



STATE OF MICHIGAN

GRETCHEN WHITMER
GOVERNOR

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ROBERT GORDON
DIRECTOR

IV-D MEMORANDUM 2020-014

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: May 22, 2020

UPDATE(S):

Manual

Form(s)

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

ACTION DUE: None

POLICY EFFECTIVE DATE: June 1, 2020

PURPOSE:

This IV-D Memorandum announces the statewide restart of genetic testing sample collections effective June 1, 2020. 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 these directives and instructed that organizations take precautions to protect people during the pandemic.¹

When sample collection restarts, there will be 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 DDC²-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.

¹ [Executive Order 2020-21](#) took effect on March 24, 2020. Ref: [Executive Orders 2020-42, 2020-70 and 2020-77](#).

² The DNA Diagnostics Center (DDC) is OCS’s genetic testing contractor.

Note: The [DDC Collector vs. IV-D Staff-Assisted Collection Spreadsheet \(Exhibit 2020-014E1\)](#) 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.³ 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 expediently and safely restart the process.

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.

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 contract⁴ 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

³ Michigan Compiled Law (MCL) 722.711 and 722.714

⁴ Ref: [Exhibit 4.10E1, Genetic Paternity Testing Services Contract Overview 2010-2015](#).

place prior to the suspension of sample collection on March 19, 2020. Revisions to the collection method will include several modifications to keep customers and staff safe during sample collection.

2. Date for Resuming Sample Collection

The June 1, 2020 restart date provides partners with time for review of the revised sample collection procedure and allows for coordination between IV-D staff and DDC regarding sample collection dates and times. Though some counties will not be operational by June 1, 2020, counties 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 2020-014E2](#)). 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 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.⁵

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.

⁵ 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.

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;
- Camera and film; and
- Gloves.⁶

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,⁷ 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;

⁶ DDC provides gloves for the protection and integrity of the sample collected. DDC does not consider their glove supply as a form of PPE.

⁷ Ref: Exhibit 2020-014E2.

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

The Division of Emergency Preparedness & Response (DEPR) within the Michigan Department of Health and Human Services (MDHHS) has agreed to provide IV-D staff with necessary PPE for sample collection.⁸ All counties designated as being IV-D staff-assisted collection counties may obtain PPE from DEPR for the purpose of conducting sample collections. Additionally, counties using DDC-contracted onsite collectors may obtain authorized cleaning supplies from DEPR.⁹ A designee from each of the IV-D offices will contact the assigned regional coordinator identified in the [Regional Healthcare Coalition Contact Information Sheet](#) (Ref: [Exhibit 2020-014E3](#)). This sheet identifies eight Emergency Preparedness Regions within Michigan,¹⁰ and each region has a specific process for requesting PPE.

Regional coordinators will likely be unfamiliar with these incoming requests from IV-D offices. Therefore, when contacting the regional coordinator, the designee must explain that the PPE request is on behalf of MDHHS-OCS. The designee will also indicate 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. If regional coordinators require additional information or confirmation, the designee may contact Kara Bradley, OCS Policy Analyst, at bradleyk8@michigan.gov for assistance.

County IV-D staff are not required to solely use DEPR for their sample-collection PPE needs. They may use all available resources in securing PPE for their offices. 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.

⁸ DEPR will provide PPE for sample collection only. IV-D offices must obtain PPE and cleaning supplies that may be needed for other IV-D activities through other available resources.

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

¹⁰ The *Regional Healthcare Coalition Contact Information Sheet* separates counties located in and around the Detroit area into Region 2S and Region 2N.

E. Additional Information

In the near future, OCS will offer a webinar to discuss the revised procedures for sample collection during the COVID-19 pandemic. OCS will announce the date and time of this webinar in an email notification.

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.

REVIEW PARTICIPANTS:

Program Leadership Group

CONTACT PERSON:

Kara Bradley
OCS Policy Analyst
Bradleyk8@michigan.gov

CC:

None

SUPPORTING REFERENCES:

Federal
None

State
MCL 722.711
MCL 722.714

ATTACHMENTS:

- 2020-014E1: DDC Collector vs. IV-D Staff-Assisted Collection Spreadsheet
- 2020-014E2: Assisted Buccal Specimen Collection – Chain of Custody Procedure
- 2020-014E3: Regional Healthcare Coalition Contact Information Sheet

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