

**TO:** Vermont Health Care Providers and Health Care Facilities  
**FROM:** Patsy Kelso, PhD; State Epidemiologist

**Further Update Regarding Recommendations for  
COVID-19 Testing in Long-Term Care Facilities**

This Health Update provides an update to recommendations for COVID-19 testing in long-term care facilities (LTCFs) included in the Health Update of [May 25, 2021](#). LTCFs should continue to use antigen tests immediately upon identification of a symptomatic resident or staff person.

New recommendations are as follows:

- **Residents:**
  - Residents (both vaccinated and unvaccinated) should be tested as close as possible to **day 3 following admission to/arrival at** the facility.
  - Residents who leave the facility for **24 hours or more** (e.g., for family visits), or who attend an event which is identified as being **higher risk** (e.g., a large indoor event such as a wedding), or who are **transferred to another health care facility** (e.g., they are hospitalized) should be tested as close as possible to **day 3 following return** to the facility.
- **Staff:**
  - Unvaccinated staff who work in congregate living settings, including LTCFs, may end work exclusion with a negative PCR test collected **on or after day 7** of post-exposure quarantine.
  - Fully vaccinated staff who have ongoing exposure in their household:
    - Facilities should decide, based on the facility's needs, whether or not to exclude staff from work while they have ongoing exposure in their household.
    - If these staff are not excluded, increased frequency of testing for these staff is recommended, i.e., testing every 2-3 days for the duration of the ongoing exposure.
  - Continue once weekly PCR testing of **all staff** unless more frequent testing is required by CMS. Long-term care facilities should resume including their fully vaccinated staff in surveillance testing.

The Vermont Department of Health is not adopting the U.S. Centers for Disease Control and Prevention's updated recommendations for: 1) quarantine of fully vaccinated residents and residents who have had SARS-CoV-2 in the past 90 days; or 2) exclusion of fully vaccinated staff from surveillance testing.

In addition, on September 10, the U.S. Centers for Medicare & Medicaid Services (CMS) issued a [revision](#) to its Interim Final Rule regarding LTCF testing requirements. In this document,

recommendations for the prioritization of COVID-19 testing are included as follows: 1) test persons with signs and symptoms of COVID-19 first; and 2) then perform testing as part of an outbreak investigation. See the table below.

Testing Trigger	Staff	Residents
<b>Symptomatic individual identified</b>	<ul style="list-style-type: none"> <li>Staff, vaccinated and unvaccinated, with signs or symptoms must be tested immediately.</li> <li>These people are restricted from the facility pending testing results.</li> <li>Staff who do not test positive but have symptoms should follow facility policies to determine when they can return to work.</li> </ul>	<ul style="list-style-type: none"> <li>Residents, vaccinated and unvaccinated, with signs or symptoms must be tested immediately.</li> <li>These people should be placed on transmission-based precautions in accordance with CDC guidance pending testing results.</li> <li>Once test results are available, the facility must take appropriate actions based on these results.</li> </ul>
<b>Newly identified staff or resident with COVID-19 in a facility that can identify close contacts*</b>	<ul style="list-style-type: none"> <li>Test all staff, vaccinated and unvaccinated, who had a higher-risk exposure** to a person with COVID-19</li> </ul>	<ul style="list-style-type: none"> <li>Test all residents, vaccinated and unvaccinated, who had close contact with a person with COVID-19</li> </ul>
<b>Newly identified staff or resident with COVID-19 in a facility that is unable to identify close contacts</b>	<ul style="list-style-type: none"> <li>Test all staff, vaccinated and unvaccinated, facility-wide or at a group level if staff are assigned to a specific location where the new case occurred (e.g., unit, floor, or other specific area(s) of the facility).</li> </ul>	<ul style="list-style-type: none"> <li>Test all residents, vaccinated and unvaccinated, facility-wide or at a group level (e.g., unit, floor, or other specific area(s) of the facility).</li> </ul>

\*Close contact refers to a person who has been within 6 feet of a person with COVID-19 for a cumulative total of at least 15 minutes during a 24-hour period.

\*\*Defined in the September 10, 2021 CMS [revision](#) to its Interim Final Rule regarding LTCF testing requirements.

Of note, the revised CMS guidance now allows for a more targeted approach instead of broad, facility wide testing, when appropriate to the circumstances. Please consult with the Health Department to develop a plan for your facility. To reach the COVID-19 Epidemiology Team,

email (monitored during business hours): [AHS.VDHEpiCOVID19Program@Vermont.gov](mailto:AHS.VDHEpiCOVID19Program@Vermont.gov). If you need to report a case of COVID-19, contact the Health Department's Infectious Disease Epidemiology team. Call 802-863-7240. After hours (24/7) choose option 7.

**REQUESTED ACTIONS:**

1. Follow the new recommendations regarding testing for COVID-19 in LTCFs delineated above.
2. Be familiar with the revised CMS guidance regarding COVID-19 testing in congregate settings such as LTCFs.

If you have any questions, please contact the HAN Coordinator at 802-859-5900 or [vthan@vermont.gov](mailto:vthan@vermont.gov).

**HAN Message Type Definitions**

*Health Alert:* Conveys the highest level of importance; warrants immediate action or attention.

*Health Advisory:* Provides important information for a specific incident or situation may not require immediate action.

*Health Update:* Provides updated information regarding an incident or situation; unlikely to require immediate action.

*Info Service Message:* Provides general correspondence from VDH, which is not necessarily considered to be of an emergent nature.