Federal K-12 COVID-19 Testing Guidance for Ohio Schools

As you know, last month 230,000 Abbott BinaxNow at-home rapid antigen tests for COVID-19 were made available to Ohio K-12 schools. Ohio’s network of 51 Educational Service Centers (ESCs) has managed the allocation and distribution of these test kits to schools (public or private) within their jurisdictions.

Recently, the U. S. Department of Health & Human Services (HHS) announced that the Centers for Disease Control and Prevention (CDC) would invest $10 billion from the American Rescue Plan for screening testing in K-12 schools. CDC provided guidance to states for how to implement this initiative – including allowable costs, reporting requirements, and timelines.

It is the state’s intention to continue to use the BinaxNOW at-home tests as the foundation of our school COVID testing strategy through the remainder of the current school year. This strategy is consistent with the federal guidelines. However, the federal initiative does change some of the logistical details, so there are changes from the original guidance provided by the state on March 11, 2021. These changes are described below in more detail, but are summarized as follows:

- Testing remains voluntary for schools, and the specific elements of the testing strategy are to be determined by the school, in consultation with the appropriate local health department. However, the CDC is strongly emphasizing aggressive screening testing as a mitigation strategy in schools.
- All districts and other schools participating in the state’s testing strategy will be required to notify the state of your intent to participate, and how often you plan to test.
- In order to comply with federal requirements, all schools participating in testing will be required to report weekly to the state the number of tests distributed. Note that we are no longer requiring schools to report the number of positive cases.

Finally, pursuant to the federal guidelines, the state will engage in planning around a statewide testing strategy for the 2021-22 school year. We will utilize the experiences of Ohio and other states in the current school year, perspectives of school personnel and local health departments, and CDC guidance to craft a strategy for using federal resources beginning in the fall.

Screening Testing Strategy
As indicated above, the federal K-12 testing strategy is centered on the idea of using screening testing “to support and maintain in-person learning.” The federal guidance states in part:

Awarding $10 billion from the American Rescue Plan Act of 2021, P.L. 117-2, under the ELC Reopening Schools award, will afford recipients the ability to support comprehensive screening testing for K-12 schools (public and private). A key goal of this initiative is to establish screening testing programs in schools around
the country in April 2021, extending through the end of the school year and into summer activities and subsequent school year, as funds allow.

One resource that the CDC guidance sites for testing strategies is the Rockefeller Foundation’s report, *Covid-19 Testing in K-12 Settings: A Playbook for Educators and Leaders*. The Rockefeller Foundation defines screening testing as “Routine testing of individuals without symptoms or any reason to suspect exposure. The objective is to reduce transmission by identifying potentially infected individuals faster to protect public health.” Rockefeller’s National Testing Action Program (NTAP) suggests testing student once per week, and up to twice per week for teachers and staff (note that this frequency is not mandated under the federal initiative).

Neither NTAP nor the CDC express a preference for the type of test – PCR or antigen – utilized in a K-12 screening testing strategy. For the current school year, the state has made Abbott BinaxNOW Home antigen tests available for schools to use. Because they can be provided to individuals to test at home – utilizing a telehealth session from eMed – they address some of the logistical challenges to testing in schools, such as CLIA laboratory requirements, parental consent, and result reporting. As indicated in the earlier guidance and Q&A provided by the state, if a school prefers to test on-site and is able to navigate these logistical challenges, the state can provide alternative test options more appropriate for that environment.

The state testing team stands ready to assist those schools who initiate a screening testing strategy. Please contact TestingRequests@odh.ohio.gov for support.

**Reporting Requirements**

In order to comply with the new CDC requirements, by April 19, 2021 all schools (public and private) must notify the state testing team of your intention to participate in the testing initiative for the 2020-21 school year. Please click here to provide the following information:

- Have you already received tests from the state through the ESC – yes or no?
  - If no, do you intend to begin providing testing in the current school year?
- Testing strategy (symptomatic, screening, or other)
- Frequency of testing (e.g., weekly, twice weekly, or other)
- Population to be tested (students, teachers, and/or staff) and percentage of each population to be tested if less than 100%

In addition, beginning April 26, 2021 each participating school must submit the number of tests distributed to the reporting portal by Close of Business each Monday.

