

GUIDANCE FOR OPERATIONS DURING COVID-19 PANDEMIC

What follows is guidance provided to assist WRW Legal clients with reducing liability related to operations during the COVID-19 pandemic. Note that this guidance is only as good as the information known about COVID-19 today, March 18th, and therefore, is subject to change.

GENERAL

- MOST IMPORTANT! Keep up to date and up to the minute.
 - Check the CDC website several times each day for the latest information and guidance. Check the website first thing in the morning, mid-day and in the evening, at a minimum.
 - Check your state and county health department websites for the latest information and guidance. Check the websites at the same times you check the CDC website.
- Follow the current CDC and state/local practices for preventing infection and social distancing.
- Post guidelines throughout your public and private spaces.
- Be vigilant about cleaning, following the CDC cleaning guidelines.

HANDLING OF REMAINS

- Follow the CDC funeral guidelines.
- Personal Protective Equipment/PPE (gloves, gowns, face shields/masks, goggles) must be worn.
- Non-professional interaction with or preparation of remains:
 - Require a waiver of liability for any non-professional persons who will interact with or prepare the remains of someone who died of COVID-19.
 - Non-professional persons should strongly consider not touching the remains of someone who died of COVID-19.
 - If washing the body or shrouding are required, any persons participating in the practice must wear PPE (gloves, gowns, face shields/masks, goggles).
- Transport of and travel with remains must be handled with care.
 - Wear PPE.
 - Disinfect the transport container/bag, vehicle and equipment with a product containing EPA-approved chemical/s expected to be effective against COVID-19 based on data for harder to kill viruses.
 - Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).
- Burial or cremation is possible but check for any applicable state and local requirements that may dictate the handling and disposition of the remains of individuals who have died of certain infectious diseases. Florida has not currently provided any guidance about how remains of COVID-19 decedents should be handled as of March 18th.

FUNERALS, VISITATIONS, GATHERINGS

- A funeral, visitation or gathering can be conducted. HOWEVER,
 - Encourage people who are ill or who are part of an at-risk population (e.g., the elderly, immune-compromised, etc.) to stay home.
 - Remind ALL of CDC guidance on how to prevent the spread of COVID-19, such as by staying home if you are sick, social distancing, washing your hands, and covering coughs and sneezes with tissues that are immediately discarded safely.
 - Post CDC informational flyers about healthy habits, such as "How to Stop the Spread of Germs".
 - Keep soap dispensers filled in all restrooms. Post CDC informational flyers on handwashing in all restrooms.
 - Offer alcohol-based hand sanitizer that contains at least 60% alcohol.
 - Have tissues on hand.
 - Refrain from direct person-to-person contact (e.g., handshakes, hugs, etc.)
 - Keep and encourage a safe distance (6') between persons.
- Limit gatherings pursuant to the CDC guidelines.
 - As of March 16th, the CDC recommended limiting gathering to no more than 50 people for the next eight weeks. The CDC hosted a live Facebook event which indicated that funerals can still take place, provided they are under the 50-person limit. The White House recommended gatherings be limited to 10 people or less on March 16th for the next two weeks.
 - Consider the capacity of your space when arranging for any gathering. If your space has a capacity of 60, consider limiting capacity to half to ensure safe distance between persons.
- Refrain from offering a guest book. An employee can receive attendees and record names and condolences or offer an electronic guestbook that attendees and others can "sign" online. Post information regarding the electronic guestbook where your guestbook would normally be located and in entrances, restrooms, etc.
- Offer livestreaming or recording options.
 - Do not use copyrighted media, such as images or music, without permission.