



March 15, 2021

(VIA EMAIL)

Dennis Schrader, Acting Secretary
Office of Secretary
Maryland Department of Health
Herbert R. O'Connor State Office Building
201 West Preston St.
Baltimore, MD 21201 – 2399

SUBJECT: Reporting Frequency through CRISP, and Aligning Observation Days with Latest CMS/CDC Guidance

Dear Secretary Schrader:

We write to request that the Department of Health (MDH) revise its requirement for daily reporting by nursing homes to CRISP and reduce the number of required observation days in nursing homes from 14 to 10 days for unvaccinated individuals, and in alignment with latest CDC guidance, remove observation days entirely for vaccinated individuals.

Daily reporting through CRISP has been an effective and necessary public health tool. Data collection and tracking remain a vital tool in slowing the spread of COVID-19, and we fully support all required reporting. However, positivity rates in the state have dropped considerably in recent weeks. Most nursing home residents are now fully vaccinated, thanks to MDH and the pharmacy partnership program. This has resulted in a dramatic decline of cases in nursing homes. We request that MDH examine whether reporting frequency could be decreased weekly when a facility is not currently in outbreak status.

Presently, Maryland requirements are inconsistent with CMS guidance related to the observation of new admissions and readmissions into nursing homes and visitation of patients in the observation phase of their nursing home stay. CMS guidance now states that individuals who are fully vaccinated and are asymptomatic do not need to be placed in observation for 14 days in a private room. However, the MDH still requires that facilities place all new admissions and readmissions in a private room for 14 days, regardless of vaccination status. Considering this new federal guidance, the high rate of vaccination among nursing home residents, and the low positivity rates in nursing homes in Maryland, we urge MDH to align with CMS guidance and cease requiring observation days for fully vaccinated, asymptomatic residents. This will allow nursing homes to provide care to more individuals by freeing up bed-locked capacity.

We appreciate all that you and MDH are continuing to do to support older Marylanders. Thank you for your consideration.

Respectfully,

Be well,



Joseph DeMattos
President & CEO
HFAM

Sincerely,



Allison Ciborowski
President & CEO
LeadingAge Maryland

Sincerely,



Kevin Heffner
President & CEO
LifeSpan Network

cc: Dr. Jinlene Chan, Deputy Secretary
Webster Ye, Office of Government Affairs
Heather Shek, Office of Government Affairs