



Rappahannock-Rapidan Health District  
Virginia Department of Health

## Guidelines and Procedures for Sharing Protected Health Information with 9-1-1 Centers

### Application

This applies to the Rappahannock-Rapidan Health District (RRHD) and the Counties of Culpeper, Fauquier, Madison, Orange, and Rappahannock.

### Purpose

The purpose is to outline processes and guidelines for a limited release of protected health information (PHI) to emergency/911 dispatch centers during public health emergencies, to mitigate risk to local emergency personnel and first responders.

### Background

During certain public health emergencies (e.g. H1N1, Ebola, COVID-19), and as determined by the Commissioner of Health, it is necessary to share limited protected health information (PHI) to provide for the health and safety of first responders. Under [Section 32.1-41 of the Code of Virginia](#), the Commissioner of Health has the authority to release protected health Information (PHI) if it is pertinent to an investigation.

COVID-19 presents additional risks to first responders. Knowledge of the potential for exposure to COVID-19 prior to responding to a 911 call allows responders to take respiratory protection precautions to minimize risk. E-mail guidance from the VDH Deputy Director for Community Health Services, dated March 29, 2020, has authorized a limited release of PHI due to COVID-19..

To reduce risk and protect the health of first responders, the Rappahannock-Rapidan Health District will provide the addresses of COVID-19 patients to the 911 dispatch centers in each locality in RRHD. It is suggested the point of contact (POC) be the jurisdictional 911 coordinator or designee, however this will be confirmed by each locality through the jurisdiction emergency coordinator/manager.

### Guidelines

1. The RRHD Local Health Emergency Coordinator is the primary point of contact (POC) for sharing protected health information with localities.
2. The jurisdictions Emergency Coordinator, Emergency Services Manager, or Emergency Manager will designate the primary (POC) for receiving protected health information in their locality.
3. PHI provided to local jurisdictions is limited to the individual's initials, physical address, and the designation "Isolation Precautions – Use PPE".
4. Information will be provided, as soon as feasible, for each new person who tests positive for COVID-19 that the RRHD is aware of.

5. Local government personnel will protect all information provided from inappropriate, unethical, and unlawful disclosure
6. RRHD will provide addresses to each jurisdiction until the Commissioner of Health suspends release of PHI or if/when the number of new cases exceeds capacity to share information in a timely manner.
7. Due to the possibility of community transmission, first responders may encounter cases of COVID-19 that are unknown to RRHD. First responders should follow universal precautions to protect themselves on all responses.
8. The absence of a person from this list in no way implies that said person is not infected with COVID-19, and implies no increased level of first responder safety based solely upon such absence. The presence or absence of a person on this list should not form the basis of a decision by the EMS crew to don or not to don personal protective equipment (PPE).

#### Authority

Under [Section 32.1-41 of the Code of Virginia](#), the Commissioner of Health has the authority to release protected health information (PHI) if it is pertinent to an investigation.

#### Administrative Procedures

1. The Local Health Emergency Coordinator will gather all addresses of COVID-19 positive patients, as they are identified.
2. The Local Health Emergency Coordinator will provide the initials and isolation address of the COVID-19 positive person, in a secured manner such as encrypted e-mail, with the locality POC. The POC will then ensure that their designated 911 center is notified with the phrase "Isolation Precautions – USE PPE".
3. The 911 center will remove this information forty-five (45) days after entry, due to the end of the potentially infectious period to ensure no delay in first responder contact for future 911 calls.
4. The POC with knowledge of the PHI will treat it as the highest priority to safeguard the PHI, including not disseminating the PHI in any manner.

#### Acronyms

COVID-19 – Novel coronavirus 2019  
PHI – Protected Health Information  
PPE – Personal Protection Equipment  
RRHD – Rappahannock-Rapidan Health District  
POC – Point of Contact