



COVID-19 Guideline Modifications as CMS Announces “Opening Up America Again”: Comments from the Society of Surgical Oncology

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On 19 April 2020, the Center for Medicare and Medicaid Services (CMS) released a document entitled “Opening Up America Again: Centers for Medicare & Medicaid Services (CMS) Recommendations for Re-opening Facilities to Provide Non-emergent Non-COVID-19 Healthcare: Phase I.”¹ The CMS recognizes that some areas of the United States have low and/or stable numbers of COVID-19 patients, and that healthcare facilities should have greater flexibility to deliver care currently deferred due to the pandemic, including surgical procedures. Regions must fulfill what the White House has defined as “gating criteria” to allow progress to phase 1 of re-opening.² These criteria include:

1. A downward trajectory of cases with influenza-like illness or COVID-like symptoms within 14 days
2. A downward trajectory of documented COVID-19 cases or positive tests (as a percentage of total tests) within 14 days
3. Hospitals are treating patients without crisis care
4. Robust testing programs are in place for at-risk health care workers.

Phase 1 of re-opening would allow resumption of elective surgeries as clinically appropriate on an outpatient basis at facilities that adhere to CMS guidelines. If a region shows no rebound in the number of cases and satisfies the 14-day gating criteria a second time, it can move to phase 2, in which “elective surgery can resume, as clinically appropriate, on an out- or inpatient basis at facilities that adhere to CMS guidelines.”² If a region then shows no rebound in the number of cases and satisfies the 14-day gating criteria a third time, it can move to phase 3, in which surgery can fully resume, and other social restrictions can be relaxed (e.g., unrestricted staffing of worksites, limited physical distancing in large venues).

The CMS document suggests that “providers should prioritize surgical/procedural care and high/complexity chronic disease management.”¹ This would require testing capacity, a healthy workforce, adequate personal protective equipment (PPE), and post-acute care that would not jeopardize the facility’s capacity to respond to another surge in COVID-19 cases. Facilities also should continue taking steps to reduce transmission (distancing, separation of COVID-19-free spaces, prohibition of visitors, increased sanitation protocols), and all patients should be screened for symptoms and by laboratory testing “before care” (presumably including surgery). Health care workers also should be regularly screened by laboratory testing when “adequate testing capability is established.”

To summarize, the White House and CMS documents^{1,2} suggest that facilities with down-trending numbers of COVID-19 cases, adequate testing abilities, and no shortages of PPE, intensive care unit (ICU) beds, ventilators, or health care workers may be able to resume elective surgeries, which would reasonably include all cancer cases.

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66 Phase 1 of recovery, as described by the White House
67 document, would allow outpatient procedures for cancer
68 patients, which had been deferred as lower-priority oper-
69 ations during the pandemic phase of care. Phase 2 then
70 would allow for cases requiring inpatient care and for
71 outpatient procedures. In their document, “Local
72 Resumption of Elective Surgery Guidance,” the American
73 College of Surgeons (ACS) also has given detailed sug-
74 gestions about what facilities should do to prepare for the
75 ramping up needed for initiation of elective surgeries.³

76 The ACS recently updated their cancer-triaging sug-
77 gestions during COVID-19 to include a recovery phase in a
78 document entitled “ACS Guidelines for Triage and Man-
79 agement of Elective Cancer Surgery Cases During the
80 Acute and Recovery Phases of Coronavirus Disease 2019
81 (COVID-19) Pandemic.”⁴ This document breaks down the
82 COVID-19 outbreak into the pandemic phases for which
83 the Society of Surgical Oncology (SSO)⁵ and the ACS⁶ had
84 already posted guidelines (on 24 March 2020) for triaging
85 of cancer cases, and these new guidelines now include two
86 recovery phases. The early recovery phase is characterized
87 by fewer COVID-19 cases each day and greater availability
88 of limited resources such as PPE, health care workers,
89 ventilators, ICU beds, and testing. In the late recovery
90 phase, the facility is more than 14 days beyond its peak,
91 and resources are at near normal levels. The ACS docu-
92 ment⁴ gives specific suggestions for prioritizing cancer
93 cases in the acute and late recovery phases for patients with
94 breast cancer, colorectal cancer, thoracic malignancies,
95 pancreatic and periampullary cancers, soft tissue sarcoma,
96 and melanoma.

97 Although the release of these documents from the White
98 House and the CMS^{1,2} are encouraging for surgeons,
99 inspiring hope that they may be able to resume elective
100 surgeries soon, all regions of the country and even specific
101 hospitals within the same region will have unique chal-
102 lenges in meeting these proposed criteria. Some confusion
103 may result from the fact that phase 1 of recovery mentions
104 only performance of outpatient procedures, and that indi-
105 vidual states may have different criteria mandated by their
106 governors. Therefore, surgeons must work closely with
107 their hospital leadership and local authorities to determine
108 whether they fall within the pandemic or recovery phases,
109 and whether they meet gating criteria as well as CMS and
110 state guidelines. If these standards are met, then it would be
111 reasonable for hospitals to resume elective surgeries for
112 cancer patients, which could include both in- or outpatient
113 procedures because few cancer cases would be considered
114 as truly elective.⁷

115 The updated ACS guidelines for triage give detailed
116 suggestions on how to prioritize cancer cases that have
117 been deferred at these six disease sites.⁴ A general principle
118 emerging from these suggestions is that clinicians must

review the priority of cancer cases suggested in the pan- 119
demic phases, and begin by performing the more urgent 120
cases that were delayed, followed by the semi-urgent cases. 121
Afterward, other cancer cases can follow based on priori- 122
tization as to which patients are most likely to have 123
compromised outcomes with further delays. It is important 124
for health care workers to be aware that there could be a 125
resurgence of COVID-19 cases related to seasonal changes 126
(in the fall or winter), as social distancing practices are 127
relaxed, or as a result of other currently unforeseen factors. 128
Should this happen, these events could again lead to severe 129
restrictions in cancer care delivery and a return to these 130
triage guidelines for cancer patients. All guidelines will 131
also need to be updated periodically as both COVID-19 132
polymerase chain reaction and antibody testing become 133
more universally available, effective drugs are identified, 134
and/or a successful vaccine is developed. 135

*Readers might also be interested in how the COVID-19 136
pandemic is affecting the academic mission in surgical 137
oncology,⁸ and a detailed example of how one medical 138
center has navigated the issues surrounding COVID-19.⁹ 139*

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