January 29, 2019

Dear Colleagues:

Like you, I share a growing concern over opioid and related substance use problems – a genuine epidemic here and throughout the country. As Public Health Officer for Chelan and Douglas Counties I have been grateful for the leadership provided by many of our local health care providers and officials in generating a multifaceted response to a complex problem. One contribution Public Health can make is to track and describe the epidemic, as we would with any other, and I am writing you today to ask your help in doing so.

Using powers granted to a Public Health Officer in WAC 246-101-505 (3)(d) I have declared life-threatening overdoses a notifiable condition. This means health care providers in Chelan and Douglas Counties are obligated to report such events. Attached is a form for this purpose. It includes a case definition (on page 2) and instructions on submission.

You may wonder why we made all overdoses notifiable, not only those from opioids. Outside of an Emergency Department (and sometimes even then) it can be difficult to determine the substance causing an overdose. In addition, the opioid epidemic is a changing situation. We have anecdotal reports of a resurgence of other drugs, including meth, in response to less availability of pharmaceutical grade opioids, and perhaps in response to the hazards of heroin contaminated by fentanyl. We will distinguish these as best we can, and report our findings regularly to you and our community. But as the situation develops we want to be able to discharge our responsibility to track an epidemic of such importance, even as it changes form over time.

A second important purpose for this effort is to offer help to patients at a time which may be a turning point for many. Yet Federal law provides protections for identifying information regarding substance use disorders that is even more restrictive than those imposed by HIPAA on other medical information. For that reason the attached reporting form asks that you submit it to the Center for Alcohol and Drug Treatment in Wenatchee. This does not violate related Federal regulations. Because the personal information is restricted to the top of the form, the Center can then fax the rest of the form to Public Health, since we do not need the personal information. The Center will then make follow-up contacts with patients as appropriate. I believe the Center deserves great credit for being willing to take on this task in spite of the many demands on their staff.

Please do not hesitate to get in touch with me, or with our public health Administrator Barry Kling (barry.kling@cdhd.wa.gov), if you have any questions or concerns about this matter.

Kindest regards,

Francis J.V. Collins, MD, DDS