

## Organized Sports Testing Frequently Asked Questions

The Michigan Department of Health and Human Services (MDHHS) requires unvaccinated individuals ages 13 -19 participating in contact and non-contact organized sports to test for COVID-19 on a weekly basis, in addition to following certain safety measures. More frequent testing is required for unvaccinated individuals, regardless of age, participating in contact sports where the sports organizer has determined that a face mask cannot be safely worn. A negative COVID-19 test result is required for unvaccinated individuals on at least a weekly basis, and more frequently for unmasked practice or play. These requirements apply to both school and non-school sponsored athletics, and they remain in place pursuant to MDHHS's "Gatherings and Face Mask Order" issued on May 4, 2021.

Along with other mitigation practices, like wearing a face mask, screening for symptoms before practice or play, and frequent cleaning, the May 4, 2021 [MDHHS Interim Guidance for Athletics](#) outlines how testing for SARS-CoV-2 (the virus that causes COVID-19) can and, where required by MDHHS's Order, must be used as part of a comprehensive strategy to allow organized sports participants to compete in a safer way.

### Testing Requirements

#### **Who must participate in COVID-19 athletics testing?**

All unvaccinated individuals ages 13 – 19 participating in contact and non-contact organized sports in the state of Michigan must test for SARS-CoV-2 on a weekly basis. Regardless of age, individuals who are not fully vaccinated and are participating in contact sports that are deemed unsafe to play while masked must test for SARS-CoV-2 before any unmasked activity, up to 3 times weekly.

Organized sports include training and practices for competitive athletic activities, as well as competitive athletic activities themselves. Testing is required even if it is during an off-season. Lessons which are not affiliated with organized sports are not required to participate in the COVID-19 testing requirements.

"Organized sports" means competitive athletic activity requiring skill or physical prowess and organized by a sports organizer, pursuant to MDHHS's "Gatherings and Face Mask Order" issued on May 4, 2021.

#### **Does this testing requirement apply to organized sports that are not affiliated with schools?**

Yes. This testing requirement applies to unvaccinated individuals participating in organized sports that are school-sponsored as well as those which are not, such as club sports or leagues.

#### **Do private athletic lessons or pick-up games need to follow the testing requirements?**

No. These testing requirements are required for members of an organized sports team or league who participate in competitions or practices. Private lessons or athletic activities not

part of an organized team or league are not required to comply with the testing requirements. All other mitigation and safety measures in gyms and other settings to prevent the spread of COVID-19 still apply.

**What if I do not want my child to be tested? Can my child still play?**

Participants who do not follow the testing requirements will be unable to participate in organized sports practice and competition.

**Should participants who have already had and recovered from COVID-19 still participate in testing?**

Participants who have recovered after having a laboratory-confirmed COVID-19 diagnosis in the past three months and remain symptom-free may participate in organized sports practice and competition without testing if:

- they can provide a letter from their doctor attesting that they fall into this category, or
- they have proof of a positive antigen or RT-PCR diagnostic test within three months. An antibody test is not sufficient.

The individual must resume testing if they become symptomatic or it has been more than 90 days from the date of a positive laboratory-confirmed COVID-19 test, unless that individual has been fully vaccinated.

Any participant that displays COVID-19 symptoms at any time, regardless of prior COVID-19 diagnosis or vaccination status, should stay home and self-isolate in accordance with [CDC guidance](#).

**If an individual has been fully vaccinated for COVID-19, do they still have to participate in the routine testing program?**

No. Per [CDC Guidance](#), fully vaccinated individuals can gather for the purposes of sports practice or competition without testing if they are asymptomatic.

An individual is considered [fully vaccinated](#):

- 2 weeks after their second dose in a 2-dose series, such as the Pfizer or Moderna vaccines, or
- 2 weeks after a single-dose vaccine, such as Johnson & Johnson's Janssen vaccine.

If an individual does not meet these requirements, they are not fully vaccinated and must continue to participate in the testing program requirements in order to participate in organized sports.

