

March 18, 2020

To: All Division of Licensing & Protection (DLP) Staff
From: Joe Nusbaum
Re: Temporary Protocol for In-Person Precautionary Measures

The following provides additional guidance to enact and augment Governor Phil Scott's [Executive Order](#) (EO) in relation to the COVID-19 virus and measures the Administration is taking to mitigate the impact and risk the virus presents to Vermonters and particularly to our most vulnerable populations.

In the EO, the Governor lays out prohibitions and restrictions on visitors to our Nursing Homes, Residential Care Homes, Assisted Living Facilities and Therapeutic Residences, in a focused effort to prevent the spread of the virus and protect our most vulnerable Vermonters. While DLP staff are not technically "visitors" when entering these facilities as a function of DLP survey or investigation efforts, we need to limit our entry into these facilities and residences. **At this time it is important that all staff refrain, wherever possible, from in-person contact. If any in-person activity can be conducted remotely through other means, DLP should make use of those options and document the reason alternative methods were enacted to ultimately help safeguard vulnerable adults. If DLP staff believe that alternative methods to in-person contact are not an option, they must receive approval from their component or division director before proceeding.**

Until further notice, all DLP staff will adhere to the following restrictions when entering any level of healthcare facility or conducting face-to-face interviews with vulnerable adults:

- **DLP must receive approval from their component or division director before entering any certified facility, residence, or conducting a face-to-face interview with a vulnerable adult.**
- Before entering any facility or interviewing vulnerable adults in person, DLP staff should be screened in accordance with recommendations by the Commissioner of the Vermont Department of Health (see link below for these screening guidelines).
- If DLP staff determine a face-to-face visit with a vulnerable adult may jeopardize the health, welfare, or safety of the vulnerable adult, they will document their concern and seek guidance from their supervisor.
- DLP staff must wear a face mask and disposable gloves, to be donned before entering the building or home, and remain on for the entirety of the visit. If no disposable gloves

or facemask is available, DLP staff may not enter the facility or home without direction from their supervisor. If DLP staff uses bathroom facilities or sees more than one vulnerable adult for which they must open doors or use an elevator, gloves must be discarded and a new pair donned in each instance.

- DLP staff will maintain six feet of space between themselves and all other individuals (staff and vulnerable adults) in the facility or home.
- There will be no physical contact, including shaking hands or casual touch, with any staff or vulnerable adults.
- DLP staff will not retrieve or relay any items to staff or vulnerable adults, including ID badges, pens, or paper. If DLP requires a form be signed by a participant, DLP staff will ask a witness to observe the participant's consent, and DLP will note both participant's and witness' name and contact information on the form. DLP forms will not be handled or physically signed by vulnerable adults at this time. DLP staff will offer to email a scanned copy of the form to the vulnerable adult or their guardian/caregiver.
- DLP staff may receive evidence (papers, photographs, etc.) from vulnerable adults, caregivers, witnesses, etc., but the evidence must remain in the possession of DLP staff. Shared evidence, such as pictures on cell phones, will not be passed back and forth.

The Governor's Executive Order also limits out-of-state travel for all State employees. This requirement is to limit employee exposure to gatherings through group functions (such as conferences outside of Vermont), but at this time will not include restrictions on routine job functions, such as interviewing participants in border towns for the purposes of an investigation. If you do need to cross the Vermont border to perform an essential job function, inform your supervisor beforehand.

Because of the at-risk populations we work with, we are also recommending that all DLP staff practice "social distancing" and isolate as much as possible. This includes making use of telecommuting options, and offering remote interviewing alternatives to participants. While there is no requirement for personal activities and interactions outside of work, we encourage all DLP staff to remain home and limit interactions with other people to those within your household.

Thank you for taking extra precautions and modifying your routines during this challenging time. We believe these extra measures can make an important difference toward protecting and ensuring continued care for our most vulnerable Vermonters.

Additional resources:

VDH Screening Guidelines can be found here:

<https://www.healthvermont.gov/sites/default/files/documents/pdf/COVID19-Visitor-Screening-Tool-Congregate-Settings.pdf>

DAIL COVID-19 page here: <https://dail.vermont.gov/novel-coronavirus-information>

CDC guidance on proper use of Personal Protective Equipment (PPE):

<https://www.cdc.gov/hai/pdfs/ppe/ppeslides6-29-04.pdf>