COLLEGE of AMERICAN PATHOLOGISTS

October 9, 2020

The Honorable Mikie Sherrill
United States House of Representatives
1208 Longworth House Office Building
Washington, D.C. 20515

The Honorable Susan DelBene
United States House of Representatives
2330 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Terri Sewell
United States House of Representatives
2201 Rayburn House Office Building
Washington, D.C. 20515

Dear Representatives Sherrill, Sewell, and DelBene:

On behalf of the College of American Pathologists (CAP), we appreciate your efforts to address COVID-19 testing. We are writing you regarding our significant concerns with the SPEEDY COVID-19 PCR Tests Act (H.R. 8496). Clinical laboratories and pathologists have made tremendous strides in providing access to quality tests and diagnoses throughout the pandemic. Our members have worked tirelessly through a very challenging time to provide the testing results that are necessary. Our members stepped up and answered the call by investing in reporting systems and multiple testing instruments to provide local testing for frontline health care workers and patients. We remain committed to providing patients with timely test results that guide treatment and care decisions.

Our members are providing approximately a million tests every day and there will be more in the weeks and months ahead. This is while we are still facing challenges throughout the testing process and many of these obstacles are outside our control. Laboratories, for example, have documented persistent problems obtaining the necessary supplies needed for testing. Our own research shows laboratory directors citing problems acquiring necessary reagents, test kits, plastic pipette tips, and specimen acquisition swabs and transport media as the greatest barriers to COVID-19 testing. Some laboratories have reported they have excess capacity to conduct tests but lack the supplies to do so. Laboratories have reported using multiple testing platforms to keep up with the demand and ensure access to tests. But, there have not been enough supplies for any one system for laboratories to rely on.

Using rapid tests that might have lower sensitivity or accuracy to increase speed is not in the best interest of the patient who needs conclusive results. There are times a patient sample requires extra work to be confident of the result. Laboratories often perform this quality measure and are not reimbursed for this effort. Additionally, laboratories have no control on when they receive the sample from the patient since specimens are collected and then sent to the laboratory. This could also contribute to delayed reporting of results. As you can imagine, emerging hot spots and rapid demand for testing can impact the response time of testing results as well.

In addition to requests to address economic and other financial stresses on laboratories, we continue to urge the federal and state governments to solve issues within the supply chain to

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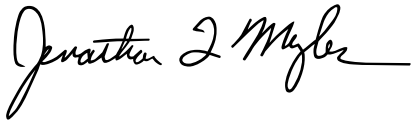
improve testing capacity and the turnaround time of test results. Any effort to penalize laboratories during a pandemic due to the multitude of problems within the supply chain and other matters outside their control will only exacerbate any current issues with testing. Our attention must focus on proactive solutions that give pathologists and laboratories the resources requested to meet America's diagnostic needs.

We have communicated to Congress and the Administration endlessly about the rapidly evolving challenges with providing COVID-19 testing. We welcome the opportunity to work with you to address these issues for all Americans. Please contact Sarah Bogdan via email at sbogdan@cap.org or via phone at (401) 316-5144 if you have any questions regarding these comments.

Sincerely,



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