**If an individual is under the age of 13 but plays on a team with 13-year-olds, should they be tested?**

For contact sports where a face mask cannot be safely worn, testing is required for all unvaccinated individuals, regardless of age. For all other organized sports, MDHHS recommends

that all members of the team obtain testing, but the testing requirement only applies to unvaccinated participants ages 13 -19.

**Do individuals who reside outside of Michigan but participate in team sports activities within state boundaries need to comply with these testing requirements?**

Yes. MDHHS requires that all unvaccinated individuals participating in organized sports in the state of Michigan comply with the testing requirements imposed by the “Gatherings and Face Mask Order” issued on May 4, 2021 and outlined in the May 4, 2021 Interim Guidance for Athletics. Unvaccinated individuals ages 13-19 who reside in another state but participate in a tournament or competition within the state of Michigan must test at least once in the seven days prior to that tournament or competition (more frequent testing is required for unvaccinated individuals of all ages participating in contact sports where face masks cannot be safely worn). If an individual resides outside of the state of Michigan but participates on a sports team based in the state of Michigan, that individual must participate in the same testing requirements as the rest of the team.

The hosting venues, sports organizers, and teams are responsible for ensuring that all participants in a sports practice or competition have complied with these testing requirements.

**If an individual is participating in organized sports with multiple teams, does that individual have to get tested with every team they participate with?**

Generally, no. An individual can use proof of a negative COVID-19 test for all the organized sports teams that they participate with and do not need to obtain a test with every team, as long as that test was conducted within the required timeframe based on the testing requirements. Please note that if any of the teams involves a contact sport where face masks cannot be safely worn, the individual will have to follow the more frequent testing protocol required for the sport, which the individual can use as proof of compliance with the state testing requirements for any other team.

## Testing Logistics

**How often does testing have to be conducted?**

Weekly testing is required for unvaccinated individuals ages 13 – 19 who participate in contact and non-contact organized sports. Unvaccinated individuals ages 13 – 19 can only participate in organized sports with proof of a negative diagnostic test (antigen or RT-PCR) on at least a weekly basis.

Additional testing is required for all unvaccinated individuals, regardless of age, who participate in contact sports where a face mask cannot safely be worn. Namely, if a sports organizer has determined that face masks cannot safely be worn while engaging in a contact sport, all teams within the organization must test all unvaccinated participants before any unmasked activity in practice or competition, up to three times weekly. An unvaccinated participant can only engage in such an unmasked activity with either (1) a negative antigen test result within the 24

hours preceding the unmasked activity, or (2) a negative RT-PCR test result within the 72 hours preceding the unmasked activity.

Even where it is not required, sports organizers are encouraged to administer a testing program consistent with these requirements. Furthermore, to the extent possible, rapid testing should be performed in the 24 hours before any inter-team competition, especially before unvaccinated participants come into close contact with other unvaccinated participants from outside the local community.

The exact testing cadence can be set by the participating school, team, or governing association, so long as it is consistent with the above requirements.

### **How can schools/sports organizations administer tests to their participants?**

There are a variety of methods schools/sports organizations can employ to be compliant with the testing requirements imposed by the “Gatherings and Face Mask Order” issued on May 4, 2021 and outlined in the May 4, 2021 Interim Guidance for Athletics, including:

- Work with local schools to get participants tested as students
- Use local testing sites in your community
- Contract with a vendor/ lab
- Procure your own antigen testing supplies
- Enroll in the MI Safer Sports Testing Program and request antigen testing kits (more information below)

### **Are there free testing sites across the state, including UP and for those in rural, inner city areas?**

Yes. You can find options for free COVID-19 testing in the community via our website: <https://www.solvhealth.com/search?cobrandedSrpLocation=MI>.

### **Can at-home COVID-19 tests be used for these testing requirements?**

Yes, at this time Ellume and BinaxNow at-home COVID-19 tests may be used to fulfill these testing requirements. These are the only two types of at-home COVID-19 tests that MDHHS has approved at this time, but we will continue to monitor new tests for inclusion in the future.

Participants can purchase their own at-home tests and administer them according to manufacturer guidelines. Alternatively, organized sports teams may purchase these at-home tests and give them to their participants to fulfill these testing requirements. MDHHS is working to procure a limited number of these tests and will provide updates on availability as these tests are available.

