ORDER OF THE HEALTH OFFICER OF THE COUNTY OF MENDOCINO
REGarding Hospital Affiliated Healthcare Facilities
Data Reporting and Testing Guidance for COVID-19

DATE OF ORDER: November 12, 2020
EFFECTIVE on November 16, 2020

Please read this Order carefully. Violation or failure to comply with this Order is a misdemeanor punishable by fine, imprisonment, or both (Cal. Health & Safety § 120295, et seq.; Mendocino County Ordinance No. 4464; Cal. Penal Code § 19)

UNDER THE AUTHORITY OF THE CALIFORNIA HEALTH AND SAFETY CODE
SECTIONS 10140, 101085, 120175 THE COUNTY OF MENDOCINO HEALTH OFFICER ORDERS:

1. State law and regulations require reporting of accurate, complete, and prompt information about all current cases of COVID-19 within Mendocino County to the Public Health Department. This information is critical to the functions of Public Health, and is necessary to (1) identify individuals known to be contagious with COVID-19 and place them under isolation orders during the infectious period, (2) identify persons known to have been close contacts of contagious persons with COVID-19 and place them under quarantine, (3) ensure that individuals without transportation or a safe place to isolate or quarantine are connected with services designed to provide safe transportation and/or temporary shelter for isolation or quarantine, (4) conduct appropriate outbreak/response and surveillance testing to identify and contain new outbreaks, (5) develop guidance and orders for Mendocino County based in current epidemiologic risks and circumstances, (6) allocate and procure resources needed to combat the pandemic, and (7) take other such actions as may be appropriate based on current facts and circumstances.

2. The Mendocino County Department of Public Health is a “public health authority” within the meaning of 45 C.F.R. section 164.512(b)(1)(i) and 45 C.F.R. section 501, and is authorized by law to collect and receive confidential patient information for the purpose of preventing or controlling disease. While most providers understand that they have an obligation to report new COVID-19 cases to Public Health pursuant to California law and regulations (e.g., 17 C.C.R. 2505), their uncertainty as to the scope of disclosure required and permitted by law has led to unnecessary delays in obtaining needed information. These delays increase the risk of further transmission of the virus by impeding the efforts of Public Health.

3. The purpose of this order is to support the Mendocino County hospital-affiliated healthcare facilities’ reporting of COVID-19 data in a predictable and organized fashion, and which is accurate, complete and timely, to Mendocino County Public Health in order to facilitate those actions necessary to protect the health of the
public from the novel coronavirus which causes the disease known as COVID-19.

4. Additionally, this order is intended to ensure Mendocino County hospital-affiliated healthcare facilities inform the Public Health Department of discharges or transfers of infectious COVID-19 patients from the hospital, including the emergency department. This communication will work to ensure coordination of safe transportation and/or housing for continued isolation upon discharge.

5. Pursuant to State CDPH Guidance on Testing, https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Updated-COVID-19-Testing-Guidance.aspx, this Order also intends to ensure equitable access and adequate availability of Diagnostic testing for priority purposes in order to effectively prevent and control the spread of COVID-19 (SARS-CoV-2), ensure infected individuals receive appropriate care, protect vulnerable populations, and better understand the spread of the disease in the County.

6. All Mendocino County hospitals (which means any acute care hospital, any Emergency department or urgent care facility located at a hospital in Mendocino County) shall designate a liaison within their facility to coordinate and communicate with Public Health daily as specified in this order regarding COVID-19. This information should be provided to County Public Health by email to DOCNursing@mendocinocounty.org and fax to (707) 472-2714.

