

December 10, 2020

Director Ursel McElroy  
Ohio Department of Aging  
246 North High Street  
Columbus, OH 43215

Re: BinaxNOW Testing for Home Health and Hospice

Dear Director McElroy,

This letter is to formalize the request I made in one of our recent conversations about allocating some of the state's supply of Abbott BinaxNOW cards to home health and hospice agencies for use with their employees.

The National Association for Home Care and Hospice (NAHC) reports that the home care and hospice provider sector is serving tens of thousands of patients with active COVID-19 infections, with more than 60% of home care and hospice providers reporting COVID-19-infected patients on service. Yet they have not received the same level of testing support in Ohio as other health care sectors that care for COVID-19 infected patients.

We feel BinaxNOW rapid tests are a critical tool in preventing additional community spread from symptomatic or potentially exposed health care workers. Home health and hospice agencies would benefit from an allocation of these important resources.

It is important to remember that these workers, on a daily basis, go to multiple homes and also provide care in other health care settings, including skilled nursing centers, assisted living facilities, and inpatient hospice facilities.

Additionally, hospice care workers are included in the definition of facility staff in Centers for Medicare and Medicaid Services (CMS) Quality Safety and Oversight (QSO) memo 20-38-NH, which prescribes the COVID-19 testing requirements for SNFs, so they are subject to the county positivity cadence of testing for the facilities they serve.

While hospice staff are subject to the testing mandate, SNFs typically do not include hospice staff in their regular testing. Without state-supported testing, this leaves many hospice agencies without access to rapid testing and limits their ability to service SNF residents who elected hospice care.

While home health agency staff are not included in the definition of staff for the assisted living testing requirements the Department of Aging administers, the frequently asked questions specify, "it is strongly recommended that non-staff members who come and go from the facility be tested at least every other week. This includes, but is not limited to, contract and agency staff, and private caregivers." This recommendation, together with the urgent need to prevent spread of COVID-19, leaves home health agencies in a similar position of needing test results on a more frequent basis than is available to them.

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You may have heard that the US Department of Health and Human Services allocated some BinaxNOW cards to home health and hospice agencies, but this distribution was limited to the largest national chain providers. Unfortunately, it was of no help to most of the agencies in Ohio.

We respectfully request additional distributions to hospice and home health agency staff from the state allocation of BinaxNOW cards to help reduce community spread of COVID-19, protect our health care workers, and support home and community-based services in Ohio.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Van Runkle". The signature is fluid and cursive, with the first name "Peter" being more prominent.

Peter Van Runkle  
Executive Director