For the Ellume at-home test, participants must use the accompanying smart phone app to receive results and submit data about their tests. For the BinaxNOW at-home test, participants should report their test results to their sports organizer for aggregate reporting to MDHHS.

### What happens if someone tests positive for COVID-19?

It is recommended that any individual who tests positive for COVID-19 should be sent home immediately and should not gather for purposes of organized sports as set forth below.

If an individual tests positive via antigen test, that individual should not gather for the purposes of organized sports for the duration of their infectious period as determined by [current CDC guidance](#) (URL: [bit.ly/2TBf0Xq](https://bit.ly/2TBf0Xq)), unless that individual is asymptomatic and obtains a negative PCR test within 48 hours of the initial positive antigen test.

If an individual tests positive via PCR test, that individual should not gather for purposes of organized sports for the duration of their infectious period, defined as 10 days from date of first positive test (if asymptomatic) or as determined by [current CDC guidance](#) (URL: [bit.ly/2TBf0Xq](https://bit.ly/2TBf0Xq)) (if symptomatic).

Individuals can find a COVID-19 testing location near them at [www.Michigan.gov/coronavirustest](http://www.Michigan.gov/coronavirustest).

### What happens if someone is told they were a "[close contact](#)" of someone with COVID-19 and must quarantine, but they have had a negative antigen test?

MDHHS recommends the following:

Scenario (participant, coach, or staff)	Should not participate in athletic practice or play until:
Asymptomatic and " <a href="#">close contact</a> " of a person with COVID-19, unless fully vaccinated	Local health department quarantine guidelines have been met.
Symptoms including fever, cough, other respiratory symptoms, or those symptoms outlined by the CDC	Symptoms have resolved for more than 24 hours and the person has a negative <b>PCR test</b> (not antigen test).
Asymptomatic with positive antigen test	Isolate and obtain confirmatory PCR test within 48 hours. If negative and continues to be asymptomatic, can resume athletics. If positive continue isolation for 10 days from date of first positive test, or longer as per CDC guidelines.
Asymptomatic with positive PCR (molecular) test	Isolate for 10 days from date of first positive test, or longer as per CDC guidelines.

### What happens to a team if one person has a positive COVID-19 test?

Any unvaccinated team members with [close contacts](#) to that person should quarantine according to their local health department requirements. If a program participant tests positive for COVID-19, that person should cooperate with contact tracing, and any others who have had close contact should quarantine (per the table above).

### **Are COVID-19 antigen tests safe?**

Yes, the antigen tests are rigorously tested and are safe to use on a regular basis. Ethylene oxide is widely used to sterilize medical equipment, including COVID-19 testing kits. The sterilization process is tightly controlled to ensure any residue left over is negligible – and to ensure medical devices are safe to use. While chronic inhalation or occupational exposure to ethylene oxide has been linked to certain health concerns, low levels of exposure to ethylene oxide gas via medical equipment sterilization has not been shown to result in significant adverse health risks.

More information about ethylene oxide sterilization can be found here:

- U.S. Food and Drug Administration: [Ethylene Oxide Sterilization for Medical Devices | FDA](#)
- U.S. Centers for Disease Control and Prevention: <https://www.cdc.gov/infectioncontrol/guidelines/disinfection/sterilization/ethylene-oxide.html>
- U.S. Department of Labor, Occupational Safety and Health Administration: <https://www.osha.gov/ethylene-oxide/hazards>

For recent reporting about ethylene oxide:

- <https://apnews.com/article/fact-checking-10038432007>
- <https://www.reuters.com/article/factcheck-ethylene-oxide/fact-check-lateral-flow-tests-do-not-cause-cancer-ethylene-oxide-sterilisation-is-a-widely-used-process-that-is-regulated-by-international-safety-standards-idUSL1N2LO1YM>

## **MI Safer Sports Testing Program**

### **What is the MI Safer Sports Testing Program?**

MI Safer Sports is a free COVID-19 testing program offered by MDHHS for Michigan schools and non-school affiliated sports organizations. MI Safer Sports provides training, guidance, and rapid antigen testing materials to those who sign up and agree to the program requirements.

