NPAIHB
Indian Leadership for Indian Health

COVID-19
GUDIANCE ON USING THE TRIBAL BUSINESSES & SERVICES RISK ANALYSIS TOOL

The purpose of this document is to provide guidance on how to effectively utilize the Northwest Portland Area Indian Health Board (NPAIHB) Facility Risk Analysis Tool to make informed, calculated decisions around the reopening of businesses and resuming community services. These decisions should be guided by cultural values, non-maleficence, and grounded in public health principles. The Risk Analysis Tool is designed to help tribal governments identify high risk operations, develop and implement effective mitigation measures, and monitor and evaluate risk management over time as conditions and circumstances change.

CONSIDERATIONS FOR REOPENING

Tribes should consider initiating the reopening process when the following are met:

1. downward trajectory of number of new cases for at least 14 days;
2. rapid diagnostic testing capacity is sufficient to test, at minimum, all people with COVID-19 symptoms, including mild cases, as well as close contacts and those in essential roles;
3. the healthcare system is able to safely care for all patients, including providing appropriate personal protective equipment for healthcare workers; and
4. there is sufficient public health capacity to conduct contact tracing for all new cases and their close contacts.

Tribes should also have a plan in place for what to do when the number of new cases rises again and/or they discover a case has visited one of their establishments.

RISK ASSESSMENT

Risk assessments should be integrated into the decisions around reopening. Risk assessments are formalized processes to evaluate risks and hazards. Assessing the risks of easing physical distancing measures and restarting parts of the economy requires a measurement of the **likelihood** of increased transmission and the **consequences** of that transmission. Likelihood in this case means the probability that reopening a business, school, or other organization where people congregate will cause significantly increased transmission. Consequence is the impact that increased transmission could have on individuals or communities if a business, school, or other organization reopens or eases social distancing measures. The Risk Analysis Tool seeks to estimate the overall risk of reopening a specific industry, business, or facility. Follow the instructions in the Risk Analysis Tool to appropriately estimate the measure of likelihood and consequence as described above, which when combined, will provide an estimated risk score: likelihood x consequence = risk.

RISK ANAYLSIS FACTORS & CONSIDERATIONS

When evaluating the risk of each facility, assume the worst-case scenario. Likelihood factors and considerations include:

- Time- How much time on average do people spend in the facility? COVID-19 spreads primarily through prolonged, close contact. The less time spent in a facility, the lower the risk; the more time, the higher the risk.

- Distance- Physical distancing of at least 6' is one of the proven measures to reduce the transmission of COVID-19. Can physical distancing of 6' or more be maintained and enforced? If not, can physical barriers (i.e. plexiglass) be installed that restrict transmission of the virus? If not, can all persons be required to wear face coverings? Physical distancing is the strongest measure, while heavy reliance on PPE Is the weakest. Settings where close contact is minimal, will be at lower risk than those with prolonged, close contact.
- Size of Population- The average number of persons in the same setting at the same time effects the overall level of risk. The greater the number of contacts, the greater the risk.
- Public Health Factor- Use metrics provided by the local health jurisdiction (tribe, city, county, state) to determine the overall level of risk in the community. Depending on the data available, you might consider the overall infection rate and the new confirmed cases daily to help you determine if your local area is at high, moderate, low risk.

Consequence factors and considerations include:

- Health Impact- The risk that staff or customers could contract illness and precipitate community spread is reflected in the health impact factor.
- Service Impact- The effect that disease spread while in the facility may have on the business is reflected in the service impact factor. This might include: direct financial loss, loss of customers or community support, discredit to reputation or public image, and loss of workforce.
- Susceptibility of Population At Risk- People who are at higher risk for severe illness associated from COVID-19 infection include: people 65 years and older, people who live in nursing homes or long-term care facilities, and people with underlying conditions such as asthma or chronic lung disease, diabetes, obesity, liver disease, chronic kidney disease undergoing dialysis, serious heart conditions, and those who are immunocompromised. Consider what percentage of those using the services or patronizing the business represent an at-risk group.

