



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

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GOVERNOR

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MEMORANDUM

Date: June 15, 2020

To: Skilled Nursing Facilities, Facility Administrators, and Local Health Departments

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

Subject: MDHHS Skilled Nursing Facility Testing Guidance

Executive Summary

- The Michigan Department of Health and Human Services (MDHHS) is issuing guidance requiring the following diagnostic testing practices in skilled nursing facilities:¹
 - Initial testing of all residents and staff
 - Testing of all new or returning residents during intake and routine quarantine of new residents
 - Testing any resident or staff member with symptoms or suspected exposure
 - Weekly testing of all residents and staff in facilities with any positive cases among residents or staff, until 14 days after the last new positive
 - Weekly testing of all staff in regions of medium risk or higher on the [MI Safe Start Map](#)
 - Testing of all staff in Regions 1 through 5 and 7, at least once between the date of this order and July 3, 2020
- Given the significant risk of COVID-19 outbreaks in skilled nursing facilities, and the tragic loss of life at these facilities throughout the pandemic, it is imperative that facilities provide routine testing to identify infections and contain spread as quickly as possible.
- These guidelines reflect epidemiological risk from various populations and form part of a comprehensive strategy, including strong infection prevention measures.
- Facilities must complete a plan by June 22nd for how to conduct testing in compliance with this guidance, using the template attached to this memorandum. Facilities must begin testing by June 29th and have several options for how to do so, as outlined in this memorandum.

Testing Guidelines for Skilled Nursing Facilities

(Diagnostic tests: polymerase chain reaction (PCR), nucleic acid, or antigen tests)

MDHHS guidance requires that all skilled nursing facilities perform diagnostic testing for COVID-19 on residents and staff in certain circumstances to rapidly identify cases, including among asymptomatic individuals, contain spread as quickly as possible, and prevent severe health outcomes for residents and staff. As explained below, each of the guidelines reflects epidemiological

¹ Please see table on page two for additional details on each of the testing requirements.

risk of spreading COVID-19 into and within a facility. Note that all testing guidelines refer to diagnostic testing (not serology, anti-body, or blood testing), and that diagnostic testing must be conducted by a laboratory certified for Clinical Laboratory Improvement Amendments (CLIA) high-complexity testing,² using a testing method with Food and Drug Administration (FDA) Emergency Use Authorization approval. Each facility must have a procedure for addressing residents who decline testing or are unable to be tested, as well as a procedure for how employees who decline without medical justification and documentation will be separated from nursing home residents. Testing the same individual more than once in a 24-hour period is not recommended.

Circumstances When Diagnostic Testing Required ³	Rationale
Initial testing: one-time testing for all residents and staff	Provide baseline identification of cases to isolate positives, if needed, and inform ongoing testing practices (i.e., whether facility has positive cases or not)
All new or returning residents during intake ⁴	Provide screening prior to entry into facility to prevent introduction of infections and follow routine intake quarantine procedures
Residents or staff with symptoms or suspected exposure	Provide diagnostic information for residents or staff showing symptoms of the disease or known exposure to the disease to inform safety practices and treatment
All residents and staff on weekly basis if any positive cases among residents or staff, until the testing identifies no new cases of SARS-CoV-2 infection among residents or staff for a period of at least 14 days since the most recent positive result ⁵	In facilities with COVID-19 present, provide ongoing monitoring to identify and isolate cases and contain the disease. Weekly testing identifies new cases as they develop following exposure. Weekly testing of all residents and staff must continue until the testing identifies no new cases of SARS-CoV-2 infection among residents or staff for a period of at least 14 days since the most recent positive result
All staff on weekly basis in medium risk or higher regions ⁶	In regions with ongoing COVID-19 spread, monitor for potential infection among staff to prevent staff from inadvertently introducing infections into the facility. Because of the prevalence of asymptomatic infection, testing of all staff, including those with no symptoms, is vital

² Facilities may utilize a CLIA waived laboratory if using a CLIA waived test (e.g., a rapid point-of-care test)

³ Residents must have the option of refusing testing if they choose

⁴ Facilities do not need to test a new or returning resident who has already been tested in last 72 hours

⁵ Testing should include all residents and staff who previously tested negative. Residents and staff who previously tested positive do not need to be re-tested weekly.

