



STATE OF MICHIGAN

GRETCHEN WHITMER
GOVERNOR

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ROBERT GORDON
DIRECTOR

IV-D MEMORANDUM 2020-024

TO: All Friend of the Court (FOC) Staff
All Prosecuting Attorney (PA) Staff
All Office of Child Support (OCS) Staff

FROM: Erin P. Frisch, Director
Office of Child Support

DATE: August 17, 2020

SUBJECT: Genetic Testing Sample Collection During the COVID-19 Pandemic

ACTION DUE: None

POLICY EFFECTIVE DATE: June 1, 2020

PURPOSE:

This IV-D Memorandum updates and replaces the policy in IV-D Memorandum 2020-014, *Genetic Testing Sample Collection During the COVID-19 Pandemic*. IV-D Memorandum 2020-014 announced the restart of the genetic testing process on June 1, 2020. It also discussed the revised genetic testing sample collection process. In this memorandum, changes that have been made to the policy since the publication of IV-D Memorandum 2020-014 are indicated by a change bar in the right margin.¹

Exhibits 2020-014E1 and 2020-014E2 from IV-D Memorandum 2020-014 are being republished with this memorandum as Exhibits 2020-024E1 and 2020-024E2, respectively. These exhibits have no content changes. Exhibit 2020-014E3, Regional Healthcare Coalition Contact Information Sheet, is obsolete. It is being replaced by Exhibit 2020-024E3, Michigan Local Emergency Manager Contact Information Sheet.

OCS suspended genetic testing sample collections ("sample collections") on March 19, 2020 due to Executive Order 2020-21, which directed Michigan citizens to "stay home, stay safe" during the COVID-19 pandemic. Subsequent executive orders extended

UPDATE(S):

☐ Manual

☐ Form(s)

¹ Changes to the sample collection process that are discussed in this memorandum were first communicated to IV-D staff in the June 4, 2020 email notification [UPDATE: Genetic Testing Sample Collection – Change in Process for Requesting Personal Protective Equipment \(PPE\)](#).

these directives and instructed that organizations take precautions to protect people during the pandemic.²

In the restarted sample collection process, there is a revised process to ensure a “no direct physical contact” specimen collection. This process, which is introduced in this IV-D Memorandum, is intended to protect customers and IV-D staff.

For IV-D offices that use DDC³-contracted staff for specimen collection, onsite collectors will be required to follow the revised process. For county offices with IV-D staff performing staff-assisted specimen collections, OCS is introducing this process as voluntary. However, OCS highly recommends that IV-D staff follow the process.

Note: The [DDC Collector vs. IV-D Staff-Assisted Collection Spreadsheet \(Exhibit 2020-24E1\)](#) lists which counties use DDC to collect genetic testing samples and which counties use IV-D staff-assisted specimen collection.

This memorandum also discusses acquiring personal protective equipment (PPE) to be used in sample collection.

DISCUSSION:

A. Background

Genetic paternity testing is used to establish paternity and resolve disputes in IV-D child support cases.⁴ In IV-D offices, DDC-contracted staff collect genetic testing samples, or IV-D staff assist customers in collecting the samples. DDC provides paternity testing for the Michigan IV-D program.

Paternity testing must be conducted so families can secure financial support for their children, and sample collection must be done safely. Therefore, when the sample collection process was suspended, OCS collaborated with DDC to determine how to restart the process expediently and safely.

1. Options Considered for Sample Collection

OCS and DDC considered all options when discussing how to best restart the sample collection process. However, the use of DDC physical collection locations and additional DDC staff for conducting sample collections were quickly identified as non-viable options.

² Executive Order 2020-21 took effect on March 24, 2020. Ref: Executive Orders 2020-42, 2020-70 and 2020-77. The Governor’s Executive and Emergency Orders related to COVID-19 can be found at https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705---,00.html.

³ The DNA Diagnostics Center (DDC) is OCS’s genetic testing contractor.

