



# Skagit County Public Health

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To our Skagit County Fire and EMS partners,

Effective April 1, 2019 suspected opioid overdoses that occur in Skagit County are reportable to Skagit County Public Health under [Skagit County Ordinance #O20190001](#). This ordinance is enabled by [WAC 246-101-101](#) in which the Local Health Officer can require additional conditions to be notifiable within the Local Health Officer's jurisdiction. We have prepared the following information to educate responders on the upcoming changes.

## **Why is this an Ordinance?**

Given the opioid crisis in Skagit County, the Local Health Officer and the Board of Health have deemed required reporting an important tool to identify the persons affected, reach out to them following an opioid overdose, offer referrals, and save lives. Similar ordinances exist in Clallam and Mason counties as a tool to identify patients who have survived an opioid overdose and to prevent it from happening again.

To learn more about the opioid epidemic in Skagit County, see the [Skagit County Opioid Dashboard](#) and [infographic](#). To learn about other Public Health and community efforts regarding opioids, see the Skagit County Public Health's [opioid crisis page](#).

## **How does this impact you?**

We expect the providers most impacted by this ordinance will be those working in Emergency Departments and EMS/Fire personnel. As such, we have been working directly with Skagit EMS to automate opioid overdose reporting through ESO. In ESO, we will be looking for naloxone administration but also general impression of opioid overdose and symptoms consistent with opioid overdose. If you believe you are responding to an opioid overdose, please consider

**Report a suspected opioid overdose within 72 hours of responding to Public Health.** Our HIPAA-compliant numbers are:

Fax: (360) 416-1515

Phone: (360) 416-1542

**Report multiple OD events immediately to:**  
24-Hour Urgent Phone: (360) 770-8468

Include the following information:

- The responder and jurisdiction name (e.g. John Doe, Fire District 8)
- The patient's name
- Patient date of birth
- Incident date of the overdose
- The record number for the incident
- If transported, where

(Report form at the end of the FAQ)

including “overdose” in the primary or secondary impression so we can more reliably flag the report.

Since not all Fire districts report into ESO, Public Health has developed a simple report form for districts to use to report opioid overdoses via confidential fax or phone. This form is included at the end of this FAQ.

**EMS and Fire that respond to an acute opioid overdose event are asked to report the overdose within 72 hours of the event.** This time frame allows Public Health to do follow up quickly with patients who experienced a near-miss event and offer resources such as treatment referrals when patients might be more likely to accept them.

To properly assess a reported case of opioid overdose, Skagit County Public Health may contact your jurisdiction about the patient and request records pertinent to the opioid overdose. These are releasable under the ordinance and we will protect this information as we do with all other notifiable conditions (e.g. STDs, HIV, etc). [See “What is the legal basis for this?” below for the legal parameters around this information exchange.]

### **What will we do with this information?**

Similar to the way we follow up on communicable diseases that are already notifiable statewide under [WAC 246-101-101](#), Skagit County Public Health will investigate incidents of opioid overdose. We plan to follow up with patients directly beginning this summer to offer referrals to services such as opioid use disorder treatment, naloxone kits, hepatitis C and HIV testing, hepatitis A and B vaccinations, and/or social services as needed. If you have recommendations on resources we could offer to patients, we invite your feedback. We also welcome feedback on what resources would help you as you respond to these incidents.

As we centralize data collection in Public Health, we will be able to aggregate information together to better describe the opioid crisis in the County. We will share these aggregate, non-identifiable reports back to reporters to show the bigger picture, raise awareness of the reality we are facing, make planning and funding decisions to address illuminated gaps, and evaluate programs/interventions to see if they are changing the situation.

Not only does security and confidentiality remain our utmost concern, it is our legal mandate. We will protect all provided information on opioid overdoses as we do with state-mandated notifiable conditions. Our fax and phone are HIPAA compliant. We will not use any information to criminalize opioid overdose or report individual cases to law enforcement.

### **What is the legal basis for this?**

**State law:** WAC 246-101-101 provides reporting requirements for certain diseases and conditions affecting public health and authorizes Local Health Officers to require additional conditions to be notifiable within the Local Health officer’s jurisdiction.

To review the WAC, see the following link: <https://app.leg.wa.gov/wac/default.aspx?cite=246-101-101>

**Local law:** On December 11, Public Health presented to the Skagit County Board of Health and outlined the need for and components of the proposed ordinance. At that time, the Board of Health signed a resolution opening public comment and calling for a public hearing. The public comment period ran through January 7, 2019. On January 8, the Board of Health held the public hearing, reviewed all comments, and moved to pass the ordinance with an implementation date of April 1, 2019.

**HIPAA:** The U.S. Department of Health and Human Services recognized the importance of sharing personal health information (PHI) to accomplish essential public health objectives. Therefore, the Privacy Rule expressly permits PHI to be shared for specified public health purposes. For example, covered entities may disclose PHI, without individual authorization, to a public health authority legally authorized to collect or receive the information for the purpose of preventing or controlling disease, injury, or disability [45 CFR § 164.512(b)]. Further, the Privacy Rule permits covered entities to make disclosures that are required by other laws, including laws that require disclosures for public health purposes.

To read more about the HIPAA Privacy Rule and Public Health, see the CDC article available at:

<https://www.cdc.gov/mmwr/preview/mmwrhtml/m2e411a1.htm>

**For questions about opioid overdose reporting, please contact:**

Skagit County Public Health

360-416-1500 or [communicabledisease@co.skagit.wa.us](mailto:communicabledisease@co.skagit.wa.us)