Subject: PHSKC recommends weekly testing of LTCF staff regardless of positivity rate at least through the end of the 2020-2021 flu season

Recently CMS issued a memo regarding new requirements for regular testing for COVID-19 in Skilled Nursing Facilities (SNF). In addition to making recommendations around testing required during an outbreak (i.e. when there is even one case identified in a staff or resident of a facility), they also issued guidance for routine testing of staff in the absence of an outbreak and stipulated a cadence based on the jurisdiction's positivity rate.

The positivity rate is the percentage of tests performed within a jurisdiction that are positive over time. The CMS memo refers facilities to this website to check their jurisdictions current positivity rate, the King County positivity rate is also updated regularly on our website for reference here. On King County's website however it is reported slightly differently, we report the number of people tested for each positive result, to get the positivity rate just divide 1 by the number provided (i.e. if the number of people tested for each positive case identified is 50 then the positivity rate is 1/50 = 0.02 multiply this by 100 to get the percent 0.02x100 = 2%).

In the memo CMS recommends testing all staff in skilled nursing facilities (SNF) on a monthly basis if the positivity rate is below 5%. However, Public Health – Seattle & King County values a more cautious approach at this time. We recommend weekly testing of all nursing home staff until further notice. We are available to consult with your facility regarding this recommendation including testing platform options that are available to support weekly testing.

This recommendation is consistent with CMS/DSHS in that facilities and jurisdictions are always able to implement or recommend interventions that go above and beyond CMS requirements, they are just not able to make recommendations or have practices that are less stringent than CMS/DSHS requirements. PHSKC is making this recommendation for a number of important reasons:

- Positivity rates vary across communities in King County and the overall rate can mask rates that are higher in certain areas.
- The significant impact of COVID-19 on LTCF residents, staff and facility operations and the importance of prevention and rapid detection of COVID-19 in achieving effective containment.
- The potential for increased risk for COVID transmission during flu season.
Where feasible, PHSKC recommends weekly testing for staff in Assisted Living Facilities as well. We understand that this may not be financially possible for some facilities and we would encourage those facilities to test staff weekly or as often as possible if unable to meet the weekly testing recommendation. We also believe weekly testing for other LTCF types would be ideal but realize that for entities like Adult Family Homes and Supported Living agencies this may not be possible.

James Lewis, MD, MPH (he/him)

Medical Epidemiologist, COVID-19 Healthcare System Response
Public Health Seattle and King County
E-mail: james.lewis@kingcounty.gov
Phone: (206) 263-1452

Links:
- Key Indicators of COVID-19 activity in King County - https://kingcounty.gov/depts/health/covid-19/data/key-indicators.aspx