⁶ To include any individual providing services at the facility on a weekly basis, including all staff and contractors with routine access to facility

Testing of all staff in Regions 1 through 5 and 7, at least once between the date of this order and July 3, 2020	Ensure that at least one round of staff testing occurs in coming weeks to provide a timely and up-to-date understanding of infections
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Options for Meeting Testing Guidelines

MDHHS and the State of Michigan recognize the unprecedented challenges that the pandemic has placed upon skilled nursing facilities and are committed to helping facilities protect resident safety. The remainder of the memorandum outlines the responsibilities of facilities in meeting these guidelines and the available options to do so.

Facilities must complete a plan by June 22nd for how to conduct testing in compliance with this guidance and make it available to MDHHS, the Michigan Department of Licensing and Regulatory Affairs, or members of the public upon request. Facilities must use the template attached to this memorandum to complete the plan. Facilities must begin executing on their plans as soon as practicable and no later than June 29, 2020.

The State of Michigan will provide testing support for each facility as its capacity allows and assist facilities in identifying other sources of testing capacity as needed. Requests for state assistance must be submitted to MDHHS as soon as practicable and not later than June 22, 2020, via email to MDHHS-LTCRequest@michigan.gov.

The table below provides a high-level overview of options for completing each type of testing, with details following below.

Circumstances When Diagnostic Testing Required ⁷	Implementation Responsibility and Options
Initial testing: one-time testing for all residents and staff	Facility responsible for performing, in normal course of business. State has offered skilled nursing facilities support from the National Guard to conduct initial testing or to drop off test kits for the facility’s use in initial testing
All new or returning residents during intake ⁸	Facility responsible for performing, in the normal course of business
Residents or staff with symptoms or suspected exposure	Facility responsible for performing, in the normal course of business
All residents and staff on weekly basis, if any positive cases among residents or staff, until the testing identifies no new cases of SARS-CoV-2 infection among	Several options, in rank order: 1) Facility conducts, taking patient specimens and sending to any laboratory partner chosen

⁷ Residents must have the option of refusing testing if they choose

⁸ Facilities do not need to test a new or returning resident who has already been tested in last 72 hours

<p>residents or staff for a period of at least 14 days since the most recent positive result⁹</p>	<p>2) State drops off specimen collection supplies for the facility to take patient specimens and return to a specific external laboratory 3) State visits facility to take patient specimens and return them to a specific external laboratory</p>
<p>All staff on weekly basis in medium risk or higher regions¹⁰</p>	<p>Several options, in rank order: 1) Facility conducts, taking patient specimens and sending to any laboratory partner chosen 2) Facility staff visit testing locations in the general community 3) State drops off specimen collection supplies for the facility to take staff specimens and return to a specific external laboratory 4) State visits facility to take patient specimens and return them to a specific external laboratory</p>
<p>Testing of all staff in Regions 1 through 5 and 7, at least once between the date of this order and July 3, 2020</p>	<p>Same options as row immediately above</p>

Resources to Complete Initial Testing

Throughout May 2020, MDHHS and the Michigan National Guard have worked closely with local health departments to offer skilled nursing facilities support conducting initial testing, either through the National Guard dropping off specimen collection materials for facility staff to administer and return to the laboratory or through the National Guard visiting the facility to take patient specimens and return them to the laboratory. Separate from this process, some facilities had already chosen to conduct initial testing, while other jurisdictions had already completed initial testing in all local skilled nursing facilities.

Facilities may conduct their own initial testing, separate from any state assistance or process, to comply with the requirement for initial testing of all residents and staff.

Any facility that did not receive an offer for initial testing assistance from the Michigan National Guard, or that has not yet conducted initial testing and would like assistance to do so, should please contact MDHHS-LTCRequest@michigan.gov to request state assistance, including the name and location of the facility and the number of residents and staff needing testing.

⁹ Testing should include all residents and staff who previously tested negative. Residents and staff who previously tested positive do not need to be re-tested weekly.

