REOPENING AFTER A DISASTER

OSHA, HIPAA, AND INFECTION CONTROL

The following topics related to OSHA, Infection Control, and HIPAA must be addressed before reopening. This list is not exhaustive, and additional issues may arise during the reopening process. Consult state and local regulations and agencies for further guidance.

INFECTION CONTROL	YES	NO	N/A
WATER			
Is the water safe to drink?			
Is there a Boil Water Advisory? • The CDC recommends that all dental units should use systems that treat water to meet EPA drinking water standards. Follow CDC guidelines for Do's and Dont's during a boil water notice.			
Is there sufficient supply for hand hygiene? *(sanitizer can be used in some cases)*			
Is there sufficient supply to run dental equipment? • Compressors, instrument washers, ultrasonics, dental unit waterlines. • Distilled water is needed for autoclaves and in some self-contained dental unit waterlines.			
Is there sufficient water supply to run medical equipment? • equipment, ultrasonics, instrument washers, autoclaves.			
Have you inspected equipment for water damage? • Inspect supplies and equipment. Expired and damaged supplies should be discarded according to manufacturer's instructions. • Previously sterilized instruments should be cleaned, repackaged and sterilized again. • Maintenance should be performed on any equipment before patient care, including autoclaves, ultrasonics, instrument washers, suction lines, ultrasounds, radiology equipment, etc. • Perform spore testing on autoclaves prior to use.			
Have Dental Unit Waterlines been shocked and tested before use? • If the testing reveals failing water quality, shock and test again. If testing continues to fail, troubleshoot and contact manufacturer.			
MOLD			
Is there mold present? • Mold is common after hurricanes due to high humidity and moisture levels. Mold can begin to grow within 24-48 hours AND can be a serious health issue for people with allergies and respiratory illnesses.			
SANITARY / SEWER SYSTEMS			
Are the sanitary or sewer systems in working order? • Toilets for employee use • Offices who dispose of suctioned materials			
CLEAN WORKING SURFACES			
Have all surfaces been cleaned and disinfected before patient care? • Clean and disinfect surfaces with an EPA registered hospital level disinfectant.			
Are all surfaces free of debris, dirt, mud, etc.? • Clean all surfaces before re-opening.			
Do furniture, carpets, rugs or floors need to be washed or cleaned? • debris, mud, etc.			
PPE (Personal Protective Equipment)			
Is PPE readily available? • Appropriate sizes, not contaminated/destroyed due to flood waters			

OSHA: EMPLOYEE SAFETY	YES	NO	N/A
SAFETY			
Is there a hierarchy of command in place?			
Is the building safe to enter and work in? • Structural changes, compressed gas cylinders that have been tipped over due to the hurricane, electrocution risk, sharp objects, infectious materials or other new hazards present, etc.			
Have any hazardous materials or chemicals been spilled that require professional clean-up?			
Are there NEW security concerns for employees?			
Are adequate restrooms available?			
Are handwashing facilities available? • hand sanitizer can be used unless hands are visibly soiled/dirty			
Will employees be exposed to hazardous materials, chemicals, fumes?			
Will employees be exposed to hazards outside of the building? • Fallen electrical lines, flooding, sink holes, debris			
Will employees have access to cooling/heating?			
Do the employees have appropriate PPE to address any new job hazards?			
Is the fire suppression system working?			
Are fire hazards present?			
Are the exits clear and operable? • Free of debris, furniture, etc.?			
Is respiratory protection, if needed, available?			
Do any employees have medical issues that could affect their work now that didn't before?			
Could there be an unexpected release of energy from restarting machines, power surges?			
Are any slip, trip, fall hazards present?			
Are any sewage contamination hazards present?			
Do employees have access to first aid materials?			
Do employees have a means of emergency communication? • Cell phones, landlines, walkie talkies			
Are employees now working in confined spaces?			
Do employees have access to safe drinking water? (bottled may be best)			
Do employees have a means for eliminating trash and debris?			
Is insect repellant available? • Standing water after a hurricane could create this hazard			
If generators are being used, do employees have ear protection?			
Is a break room or rest area available for employees?			

