



EMS Special Memorandum - #21-002

Date: March 19, 2021

To: Sonoma County EMS Providers and System Stakeholders

From: Bryan Cleaver
Regional EMS Administrator

Mark Luoto, MD
Regional EMS Medical Director

Re: **Exposure Reporting**

The intent of this memorandum is to provide education to EMS System providers in regard to reporting communicable disease exposures or suspected exposures with a focus on SARS-CoV-2.

Exposure reporting requirements for prehospital personnel are defined in California Health and Safety Code §1797.188 and are applicable to local health jurisdictions, health facilities, prehospital responders and their employers. This memo is not intended to provide a comprehensive understanding of the statute but rather to define the actions Sonoma County Public Health will take to comply with the requirements within the law. Other system partners have an independent responsibility to comply with statutory requirements as summarized.

Exposure defined

For the purpose of this guidance relative to SARS Cov-2, Sonoma County Public Health authorities define exposure consistent with guidance published by Centers for Disease Control here: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html>

Current guidelines:

HCP who had prolonged¹ close contact² with a patient, visitor, or HCP with confirmed SARS-CoV-2 infection³

- HCP not wearing a respirator or facemask⁴
- HCP not wearing eye protection if the person with SARS-CoV-2 infection was not wearing a cloth face covering or facemask
- HCP not wearing all recommended PPE (i.e., gown, gloves, eye protection, respirator) while performing an aerosol-generating procedure¹

Prolonged close contact defined as exposure of 15 cumulative minutes over a period of 24 hours. However, **any duration** should be considered prolonged during performance of CPR and/or an [aerosol generating procedure](#).

Prehospital Provider Responsibilities

Due to the prevalence of SARS-CoV-2 in the community, all prehospital personnel should be protected with PPE appropriate for the level of care they are providing and the level of protection their patient is using on each patient contact, irrespective of patient's suspected COVID status. Any PPE breach or failure to don PPE should result in the prehospital provider reporting a potential exposure to the receiving facility's infection control program as well as their



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provider agency Designated Officer for follow-up. Non-transporting responders may provide name and phone contact information to the receiving facility infection control program via the transporting provider.

Provider Agency Responsibilities

Provider agency designated officer 24-hour contact information must be posted on the agency website. Provider agency Designated Officers are required to immediately notify employees with potential exposure when contacted by a health facility infection control officer. Provider agencies are encouraged to review Cal-OSHA requirements for workplace exposure reporting as those mandates are beyond the scope of this memorandum. Training on the requirements of HSC 1797.188 for Provider Agency Designated Officers is required by the statute

Health Facility Responsibilities

Health facility infection control programs have an obligation to communicate with provider agency Designated Officers via the posted designated officer contact information on the provider agency website, as well as to the Sonoma County Public Health. Due to the designation of coronavirus as a disease requiring immediate phone reporting, such reports must include a phone call in addition to any other communication method. Health facilities have an obligation to post 24-hour infection control contact information on the facility website. Employer training on the requirements of HSC 1797.188 for Health Facility Infection Control Officers is required by the statute.

Sonoma County Public Health Responsibilities:

When a report is received from a health facility identifying a responder with an exposure, as determined by the Sonoma County Health Officer to transmit SARs-CoV-2, Sonoma County Public Health shall notify the individual responder based on the contact information provided by the health facility. The county health officer shall not disclose the name of the patient or other identifying characteristics to the prehospital emergency medical care person.

This memorandum does not take the place of a detailed review of the requirements of HSC 1797.188 or any other statutory or regulatory requirements of employers related to infection control and/or workplace safety.

References:

California Health and Safety Code §1797.188

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=1797.188.

California Code of Regulations Title 17 §2500 Reporting to Local Health Authority

[https://govt.westlaw.com/calregs/Document/I5849DB60A9CD11E0AE80D7A8DD0B623B?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I5849DB60A9CD11E0AE80D7A8DD0B623B?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))