

# Home Health Agency and Hospice Fact Sheet: Long-Term Care Facility Testing Plan for Associated Staff COVID- 19 Testing

## Background

As Oregon continues to experience surge in COVID-19 cases across the state, outbreaks (defined as one case or more) at long term care facilities reflect the community trend of COVID-19 positive cases. Older adults, especially residents living in congregate long term care settings are the most vulnerable to the effects of COVID-19. COVID-19 spreads quickly in congregate settings and can have life threatening consequences for residents. Eighty percent of long-term care facility positive COVID-19 cases are related to staff or associated staff. To mitigate the risk of exposure in these settings, the Governor's Long Term Care Testing Plan requires routine testing for staffing and associated staff.

## Key Points

- Oregon has updated Phase Two of the Governor's Long-Term Care Facility (LTCF) Testing Plan to align with federal requirements for routine COVID-19 testing for staff and associated staff. The new requirements started on November 1, 2020. The requirements are in:
  - CMS guidance for nursing facilities: [CMS QSO-20-38-NF](#)
  - Full text of the [Plan for Testing Long-Term Care Staff](#)
- Home Health Agency and Hospice personnel are considered associated staff of the LTCFs and subject to COVID-19 testing requirements when entering LTCFs.
- Home Health Agencies and Hospices should work with each LTCF to understand the expectations for COVID-19 testing frequency in that facility.
- Home Health Agencies and Hospices are being asked to establish a system for COVID-19 testing of their staff who are assigned to provide services as

associated staff in LTCFs, to document that testing, and to set up a system to communicate that information to LTCFs.

- Each LTCF may be requesting COVID-19 test results or attestations to establish that associated staff from Home Health Agencies and Hospices assigned to provide services in the LTCF have met the LTCF's COVID-19 testing requirement.
- Direct reimbursement to Home Health Agencies and Hospices is not available from the Oregon Health Authority or the Oregon Department of Human Services.

## **Do Oregon Department of Human Services Rules cover Home Health Agency and Hospice personnel entering Long-Term Care Facilities?**

- Yes. Home Health Agency and Hospice personnel entering LTCFs to provide direct care to residents are defined as associated staff under Oregon Administrative Rule [411-060-0027 Routine Staff Testing Requirements](#).

## **What types of Long-Term Care Facilities are federally required to complete routine COVID-19 staff testing?**

- The federal guidance covers Skilled Nursing Facilities. Oregon also requires routine staff testing at Assisted Living Facilities and Residential Care Facilities.

## **What is the role of Long-Term Care Facilities?**

- LTCFs are responsible for ensuring residents receive and have access to care and services they are eligible to receive. Facilities must also ensure staff and associated staff adhere to COVID-19 testing requirements.
  - LTCFs that do not permit residents to receive necessary healthcare services may face sanctions related to residents' rights to receive appropriate care.
  - LTCFs that do not ensure that associated staff are tested may face sanctions related to infection control requirements.
  - LTCFs must ensure associated staff have been tested. They need to receive documentation or attestation that the associated staff assigned to the facility test negative prior to having contact with residents.

- LTCFs and home health and hospice agencies need to work proactively and collaboratively to define clear expectations for meeting the testing requirements and how they will share testing documentation or attestations for associated staff.
  - Expectations should include frequency of routine COVID-19 tests, type of acceptable COVID-19 tests, and documentation.

### **Are there additional options to facilitate testing?**

- LTCFs and Home Health and Hospices should meet to mutually determine and agree on testing protocols and procedures. To the extent possible, LTCFs are encouraged to have policies that recognize the fact that many Home Health Agencies and Hospices serve multiple LTCFs and will not have the capacity to meet different requirements for each one.
- LTCFs with antigen test devices are encouraged to use these devices to support routine COVID-19 testing for associated staff.
- LTCFs with routine PCR testing capacity are encouraged to make available to support associated staff.
- In addition to receiving associated staff test results, LTCFs are encouraged to develop a policy in which they accept an attestation of testing from employers of associated staff (including Home Health Agencies and Hospices) and other LTCFs as verification of completed COVID-19 testing.
- LTCFs should not require duplicate routine testing when timely test results or an attestation are provided.

### **What information will Home Health Agencies and Hospices need from Long-Term Care Facilities?**

- Home Health Agencies and Hospices should contact the LTCFs in which their staff are assigned provide care, to determine:
  - if the LTCF can support testing;
  - the required frequency of testing;
  - the required administrative protocols; and
  - the tracking expectations.

### **How can Home Health Agencies and Hospices acquire COVID-19 tests for staff visiting Long-Term Care Facilities?**

- Home Health Agencies and Hospices should enter into an agreement with a COVID-19 testing service or a local hospital or provider to test staff.
  - Private insurance may reimburse COVID-19 testing costs.

- Home Health Agencies and Hospices can contact their [Local Public Health Authority](#) (LPHA) to request COVID-19 testing supplies and resources.
  - Local Public Health Authority supplies and capacity to support routine staff testing varies by county and based on available resources, so LPHA may not be a reliable resource for ongoing testing needs.

**Document accessibility:** For individuals with disabilities or individuals who speak a language other than English, OHA and ODHS can provide information in alternate formats such as translations, large print, or braille. Contact the COVID-19 Response and Recovery Unit at 503-979-3377, 711 TTY or [CRRU@dhsosha.state.or.us](mailto:CRRU@dhsosha.state.or.us).