



Frequently Asked Questions: Requirement for SARS-CoV-2 (COVID-19) Testing of All Decedents in the City and County of San Francisco

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BACKGROUND: As of June 26, 2020, [Health Officer Order No. C19-14](#) requires testing of all recently-deceased people in the City and County of San Francisco for the presence of SARS-CoV-2 (the virus that causes COVID-19) prior to final disposition of the body.

AUDIENCE: Professionals and businesses of funeral-related services, including funeral homes, mortuaries, crematoriums, and cemeteries operating in the City and County of San Francisco. This Order also applies to persons transporting human remains within the City or from the City to outside the city.

Frequently Asked Questions

Why is this Order being issued?

- To help protect persons working in funeral-related services.
- To identify missed cases of COVID-19, including those without symptoms, for contact tracing.
- To understand who is at highest risk for death due to COVID-19.
- To provide the public with information on the COVID-19 epidemic.

What does the new health Order require me to do?

This Order requires you to confirm that all persons dying in San Francisco were tested for COVID-19. You can fulfill this requirement in several ways:

- Obtain confirmation that COVID-19 testing was done from the acute general care hospital or skilled nursing facility (SNF) where the death occurred, or from the Medical Examiner's office prior to transporting the body. Make note of who confirmed that testing had been done. Leave your contact information so you can receive test results if they are not yet known. Any of the following scenarios meet the requirement for COVID-19 testing:
 - The patient tested positive for COVID-19 before they died ("antemortem testing"). The positive test may be up to 14 days prior to death in all cases, or at any time before death if the cause of death is COVID-19 related.
 - The patient tested COVID-19 negative AND the test was performed within 72 hours preceding death.
 - A postmortem test was ordered, which is the responsibility of the acute general care hospital or SNF where the death occurred, or the Medical Examiner's office for Medical Examiner cases.
- When the death occurs at a place other than an acute general care hospital or SNF (e.g., a long-term care or other congregate-living facility, hospice, a decedent's home, or other residential setting) or was not a Medical Examiner case, it is the responsibility of the funeral-related service to confirm COVID-19 testing according to the above guidelines or to arrange for postmortem testing before the body is prepared for final disposition. There are three options for free COVID-



19 testing through the San Francisco Department of Public Health (SFDPH) Decedent Testing Unit (DTU) that can be arranged by calling 415-487-5046:

- Option A (only available between 7 a.m. and 9 p.m.): Contact the DTU and they will come to the place of death, collect the specimen, and order the test. Document the test was ordered and specimen collected. You may then transport the remains.
- Option B (only available between 7 a.m. and 9 p.m.): You collect the remains and arrange for the DTU to come to your place of business prior to final disposition. You may not take any steps in preparing the body for final disposition that would interfere with the testing process until after the DTU collects the specimen and orders the test. Document the test was ordered and specimen collected. Ask the DTU if you have questions.
- Option C (only available between 9:01 p.m. and 6:59 a.m.): You collect the remains and bring them to the DTU location for specimen collection. Call ahead for address and instructions. Document the test was ordered and specimen collected.
- When the body is being moved outside the City and County of San Francisco, you must work with the DTU to ensure that the test will occur before the body is prepared for disposition. Call the DTU for instructions (415-487-5046).

What are the rules concerning privacy and confidentiality of the testing documentation?

The Office of Civil Rights have modified HIPAA requirements in light of the COVID-19 emergency. HIPAA-covered entities and their business associates may share patient information as necessary in the course of their work related to COVID-19. Rules of privacy and confidentiality apply, such as only collecting the minimum amount of information needed, access to the information restricted to the fewest number of persons necessary (need to know only), storing the information in a secure location, and retaining the information for the minimum amount of time required. For more information, see:

www.hhs.gov/sites/default/files/february-2020-hipaa-and-novel-coronavirus.pdf. For purposes of this Order, you must document how you confirmed that testing occurred. Other information, such as a positive test result, must be kept strictly confidential and not shared outside those who need to know. Information about test results should not be kept longer than needed.

How long will testing take?

We anticipate that the DTU will be able to respond within one hour to requests to come to the place of death or place of business, and that wait times at the DTU location will be brief. Specimen collection itself takes approximately 5 to 15 minutes.

How long will it take to get test results?

Results will be phoned or faxed to the ordering provider (i.e., the Medical Examiner, the hospital, SNF, the DTU) within 24 to 48 hours. However, this may take longer during periods of high testing volume. Families will be notified of any positive result within 2-3 working days from specimen collection. Families will not be notified of negative test results.

What happens if a decedent tests positive for COVID-19?

If the test is positive for COVID-19, the DTU will notify the facility ordering the test and the family or next of kin. The SFDPH will initiate contact tracing to identify persons who may have had close contact with



the deceased. Further information on contact tracing, isolation, and quarantine can be found at the links at the end of this document.

Can the family, next of kin, or representative of the estate refuse testing?

No. The testing is mandatory. A flyer providing information to families is available in several languages and downloadable at www.sfgdcp.org/covidtest.

Who will pay for the testing and any costs associated with obtaining the test?

The City and County of San Francisco will bear the costs associated with the DTU's work. This does not cover the costs of transportation to the DTU location if you choose Option C. Parking will be free. If you wish to avoid the expense of transport to the DTU, you may request that the DTU field unit come to facility where the patient died (Option A) or to your place of business (Option B). The Order prohibits any attempt to pass on the costs of testing to the family, next of kin, or estate.

Where is the Decedent Testing Unit located? What are the hours of operation?

**The San Francisco Department of Public Health
Decedent Testing Unit (DTU)**

- Phone number: 415-487-5046
- Available 24 hours 7 days per week; Field testing performed 7am to 9pm
- For after-hours arrangements, call: 415-487-5046

Additional Resources

Funeral-related services must stay updated by regularly checking the SFPDH website at www.sfdph.org/healthorders.

- Frequently asked questions on mandatory postmortem testing for families, next of kin, and estate representatives is available in several languages at www.sfgdcp.org/covidtest.
- Guidance for funeral homes and families about safe funeral preparations and getting samples for COVID-19 testing: <https://sf.gov/information/guidance-funeral-homes-and-families>
- Information on isolation and quarantine: <http://www.sfgdcp.org/i&q>

From the California Department of Public Health:

- [Infection Prevention for Funeral Establishments Handling Deceased Cases of COVID-19](#)
- [Guidance \(AFL-20-24\) for Procedures and Transfer of Deceased Persons with Confirmed or Suspected Coronavirus Disease 2019 \(COVID-19\)](#)

From OSHA/Department of Labor: [Guidance for Postmortem Care Workers and Employers](#)