⁴ Michigan Compiled Law (MCL) 722.711 and 722.714

a. DDC Physical Collection Locations

While DDC maintains approved DNA-testing centers throughout Michigan, many of them are hospitals, health departments, and medical offices. Currently, these locations are being used exclusively for the COVID-19 pandemic and other critical medical services. Therefore, they cannot accommodate an increase in appointments for sample collection.

b. Additional DDC Staff

The Genetic Paternity Testing Services contract⁵ identifies counties that have an on-site DDC-contracted collector to conduct specimen collections; DDC is unable to provide this service for any additional counties.

After exploring the above options, and with no other viable options remaining, OCS determined that counties must keep the same collection method that was in place prior to the suspension of sample collection on March 19, 2020. Revisions to the collection method include several modifications to keep customers and staff safe during sample collection.

2. Date for Resuming Sample Collection

The June 1, 2020 restart date provided partners with time for review of the revised sample collection procedure and allowed for coordination between IV-D staff and DDC regarding sample collection dates and times. If some counties are still not operational, they must begin establishing plans to initiate sample collection as soon as feasible.

In counties using DDC-contracted onsite collectors, DDC will ensure its collection staff are available on each scheduled collection day. Given that, each county will coordinate with DDC regarding start dates for genetic testing collection in advance of any scheduled collections taking place. County staff will contact DDC at the telephone numbers or email addresses listed under the Additional Information section at the end of this memorandum.

B. Revised Genetic Testing Sample Collection Procedure

DDC modified the [Assisted Buccal Specimen Collection – Chain of Custody Procedure](#) (Ref: [Exhibit 2020-024E2](#)). The procedure has been revised to align with workplace safety measures as recommended by the Centers for Disease Control (CDC). The revised procedure incorporates suggested protocols for sanitizing collection sites before and after each customer, reduces the transfer of paperwork between collector and customer, and changes the sample collection process to a “no physical contact” collection when necessary. All IV-D staff responsible for sample

⁵ Ref: [Exhibit 4.10E1, Genetic Paternity Testing Services Contract Overview 2010-2015](#).

collection will read and follow the procedure as directed by their local office manager.

Additional revisions to the procedure are explained below.

1. Location of Genetic Testing Specimen Collection

Counties should consider all available options when determining where to safely conduct sample collections. This includes, but is not limited to, parking lots, lobby areas, and any other open space that allows for proper social distancing.⁶

2. Social-Distancing Measures

To the maximum extent possible, sample collections in IV-D offices should be performed consistently with the social-distancing practices and other mitigation measures necessary to protect IV-D staff and customers.

As explained in the collection procedure, customers will perform the sample collection themselves by swabbing the inside of their cheek. IV-D staff will instruct customers in this process. This will ensure no physical contact between the IV-D worker and the customer.

3. Discontinued Use of Fingerprinting

After research and discussions with PA staff and DDC, OCS determined there was no legal requirement preventing the removal of the fingerprint option from the collection procedure. OCS acknowledges that, in the past, the fingerprint option has provided an enhanced confidence that challenges to the identity of individuals tested could be quickly resolved. However, this is not critical for sample collection in the normal course of business, nor is there a safe method for its continued use in today's environment. The collection of fingerprints requires IV-D staff and multiple customers to repeatedly touch the fingerprint pads; this jeopardizes the health and safety of both IV-D staff and customers. As a result, DDC removed the fingerprint option from the procedure.

C. Collection Supplies and Personal Protective Equipment (PPE)

1. Collection Supplies

DDC is contractually required to provide all necessary supplies for specimen collection. These supplies include:

- Specimen collection kits;
- Client Authorization/Chain of Custody forms;

⁶ Executive Order 2020-77 section 11(d) states that workers and patrons must be kept at least six feet apart from one another to the maximum extent possible while on the premises.

- Camera and film; and
- Gloves.⁷

DDC will provide the supplies listed above for their contracted onsite collectors and for IV-D staff doing assisted collections.

Note: DDC will provide gloves for their collectors and for IV-D staff who do assisted collections. As described in the collection procedure,⁸ customers will collect the sample themselves; when doing so, customers need not wear gloves to protect the sample.

2. Personal Protective Equipment (PPE)

For the purposes of the sample collection process, PPE is identified as:

- Face coverings;
- Cleaning supplies;
- Plexiglass shields; and
- Gloves for the protection of individuals.

