



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES

LANSING

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GOVERNOR

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MEMORANDUM

Date: March 3, 2021

To: Skilled Nursing Facilities (SNFs), Homes for the Aged (HFAs), and Adult Foster Care homes (AFCs) licensed to care for 13 or more individuals

From: Michigan Department of Health and Human Services (MDHHS)

Subject: Updated: Implementation of Required COVID-19 Testing

Executive Summary

- Given the significant risk of COVID-19 outbreaks in long-term care facilities and the higher likelihood of severe health outcomes from COVID-19 among the elderly, it is imperative that facilities provide routine testing to identify infections quickly and contain spread.
- COVID-19 diagnostic testing is required in skilled nursing facilities (SNFs), homes for the aged (HFAs), and adult foster cares (AFCs) licensed to care for 13 or more individuals as follows:
 - Initial testing of all residents and staff;
 - Testing any resident or staff member with symptoms of COVID-19 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 counties of risk levels A through E on the [MI Safe Start Map](#);
 - Testing of all new or returning residents during intake unless tested in the 72 hours prior to intake;
 - Testing of all newly hired staff on their start date or in the 72 hours prior to start date;
 - Testing of all visitors over the age of 13 prior to entry for indoor visitation (with the exception of visits at the end of life); [see visitation order for specific requirements](#).
- Asymptomatic individuals who have recovered from COVID-19 in the past 3 months are exempted from this testing.
- SNFs must comply with both these requirements and requirements from the federal Centers for Medicare and Medicaid Services (CMS). Interactions between these requirements are detailed in this memorandum.

- To help implement these testing requirements, MDHHS will continue to ship antigen testing supplies to SNFs, HFAs, and AFCs affected by this order.
- MDHHS will continue to provide reimbursement for [confirmatory molecular testing](#)¹ that is performed in accordance with this testing protocol if such tests are not covered by insurance.

Testing Basics

When used in this memorandum and in MDHHS testing guidance generally, “testing” refers to diagnostic testing, which identifies current COVID-19 infections. There are two primary types:

1. Antigen tests that detect proteins on the surface of the virus. Antigen tests offer rapid availability of results and often point of care testing but have lower sensitivity than molecular tests. As such, it is important to follow clinical protocols for using antigen tests and, where needed, confirming results. Antigen testing should be the primary testing type utilized in SNFs, HFAs, and AFCs affected by this order.
2. Molecular tests that detect the virus’s genetic material (including tests referred to as “PCR tests,” after the type of technology used, a polymerase chain reaction). These tests tend to have the highest sensitivity and specificity, meaning that they tend to be accurate and usually do not need to be repeated. Molecular tests should only be used as a confirmatory test when needed after conducting antigen testing in SNFs, HFAs, and AFCs affected by this order.

[MDHHS guidance on antigen testing](#) provides details on protocols and requirements to use these tests. Facilities should review this guidance very carefully.

“Testing” does not include tests that are non-diagnostic, including serology, antibody, or other blood tests. These tests identify antibodies in the blood, which may tell if a person had a past infection of COVID-19.

Options for Conducting COVID-19 Testing

SNFs, HFAs, and AFCs have several options for conducting required testing.

1) State assistance: antigen testing protocol

To help implement these testing requirements, MDHHS will continue to directly ship antigen testing supplies to SNFs, HFAs, and AFCs affected by this order. Under this option for testing, SNFs, HFAs, and AFCs affected by this order should conduct antigen testing as the primary type of testing, and molecular tests should only be used as a confirmatory test when needed after conducting antigen testing.

[MDHHS guidance on antigen testing](#) provides details on protocols and requirements to use these tests, including:

- Who can order the test
- Who can conduct the test

¹ For the purposes of this guidance “confirmatory molecular testing” is defined as testing that is required to verify the results of an antigen test, as specified in protocols.

- Training for staff to conduct the test
- Protocols for using the test
- When a PCR confirmatory test is needed, and
- How to report results

Facilities should review [MDHHS guidance on antigen testing](#) very carefully. It includes additional steps that a facility must take to use the testing supplies provided, including obtaining a CLIA waiver. Facilities may not use the antigen testing supplies provided before completing these steps.

