Reminder: Long-term Care Facility COVID-19 Test Results Reporting Requirements

This document will be updated as federal and state requirements change.

Nursing Homes

Reporting requirements

- According to Virginia [Regulations for Disease Reporting and Control](#) 12 VAC 5-90-80, nursing homes are required to submit individual point-of-care (POC) SARS-CoV-2 testing data, including antigen testing data, to VDH.

- On January 8, 2021, the U.S. Department of Health and Human Services (DHHS) updated their [Reporting Guidance](#) for the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). Additionally, on January 8th, CMS released a [memo](#) with this update. [CMS testing requirements](#) were updated September 10, 2021.
  - You are required to obtain a [CLIA certificate](#) if you are conducting diagnostic tests for COVID-19. If you are conducting COVID-19 testing, you are required to report only the positive results of COVID-19 diagnostic and screening tests. This includes data for all diagnostic and screening testing completed, which includes molecular, antigen, and antibody testing for each individual tested. **Individual POC test results (only positive) must be reported daily, within 24 hours of test completion**. Failure to report may result in enforcement action.
  - UPDATE: Recent HHS update requires facilities to report only positive POC test results. Negative test results are no longer required to be reported.

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  - **Facilities that perform POC testing are required to report results for all POC testing that is performed within the facility (residents, staff, visitors).** If the National Healthcare Safety Network (NHSN) is the method by which POC test results are reported, then POC test results for visitors must be reported to NHSN.
  - Language in the document was modified to state that the NHSN POC Test Reporting tool is the preferred (but not required) method for CMS-certified LTCFs (i.e., nursing homes) to submit COVID-19 POC test results to state health departments and HHS.

How to report

- CMS-certified skilled nursing homes may report the POC test results to either the [VDH portal](#) or to NHSN. **Facilities only need to report to one system**, as results from NHSN are reported to appropriate state and local health departments using standard electronic laboratory messages.
  - If facilities choose to report to NHSN, they must first upgrade their SAMS access to Level 3. **Facilities should report individual POC test results (only positive) within 24 hours regardless of the system that is utilized.**
  - Information on reporting to NHSN, including [POC Testing Reporting Tool FAQs](#), can be

found on the NHSN LTCF website. CDC training slides are located here.
https://www.cdc.gov/nhsn/pdfs/covid19/ltcf/poc-testing-training-508.pdf

- ■ Batch reporting is possible in NHSN via upload of a CSV (Excel) file.

- ○ Nursing homes are encouraged to have, at minimum, two individuals with access to NHSN at all times so that the facility maintains access to report into NHSN if a staff member leaves their position.

Penalties for failing to report

- VDH is reiterating that nursing homes that choose NHSN as their method of reporting, are required to report individual POC test results, not **just** summary data. Failing to report the required data may result in citations and civil monetary penalties for CMS-certified skilled nursing facilities.

- If a facility holds a CLIA certificate and performs COVID-19 testing, they are held accountable to all reporting requirements, including the CLIA requirement for reporting.

Note: Nursing homes that have not been reporting individual POC test results into NHSN or the VDH Portal should report their retrospective data.

Assisted Living Facilities and other LTCFs conducting POC testing

Reporting requirements

- On January 8, 2021, the U.S. Department of Health and Human Services (DHHS) updated their Reporting Guidance for the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). Additionally, on January 8th, CMS released a memo with this update.

  - ○ You are required to obtain a CLIA certificate if you are conducting diagnostic tests for COVID-19. If you are conducting COVID-19 diagnostic testing, you are required to report only positive results of COVID-19 diagnostic and screening tests. This includes data for all diagnostic and screening testing completed, which includes molecular, antigen, and antibody testing for each individual tested. **Individual POC test results (only positive) must be reported daily, within 24 hours of test completion**. Failure to report may result in enforcement action.

  - ○ **Facilities that perform POC testing are required to report results for all POC testing that is performed within the facility (residents, staff, visitors).**

How to report

- Assisted living facilities (ALFs) and other LTCFs should report POC test results to the VDH Portal.

- Note ALFs can voluntarily report into NHSN; they would need to gain access via CDC (see instructions above).

- Facilities with both nursing home and assisted living components can either:

  - ○ Report data for nursing home component to NHSN and ALF component to VDH POC portal OR

○ Facility can work with CDC to set-up ALF as a facility in NHSN; facility can then report both nursing home and ALF data into NHSN (likely under different facility numbers)

Penalties for failing to report

● If a facility holds a CLIA certificate and performs COVID-19 testing, they would be held accountable to all reporting requirements, including the CLIA requirement for reporting.

VDH VIRGINIA DEPARTMENT OF HEALTH