HIPAA	YES	NO	N/A
Have all physical records have been accounted for? • If records have been damaged create a plan for recovery or destruction in compliance with HIPAA standards			
Is the electronic PHI protected from unauthorized access?			
Have back-up systems been restored? Are functioning and accessible?			
Can you implement temporary access restrictions if needed for employees working remotely?			
Are all firewalls, antivirus software and any other security measures in place up to date on all devices?			
Do staff understand their responsibility to report potential breaches or security incidents for proper and swift response?			
Have you notified patients about delays or changes to service availability due to the hurricane, in a compliant manner?			
Are third party systems operational and secure? (e.g. EHR, cloud storage)			
Have you updated your Disaster Recovery Plan as needed from lessons learned?			
Have you ensured your staff is trained on updated, change or new policies and procedures?			
Have you documented all measures taken to ensure HIPAA compliance including any changes to procedures?			
Is documentation readily available in case of audit or investigation?			
If using Telehealth services during recovery, is the platform compliant for PHI protection during virtual visits?			

INFECTION CONTROL REFERENCES
Restoring Water Quality in Buildings for Reopening
• https://www.epa.gov/sites/default/files/2020-05/documents/final_checklist_for_maintaining_building_water_quality_5-6-2020.pdf
Guidelines for Cleaning Safely After a Disaster
• https://www.cdc.gov/natural-disasters/safety/index.html
Best Practices for Dental Unit Water Quality
• https://www.cdc.gov/dental-infection-control/hcp/dental-ipc-faqs/best-practices-dental-unit-water-quality.html
Natural Disasters and Severe Weather
• https://www.cdc.gov/natural-disasters/
Emergency planning and disaster recovery planning in the dental office
• https://www.ada.org/resources/practice/practice-management/emergency-planning-and-disaster-recovery-planning-in-the-dental-office
Sterilizing Practices
• https://www.cdc.gov/infection-control/hcp/disinfection-sterilization/sterilizing-practices.html
Disinfection of Healthcare Equipment
• https://www.cdc.gov/infection-control/hcp/disinfection-sterilization/healthcare-equipment.html
Mold, Testing, and Remediation
• https://www.cdc.gov/niosh/mold/testing-remediation/index.html
Reopening Buildings Guidance
• https://www.cdc.gov/control-legionella/php/guidance/building-water-system.html
Conducting Assessments
• https://www.cdc.gov/environmental-health-response-and-recovery/php/about/conducting-assessments.html
Association for Dental Safety
• https://www.myads.org/

OSHA REFERENCES

Hurricane eMatrix

- [eTool : Hurricane eMatrix - General Recommendations for Working in All Impacted Areas | Occupational Safety and Health Administration (osha.gov)](osha.gov)

Emergency Preparedness and Response

- https://www.osha.gov/emergency-preparedness

HIPAA REFERENCES

Emergency Situations: Preparedness, Planning, and Response

- https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/index.html

Emergency Preparedness & Response

- https://www.hhs.gov/programs/emergency-preparedness/index.html

Emergency Preparedness

- https://www.hhs.gov/civil-rights/for-individuals/special-topics/emergency-preparedness/index.html

HHS Secretary Xavier Becerra declares public health emergency for South Carolina and Tennessee after Hurricane Helene

- https://www.hhs.gov/about/news/2024/09/30/hhs-secretary-xavier-becerra-declares-public-health-emergency-south-carolina-tennessee-hurricane-helene.html

Declarations of a Public Health Emergency

- https://aspr.hhs.gov/legal/PHE/pages/default.aspx

Department of Health & Human Services

- https://www.hhs.gov/sites/default/files/lang-access-and-effective-comm-checklist-for-emergency-responders.pdf

Emergency Preparedness Rule

- https://www.cms.gov/medicare/health-safety-standards/quality-safety-oversight-emergency-preparedness/emergency-preparedness-rule

Decision tool on when PHI can be disclosed during a public health emergency

- https://www.hhs.gov/sites/default/files/ocr/privacy/hipaa/understanding/special/emergency/emergencyprepdisclose.pdf