All counties designated as being IV-D staff-assisted collection counties may obtain PPE from their assigned local emergency manager as identified in the Michigan Local Emergency Manager Contact Information Sheet (Ref: [Exhibit 2020-024E3](#)) for the purpose of conducting sample collections. Additionally, counties using DDC-contracted onsite collectors may obtain authorized cleaning supplies from their assigned local emergency manager.⁹ A designee from each of the IV-D offices will contact the assigned local emergency manager to determine the specific process necessary for requesting PPE.

Local emergency managers will likely be unfamiliar with these incoming requests from IV-D offices. Therefore, when contacting the county's emergency manager, the designee must explain that the PPE will be used in genetic testing specimen collection to fulfill contractual, state and federal requirements for paternity and child support establishment on behalf of families. Local emergency managers will route PPE requests through the approval process and will fill requests based on the availability of supplies. If a designee's local emergency manager requires additional information or confirmation, the designee may contact Kara Bradley, OCS Policy Analyst, at bradleyk8@michigan.gov for assistance.

IV-D offices may also obtain PPE via the Pure Michigan Business Connect (PMBC) program through the Michigan Economic Development Corporation

⁷ DDC provides gloves for the protection and integrity of the sample collected. DDC does not consider their glove supply as a form of PPE.

⁸ Ref: Exhibit 2020-024E2.

⁹ At this time, DDC expects local IV-D staff to sanitize the physical collection area before and/or after a collection occurs.

(MEDC). MEDC has developed the PMBC COVID-19 Procurement Platform portal to support the PPE needs of business and industries within Michigan. More information on the PMBC COVID-19 Procurement Platform can be found at <https://www.michiganbusiness.org/ppe/>.

County IV-D staff are not required to use only local emergency managers for their sample-collection PPE needs. Local IV-D offices are encouraged to use all available resources in securing PPE. Depending on the source of the supply, IV-D offices may need to pay for the PPE. However, PPE is a IV-D-reimbursable expense.

D. Other Items for Collection Setup

County offices interested in conducting sample collection in a “parking lot” setting, as opposed to a confined office space, can do so. The purchase of items such as tents to facilitate this setup will be considered a IV-D-reimbursable expense. Questions about IV-D-reimbursable expenses should be directed to the county’s OCS Contract Manager.

For guidance and consultation regarding proper protocols for sample collection, county offices may contact DDC.

E. Additional Information

On May 28, 2020, OCS conducted the webinar *New Genetic Testing Sample Collection Procedures During COVID-19*, which discussed the revised procedures for sample collection during the COVID-19 pandemic. The webinar was recorded and is stored in the [Learning Management System \(LMS\)](#). OCS will consider conducting another webinar if there is increasing interest for one.

Counties with questions or concerns relating to their sample collection responsibilities may contact Kara Bradley, OCS Policy Analyst, at bradleyk8@michigan.gov. For information regarding scheduling of DDC-contracted collectors and proper sample collection protocols and safety measures, IV-D staff may contact either:

Lauren Elkins
DDC Collection Network Supervisor
Phone: 513-881-4003
Email: lelkins@dnacenter.com

Or

Kari Bowlin
DDC Collection Network Supervisor
Phone: 513-881-4048
Email: kbowlin@dnacenter.com

NECESSARY ACTION:

Establish and implement a plan to begin genetic testing sample collection. Read and follow the revised sample collection procedure as instructed by your office manager.

Retain this IV-D Memorandum until further notice. This IV-D Memorandum obsoletes and replaces IV-D Memorandum 2020-014 (published May 22, 2020) and its three exhibits.

REVIEW PARTICIPANTS:

Program Leadership Group

CONTACT PERSON:

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SUPPORTING REFERENCES:

Federal
None

State
MCL 722.711
MCL 722.714

ATTACHMENTS:

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|---------------------|--|
| Exhibit 2020-024E1: | DDC Collector vs. IV-D Staff-Assisted Collection Spreadsheet |
| Exhibit 2020-024E2: | Assisted Buccal Specimen Collection – Chain of Custody Procedure |
| Exhibit 2020-024E3: | Michigan Local Emergency Manager Contact Information Sheet |

EPF/KRB