December 11, 2020

Dear Healthcare Provider,

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

As clinicians and facilities expand 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 report all positive laboratory results for SARS-CoV-2 for Kentucky residents 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 (POC) testing, as well as home-testing, is included in this requirement. Clinician/facility reporting is required in addition to laboratory reporting to fulfill Kentucky’s reporting requirements.

Clarification of the reporting requirements for at-home kits is provided to address the availability of at-home COVID-19 testing. 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. The clinician/facility is required to complete the KDPH COVID-19 Case Report Form for every positive result received from these at-home tests. Clinicians who provide a prescription for the type of home testing kits that do not require the specimen to be sent to a laboratory (result is determined in the home), the clinician must complete both the laboratory result reporting (see attached COVID-19 Test Reporting Guidance) and the KDPH COVID-19 Case Report Form.

Previously, for any positive result of COVID-19 testing, submission of two forms was required: the CDC Person Under Investigation (PUI) Form and Kentucky’s Reportable Disease Form (EPID 200). A single, fillable KDPH COVID-19 Case Report Form is now available that combines the EPID 200 and CDC PUI information in one form. Completion of the new KDPH COVID-19 Case Report form replaces the need to complete two forms for COVID-19 case reporting. The form is available at: https://chfs.ky.gov/agencies/dph/covid19/CDCPUIFormKYFillable.pdf

Providers/clinicians/facilities must submit the KDPH COVID-19 Case Report Form 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.


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 not 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 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,

Steven J. Stack, MD
Commissioner
Department for Public Health