### **Does my school/ sports organization have to enroll in the MI Safer Sports Testing Program?**

No. The MI Safer Sports Testing Program is intended to provide support, guidance, and resources to schools/sports organizations in complying with the testing requirements applicable to them; enrollment is entirely voluntary. Other options that schools/sports organizations may pursue include:

- Work with local schools to get participants tested as students
- Use local testing sites in your community
- Contract with a vendor/ lab
- Procure your own antigen testing supplies

### **What kind of tests will be used in the MI Safer Sports Testing Program?**

The MI Safer Sports Testing Program uses antigen tests. Antigen tests are commonly used in the diagnosis of respiratory pathogens. They detect the presence of a specific viral antigen, which implies that the individual currently has a viral infection. The FDA has granted emergency use authorization for antigen tests that can identify SARS-CoV-2, the virus that causes COVID-19. Antigen tests for SARS-CoV-2 can be performed without special equipment and can be administered by trained staff. More information on antigen tests is available [here](#) (MDHHS) and [here](#) (CDC).

### **Are tests free if my school/ sports organization participates in the MI Safer Sports Testing Program?**

Yes, MDHHS is providing free antigen test supplies to schools/sports organizations enrolled in the Program. MDHHS will provide 1 test per participant per week for most teams, or up to 3 tests per participant per week for contact sports where face masks cannot be safely worn.

However, any staff time, personal protective equipment, or other costs to run the Program are the responsibility of the school/sports organization.

### **What is needed for a school to sign up for the MI Safer Sports Testing Program?**

Interested teams should complete the eight steps to participate at [www.Michigan.gov/sportsCOVIDinfo](http://www.Michigan.gov/sportsCOVIDinfo).

1. Engage the community.
2. Identify points of contact.
3. Train staff.
4. Plan for testing.
5. Plan for outbreak management.
6. Obtain consent and codes of conduct from participants.
7. Fill out the [enrollment survey](#).
8. Report test results as required.

### **The enrollment form says each school or organization needs a “CLIA waiver.” What is a CLIA waiver and how do I know if I have one or need one?**

The Clinical Laboratory Improvement Amendments (CLIA) of the FDA designate different types of tests that may be performed in certified scientific laboratories. The rapid antigen tests provided by the MI Safer Sports program can be performed outside a professional lab (for example, on school grounds), but only if that site has obtained a “CLIA waiver.” By law, any site where antigen testing is being performed requires a CLIA waiver.

Currently, [all Michigan public schools and all members of Michigan Association of Non-public Schools](#) have a CLIA waiver to perform rapid antigen testing at their school sites.

All other schools or organizations require a CLIA waiver to perform testing. To receive a CLIA waiver, organizations should complete the [CLIA waiver application](#) and submit it to [LARA-BCHS-DHHS-COW-TESTING-APPLICATION@michigan.gov](mailto: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. The cost is \$180 for two years.

Non-profit organizations can obtain a CLIA waiver for various sites/ clubs. Please contact [MDHHS-SportsCOVIDinfo@michigan.gov](mailto:MDHHS-SportsCOVIDinfo@michigan.gov) for more information about this process.

At home tests (such as the Ellume and BinaxNow at-home COVID-19 tests) do not require a CLIA waiver.

### **How do I get my teams' tests from the MI Safer Sports Testing Program?**

Schools: After you have completed the steps to enroll, including the [enrollment survey](#), MDHHS will let your intermediate school district (ISD) know how many tests you need for your teams. Communicate with your ISD to make arrangements to pick up or ship your antigen tests.

Non-school sponsored sports may request online that tests be shipped to them. Sports organizers can enroll via the [MI Safer Sports Enrollment Form](#).

### **Which intermediate school district (ISD) am I part of?**

[Click here](#) to see the ISD in which your school is located. If you are unsure, you can search your school name here: <https://cepi.state.mi.us/eem/EntitySearchQuick.aspx> (Go to "Search by characteristic" > Search by school name or portion of your school name, county, or ZIP code > Find your school name and click on the name to open up the school profile > Look under **ISD**)

### **I am an ISD that has more tests than I need—what do I do with them?**

Please hold on to any extra tests until the end of the 2020-2021 school year. At that point, MDHHS will work with ISDs to redistribute any extra tests to other locations where they will be used.

