

**Communicable Disease Epidemiology
and Immunization Section**

401 5th Avenue, Suite 1250
Seattle, WA 98104

206-296-4774 Fax 206-296-4803
TTY Relay: 711

www.kingcounty.gov/health

Subject: PHSKC recommends weekly COVID-19 testing of LTCF staff regardless of community test positivity rate or vaccination status until further notice.

This is an update to a previous memo titled “Public Health — Seattle & King County recommends weekly testing of all LTCF staff” posted 4/6/2021. This update includes a link to WA Department of Health guidance which supports the PHSKC recommendation as well as links to updated CDC and CMS guidance on this issue.

CMS previously issued a [memo](#) regarding requirements for regular testing for COVID-19 in Skilled Nursing Facilities (SNF). In addition to making recommendations around testing required when a new case is identified or in an [outbreak](#), they also issued guidance for routine testing of staff in the absence of an outbreak and stipulated a cadence based on the jurisdictions positivity rate. This memo was updated 27th of April 2021, concurrently with CDC [guidance](#) containing similar language, to state routine testing of staff in the absence of an outbreak is no longer required for vaccinated staff, but is still required for unvaccinated staff.

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.

In the memo, CMS recommends testing all unvaccinated staff in skilled nursing facilities (SNF) monthly if the positivity rate is below 5%. **However, Public Health – Seattle & King County values a more cautious approach at this time. We recommend at least weekly testing of all nursing home staff until further notice, regardless of vaccination status or positivity rate in the community.** WA DoH guidance to this effect can be found [here](#), and is congruent with PHSKC guidance although they recommend monthly testing if the local jurisdiction positivity rate is <5%. We are available to consult with your facility regarding this recommendation at your discretion.

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 should not, however, make recommendations or have practices that are less stringent than CMS/DSHS requirements. PHSKC is making this recommendation for a number of important reasons:

- **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.**
- **Positivity rates vary across communities in King County and the overall rate can mask rates that are higher in certain areas.**

**Communicable Disease Epidemiology
and Immunization Section**

401 5th Avenue, Suite 1250
Seattle, WA 98104

206-296-4774 Fax 206-296-4803
TTY Relay: 711

www.kingcounty.gov/health

- **King County continues to have a high level of COVID-19 transmission.**
- **Vaccine breakthrough (VBT) monitoring.**
- **Variants of Concern (VoCs) are circulating in King County and testing provides data to support our Public Health response.**
- **Testing helps understand the efficacy of the vaccine against the VoCs.**
- **As restrictions ease for visitations and activities within LTCFs, testing is important to monitor how this impact outbreak incidence and prevent transmission within facilities.**

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.

If you have questions regarding testing in your facility, please reach out to Allison Moore at Allison.moore@kingcounty.gov

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:

- CMS Memo (QSO-20-38-NH) - <https://www.cms.gov/files/document/qso-20-38-nh.pdf>
- CMS Covid-19 Nursing Home Data - <https://data.cms.gov/stories/s/COVID-19-Nursing-Home-Data/bkwz-xpvg>
- Key Indicators of COVID-19 activity in King County - <https://kingcounty.gov/depts/health/covid-19/data/key-indicators.aspx>