MITIGATION MEASURES

A facility's risk score is not fixed. It can fluctuate depending on a number of factors, such as change in the local infection rate or the implementation of effective mitigation measures. While you have little to no control over changes in the local infection rate, you can actively manage risk by implementing effective mitigation measures. When done so appropriately, mitigation measures can decrease both the likelihood and consequences of transmission. Hierarchy of controls is a concept used by the National Institute for Occupational Safety and Health as a framework for identifying controls for potentially harmful workplace hazards. See Figure 1 for a modified hierarchy of controls related to COVID-19. Each industry, business or facility will apply these measures differently but in general these can look like:

- Physical Distancing — wherever possible having people work or access the business from home; this should include restructuring responsibilities to minimize the numbers of workers that need to

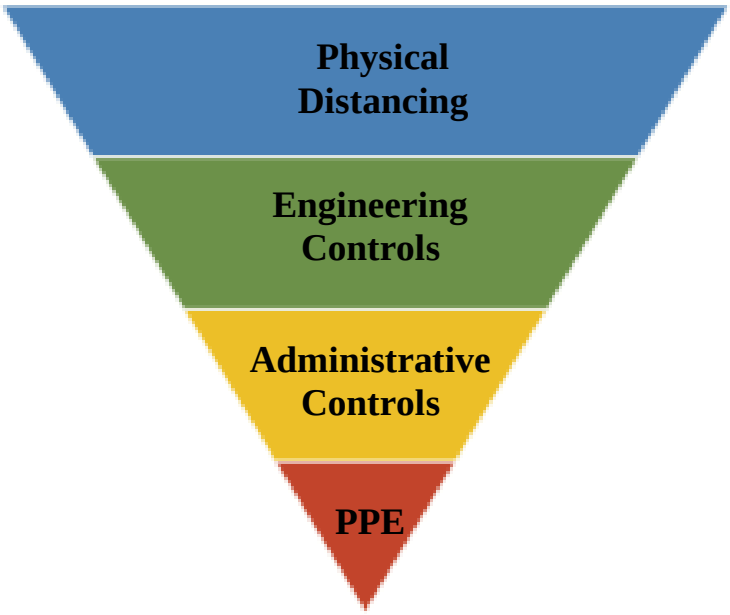

Figure 1: Modified Hierarchy of Controls Related to Covid-19

be physically present, and reducing the number of patrons allowed in the business
- Engineering controls — creating physical barriers between people (e.g., clear plastic panels between cashiers and customers)
- Administrative controls — redistributing responsibilities to reduce contact between individuals, using technology to facilitate communication
- PPE — having people wear nonmedical cloth masks

Mitigation measures are built into the Risk Analysis Tool through the "Time", "Distance", "Size of Population" and also the "Susceptibility of Population at Risk" factors. These factors should be reconsidered and adjusted routinely as mitigation measures are implemented and enforced. For example, a restaurant may have an occupancy rate of 200 people; by reducing maximum capacity to 50, you can reduce your risk. Another example may be a coffee shop which patrons visit on average for 1 hour. You can reduce this risk by asking patrons to stay for no more than 1 hour.

See facility-specific guidance documents for mitigation and modification measures to consider. These should be adapted and implemented as feasible.

EVALUATION & MONITORING

No risk assessment is complete without routine evaluation and monitoring. The RA tool identifies a recommended evaluation and monitoring schedule based off the level of risk: low= monthly, moderate= biweekly, high=weekly, but you should determine a schedule that works for you.

Evaluation and monitoring should consist of a self-assessment of all the factors and considerations based on local developments, new knowledge, the implementation of mitigation measures, and the identification of new mitigation measures. Things to consider include:

- Are mitigation or modification measures implemented effectively and enforceable?
- Have new concerns, risks, or challenges emerged or been observed?
- Are mitigation measures evaluated and adjusted as needed on a day-to-day basis?
- Has the local infection level or threat changed?
- Have any cases or potentially infected persons entered the facility?
- Have there been any changes to the federal or tribal requirements or regulations?

As you routinely evaluate and monitor, expect the risk level to adjust as mitigation measures are identified and implemented and local conditions change. It is important to note that no mitigation steps will reduce the risk entirely, and even with multiple, effective mitigation measures in place, a facility's risk may remain high. The goal is to reduce the risk when and how you can and to continually assess, evaluate and adjust.