COVID-19 DATA REPORTING REQUIREMENTS

APPENDIX A – Aggregate Data COVID-19 Hospital Smartsheet Supplement Form

7. On a daily basis, each Mendocino County hospital shall, at a regular occurring time between 9:00 A.M. and 6:00 P.M. report to Mendocino County Public Health by fax to (707) 472-2714, the attached APPENDIX A, COVID-19 Hospital Smartsheet Supplement Form and the Smartsheet as required by and provided to the State CDPH pursuant to AFL 20-31.2 (https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-20-31.aspx) which identifies the following supplemental information:

a. The number of patients currently admitted to the Mendocino County hospital who are positive for COVID-19 and are hospitalized including virtual hospital or hospital-at-home program because of symptoms associated with that condition;

b. The number of patients currently admitted who are positive for COVID-19 but are hospitalized solely because of a reason deemed to be unrelated to COVID-19;

c. The number of the patients currently admitted who are positive for COVID-19 and who are critical;

d. In the last 24 hours, e.g., since the last report, the number of the COVID-19 positive patients who were transferred to an out-of-county hospital;

1 See, Data Dictionary supporting categories of COVID Tracking Tool for Smart Sheet (https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-20-31.aspx)
e. In the last 24 hours, e.g., since the last report, the number of people who are not currently admitted to the facility but sought or received care at the Emergency Department (ED) for a COVID-19-related condition (See APPENDIX-A Smartsheet at column “e.”), i.e., COVID-19-related conditions are defined herein as conditions associated with COVID-19 occurring in suspected or confirmed cases within 45 days of COVID-19 diagnosis (using date of first positive RT-PCR sample collection);

f. Testing Based On Symptoms. In the last 24 hours, e.g., since last report, the results of COVID-19 diagnostic testing data as follows:
   i. The total number of COVID-19 tests performed since the last report, broken down by:
      1. The number of Positive/Negative/Pending COVID-19 Test Results;
      2. The number of COVID-19 tests performed on symptomatic patients (see text box);
      3. The number of patients who presented with any symptom associated with COVID-19, and requested, but did not receive, COVID-19 testing;
      4. The number of COVID-19 tests performed on asymptomatic persons who are believed to have come in contact with a person suspected to have COVID;
      5. The number of COVID-19 tests performed for purely surveillance reasons, e.g. pre-op or pre-admit screening.

   g. Disposition Based on Positive Test Result:
      i. For positive results, the number who were admitted to the hospital or transferred to another facility from the emergency department.
      ii. For positive results, the number of patients who were discharged without being admitted to any hospital.

APPENDIX B – Individual Data - COVID-19-Positive Patient Information Form
8. Mendocino County hospital shall notify Public Health by filling out the attached COVID-19–Positive Patient Information Form APPENDIX B and sending by email to DOC-Nursing@mendocinocounty.org AND fax to (707) 472-2714 as soon as possible, but in no event more than twelve (12) hours after the Mendocino County hospital affiliated facility first receives the positive result. This notification shall contain the following information, if known:
   a. Identification information for the person who tested positive, including, name, date of birth, address, telephone number, and if uninsured or if Medi-Cal (Partnership Health Plan);
   b. Written confirmation that the new case has been reported by the Mendocino County hospital to the State through the CalREDIE Electronic Laboratory Reporting System (hereinafter “CalREDIE”). Per CDPH Guidance all results, both positive and non-positive from both antigen/molecular and antibody/serology tests for SARS-CoV-2 must be reported at least daily directly from any laboratory through CalREDIE. (https://www.cdph.ca.gov/Programs/OSPHLD/LFS/Pages/LFSCOVID19ltr-
This subsection applies to patients tested through a hospital laboratory.

c. If the person is currently hospitalized:
   i. the type of the admission (ICU, med-surgery, admission solely for isolation purpose in “isolation bed”) or hospital at home;
   ii. the number of days the person is expected to be admitted;
   iii. the primary contact for person’s household, or next of kin if person lives alone;
   iv. the person’s current occupation and place of employment;
   v. if the COVID-19 positive patient has been transferred, identify the out-of-county hospital;
   vi. the discharge plan (updated daily by noon or as changing circumstances indicate), with the location and contact information to where the patient is anticipated to be transferred, e.g., home, alternate care site, skilled nursing facility, virtual hospital;
   vii. if the person is anticipated to die in next 48 hours.

d. Whether the healthcare facility anticipates any issues with transportation or housing upon discharge of the patient

e. If the person is not hospitalized:
   i. a completed form (e.g., Documentation of Service of Blanket Isolation Order https://www.mendocinocounty.org/community/novel-coronavirus/health-order) proving that the patient has been provided notice of the requirement that they isolate, including the address and phone number of the location where the person intends to isolate;
   ii. the name and contact information of any person sharing a residence or otherwise in close contact with the person who tested positive; “Close Contacts” as used in this Order are defined as any person who has been within 6 feet or less for more than 15 cumulative minutes over a 24 hour period during their infectious period (i.e., starting 48 hours before symptoms began or 48 hours before COVID-19 test sample collection for an asymptomatic person);
   iii. the name and contact information of the primary care provider (doctor or clinic).

