/dph-phase-2-reopening-non-acute-care-hospitalhealth-care-provider-guidance/download)

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## ADDITIONAL RESOURCES

The Massachusetts Medical Society is continuing to develop well-rounded resources, updated regularly to help physician practices through the COVID-19 pandemic and beyond. Please visit our dedicated [MMS COVID-19 webpage](#) for more information.

For direct assistance from MMS staff, please contact the PPRC via email at [pprc@mms.org](mailto:pprc@mms.org).

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## SPECIALTY RESOURCES

[American Academy of Dermatology — Reopening Your Practice](#)

[American Academy of Family Physicians — COVID-19 Resources](#)

[American Academy of Family Practice — Resuming Care](#)

[American Academy of Ophthalmology — Alert: Important Coronavirus Updates for Ophthalmologists](#)

[www.cmadoocs.org/Portals/CMA/files/public/CMA\\_COVID-19 Best Practices for Reopening.pdf](http://www.cmadoocs.org/Portals/CMA/files/public/CMA_COVID-19_Best_Practices_for_Reopening.pdf)

[www.mgma.com/resources/operations-management/covid-19-medical-practice-reopening-checklist](http://www.mgma.com/resources/operations-management/covid-19-medical-practice-reopening-checklist)

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*The Massachusetts Medical Society does not endorse any of the resources or sources listed in this document and is not responsible for any advice contained therein. This document is current as of June 2020.*

## **DISCLAIMER**

*This is not legal advice. If you need legal advice, you should consult a lawyer who can consider your specific situation. Each practice should exercise its own independent judgment regarding whether, when, and how to expand operations. The Massachusetts Medical Society is not responsible for the decisions of individual practices.*