August 5, 2020

Dear Healthcare Provider,

As clinicians and facilities expand testing for COVID-19 (SARS CoV2) across Kentucky this letter serves to inform and remind that within the Commonwealth of Kentucky healthcare providers are required by law and regulation to report all positive laboratory results for SARS-CoV-2 in a Kentucky resident 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 results. Rapid and point-of-care testing is included in this requirement.

Clinician/facility reporting is required in addition to laboratory reporting to fulfill Kentucky’s reporting requirements. If COVID-19 testing is performed within your facility (e.g., a pharmacy) and/or there is no “ordering clinician,” the reporting duty falls upon the facility staff. For any lab-positive results of COVID-19 testing, providers/clinicians/facilities must submit a CDC Person Under Investigation (PUI) Form (also called a, “COVID-19 Case Report Form”) and Kentucky’s Reportable Disease Form, an EPID 200, to KDPH or your local health department. An updated version of the PUI form can be found on CDC’s [website] and an updated version of the EPID 200 can be found on the Commonwealth’s [website].

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 health care 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.


Please note, submitting a CDC PUI form and/or EPID 200 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 not be interpreted as a general exemption from CDC PUI and EPID 200 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 inquiries or questions, please contact DPH.COVID19Providers@KY.gov. 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,

Eric C. Friedlander
Secretary
Cabinet for Health and Family Services

Steven J. Stack, MD
Commissioner
Department for Public Health