



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES

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GOVERNOR

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MEMORANDUM

Date: April 7, 2020

To: Health Care Providers, Healthcare Facilities, Infection Prevention and Control Specialists, and Laboratory Administrators

From: Joneigh Khaldun, MD, MPH, FACEP
Chief Medical Executive and Chief Deputy for Health
Michigan Department of Health and Human Services

As the COVID-19 crisis in the State of Michigan evolves, MDHHS continues to adapt resource and capacity planning to support the varied needs of our partners in healthcare and local public health organizations. The Michigan COVID-19 Laboratory Emergency Response Network (MI-CLERN) is used to coordinate scarce resources and increase laboratory capacity. The MiCLERN provider hotline (888-277-9894) was stood up to enable providers to gain access to testing resources. MDHHS recently ordered that all health professionals should conduct testing for the Novel Coronavirus in accordance with the COVID-19 prioritization criteria published by MDHHS. This letter informs you of four(4) changes to this system.

1. Expansion and Clarification of COVID-19 Specimen Collection and Testing Prioritization Criteria

Following the March 24, 2020 MDHHS Emergency Order Pursuant to MCL 333.2253, MDHHS updated the evaluation criteria for prioritization of collection and testing of specimens for COVID-19. At that time, and in an effort to conserve limited COVID-19 testing supplies and capacity, MDHHS prioritized testing eligibility for Priority Groups One and Two in the U.S. Public Health Services (PHS) Guidance (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/clinical-criteria.html>). These two criteria were meant to prioritize testing for specified populations in order to:

1. Ensure optimal care options for all hospitalized patients, lessen the risk of healthcare-associated infections, and maintain the integrity of the U.S. healthcare system This includes:
 - Hospitalized Patients
 - Healthcare facility workers with symptoms; and,
2. Ensure that those at highest risk of complication of infection are rapidly identified and appropriately triaged. This includes:
 - Patients in long-term care facilities with symptoms
 - Patients over age 65 years with symptoms
 - Patients with underlying conditions with symptoms
 - First responders with symptoms

Per the March 24, 2020 MDHHS Emergency Order, all CLIA-certified laboratories in the State of Michigan are required to comply with prioritization criteria as promulgated by MDHHS. This includes Public Health, commercial, and healthcare facility laboratories.

MDHHS is now clarifying which populations of individuals meet priority criteria one (1) and two (2), above, and is expanding eligibility to a key target population in priority three (3) of the U.S. PHS prioritization guidance.

1. **Clarification on Healthcare Facility Workers with Symptoms.** For priority criteria number one, above, the target population of ‘Healthcare facility workers with symptoms’ shall be understood to include all workers within a healthcare facility, not just providers of direct healthcare services. MDHHS is considering symptomatic home healthcare workers, including in-home medical aides and/or direct healthcare service providers to vulnerable populations, as eligible healthcare workers under this category. Asymptomatic workers will not be prioritized for testing and should be monitored following previous guidance issued by MDHHS.
2. **Clarification on Patients in Long-term Care Facilities.** For priority criteria number two, above, the target population of ‘Patients in long-term care facilities [LTCs] with symptoms’ shall be understood to include any patient or resident with symptoms in high-risk congregate living arrangements, as in but not limited to LTCs. High-risk congregate living arrangements include those with vulnerable populations, living in close quarters, where the introduction of COVID-19 could result in rapidly-developing clusters of cases within the facility.

These arrangements include: LTCs; skilled nursing facilities (SNFs); dormitories; jails/prisons; juvenile justice facilities; residential foster care settings; adult foster care (AFC); homeless shelters; residential behavioral health settings; other group-home living arrangements; and other institutional settings. Asymptomatic patients or residents will not be prioritized for testing and should be monitored following previous guidance issued by MDHHS.

3. **Expansion of Eligibility to Critical Infrastructure Workers with Symptoms.** MDHHS is expanding COVID-19 specimen collection and testing prioritization criteria to include critical infrastructure workers with symptoms, following Priority Three of the U.S. PHS prioritization guidance, in order to ensure the health of essential workers in Michigan communities. Critical infrastructure workers are defined in Executive Order 2020-21 (https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-522626--,00.html), in sections 8 and 9 of the order. Asymptomatic critical infrastructure workers will not be prioritized for testing and may need to practice self-quarantine and/or self-monitoring, following previous guidance issued by MDHHS.