Note that this reporting will be required of all schools that are utilizing state tests, regardless of whether they are being used for a screening program or some other testing strategy. As the state has rolled out the opportunity for testing in schools, we have developed a reporting tool on the coronavirus.ohio.gov site. Initially, in light of the weekly reporting requirements from the CDC, we had expanded the reporting tool to
include the additional fields required by the CDC. However, the state is no longer requiring schools to report positive cases.

We recognize that many schools will want a mechanism to track tests administered and results for their own efforts to curb the spread of the virus. While schools can utilize any mechanism they choose, Abbott has developed the NAVICA Connect tool to work in concert with the BinaxNOW test and the patient-facing NAVICA app. NAVICA Connect allows an organization to send an email “invitation” to participants to enter a code into the NAVICA app, and test results will be forwarded to the organization. In other words, a school can use this information to connect to its students and staff, and to automatically receive the results when they are tested. The state testing team can provide more information – including a connection to the appropriate team at Abbott – to help schools get set up in NAVICA Connect. Note that schools will still need to report the required data to the state using the reporting tool described above.

2021-22 School Year COVID Testing
The federal award for K-12 COVID testing has three overarching activities that the state must comply with. Each activity is listed below, with relevant language from the CDC guidance document:

- **Activity 1: Rapid deployment of screening testing resources** – the focus for Activity 1 is to jumpstart the ability for jurisdictions to implement school testing (estimated timeframe April to June). Recipients may also plan and implement support for screening programs in school-affiliated summer programs, including camps and summer instruction.

- **Activity 2: Development of K-12 screening testing implementation plan** – recipients will develop a comprehensive screening testing plan to support SARS-CoV-2 screening testing in K-12 schools across their communities for the 2021-2022 school year. In developing the plan, the information collected and lessons learned from Activity 1 (e.g., any limits in ability to conduct this program whether legal or practical, etc.) should inform planning for the 2021-2022 school year. The plan is intended to be used by the jurisdiction, therefore not collected by CDC, and should address the specific needs within that jurisdiction.

- **Activity 3: Implementation screening testing action plan** – using the screening testing plan as a guide, recipients will progress through the stepwise implementation of the plans to support schools safely opening/remaining open for the 2021-2022 school year. The implementation plan should include methods to monitor effectiveness and integrate modifications as needed based on lessons learned over time. Please note that additional supplemental guidance may be released to recipients based on information collected from performance measures, milestone progress reporting, and/or additional scientific understanding of SARS-CoV-2.

As indicated in the above guidance, Activity 1 applies to the 2020-21 school year, and is the basis for all of the guidance provided in this document. Activities 2 and 3, apply to the 2021-22 school year, and will be developed in part with the learnings from Activity 1, including the experiences of other states. The types of testing to be used, reporting requirements, and other details of Activities 2 and 3 are yet to be determined.
In summary, the federal government is providing the State of Ohio resources to support COVID testing in our K-12 schools, and has placed a strong emphasis on screening testing. Aggressive screening testing will work to quickly identify positive cases for isolation, keeping school infection rates low and increasing confidence in in-person learning for school staff, parents, and students.

We recognize that there are a number of challenges to testing that are unique to schools, and there will be a learning curve as we implement this federal program. However, the state testing team stands ready to assist you however we can in this important endeavor. Please don’t hesitate to contact the testing team at TestingRequests@odh.ohio.gov with any questions about any of the above.

We also encourage you to be familiar with the following resources:

- Ohio rapid testing guidance, including for testing in schools: https://coronavirus.ohio.gov/wps/portal/gov/covid-19/resources/general-resources/rapid-covid-19-test
- Ohio rapid testing reporting tool: https://coronavirus.ohio.gov/wps/portal/gov/covid-19/contact-us/binaxnow-reporting-form/

As always, thank you for all you do for Ohio’s students.