

Aide-Mémoire

COVID-19 Options for Testing with Rapid Antigen Tests from 01 March to 30 June 2024

To:	Hon Dr Shane Reti, Minister of Health	Reference:	HNZ00035731
From:	Dr Nick Chamberlain, National Director, National Public Health Service	Due Date:	18 January 2023
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Contact for telephone discussion (if required)

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The following departments/agencies have been consulted

Manatū Hauora – Public Health Agency

COVID-19 Options for Testing with Rapid Antigen Tests from 01 March to 30 June 2024

Purpose

1. This Aide-Mémoire responds to your 8 January 2024 request for the options we considered for continued community testing using COVID-19 Rapid Antigen Testing (RATs) for the period of 01 March to 30 June 2024.
2. We are proceeding to procure a small supply of five million RATs within existing appropriations to continue distribution during March – June 2024 in line with the current access criteria.

Background/context

3. A number of public health non-mandatory measures for COVID-19, such as testing, remain in place and continue to provide an effective approach to managing COVID-19, including reducing its impact on hospital admission rates.
4. RATs have been publicly-funded as part of the COVID-19 Public Health Response since February 2022 to support COVID-19 testing in community settings. No further RATs were secured in the 2022/23 financial year. This was due to high stock levels held within a centralised supply construct and reduced COVID-19 funding.
5. Our remaining COVID-19 RATs stock has a March 2024 expiry date (between mid and the end March). To ensure sufficient time for use, RATs are distributed from our warehouses with a minimum remaining shelf life of three to four weeks. In line with this practice, we are therefore unable to distribute any currently-held RATs beyond the end of February 2024.
6. Clinical and public health advice supports continued testing for COVID-19 to enable access to antiviral therapies (AVTs) and access to RATs for the public and healthcare sector to ensure the ongoing public health management of COVID-19 outbreaks.
7. In Australia, while approaches differ by state and territory, the Government has committed to investing an additional \$517 million to ensure continued supply of RATs to priority groups and clinical settings.
8. Information was provided to you on 19 December 2023 (HNZ 00034528 refers) on COVID-19 Personal Protective Equipment (PPE), vaccine, and diagnostic testing supplies, alongside forecast requirements over the coming three years. That advice noted that a small volume of publicly funded RATs will be secured to cover the period 01 March to 30 June 2024.
9. s 9(2)(b)(ii)
[Redacted]
[Redacted]
[Redacted]
10. The number of five million RATs has been derived based on May to October 2023 distribution levels, taking into account a peak demand for winter and the phasing out of that peak. This stock would continue to be distributed to Primary Care, public hospitals, pharmacies (for public distribution), Aged Residential Care, home care, first responders, the Māori and Pacific distribution network, and others such as family planning.
11. The volumes of RATs distributed to date is higher than what we expect to distribute over

the March – June 2024 period. This is due to the removal of remaining COVID-19 initiatives such as supplying RATs to travellers arriving at New Zealand borders, ceasing supply to other government agencies (such as Corrections and Education), and no-longer offering RATs to non-healthcare providers.

Clinical and Public Health risks if RATs are no longer available through the Public Health Response

12. We considered clinical and public health risks if free RATs are no longer available.
13. RATs are used for our most clinically vulnerable population groups to meet the Pharmac eligibility criteria for AVTs. If RATs were unavailable for this group, it would likely create a barrier to AVTs access, resulting in treatment not being sought (due to not being able to test) and increased emergency department presentations and hospitalisation of cases.
14. Community and Primary Care providers may revert to Polymerase Chain Reaction (PCR) testing, leading to an increase in COVID-19 PCR testing numbers. This would result in a delay in commencing treatment while awaiting test results and an increase in costs due to a higher number of PCR samples being processed.
15. A delay in supporting the management of healthcare workers with respiratory COVID-19 symptoms could result in increased staff absenteeism or delays in return to work as they await PCR results, and could lead to a significant increase in PCR testing.
16. It would not then be possible to manage cases and outbreaks in high-risk settings such as hospitals and Aged Residential Care in a timely and effective manner. This could have a significant impact in leading to more widespread outbreaks due to the delay in diagnosis and isolation of cases with an impact on patient flow.
17. It could lead to an increase in the hospitalisation of cases (since people would be unable to test themselves at home and self-manage) and a possible increase in death rates due to delayed diagnosis, treatment and management.

Discussion

Options we considered for RATs and Community Testing

18. Alongside the Public Health Agency, we considered three options. It was determined that **Option 1** would best manage the public health risk that the JN.1 variant and the wider COVID-19 continue to pose for those who are clinically vulnerable within community settings. This option provides an assurance that the risks identified in paragraphs 12 - 17 would be addressed.
19. **Option 1 (proposed)** - Purchase a limited number of RATs to enable continued access for the period 01 March to 30 June 2024. Populations or settings for which this would enable continued access to free RATs include:
 - The public, including those eligible for AVTs.
 - Primary and Urgent Care, along with community pharmacies.
 - High-risk settings such as public hospitals and Aged Residential Care
 - Māori and Pacific distribution channels.
20. **Option 2** – A smaller number of RATs are purchased and eligibility for free RATs is limited to those eligible for AVTs. This option would reduce access to healthcare providers to support cheaper diagnostic testing (e.g. RAT vs PCR), healthcare worker

testing and testing for outbreaks. This would therefore reduce the ability to manage onward transmission and outbreaks.

21. **Option 3** – RATs are not publicly-funded or freely available beyond 29 February 2024. The risks associated with this includes barriers to access AVTs for the most clinically vulnerable population group in a timely manner, leading to an increased risk of hospitalisation. It would also increase the volume of PCR testing and therefore increase laboratory processing costs and turnaround times for COVID-19 results, further delaying access to AVTs. Healthcare providers would need to purchase their own RATs. Primary Care, pharmacies and Emergency Departments would become overburdened with testing and care for undifferentiated respiratory illness. This does not align with clinical and public health testing advice.

Next steps

22. We intend to proceed with **Option 1**, with the first batch of RATs purchased by Friday 26 January 2024 to enable continuity of supply.
23. These purchases of RATs will be phased to manage obsolescence risk. The expiry date of this stock will be at least 12 months (possibly longer). If the demand is lower than expected over the period March - June 2024, we will be able to repurpose the stock across the health system.
24. We are developing a communications plan regarding continued access to RATs through to June 2024. This will be shared with your office.
25. RATs that are unable to be distributed before they expire will be disposed of. There is a procurement process underway exploring options for the disposal of expired and surplus COVID-19 stock. We will be in a position to update you once this process is completed.
26. Provision of RATs beyond 30 June 2024 will be subject to demand levels during March-June, and future budget availability. At this time, we have not made any commitment to purchase further RATs beyond the end of this financial year. We are working closely with the Ministry on future options and risks.