

CABINET FOR HEALTH AND FAMILY SERVICES DEPARTMENT FOR PUBLIC HEALTH

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Steven J. Stack, MD
Commissioner

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Dear Healthcare Provider,

This notice provides updated COVID-19 case reporting guidance for medical providers and replaces any previous guidance. This guidance includes new information for at-home testing and COVID-19 case reporting.

As clinicians and facilities continue testing for COVID-19 (SARS-CoV-2), this letter serves to reinforce that within the Commonwealth of Kentucky, healthcare providers are required by law and regulation to submit a case report for all patients with positive laboratory results for COVID-19 to the Kentucky Department for Public Health (KDPH). As a clinician or facility that offers COVID-19 testing to the public, you are responsible for reporting every positive result you have identified through laboratory testing to public health authorities (local or state) within 24 hours. This includes patients with positive PCR, NAA, antigen and antibody test results. Rapid and point-of-care (POC) testing, as well as home-testing that is observed or "proctored" by a trained healthcare provider, is included in this requirement. Clinician/facility reporting is required in addition to laboratory reporting to fulfill Kentucky's reporting requirements.

At-Home Specimen Collection:

When prescribing or ordering an at-home test, only COVID-19-positive cases where specimen collection was monitored or observed by a trained healthcare provider are reportable. For home testing kits in which specimens are collected at home and sent to a laboratory to determine the result, the laboratory testing the specimen is required to submit the laboratory results for all test results (negative and positive). The clinician or facility that orders COVID-19 tests is required to complete the KDPH COVID-19 Case Report Form for every positive result received from these at-home tests. Clinicians who order/prescribe a home testing kit where the specimen or test results are not sent to a laboratory (where the specimen collection is monitored or observed) are responsible to complete both the laboratory result reporting (see attached COVID-19 Test Reporting Guidance) and, for positive results, the KDPH COVID-19 Case Report Form.

KDPH recommends that positive results from non-proctored COVID-19 tests be confirmed with a medically proctored PCR or antigen test to assist with public health follow-up (e.g., for work or school purposes).

To reports positive case-patients, a single, fillable <u>KDPH COVID-19 Case Report Form</u> is available that replaces the EPID 200 form used for other reportable diseases. Completion of the KDPH COVID-19 Case Report form replaces the need to complete CDC's PUI form along with the KY COVID-19 case report form.

Providers/clinicians/facilities must submit the <u>KDPH COVID-19 Case Report Form</u> directly to KDPH or the local health department within 24 hours for any lab result positive for SARS-CoV-2.

It is critical for KDPH to collect accurate and complete data from healthcare providers and laboratories. Without this information, KDPH and local health authorities cannot conduct essential outbreak management activities, such as contact tracing, isolation, and quarantine, to mitigate the spread of COVID-19.

Per Commonwealth regulation 902 KAR 2:020 (detailed below), the following data elements are required to be reported by healthcare providers and/or facilities providing testing:

Section 4(16) Information to be reported. Except as provided in subsections (3) and (7) of this section, a report required by this administrative regulation shall include:

- (a) Patient name;
- (b) Date of birth;
- (c) Gender;
- (d) Race;
- (e) Ethnicity;
- (f) Patient address;
- (g) County of residence;
- (h) Patient telephone number;
- (i) Name of the reporting medical provider or facility;
- (j) Address of the reporting medical provider or facility; and
- (k) Telephone number of the reporting medical provider or facility.

(17) A reporting health professional shall furnish the information listed in subsection (16) {listed above} of this section and Section 2(6)(b) of this administrative regulation.

Section 2(6)(b) Clinical, epidemiologic, and laboratory information pertinent to the disease including sources of specimens submitted for laboratory testing.

Reporting and timeframe requirements are stated in Kentucky Administrative Regulation 902 KAR 2:020: Reportable disease surveillance, Section 10: "Newly Recognized Infectious Agents, HAI Outbreaks, Emerging Pathogens, and Pathogens of Public Health Importance." A copy of this regulation can be found at https://apps.legislature.ky.gov/law/kar/902/002/020.pdf.

Please note, submitting the KDPH COVID-19 Case Report Form as described above does not apply to testing-only events where a formal medical evaluation does not also take place. This exemption is allowed to facilitate public access to testing-only services in the midst of the current COVID-19 public health emergency and should <u>not</u> be interpreted as a general exemption from KDPH COVID-19 Case Report Form reporting obligations required of clinicians who provide a medical evaluation of a patient and order COVID-19 testing in relation to their evaluation. These reporting obligations are an essential element of the public health system and clinician compliance with them is important and appreciated.

For any inquires or questions, please contact <u>DPH.COVID19Providers@KY.gov</u>. Thank you for your commitment to reporting COVID-19 cases promptly so that effective public health action can be taken. Without your active participation in this process, Kentucky residents would be at increased risk of COVID-19.

Sincerely,

Steven J. Stack, MD

Commissioner

Department for Public Health