

# + Policies and Procedures Manual

## *Policy: Coronavirus Testing for Associates and Residents*

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### **Policy**

LifeStream’s Communities (“Community” or “Communities”) will implement COVID-19 testing of Residents and Associates, including individuals providing services under arrangement and volunteers.

### **Definitions**

- *Associates – unless otherwise designated by levels of care or based on licensure by the Arizona Department of Health Services, the term “Associates” will be used to describe all staff members who are directly employed by LifeStream Complete Senior Living or who are employed by a third-party contract but act in the capacity of a LifeStream staff member.*
- *Community or Communities - In all cases, the use of the terms “Community” or “Communities” refers to LifeStream operations and does not include communities-at-large (such as cities, counties or states) unless expressly stated.*
- *Residents – unless otherwise designated, the term “Residents” will generally refer to LifeStream Residents living in a licensed community (Assisted Living or Skilled Nursing). The term generally does NOT apply to those Residents living in Independent Living.*
- *Types of tests – two types of tests are referred to herein this policy:*
  - *PCR Test (“PCR”) – in most cases, a PCR test is conducted using a nasal or throat swab and is processed by an outside laboratory (also referred to as “lab”). For the purposes of this policy, a saliva test by a licensed laboratory will be considered to be equivalent to a PCR Test.*
  - *Rapid Point of Care Test (“POC”) – also referred to as an antigen test, refers to a rapid test that is conducted onsite at the Community or in other healthcare settings with the supplies and device to process a rapid test. For the purposes of this policy, the rapid POC test will only be acceptable when it is expressly stated that an antigen test is sufficient to fulfill the requirement.*

### **Policy Explanation and Compliance Guidelines**

1. The Community will conduct testing through the use of rapid POC testing or through an arrangement with an offsite laboratory for PCR testing.
2. Priority testing will be as follows:
  - a. Associates and Residents with COVID-19 Signs and Symptoms
  - b. Any Associate or Resident who has been in close contact of an individual who has tested positive for COVID-19

- c. Outbreaks (any new case – Associate or Resident - in the Community)
- d. Routine Testing of Associates

## Testing of Associates and Residents with COVID-19 Signs or Symptoms

1. Associates with signs or symptoms of COVID-19 will be tested and are expected to be restricted from the Community pending the results of COVID-19 testing. If supplies are available, a rapid POC test will be provided. If the result from a rapid test indicates the Associate is positive for COVID-19, the Associate will follow the Community's guidelines for how long to quarantine and when to return to work (see Policy: Associate Health Screening and Illness Management – COVID-19). If the result from a rapid test indicates the Associate is negative for COVID-19, a confirmatory PCR test will be conducted using an outside lab. The Associate will follow the Community's guidelines for how long to quarantine and when to return to work (see Policy: Associate Health Screening and Illness Management – COVID-19) until results are received from the outside lab and/or symptoms have improved.
2. Residents who have signs and symptoms of COVID-19 will be tested and will be placed on transmission-based precautions pending test results. If supplies are available, a rapid POC test will be provided. If the result from a rapid test indicates the Resident is positive for COVID-19, the Resident will continue on transmission-based precautions according to the Community's policy (see Policy: Resident Illness Management – COVID-19). If the result from a rapid test indicates the Resident is negative for COVID-19, a confirmatory PCR test will be conducted using an outside lab. The Resident will continue on transmission-based precautions according to the Community's policy until results are received from the outside lab and/or symptoms have improved.

## Testing of Associates and Residents in Response to an Outbreak

1. An outbreak is defined as one or more new COVID-19 infections in any Associate and/or any Community-onset infection in a Resident.
2. For an outbreak in a licensed area (Skilled Nursing and Assisted Living), all Associates and Residents will be tested using rapid POC and/or PCR tests from an outside lab. For an outbreak in a non-licensed area, contact tracing will be conducted and any Associates who had contact with the infected individual will be tested (mandatory for Associates; recommended for Residents).
3. All Associates and Residents that test negative will be retested every 3 to 7 days until testing identifies no new cases of COVID-19 infection among Associates or Residents for a period of at least 14 days since the most recent positive result.
4. Associates who test positive for COVID-19 will not repeat testing, but will follow the symptom-based strategy guidelines for returning to work as outlined in Community guidance (see Policy: Associate Health Screening and Illness Management – COVID-19).
5. Residents who test positive for COVID-19 will be placed on transmission-based precautions according to the Community's policy (see Policy: Resident Illness Management – COVID-19).

