



## COVID-19 Considerations for Documentation & Record Keeping, Ensuring Proper Final Disposition

[Michigan.gov/Coronavirus](https://www.michigan.gov/Coronavirus)

With the loss of life now reaching over 3,600, a large burden is being placed on the State's health care facilities and the mortuary science industry. The Michigan Department of Health and Human Services (MDHHS) issued a Public Health Epidemic Order on May 4, 2020, to address the difficulties hospitals, county medical examiners, mortuary science licensees, and other professionals are facing in preparing dead bodies for the proper final disposition of remains. This document is meant to provide guidance on the record-keeping necessary to ensure the final disposition of a dead human body and compliance with the emergency order. It also includes information on temporary storage options that was included in a previously issued guidance by MDHHS.

### Documentation & Record Keeping

#### **Individuals with Authority to Make Decisions Regarding Embalming and Final Disposition on Behalf of a Deceased Loved One under EPIC:**

Section 3206(1) of the Estates and Protected Individuals Code (EPIC), [MCL 700.3206\(1\)](#), outlines who has the right and power to make decisions regarding funeral arrangements and the handling or disposition of a decedent's body. In order of priority, the following individuals have the right and power to make such decisions:

1. If the decedent was an active member of the Armed Forces, a person designated under the laws of the United States or instruction of the Department of Defense.
2. A funeral representative designated in writing that is of sound mind and is at least 18 years old.
3. The surviving spouse.
4. The decedent's children who are at least 18 years old.
5. The decedent's grandchildren who are at 18 years old.
6. The decedent's parents.
7. The decedent's grandparents.
8. The decedent's siblings.
9. A descendant of the decedent's parents who first notifies the funeral establishment in possession of the decedent's body.
10. A descendant of the decedent's grandparents who first notifies the funeral establishment in possession of the decedent's body.

A health care facility or a funeral establishment in possession of a dead body should make attempts to contact individuals, if known, based on the order of priority outlined above to ensure that the care for the deceased person is guided by their loved ones.

### **Documenting Attempts to Notify Individuals with Authority under EPIC:**

Health care facilities and funeral directors should make attempts to contact these individuals by phone, email, or other methods while adhering to social distancing principles. All attempts to locate the individual with the authority to make decisions regarding the embalming and final disposition of remains should be documented.

The following type(s) of documentation should be maintained for a minimum of seven (7) years to demonstrate efforts to contact persons with authority to authorize embalming and control the final disposition of the body of a deceased person within the 24-hour period in the emergency order:

- If known, the full name and contact information (phone number(s), email addresses, and mailing addresses) of the person with authority.
- Date(s) and time(s) of attempts to contact the person.
- The full name of the employee who made attempts.
- The type of communication used to contact the individual (e.g., by phone, email, or other).
- Printouts of any sent email(s) to these individuals, with return receipt requested, and any responses received.

Health care facilities and funeral directors should add any other documentation or information that they believe is necessary to ensure compliance with the Public Health Emergency Order.

## **Temporary Storage Options**

### **Temporary Storage Facilities**

Types of facilities that may be suitable for alternate body storage sites in a community include:

- Empty large warehouses
- Empty grocery store buildings
- Refrigerated rail cars
- Airplane hangar provided by the National Guard or other entity
- Temporary internment will be considered as alternative body storage, particularly during a pandemic infection.

Consider a building/site with a small number of exits and entrances, and possibly a fence to deter individuals from coming close to the building. It is presumed that some of these potential body storage sites would require modifications to provide cooling/refrigeration of bodies.

## Temporary Storage Options (Non-Facility)

1. Portable cooling and storage system specially designed for temporary storage of human remains.
2. Refrigerated trucks or refrigerated transport containers used by commercial shipping companies. It is recommended mutual agreements be pre-established with trucking companies for resources in case of a pandemic. Truck/trailer requirements:
  - No external markings – remove or cover all signage.
  - Flat floor. If slotted, floor can be covered with plywood to allow for use of gurneys.
  - Electric power if the dock has shore power available. (If not, use diesel power.)
  - Preferably, the truck will have a loading dock with rollup door with a latch to allow locking with a padlock. If it does not have a loading dock, diesel power with swing doors.

A 53-foot trailer can hold 24 bodies without stacking (8x3 grid).

To increase storage capacity:

- Temporary wooden shelves can be constructed to sufficient strength to hold the bodies.
- Consider safe movement and removal of bodies (storage of bodies above waist height is not recommended but may be required). Ensure enough staffing is available to avoid injuries.
- Shelves will be contaminated with biological material and will require decontamination and disinfection after the storage.
- The decision to utilize more than one body bag is based on the following:
  - o Condition of the decedent and potential for fluid leakage with longer term storage.
  - o The thickness of the body bag material. It has been noted that some body bags are not of the highest quality and may rip at the zipper or seams when placing bodies in them or during the transport and transferring.