APPENDIX C – Individual Data - COVID-19 DEATH REPORT Form

9. No later than four (4) hours after learning of a patient death from a cause thought to be associated with COVID-19 (See “How are COVID-19-related conditions defined?” explained with para. 7.e. above) in a Mendocino County hospital-affiliated healthcare facility, each Mendocino County hospital shall notify County Public Health by phone to (707) 272-8035 followed by a written report by filling out the attached Form in APPENDIX C and email to: DOC-Nursing@mendocinocounty.org AND fax to (707) 472-2714 the following:
   a. Where death occurred (e.g., which Mendocino County Hospital or “virtual hospital”)
   b. Written confirmation that the death has been reported to the State through the CalREDIE;
   c. The Name and Date of Birth of the decedent;
   d. Gender;
   e. The Race and Ethnicity of the decedent;
f. The address of the decedent or where the onset of disease occurred;
g. Date of COVID-19 diagnosis (when was sample collected);
h. If not Mendocino County, in what county was the person thought to have acquired the virus;
i. The household members of the decedent (or if patient lived alone, the next of kin).

APPENDIX D – Aggregate and Individual Data - COVID-19 Hospital Affiliated Outbreak Reporting Form

10. No later than twelve (12) hours after learning that two or more Healthcare personnel\(^2\) employed by, contracted with, or otherwise affiliated with the Mendocino County hospital have tested positive for COVID-19 and have a work related epi-linkage, the hospital or affiliated ambulatory site (e.g., clinic, physical therapy center, infusion center) shall notify County Public Health by phone to (707) 272-8035 and provide the following information by written report in APPENDIX D by email to: DOC-Nursing@mendocinocounty.org and fax to (707) 472-2714. This form should be updated daily after the first initial outbreak report.

a. Number of COVID-19 (+) cases associated with this outbreak among Healthcare Personnel associated with the Mendocino County Hospital or Hospital affiliated clinics (i.e., the epi-linked cases);

b. The number of Healthcare Personnel Close Contacts; Healthcare Personnel Close Contact defined as those healthcare workers who were within 6 feet or less for more than 15 minutes cumulatively over a 24 hour period during the COVID (+) infectious period (i.e., starting 48 hours before COVID (+) symptoms began or sample collection for an asymptomatic person). The determination of close contact should generally be made irrespective of whether HCP were wearing a respirator or facemask.\(^3\)

c. Explain current measures and plan being undertaken to contain the outbreak, including implementation of isolation and quarantine for cases and close contacts;

d. Explain any anticipated shortages of PPE and staffing as a result of a COVID-19 case;

f. Attach Map of the workplace indicating where the close contact occurred;

g. Attach and identify who was tested and when by completing the APPENDIX-D COVID-19 Hospital Affiliated Outbreak Report Form Line List Template Attachment;

\(^2\) See, California Department of Public Health AFL 20-75 (https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-20-75.aspx) and Title 17 of the California Code Regulation (CCR) Section 2500, 2501, and 2502 and Title 22 CCR Sections 70737, 70739, 72523, 72539 for CDPH requirements on reporting outbreaks to the Local Public Health Department. Please note, the Health Officer requires a consistent “outbreak definition” of two or more confirmed COVID-19 cases in healthcare personnel with epi linkage who do not share a household and are not listed as a close contact of each other outside of the workplace.

\(^3\) CDC revised definition of “close contact” including cumulative total of 15 minutes or more over a 24-hour period. https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/appendix.html#contact
h. Certification that Outbreak/Response Testing will occur 7 days after outbreak is thought to be contained, repeated every 7 days thereafter until there are no positive tests, which may include surveillance testing offered by County Public Health;
  
  i. Any special circumstances.