## Testing of Associates and Residents in Response to Close Contact

1. If an Associate or Resident has been in close contact (defined as prolonged contact of 15 or more minutes within 6 feet or less) of an individual who has tested positive for COVID-19

- (such as a visitor to the Community, a household contact, etc.), the Associate or Resident must be tested.
- The Resident will be placed on transmission-based precautions according to the Community’s policy (see Policy: Resident Illness Management – COVID-19) for 14 days, even if the Resident tests negative.
  - LifeStream’s Associates are considered critical infrastructure workers and are not required to self-isolate, unless they test positive for COVID-19 (see Policy: Associate Health Screening and Illness Management – COVID-19). All appropriate infection prevention protocols should be followed including wearing a mask, physically distancing from others as much as possible, performing frequent hand hygiene and monitoring for signs and symptoms of COVID-19.

### Precautionary Routine Testing of Associates

- The Community will use the Maricopa County COVID-19 positivity rate as of the most current date posted at <https://www.azdhs.gov/preparedness/epidemiology-disease-control/infectious-disease-epidemiology/index.php#novel-coronavirus-community> to determine staff testing frequency.
- Associates will be tested at routine testing frequencies as defined by the COVID-19 Testing Indicator:

#### COVID-19 Testing Indicator

Positivity Level	County-Reported COVID-19 Positivity Rate	Resident/Associate Testing Frequency
LOW (GREEN)	Less than 5%	Once per month
MEDIUM (YELLOW)	Between 5-10%	Once per week
HIGH (RED)	Greater than 10%	Twice per week

- If supplies are available and an outside laboratory is able to provide a 48 hour turnaround for results, PCR testing will be collected by Community staff and sent to the outside lab to process. If the Community cannot use the outside lab (either due to lack of supplies or unacceptable turnaround time in excess of 48 hours) rapid POC testing may be used, provided supplies and personnel are available to collect and process the tests.
- Should the 48 hour turnaround time not be met due to testing supply shortages or limited access or inability of labs to process tests within 48 hours, the Community will document its efforts to obtain quick turnaround test results with the identified lab or labs and its contact with Arizona Department of Health Services and Maricopa County Public Health.
- The Community will monitor the Maricopa County positivity rate every Friday and adjust the frequency of performing staff testing according to the testing frequency as outlined above. (Note: If Friday is a holiday, positivity rate will be checked on the next business day).

- a. If the County positivity rate increases to a higher level of activity, the Community will begin testing Associates at the frequency of the testing intervals as outlined above, as soon as the criteria for the higher activity are met.
  - b. If the County positivity rate decreases to a lower level of activity, the Community will continue testing Associates at the higher activity level until the County positivity rate has remained at the lower activity level for at least two weeks before reducing the testing frequency.
6. Newly hired Associates will be required to present a negative COVID-19 test result, with a test collected date of less than 48 hours prior to their first day of employment. If supplies and personnel are available, new hires may be tested using the rapid POC test on or before their first day of employment (but within 48 hours). If the Associate tested positive for COVID-19 within the previous 3 months, a copy of the confirmed COVID-19 positive test must be provided. The Associate must be fully recovered in accordance with LifeStream's guidelines for COVID-19 recovery (see Policy: Associate Health Screening and Illness Management – COVID-19).

### **Refusal of Testing - Associates**

1. Human Resources will engage with Associates who refuse testing to determine the cause of the refusal. Human Resources will provide education about the importance of testing and provide alternative options, such as seeking a private test within the required timeframes (the private test must be equivalent to or greater than the sensitivity level of the testing being conducted by the Community. Specifically, if the Community is using rapid POC tests, a similar antigen test or a PCR test will be an acceptable alternative. If the Community is using PCR testing through an outside lab, a similar PCR test (nasal or saliva) will be an acceptable alternative).
2. Associates who exhibit signs and symptoms of COVID-19 and refuse testing will be prohibited from being on the Community property and/or entering the Community (any building) until they provide a return to work authorization from their healthcare provider.
3. Associates who refuse testing after an outbreak has triggered will be prohibited from being on the Community property and/or entering the Community (any building) until they present a negative test as stated above.

