

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, April 21st, and therefore, is subject to change.

GENERAL

- MOST IMPORTANT! Follow the current CDC and state/local practices for preventing infection and social distancing.
- 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.
- Post guidelines throughout your public and private spaces.
- Be vigilant about cleaning, following the CDC cleaning guidelines.

STAY-AT-HOME ORDER

- Florida has imposed a state-wide stay-at-home order starting April 2nd. Funeral home, mortuary, and cemetery workers are essential employees and can conduct funeral business.
- Keep a copy of stay-at-home orders, proof of employment, and positive identification inside company vehicles in the event of law enforcement stopping those vehicles

HANDLING OF REMAINS

- Follow the CDC funeral guidelines.
- Personal Protective Equipment/PPE (gloves, gowns, face shields/masks, goggles) must be worn. Continue to order via your PPE supplier.
 - If there is a shortage of PPE available, contact your county emergency operations center.
- 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 temporarily waived the 48-hour limit before cremation by Executive Order.

- Before meeting in person, ask if family members or others have been exposed to COVID-19.
- Encourage people who are currently ill, people who have been in contact with COVID-19 positive individuals, 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, using cloth face masks, 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' – 10') between persons.
- Maintain a list of any attendee to any funeral, visitation, or gathering.
- Limit gatherings pursuant to the CDC guidelines and applicable state/local orders.
 - The White House, the CDC currently recommend gatherings be limited to 10 people until after April 30th.
 - Consider the capacity of your space when arranging for any gathering in order to maintain social distancing.
- 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.
 - You do not need a written release from guests. However, do make guests aware of streaming or recording via signage, the obituary, give an announcement that the service is recorded.
 - Do not use copyrighted media, such as images or music, without permission.

LICENSING

- Florida has extended reporting deadlines for preneed licensees and renewal deadlines for preneed main license, have been extended from April 1st to June 1st, 2020. All active and valid preneed licenses are extended to August 31st, 2020.
- Inspections have been suspended until further notice, and the Division's inspection deadline has been extended until September 28th, 2020.

FUNERALS, VISITATIONS, GATHERINGS

- A funeral, visitation or gathering can be conducted. HOWEVER,