## **Testing Protocol for enrollees in the MI Safer Sports Testing Program**

### **Who is responsible for administering the rapid tests and how are they be trained?**

Anyone who is trained can administer these tests. Individuals who administer the tests must complete two online training videos [here](#) and [here](#).

### **How does testing work?**

Trained personnel from participating school/sports organizations administer the point of care antigen tests on site. Individuals receiving the test can use nasal swabs to swab their own nostrils to provide samples.



### **How can schools/sports organizations get access to additional personal protective equipment (PPE) for testing?**

Schools/sports organizations can [contact their local emergency management program](#) if they need assistance obtaining additional PPE for testing. Schools can also request PPE for donation or purchase at discounted rates [here](#).

### **My school/sports organization does not have a biohazard waste disposal process. Can we dispose of waste from the BinaxNOW test kits in the regular trash?**

MDHHS recommends that used antigen tests be disposed of as biohazardous waste materials in an appropriately labeled biohazard bag in compliance with manufacturer's disposal instructions. Pick-up of these materials can be contracted through a school's existing waste pick-up programs (as an extension of their current solid waste management agreements or in addition to any biohazardous pick-up already in place for sharps/used diabetic test materials/etc.) or can be autoclaved.

MDHHS cannot provide biohazard pick-up or disposal. You may be able to work with your local health department or other [local household hazardous waste programs](#) in your area. You can find a list of Michigan-based medical waste disposal services here:

[https://www.michigan.gov/documents/deq/whm-stsws-medical-waste-disposal-services-200704\\_192787\\_7.pdf](https://www.michigan.gov/documents/deq/whm-stsws-medical-waste-disposal-services-200704_192787_7.pdf).

At-home tests (such as the Ellume and BinaxNow at-home COVID-19 tests) may be disposed of with routine household waste as per the manufacturers package insert.

## **General Athletics Questions**

### **Do organized sports participants still need to wear face masks while following these testing requirements?**

Yes. Participants, coaches, and other team personnel must wear a face mask at all times, including when not engaged in active play or practice, except:

- For contact sports, participants need not wear face masks during active play or practice where a sports organizer has determined that wearing face masks would be unsafe and all participants have been tested and received negative tests consistent with the testing requirements applicable to contact sports (as detailed in the [MDHHS Interim Guidance for Athletics](#)); OR
- For non-contact sports practice and competition, face masks are not required during active play or practice when conducted outdoors.

### **Where can teams hold practices and competitions? May spectators attend?**

Practices and competitions may be held at school facilities or other community or privately owned facilities, including stadiums or arenas (with 5,000+ fixed seating capacity). The total capacity of the facility or venue may be limited by local or state regulation.

The following capacity limits apply:

- Indoor Facilities (fixed seating capacity less than 5,000 spectators):
  - o Limited to 300 spectators
  - o Total occupancy (including participants, coaches, staff, and spectators) must not exceed 50% of the capacity limits established by the fire marshal.
- Outdoor Facilities (fixed seating capacity less than 5,000 spectators):
  - o Limited to 1,000 spectators
  - o Total occupancy (including participants, coaches, staff, and spectators) must not exceed 50% of the capacity limits established by the fire marshal, if applicable.
- Outdoor Stadiums or Arenas (fixed seating capacity up to 10,000 spectators):
  - o Generally limited to 1,000 spectators
  - o However, if the facility and sports organizers comply with **MDHHS's Large Outdoor Events Guidance**, they may allow up to 20% fixed seating capacity or 20 persons per 1,000 square feet (including spectators, staff, vendors, participants, etc.), whichever is greater.
- Outdoor Stadiums or Arenas (fixed seating capacity greater than 10,000 spectators):
  - o Generally limited to 1,500 spectators
  - o However, if the facility and sports organizers comply with **MDHHS's Large Outdoor Events Guidance**, they may allow up to 20% fixed seating capacity or 20 persons per 1,000 square feet (including spectators, staff, vendors, participants, etc.), whichever is greater.
- Indoor Stadiums or Arenas (fixed seating capacity up to 10,000 spectators):
  - o Limited to 375 spectators
- Indoor Stadiums or Arenas (fixed seating capacity greater than 10,000 spectators):
  - o Limited to 750 spectators

