Design and Implementation of an Institutional Response to the Pandemic

The client firm ("Company") is a leading provider of residential and supported living services to individuals with intellectual or developmental disabilities, with over 2,000 employees supporting about 700 individuals in 250 home locations across multiple states. Many of these individuals have physical and intellectual vulnerabilities that make it difficult for them to communicate and cooperate with caretakers.

SITUATION

As COVID-19 rapidly evolved into an infectious disease pandemic, the Company recognized the urgent need to develop and implement a strategy to protect its employees and the individuals it serves.

OUR ROLE

FTI Consulting Health Solutions provided an Interim Chief Compliance and Quality Officer (CCQO) to restructure and direct the Company’s compliance program, with a new focus on client safety and quality of care.

The CCQO assumed the role shortly before Health and Human Services Secretary Alex M. Azar II declared a public health emergency for the United States on January 31, 2020 in response to the 2019 novel coronavirus.

With FTI’s assistance, the Company quickly responded by implementing preparedness principles for emerging infectious diseases developed by the CDC and WHO for the SARS pandemic, in combination with OSHA guidance for preparing workplaces for an influenza pandemic, adapting them to the specific needs of a home-based community services provider in the context of the COVID-19 pandemic.
The following outline summarizes the Company's comprehensive efforts to provide for the safe and orderly delivery of services, which was developed and implemented with assistance from FTI Consulting specialists.

**Emerging Infectious Disease Policy**
- Emergent Infectious Disease Plan (EID Plan)

**Communications and Teamwork**
- Comprehensive Company Website
- Infection Preparedness Team
- Daily Crisis Huddle

**COVID-19 Update**
- Contact Tracing
- COVID-19 Exposure Reporting System
- COVID-19 Exposure Registry
- Medical High-Risk Client Registry

**Workplace Safety**
- Business Continuity Plans
- Administrative Controls
- Return-to-Work Policies, Procedures and Plans

**Personal Protective Equipment**
- Logistics Management
  - PPE Demand Forecasting Tool
  - Company-wide Tracking of PPE
  - Care Centers
  - Weekly PPE Meetings

**Employee Training and Education**
- Educational Conference Calls
- Donning, Offing and Disposing of PPE
- Direct Staff Training for In-Home Sick Care
- Setting Up an Isolation Room
- Pulse Oximetry and Thermometer Guidelines
- COVID-19 Handbook

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**OUR IMPACT**

To date, all Company services and residential facilities have remained open and functional.

The Company’s state partners have recognized its prompt and effective efforts to safely manage its homes and protect both the individuals under its care and those in its employ.

The Public Health Department of one of the nation’s most populous states, which was also one of the centers of the outbreak, provided feedback that the Company was the best prepared of any residential services homes.

The Developmental Disabilities Administration of another large state complimented the Company’s early efforts to secure PPE and train staff.

The state Public Health Department in charge of residential care services noted that the Company was one the first agencies to equip staff with preventive PPE.

As lockdowns were reversed in the several states in which the Company does business, the Company continued its administrative controls for sanitation, hygiene, prevention and mitigation.

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