



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES

LANSING

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GOVERNOR

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**MEMORANDUM**

Date: April 20, 2020

To: Health Care Providers, Healthcare Facilities, Infection Prevention and Control n 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 (MDHHS)

**Executive Summary**

- MDHHS is expanding COVID-19 testing prioritization criteria to include all health care workers and first responders (even if they do not have symptoms) as part of the Priority Three group for testing
- MDHHS has added a Priority Four group that includes critical infrastructure workers (i.e., any worker still leaving the home for in-person work), whether they have symptoms or not.
- Health care providers should still prioritize test capacity for higher-risk patients, but if additional specimen collection and testing capacity is still available after serving these patients, providers should also test exposed critical infrastructure workers.
- The full current testing prioritization criteria are reproduced at the end of this memorandum.

**Introduction**

As the COVID-19 situation 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. 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 changes to those criteria.

1. Expansion of COVID-19 Testing Prioritization Criteria to Include All Critical Infrastructure Workers with Potential Exposure, Whether Symptomatic or Asymptomatic

Given the continued expansion of COVID-19 testing capacity in Michigan, MDHHS is expanding the COVID-19 testing prioritization criteria to broaden the populations eligible for testing to include individuals with mild symptoms in certain circumstances. **Specifically, health care providers should test any healthcare facility worker or first responder (even if they do not have symptoms). Critical infrastructure workers (i.e., any worker still leaving the home for in-person work) with potential COVID-19 exposure, whether symptomatic or asymptomatic,**

**should be tested as well, so long as adequate specimen collection and test processing capacity remains after serving all known patients in higher-priority testing categories.**

The U.S. Centers for Disease Control and Prevention (CDC) have issued clinical guidance to help prioritize COVID-19 testing resources that, unfortunately, remain too scarce nationwide. These guidelines (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/clinical-criteria.html>) group patients into Priority One, Priority Two, and Priority Three categories, reflecting risk of severe illness and other considerations like integrity of the healthcare system.

Providers must continue to follow MDHHS prioritization criteria and must prioritize test capacity for populations from Priority One, Priority Two, and Priority Three patients; these priorities are reproduced at the end of this memorandum. If capacity remains after serving patients from those priority populations, providers should test all critical infrastructure workers with potential COVID-19 exposure, whether symptomatic or asymptomatic. This population is not prioritized by the CDC guidelines.

MDHHS recognizes that population health needs, patient characteristics, and testing capacity vary significantly across the state, and this system seeks to broaden eligibility for testing to fully take advantage of available test capacity in the state, while still ensuring that the highest-risk patients can access testing resources. It is also important to note that Michigan is seeing alarming racial disparities in COVID-19 cases and deaths, with African Americans consisting of 14% of the state's population, but 33% of cases and 40% of deaths. Clinicians should be mindful of this disparity and have heightened awareness when considering testing and treatment strategies in this patient population.

Health care providers should assess available testing resources on a periodic basis (e.g., weekly) and determine if resources are sufficient to serve asymptomatic critical infrastructure workers, alongside other priority populations.

Please note that testing asymptomatic critical infrastructure workers does not change precautions that should be taken to decrease COVID-19 spread, including quarantine of exposed individuals, and that a negative test result reflects infection status at a point in time. An individual may receive a negative test result soon after exposure but later develop an infection.

As a reminder, per the March 24, 2020 MDHHS Emergency Order, all CLIA-certified laboratories in Michigan are required to comply with prioritization criteria as promulgated by MDHHS. This includes Public Health, commercial, and healthcare facility laboratories. We believe that these clarifications and this expansion of prioritization criteria will help to improve access to COVID-19 testing.

**This expanded prioritization criteria will take effect at 8:00 AM on April 21, 2020.**

## 2. Full COVID-19 Testing Prioritization Criteria Currently in Effect

As a reminder, the current MDHHS COVID-19 testing prioritization criteria are as follows:

### Priority One

- Hospitalized Patients
- Healthcare facility workers with symptoms;

- Note: MDHHS interprets this to include all workers within a healthcare facility, not just providers of direct healthcare services.

#### Priority Two

- Patients in long-term care facilities with symptoms
  - Note: MDHHS interprets this to include any resident with symptoms in congregate living arrangements, not only long-term care facilities.
- Patients over age 65 years with symptoms
- Patients with underlying conditions with symptoms
- First responders with symptoms

#### Priority Three

- Critical infrastructure workers with symptoms
- Individuals who do not meet any of the above categories with symptoms
- (Newly added) Asymptomatic health care workers and first responders
- Individuals with mild symptoms in communities experiencing high COVID-19 hospitalizations
  - Note: MDHHS interprets the full state of Michigan to be a community with high COVID-19 hospitalizations

#### Newly Added Priority

- Critical infrastructure workers, including asymptomatic workers
  - Note: these individuals may be tested only if specimen collection and testing capacity remains after serving all patient groups above

MDHHS is making these changes as part of its efforts to increase testing access to as many Michiganders as feasible while ensuring that statewide testing capacity is sustained. We will continue to monitor test availability and adjust this protocol, as necessary.

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

Thank you for all you do to serve the residents of Michigan at this difficult time.