Critical infrastructure workers can be characterized as those individuals who, under Executive Order 2020-21, should be considered essential and should continue to report to their place of work in order to sustain necessary operations. This does not include those who are permitted or required to work from remote locations, such as home.

We believe that these clarifications and this expansion of prioritization criteria will help to improve access to COVID-19 testing and begin to ameliorate challenges experienced by providers and individuals in the application of otherwise stricter prioritization criteria. **This expanded set of prioritization criteria will take effect at 8:00 AM on Wednesday, April 8, 2020.**

2. Removal of MDHHS Test Approval Process and Person Under Investigation Form for Health Providers

To streamline access to testing, MDHHS will no longer require healthcare providers to seek prior approval from MDHHS or submit a Person Under Investigation form when ordering a COVID-19 test for testing through most laboratories in the State of Michigan.

Providers no longer need to seek MDHHS approval or a Person Under Investigation (PUI) number for any test requisition that does not leverage BOL testing capabilities. However, a medical provider must still order COVID-19 testing in line with the MDHHS COVID-19 Specimen Collection and Testing Prioritization Criteria for any test requisition submitted to any laboratory. If a COVID-19 test result is positive, the findings must be reported to the Michigan Disease Surveillance System to facilitate public health investigation.

Medical providers, facilities, or laboratories must still obtain a Person Under Investigation number if submitting a specimen for testing to the MDHHS Bureau of Laboratories. See following section for details.

3. Use of MDHHS Bureau of Laboratory (BOL) Testing Facilities Amidst Growing Statewide Testing Capacity

MDHHS recognizes the importance of early detection of COVID-19 to facilitate appropriate action, such as self-isolation, to help slow and mitigate the spread of disease. Until very recently, very few laboratories had the capabilities to conduct wide-reaching diagnostic testing. For this reason, MDHHS BOL significantly scaled up its operations to support this need.

However, over the course of intervening weeks, commercial and healthcare facility laboratories have increasingly established the capabilities to conduct this testing without the involvement of MDHHS BOL. MDHHS believes that leveraging the expanding capabilities of these facilities through existing practice (i.e., using in-house and/or referral laboratories with whom the provider has an existing partnership) will significantly help to stabilize access to COVID-19 testing, in line with the prioritization criteria referenced herein. Healthcare providers and facilities with established relationships to laboratories should leverage those relationships, where feasible, prior to leveraging BOL testing capabilities. This will allow for BOL to place focus on its role in supporting critical public health investigations and activities.

Please remember that, when submitting specimens to BOL, healthcare providers must include the PUI identification number on all of the following:

- The PUI Case Report Form. This form must be submitted to the patient's local health department when leveraging BOL testing facilities.
- All BOL laboratory testing requisition documents
- The specimen container

BOL will not prioritize specimens that arrive without a corresponding PUI identifier.

4. Change of MiCLERN Hotline Hours of Operation

As providers capitalize on their existing relationships with in-house or referral laboratories (facility and/or commercial) for COVID-19 testing, the need for BOL to sustain diagnostic testing capacity as a statewide solution will be reduced. To help continue this systemic operational improvement, MDHHS will be modifying the hours of operation for the MiCLERN healthcare provider hotline, used for PUI identification number issuance.

Beginning with MiCLERN operations on Wednesday, April 8, 2020, at 8:00 AM, the MiCLERN hotline will operate twelve hours per day, from 8:00 AM to 8:00 PM, seven (7) days per week.

Additionally, to help facilitate this change and per the March 25th MDHHS memorandum concerning prioritization criteria changes, MDHHS would like to remind hospitals that physicians should consult with a member of the health system (most commonly Infection Prevention) to determine whether their patient(s) meet the prioritization criteria outlined herein.

MDHHS is making these changes to ensure that testing is available for decision making to protect those of greatest public health concern during the COVID-19 outbreak. Thank you for all you do to serve the residents of Michigan at this difficult time.

For the latest information on Michigan's response to COVID-19, please visit www.michigan.gov/coronavirus. You may also email our Community Health Emergency Coordination Center at: checcdeptcoor@michigan.gov.