## Reporting Protocol

### **How must schools/sports organizations report test results?**

All PCR tests conducted for COVID-19 must be reported to MDHHS in a manner directed by MDHHS via the Michigan Disease Surveillance System (i.e., electronic laboratory reports or manual case entry) within 4 hours of completion of the test, whether positive or negative.

Antigen tests for COVID-19 must be reported to MDHHS in a manner directed by MDHHS within 4 hours of completion of the test, if the result is positive. On a day when testing occurs, the total number of negative antigen tests completed should be reported within 24 hours.

The following patient data elements are required to be reported to MDHHS for all PCR COVID-19 diagnostic testing results and all positive antigen tests:

- Full name
- Full residential address
- Residence County

- Telephone number
- Date of birth or age
- Sex
- Patient's race
- Patients ethnicity, including both Hispanic/Latino and Arab ethnicities
- The specific laboratory test
- Date test ordered
- Date test performed
- Test results
- The name and address of the reporting laboratory (or location of the test if reporting a positive antigen test)
- The name, address, and telephone number of the person who ordered the test

Any laboratory requisition form used by physicians or other health care professionals must include the above data elements to ensure laboratories are able to comply with the Department's demographic reporting requirements.

For schools/ sports organizers who enroll in the MI Safer Sports Testing Program, all positive antigen test results should be reported at this [link](#).

**If an individual tests positive, who should schools/sports organizations notify?**

In addition to the [reporting requirements to MDHHS](#), the school/sports organization should notify the local health department and all other participants, coaches and team personnel of any positive results. The result is also counted as a probable case for school mandated public reporting. [More information on notification requirements and privacy considerations under state and federal law can be found here.](#)

**Is reporting for the sports testing requirements HIPAA-compliant? How is participant privacy protected?**

Schools/sports organizations enter test results directly into a portal for the Michigan Disease Surveillance System (MDSS), the state's system for reporting communicable diseases. Results are only used for public health monitoring purposes – not sold or shared with law enforcement agencies. This process does not, on its own, create FERPA- or HIPAA-covered records in MDSS. To the extent HIPAA applies to you as a reporting entity, reporting this data is a public health activity that is permitted under HIPAA. To the extent FERPA applies to the records to be reported, it is up to the school/sports organization to either obtain the necessary FERPA consent or determine that an exception under FERPA applies.

MDHHS has supplied [a template consent form](#) for schools/sports organizations to build upon based on their own needs and processes for sports testing requirements. If a school/sports organization creates its own process or forms, then that school/sports organization should consult its own lawyers about compliance with relevant privacy laws. Schools/sports organizations should have a plan in place to securely retain any records developed for this

program, in compliance with all applicable state and federal laws, and provide them to MDHHS upon request at any time.

## Testing Oversight and Additional Resources

### **How are the testing requirements being monitored?**

Schools/sports organizations should document their compliance with all requirements. These plans should be made available to MDHHS or local health departments upon request.

### **How do schools/sports organizers verify that participants get tested if we don't do on-site testing?**

Schools/sports organizations have the flexibility to determine how to verify testing. Options include but are not limited to: time stamped photos of students holding negative test cards, reports from a lab, or the NAVICA app which pairs with certain antigen tests.

### **Where can I find more information?**

Interested districts or organizations are invited to attend or view MDHHS's series of webinars outlining further details and next steps. Find links to and recordings of these sessions at [www.Michigan.gov/sportsCOVIDinfo](http://www.Michigan.gov/sportsCOVIDinfo).

### **Who can I contact if I have additional questions?**

Please send an email to [MDHHS-SportsCOVIDInfo@Michigan.gov](mailto:MDHHS-SportsCOVIDInfo@Michigan.gov).