### **Refusal of Testing - Residents**

1. Residents have a right to refuse COVID-19 testing. The Community will use person-centered approaches when explaining the importance of COVID-19 testing.
2. Residents that exhibit signs or symptoms of COVID-19 or have known exposure to COVID-19 and refuse testing will be placed on transmission-based precautions until the criteria for discontinuing transmission-based precautions as outlined in Community policy (see Policy: Resident Illness Management – COVID-19) have been met.
3. Residents that refuse testing during a triggered outbreak will be placed on or remain on transmission-based precautions until they meet the symptom-based criteria for discontinuation or the outbreak has been cleared.

## Other Testing Considerations

1. Recovered, asymptomatic Associates and Residents do not need to be retested for COVID-19 within 3 months of a confirmed COVID-19 positive test. Testing is required again (e.g. in response to an exposure) 3 months after the collection date of a confirmed COVID-19 positive test.
2. The Community, at its discretion, may test Residents' visitors to help facilitate visitation while also preventing the spread of COVID-19, but will prioritize Resident and Associate testing prior to testing Residents' visitors.
3. Newly admitted Residents may be tested for COVID-19 using the rapid POC test according to the Community's guidelines for admissions.

## Conducting Testing

1. Testing has been authorized by the Community's Medical Director, see signature of testing authorization below. Testing includes rapid POC testing or testing in a licensed laboratory.
2. Specimens will be collected by trained personnel or other non-staff healthcare providers and, if necessary, stored in accordance with the manufacturer's instructions for use for the test and CDC guidelines.
3. The Community will maintain proper infection control and use recommended personal protective equipment (PPE) which includes a KN95 or N95 respirator (or facemask if a respirator is not available), eye protection, gloves and a gown when collecting specimens.
4. The Community will clean, disinfect and maintain testing equipment in accordance with the manufacturer's instructions.

## Reporting Test Results

1. The Community will report data for all testing completed, for each individual tested.
2. For Skilled Nursing Facilities, each facility will report COVID-19 information to the CDC's National Healthcare Safety Network (NHSN) weekly. In addition, testing using rapid Point of Care testing devices must be reported to Maricopa County and to the Arizona Department of Health Services.
3. Assisted Living will report to Maricopa County Public Health per local requirements.

## Documentation of Testing

1. The Community will demonstrate compliance with the testing requirements by documenting the following:
  - a. For symptomatic Residents and Associates, document:
    - i. Date and time of the identification of signs or symptoms
    - ii. Date when testing was conducted
    - iii. Date when results were obtained
    - iv. Actions the Community took based on the results
  - b. Upon identification of a new COVID-19 case in the Community (i.e. outbreak), document:
    - i. Date the case was identified
    - ii. Date all other Associates and Residents are tested
    - iii. Dates that Associates and Residents who tested negative are retested
    - iv. Results of all tests
  - c. Upon identification of a risk of close contact case, document:

- i. Date of close contacts COVID-19 positive test collection date
  - ii. Date Associate/Resident is tested
  - iii. Results of the test
- d. For routine testing of Associates, document:
  - i. The Maricopa County positivity rate
  - ii. The corresponding testing frequency indicated (e.g. every other week)
  - iii. Date each positivity rate was collected
  - iv. Dates that testing was performed for all Associates
  - v. Results of all tests
- 2. The Community will document the Community’s procedures for addressing Residents and Associates that refuse testing or are unable to be tested, and document any Associates or Residents who refused or were unable to be tested and how the Community addressed those cases. (see Sections: Refusal of Testing – Associates and Refusal of Testing – Residents).
- 3. The Community, when necessary, such as in emergencies due to testing supply shortages, will document contact with state and local health departments for assistance in testing efforts, such as obtaining testing supplies or processing test results.
- 4. The Community will document the conducting of tests by maintaining a record of testing, including the Maricopa County positivity rates, schedules of completed testing, and/or staff and Resident records.
- 5. The Community will document Resident test results in the medical record in accordance with standard for protected health information.
- 6. The Community will document Associate, including individuals providing services under arrangement and volunteers, test results in a secure manner.

**Medical Director Signature**

I hereby authorize this testing policy: *Coronavirus Testing for Associates and Residents*

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Name (Print)

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Signature

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Date