

HHS Letter: COVID-19 Pandemic Response, Laboratory Data Reporting: CARES Act Section 18115

These Frequently Asked Questions were compiled in response to the <u>COVID-19 Pandemic</u> <u>Response, Laboratory Data Reporting: CARES Act Section 18115</u> letter sent out by Health and Human Services on June 4, 2020. TDH is currently working technical guidance to meet these requirements as well as a partner engagement roll-out plan. Please check back for updated versions of this FAQ. Please contact <u>ceds.informatics@tn.gov</u> with any questions you have after reviewing this document.

What if we cannot send the required information?

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The expectation of the Federal government is that you make all reasonable efforts to collect and send the information required. This may mean making changes to your laboratory operating systems, order submission forms, and other protocols. Please refer to <u>HL7 Version 2.5.1 Lab Order Interface Implementation Guide</u> for more information.

What if we already collect this information and are ready to add this to our TDH reporting?

Please do not make any changes to the data files or messages you are currently sending to TDH. TDH is currently working technical guidance to meet these requirements as well as a partner engagement roll-out plan. However, if you feel that your data files or messages meet the new requirements, email <u>ceds.informatics@tn.gov</u>. We will contact you about receiving test messages.

We can collect and send the information but our submitters do not send us this data. What should we do?

The expectation of the Federal government is that you make all reasonable efforts to collect and send the information required. This may mean making these fields required from submitters ordering tests from your lab. This could also require changes to your technology systems to collect and store this information. Please refer to <u>HL7 Version 2.5.1</u> <u>Lab Order Interface Implementation Guide</u> for more information.

What if my laboratory tests specimens for multiple states?

If you already have an electronic reporting process established with TDH, we would prefer that you make updates to that established process. It is possible to onboard reporting with these new standards through the Association of Public Health Laboratories' AIMS platform



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in order to report to multiple states via one feed. However, you would need to maintain your current TDH reporting until this new process is vetted and validated by TDH. You cannot onboard for COVID only via AIMS if you already report more conditions to TDH via an established electronic process.

Do I need to report the "ask on order entry" (AOE) questions on all lab results I report to TDH?

In general, no, the AOE questions only apply to COVID-19 associated test orders and their corresponding results. However, pregnancy status is included in the AOE questions and is also a required field to be reported on all HIV, STD, and Hepatitis test results in Tennessee.

My lab test for other diseases and conditions besides COVID; do I need to report these?

Yes, laboratories are responsible for reporting all diseases and conditions of public health importance including conditions like *E. coli*, Lead, TB, West Nile Virus among many others. The full list of reportable diseases is available on the TDH <u>website</u>. Additional information on disease reporting in Tennessee can be found on our website at: <u>https://www.tn.gov/health/cedep/reportable-diseases.html</u>. Please contact <u>ceds.informatics@tn.gov</u> as soon as possible if you are not currently reporting all reportable diseases.

I am ready to onboard for HL7 ELR, what should I do?

If your facility is ready to begin reporting to TDH via HL7, please review the <u>current</u> <u>requirements</u> on TDH's website and then email <u>ceds.informatics@tn.gov</u>. Please keep in mind that these reporting requirements are in the process of being updated to reflect the HHS letter and its updated requirements. In your email please include your current reporting process and any other relevant details about timeline and volume of reporting. Someone from TDH will contact you about next steps.

I don't have a lab site at my clinic, do I still need to report?

If your clinic operates any type of Point of Care testing (for example the Abbott ID Now diagnostic machine) for COVID testing, you are subject to this law and must report according to these standards. If you have questions about how to report results from POC testing platforms, please contact <u>ceds.informatics@tn.gov</u>. If your clinic does not perform lab testing of any sort, you are still subject to TDH's general reporting requirements and



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must report all COVID-19 diagnoses in your clients/patients according to <u>guidelines</u>. Also, please see the question below about all diseases and conditions you are required to report as a healthcare provider.

I am a healthcare provider and I diagnose diseases other than COVID. Do I need to report these?

Healthcare providers are responsible for reporting all diseases and conditions of public health importance including conditions like E. coli, Lead, TB, West Nile Virus among many others. The full list of reportable diseases is available on the TDH <u>website</u>. Additional information on disease reporting in Tennessee can be found on our website at: <u>https://www.tn.gov/health/cedep/reportable-diseases.html</u>. Please contact <u>ceds.informatics@tn.gov</u> as soon as possible if you are not currently reporting all reportable diseases.

Does this replace the aggregate reporting that facilities have to complete for HHS/CMS?

No, as we understand the rule at this time, the requirement for facilities to submit aggregate case count data to HHS/CMS is still in place.