

# Managing your Dermatology Practice During COVID-19 (Revised 05/13/20)

This checklist will help manage your dermatology practice during the COVID-19 pandemic. For complete guidance visit <https://www.aad.org/member/practice/managing/coronavirus>.

## CLINIC PREPAREDNESS

- Review the AAD [Everyday health and preparedness steps in clinic](#) to protect your patients, staff, and yourself.
- Consider treating [iPLEDGE](#) patients remotely
- Refer to the Academy's guidance on treating patient with [biologics](#)

## PRESERVING & DONATING PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Consider these conservation strategies for surgical masks and gowns: <https://www.fda.gov/medical-devices/letters-health-care-providers/surgical-mask-and-gown-conservation-strategies-letter-healthcare-providers>.
  - Note, while preserving is encouraged, hoarding in all its forms must be avoided so that urgently needed medications and supplies are available for our patients and health care responders on the front lines.
- If possible, consider donating viral transport medium (VTM) and nasopharyngeal swabs which are currently in shortage and contributing to the testing bottleneck. If you who have these supplies consider donating them to local health departments, hospitals, or labs processing tests along with these [AAD assembled list of products](#).

## EMPLOYEE & FAMILY SICK LEAVE REQUIREMENTS

- If you employ less than 500 employees, you must provide emergency paid sick leave and expanded family medical leave, unless you meet certain exemptions. Review the [Emergency Paid Sick Leave & Paid Family and Medical Leave Acts](#) for details.
- Review the [Frequently Asked Questions](#) to help address outstanding questions about the above-mentioned acts
- Post in a visible location in your practice or email this [notice](#) to all staff about these acts as developed by the US Department of Labor
- Consult with your attorney to begin implementing payroll tax credits

## SMALL BUSINESS SUPPORT

- Review the [Small Business Owner's Guide to Coronavirus Aid, Relief, and Economic Security \(CARES\) Act](#) to determine if you are eligible for any of the following:
  - [Payment Protection Program \(PPP\) Loans](#)
  - Small business debt relief
  - [Economic injury disaster loans and emergency economic grants](#)
  - [Small business tax provisions](#)
- Review the [Economic Injury Disaster Loans](#) information offered by Small Business Administration (SBA)
  - Check if your state or territory already has a [COVID-19 Economic Injury Disaster declaration](#)
  - Apply for a small business loan if needed through <https://covid19relief.sba.gov/#/>
  - Apply for a small business bridge loan if needed through <https://www.sba.gov/document/support--express-bridge-loan-pilot-program-guide>

- Review the updated CMS [Fact Sheet: Expansion of the Accelerated and Advance Payments Program for Providers and Supplies During COVID-19 Emergency](#) to understand the changes with the Medicare advance payments. The program was suspended as of April 26, 2020.
- Assess the opportunity to apply for a second round of funding from the Department of Health & Human Services (HHS) as part of the distribution of the \$100 billion provider relief fund provided for in the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Visit <https://covid19.linkhealth.com/docu/sign/#/step/1> to apply.
- Consult with your attorney to defer payment of employer federal payroll taxes and filing of taxes.
  - Note, the [IRS has delayed the payment of personal taxes and the first quarter 2020 estimated taxes from April 15, 2020 to July 15, 2020](#)

## REGULATORY CONSIDERATIONS

- **Centers for Disease Control and Prevention (CDC) Guidance for COVID-19:** Review the [recommendations](#) how to protect yourself and what to do if you think you are sick.
- **Merit-based Incentive Program (MIPS):** Be aware that the [2019 MIPS](#) performance year reporting deadline has been extended to April 30, 2020.
  - MIPS eligible clinicians who do not submit their MIPS data by the April 30, 2020 deadline will have the automatic extreme and uncontrollable circumstances policy applied and receive a neutral payment adjustment for the 2021 payment year.
  - If a clinician or group began submitting data but will not be able to complete it by April 30, 2020 they should submit an [application for extreme and uncontrollable circumstance](#) citing COVID-19 to have previously submitted data overridden. Applications must be submitted between April 3 – April 30, 2020.
- **Ambulatory Surgical Care Quality Reporting Program:** Be aware that if you are participating in the ambulatory surgical center quality reporting program, the deadline for 2019 Quarter 4 (Q4) data submission is now optional.
  - Q4 data that is submitted will be used, but if it cannot be submitted, 2019 performance will be calculated on the data from the first three quarters of 2019. Additionally, CMS will not count data from the first two quarters of 2020 for the ASC program and it does not need to be submitted.
- **Occupational Safety and Health Administration (OSHA):** Review your current OSHA protocols and update them accordingly for the pandemic based on the [suggested guidance](#) released by OSHA.

## PROVIDING VIRTUAL CARE (TELEDERMATOLOGY)

- If appropriate, consider providing care to patients via telemedicine as the government has significantly relaxed regulations during the pandemic. Guidance on how to get started and get reimbursed can be found here: <https://www.aad.org/member/practice/managing/coronavirus/teledermatology>

For more information, contact the American Academy of Dermatology: [aad.org](http://aad.org)

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