To receive a CLIA waiver, facilities should complete the [CLIA waiver application](#) and submit it to LARA-BCHS-DHHS-COW-TESTING-APPLICATION@michigan.gov. No specific credentials are required to obtain a CLIA waiver. The site performing the testing must follow the guidelines specified under the waiver.

In some cases, antigen test results should be confirmed by a molecular test; MDHHS antigen testing guidance provides [flowcharts showing when test results should be confirmed with molecular testing for patients with symptoms](#) or [without symptoms](#).

Confirmatory PCR tests can be sent to the State of Michigan Bureau of Laboratories at no cost to the facility. [Instructions for how to send confirmatory PCR tests to the Bureau of Labs can be found here](#).

Facilities seeking refills of antigen testing supplies, molecular testing supplies, or other types of testing assistance should complete [the state's testing assistance request template](#).

2) Facility-managed testing program

As an alternative to using state-provided antigen tests, facilities may continue to manage their own testing programs to fulfill staff and resident testing requirements—using existing facility medical staff or contracting with an external health care provider to collect patient samples and contracting with a laboratory to process these samples.

Effective March 22, 2021, MDHHS will not provide reimbursement for facility-managed testing programs and molecular tests that are used outside of confirmatory purposes such as to fulfill the facility's weekly testing requirement. MDHHS reimbursement will be limited to [necessary confirmatory molecular testing](#) that is not covered by insurance.

Facilities wishing to transition to the state assistance antigen testing protocol should do so as soon as possible, but no later than March 22, 2021.

Reimbursement Basics

MDHHS has developed a process to facilitate state assistance for antigen testing and will reimburse for costs not otherwise covered by insurance or the state. Reimbursement will be processed through SIGMA, the state's accounting system. Facilities must be registered in SIGMA to receive reimbursement and may [access SIGMA here](#) or [register a new account here](#).

For facilities using state-provided antigen kits, MDHHS will reimburse for the specimen collection done by the facility.

Reimbursement will also be provided for necessary confirmatory molecular testing that is not covered by insurance. Alternatively, confirmatory molecular tests can be sent to the State of Michigan Bureau of Laboratories at no cost to the facility.

To seek reimbursement, when applicable, facilities should complete the [Long Term Care COVID-19 testing reimbursement form](#) and submit it to MDHHS at:

- MDHHS-SNF-Testing-Financial@michigan.gov for Nursing Homes; or
- MDHHS-HFA-COVID-PAYMENT@michigan.gov for HFAs and AFCs licensed to care for 13 or more individuals.

Please see MDHHS' Financial Guidance for additional information about reimbursement.

Additional Testing Requirements for Skilled Nursing Facilities

Federal CMS has also issued testing requirements for nursing homes. Nursing homes must comply with both state and federal requirements. In practice, this means that:

- SNFs in counties of risk levels A through E on the [MI Safe Start Map](#) must test all staff weekly under the MDHHS order, even if federal requirements would only require monthly testing in the county where the facility is located.
- SNFs in counties with percent positivity over 10 percent, as indicated in [CMS data](#), must test staff twice per week in order to meet federal requirements. These SNFs will meet and surpass the minimum level of testing required by the state.
- SNFs in counties with the risk level of low on the [MI Safe Start Map](#) do not need to conduct weekly staff testing under the state order. SNFs in these counties should conduct staff testing in accordance with federal requirements only.

Refusals of Testing

Facilities must receive patient consent, or consent from a resident's medical power of attorney, for all testing conducted. Residents must have the option to refuse testing if they choose. Facilities should develop a procedure for addressing residents who decline or are unable to be tested, as well as a procedure for how staff who refuse a test without medical justification and documentation will not have contact with residents. If a resident's medical power of attorney consents to the testing, but the resident refuses to have a sample collected, facilities should treat this as a declination to be tested and follow the procedure developed.

MDHHS has also issued guidance on "[COVID-19 Testing Guidelines for Individuals who may be Sensitive to Testing or have Decision-Making Challenges](#)."

Questions

Please see www.michigan.gov/LTCcovidplan for additional information and relevant FAQs. Remaining questions can be directed to MDHHS-MSA-COVID19@michigan.gov.