



**Date:** September 16, 2020  
**To:** Long Term Care Partners in Iowa  
**From:** Iowa Department of Public Health  
State Hygienic Laboratory at The University of Iowa  
**Re:** CMS Testing Requirements for Long-Term Care Facilities  
**Contact:** For more information, please email [hai-ar@idph.iowa.gov](mailto:hai-ar@idph.iowa.gov)

On August 26, 2020, the Centers for Medicare and Medicaid Services (CMS), issued the Interim Final Rule CMS-3401- IFC, Additional Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency related to Long-Term Care Facility Testing Requirements and Revised COVID-19 Focused Survey Tool.

This rule directs long-term care facilities to test residents and staff for COVID-19 based on parameters set by the Department of Health and Human Services (HHS). This includes testing of staff and residents with symptoms of COVID-19; testing staff and residents in response to an outbreak; and conducting routine testing of staff, including consultants, contractors, volunteers and others.

The Iowa Department of Public Health (IDPH) and State Hygienic Lab (SHL) have worked closely with Iowa's long-term care facilities to provide COVID-19 testing supplies and support to help ensure the health of their residents and staff throughout the pandemic. As we have since the start, IDPH and SHL will continue to conduct testing in facilities when staff or residents become symptomatic, or when cases are identified.

However, the volume and frequency that will be generated by the new requirement for routine staff testing, in addition to the testing already occurring across the state, will exceed the current capacity of SHL. Therefore, SHL will be unable to provide and process routine tests for Iowa's long-term care facility staff members for the purpose of complying with the CMS rule.

IDPH and DIA are aware that HHS intends to supply rapid point-of-care (POC) diagnostic testing supplies and equipment to long-term care facilities in Iowa. Information on the availability and use of POC testing will be provided as soon as it is available.

If facilities are unable to meet CMS testing requirements due to supply shortages, lab availability or other reasons, they are instructed to document their attempts to perform and/or obtain testing in accordance with the guidelines. This letter is intended to serve as documentation that neither SHL, IDPH or county public health departments in Iowa can provide testing services for surveillance purposes as outlined in CMS-3402-IFC and QSO-20-38-NH.

SHL will continue to provide testing support for symptomatic staff and residents, close contacts of cases, and when working with public health and long-term care facilities if positive cases are identified.