¹⁰ To include any individual providing services at the facility on a weekly basis, including all staff and contractors with routine access to facility

Resources for Facility-Conducted Testing

Skilled nursing facilities retain primary responsibility for conducting testing, including testing all new or returning residents during intake and testing any resident or staff member with COVID-19 symptoms or suspected exposure to COVID-19. Facilities may also conduct weekly testing of residents and staff in any facility with a positive case and weekly testing of staff.

In these circumstances, facility staff are responsible for collecting the patient specimen, returning it to an appropriate laboratory, and communicating the results to the patient. Facilities may choose to work with an existing laboratory partner or to partner with any CLIA high-complexity laboratory that has validated testing for COVID-19 using a testing method with FDA Emergency Use Authorization.

Several laboratories in Michigan can conduct COVID-19 testing, have capacity to serve more patients per day, and may be willing to partner with skilled nursing facilities to conduct testing. Please visit michigan.gov/coronavirustest for an up-to-date [list of laboratories with COVID-19 testing capabilities and capacity to partner with new entities](#) for specimen collection. Many national commercial laboratories also have capacity to conduct more COVID-19 tests per day and may be an option (e.g., Quest, LabCorp).

Laboratories typically provide specimen collection materials as part of such an arrangement and medical providers typically face no cost for sending specimens to these laboratories, rather insurance billings provide reimbursement.

Note that Medicare and Medicaid cover COVID-19 testing that aligns with recommendations from the Centers for Disease Control and Prevention. This should include testing of new or returning residents upon intake, testing of residents with symptoms or exposure, and weekly testing of residents and staff following a positive case among residents or staff. Finally, Medicare also reimburses for specimen collection in skilled nursing facilities.

Resources for Weekly Testing of Residents and Staff Following a Positive Case

Facilities have several options to complete weekly testing of all residents and staff, if any positive cases among residents or staff, until the testing identifies no new cases of SARS-CoV-2 infection among residents or staff for a period of at least 14 days since the most recent positive result.

First, if possible, the facility should conduct this testing itself. The prior section of this memorandum outlines options and guidelines to do so.

Second, if State of Michigan support is necessary, the State can drop off specimen collection supplies for the facility to take patient specimens. These specimens must be returned to the specific laboratory that the State purchased the test kits from; the State will provide this information.

Third, if State of Michigan support is necessary, the Michigan National Guard can visit facility to take patient specimens and return them to a specific external laboratory for processing.

Facilities requiring state assistance for conducting testing (options two or three) should please contact MDHHS-LTCRequest@michigan.gov to request state assistance, including the name and location of the facility and the number of residents and staff needing testing. The State will

provide assistance as its capacity allows or may alternatively direct facilities to other sources of testing capacity to utilize.

The State of Michigan will cover all costs for state-facilitated testing options (options two and three).

Resources for Weekly Staff Testing

Facilities have several options for conducting weekly testing of all staff in medium risk or higher regions, based on the [MI Safe Start Map](#).

Facilities can use the three options outlined immediately above: 1) facility conducts testing itself, 2) facility requests that state drop off test kits for facility to administer, or 3) facility requests that state visit facility to conduct testing.

Facilities requiring state assistance for conducting testing (options two or three) should please contact MDHHS-LTCRequest@michigan.gov to request state assistance, including the name and location of the facility and the number of residents and staff needing testing. The State will provide assistance as its capacity allows or may alternatively direct facilities to other sources of testing capacity to utilize.

In addition, facilities have a fourth option for conducting this testing: facility staff may visit testing locations in the general community. Please visit michigan.gov/coronavirustest for a [list of test sites offering no cost testing](#), including individuals without insurance. Staff or the facility may choose to contact a no-cost test site in advance to ensure that their specific insurance coverage and reason for being tested will not result in out-of-pocket costs.

Personal Protective Equipment

Facilities that require more personal protection equipment in order to conduct testing should utilize the existing request process through the appropriate Regional Healthcare Coalition.

Attachment

MDHHS Skilled Nursing Facility Testing Plan Template