

**Input to TDEM, DSHS and HHSC on Governor Abbott's Directive
to Test All Nursing Facility Residents and Staff in Texas**

May 12, 2020

Texas Health Care Association and LeadingAge Texas appreciate the opportunity to share concerns, questions and recommendations on the development of a statewide plan to test all nursing facility residents and staff. We are committed to working with the Office of the Governor, state and local agencies to develop a successful testing strategy focused on protecting the health and safety of residents and staff.

Plan Development & Implementation

When developing a plan, there are unique considerations to be made based on the large number of facilities and the sheer size of our state. Involvement by our associations and the provider community will be critical to the overall success of this initiative.

Our associations recommend a phased-in approach considering multiple factors when determining the number of facilities tested and their location per phase including:

- Workforce/staffing supply available to provide support in case of shortage. *We are concerned taking a regional/SDA approach may further strain local workforce supply.*
- Testing priority based on risk of infection or outbreak, current testing status, facility resources and facility requests.
- Capacity of facilities to isolate and/or cohort residents who test positive. This may also be assessed for staff that test positive but are asymptomatic so they may continue working following CDC guidelines.
- Testing capacity (ability to provide rapid results 24-48 hours).
- Lab capacity
- PPE capacity (facilities and testers)

Questions:

1. What is the timeline for testing all nursing facility residents and staff?
2. When will the testing initiative begin?
3. What can facilities prepare for this initiative?
4. Will agency personnel (HHSC, DSHS, TDEM) be required to take a test?
5. Will facilities who work with agency staff be required to have agency staff tested?
6. Will hospitals be mandated to test a patient prior to sending the patient to a nursing facility?
7. How will this initiative inform decision-making processes moving forward?
8. Does Texas have access to the testing kits, lab capacity and PPE necessary to properly execute the initiative?
9. What resources may be developed to best prepare the provider community for this initiative?
10. How may the association's communication platforms be leveraged to educate providers, residents and families, and communities about the initiative?

11. Will facilities that have already tested residents and staff be included in the initiative?
12. How will facilities be prioritized for testing?
13. Can Telehealth tools be used as part of the solution?
14. How many people have registered in the TDEM Volunteer portal and what are their credentials?
15. Who does a facility call if they are facing a crisis?
16. Who (agencies, organizations) will be involved in the development of a staffing strategy to address the potential staff challenges the testing could create?

Workforce & Staffing

Existing workforce challenges facing nursing facility providers is exacerbated by the COVID-19 pandemic. The state's ability to support potential staffing shortages when administering mass testing is a primary concern. When developing a statewide testing strategy workforce considerations must be top of mind.

Questions:

1. How is staff defined? What facility staff will be tested?
2. To what extent is the state equipped to support and supply staff in facilities that experience staff shortages? Is the staff supply sustainable?
3. What criteria will be used to determine when a staff person who has tested positive may continue working?
This should be considered for both direct-care staff and staff with no direct resident contact.

Testing & Results

The availability of testing and rapid results is critical to identify real-time exposure in a facility and respond accordingly. In order to best monitor nursing facilities the testing strategy must be precise and sustainable.

Questions:

1. Is access to rapid results testing available to execute this initiative?
2. How will communication with the facilities be conducted in preparation of testing?
3. What will be the process for testing residents? For staff?
4. What if a resident or staff person declines to test?
5. Who will be administering the tests?
6. What labs will be processing the tests?
7. How will the tests be paid for?
8. Will Texas provide reimbursement to facilities who have recently paid for and coordinated their own 100% testing efforts?
9. What role will the facility have in testing? Due to workforce/staffing concerns, our associations believe testing should be administered or strongly supported by the state.
10. Will facility tests be prioritized for processing so results are timely? Lab capacity.
11. How will test results be reported to a facility?
12. What type tests will be used?
13. What timeframe will results be reported?
14. As soon as test results are available, will the test results be shared with the nursing facility immediately so that the facility can initiate their plan, if necessary?
15. Will additional tests be made available to facilities following initial testing? We recommend providing facilities with a number of tests following their initial test results so they may test and/or retest as needed.

16. Will residents and staff recently tested (positive and negative result) need to be tested again?
17. If residents and staff have confirmed antibody testing will they need to be tested again?
18. Will testing be extended to other levels of care on the same campus as a nursing facility, i.e. CCRC? We recommend a voluntary option for these types of communities.
19. Is a facility allowed to arrange for a reputable lab to come into the building to test their residents and staff?
20. How frequently will facilities be tested?

Personal Protective Equipment & Isolation

If significant increases of confirmed cases occur due to this initiative, facilities must have abundant PPE and the ability to properly isolate and/or cohort residents (and potentially staff) that are COVID-19 positive.

Questions:

1. How will the state provide the PPE necessary to prepare for mass testing and care for residents in COVID-19 positive buildings?
2. Will the state be assessing the ability of facilities to isolate residents and or staff if confirmed COVID-19 positive or refuse testing?

Thank you again for the opportunity to share our initial questions and concerns as this initiative develops. We look forward to working with TDEM, DSHS and HHSC to ensure the Governor's directive is executed successfully in order to protect nursing facility residents and the staff who care for them.

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