11. Every Mendocino County hospital and affiliated clinic (e.g., clinic, physical therapy, infusion center) is ordered to promptly provide Public Health with any requested information in its knowledge, records, or control if either:
  
  a. requested by any officer, employee, contractor, or agent of Mendocino County Public Health who is engaged or assisting in a case investigation/contact tracing of a known or suspected COVID positive person and who represents that the information is relevant to their case investigation/contact tracing efforts; or
  
  b. requested by the Public Health Officer or a Deputy Public Health Officer or their designee for reasons related to the COVID-19 pandemic.

This information shall be provided as soon as reasonably practicable, but in no later than twenty four (24) hours after a request is received.

**COVID-19 TESTING REQUIREMENTS**

12. To the extent possible, all Mendocino County hospitals must offer Diagnostic Testing (the use of PCR diagnostic testing or equivalent, related to SARS-CoV-2, the virus that causes COVID-19, or novel coronavirus infection), whether in the facility or by an outside commercial laboratory, to the following categories of patients who seek testing or other care, prioritizing in descending order as follows:

  a. All Symptomatic Persons, (meaning any individual who has any COVID-19 Symptoms, e.g., including, but not limited to, ILI, cough, shortness of breath, difficulty breathing, fever (measured or subjective), chills, rigors, myalgia, headache, sore throat, or loss of smell or taste), regardless of age, hospitalization status, comorbidities, or other risk factors for COVID-19;
  
  b. All persons, with or without a COVID-19 Symptom, who reliably report that recently within the past 14 days they are a close contact of, and have been exposed to, a confirmed case of COVID-19 within the infectious period;
  
  c. All persons, without a COVID-19 Symptom, who are at increased risk of exposure to COVID-19 by virtue of (1) living in higher risk congregate care facilities, including skilled nursing facilities, residential care facilities for the elderly, correctional facilities, or homeless shelters; (2) working in the health care sector who have frequent interactions with the public or with people who may have COVID-19; (3) working in a high risk setting, such as workers who are at high risk for exposure due to frequent face-to-face interaction with members of the public and inability to maintain physical distancing at work, including, but not limited to, first responders, emergency service response, child protective and adult protective services workers, congregate care facility workers, correctional facility workers, elder and disability care providers, food service workers, delivery workers,
grocery store clerks, etc.; or (4) attending a gathering of 20 or more individuals in the 14 days prior to presenting for testing.

d. Asymptomatic Patients requiring pre-operative/pre-hospital admission screening;

e. Asymptomatic Patients being discharged from hospitals to lower levels of care.

13. All patients in categories (a) and (b) of Section 12 should be offered testing to the extent possible at the time they present for care in a Mendocino County hospital or affiliated clinic. All patients in category (c) may be referred to an affiliated clinic or testing center or to screening testing sites operated by County Public Health. A Mendocino County hospital or affiliated clinic may not refer any person with a COVID-19 symptom or any person who should be in quarantine due to having been exposed to a confirmed case of COVID-19, to a screening testing location, e.g., OptumServe.

14. Mendocino County hospitals shall not perform pre-operative COVID-19 testing for non-emergency or elective surgeries unless the facility has sufficient testing supplies to meet their obligations for testing patients in the highest priority category, i.e., Section 12(a).

15. This Order shall become effective on November 16, 2020, and will continue to be in effect until it is extended, rescinded, superseded, or amended in writing by the Health Officer.

16. Copies of this Order shall promptly be: (1) made available at County of Mendocino Executive Office, County Administration Building, 501 Low Gap Road, Ukiah, California 95482; (2) posted on the County website www.mendocinocounty.org and; or (3) provided to any member of the public requesting a copy of this Order.

17. If any provision of this Order to the application thereof to any person or circumstance is held to be invalid, the remainder of the Order, including the application of such part or provision to other persons or circumstances, shall not be affected and shall continue in full force and effect. To this end, the provisions of this Order are severable.

**IT IS SO ORDERED**

Date: 11/12/2020

Issued by: Howard Andrew Coren, M.D.
Health Officer
County of Mendocino