

Guidance for Tuberculin Skin Testing (TST) and COVID-19 Vaccinations: Frequently Asked Questions (FAQs)

TST-1: Does OCDEL require proof of Tuberculin Skin Test (TST) upon hire and every 2 years thereafter?

Yes, but due to the CDC guidance related to TST and COVID-19 vaccinations impact on licensees' ability to comply with regulatory requirements and with the Governor's authorization as conferred in the Disaster Proclamation, the Department has temporarily issued a limited suspension of the timing of the TST provisions in the following sections of 55 Pa. Code: OCDEL regulations 55 Pa. Code:

- §3270.151(c)(2)
- §3280.151(c)(2)
- §3290.151(c)(2)

As best practice and in conjunction with the bi-annual health assessment the physician should assess TB risk and follow up accordingly. This suspension will last until the end of the Governor's Disaster Declaration.

TST-2: Does the timing of COVID-19 vaccination impact TST screening?

Yes, CDC guidance relating to vaccination indicates that the tuberculosis skin test should not be given within 4 weeks after the COVID-19 vaccination process.

TST-3: To be compliant with 3270.151(c)(2), 3280.151(c)(2), and 3290.151(c)(2), are new staff required to contact their doctor to schedule the TST screening or get documentation of postponement of the TST?

Yes, staff person must obtain documentation of the COVID-19 vaccine administration, including the date of administration or written documentation from the individual's or staff person's physician of the necessity to defer TST; **and** follows physician recommendations as it relates to TST as soon as possible after completing a COVID-19 vaccine schedule.

TST-4: If new staff person received the COVID-19 vaccination (including single-dose), when should they follow up on the TST?

After completion of COVID-19 vaccination, within 8 weeks or recommendation by a physician as it relates to TST. If the physician recommends a later TST, the staff person must maintain documentation of the later timeframe.

TST-5: Are certified child care staff required to be vaccinated for COVID or provide COVID vaccination records?

OCDEL is not requiring child care staff to be vaccinated for COVID-19. The only time documentation of COVID-19 vaccination is required is in the instance when a newly hired staff person must defer the TB TST. Documentation of COVID-19 vaccination temporarily suspends the requirement of TB TST until the staff person's physician approves TST.