

North Sound Mental Health Administration

Regional Support Network for Island, San Juan, Skagit, Snohomish, and Whatcom Counties

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NSMHA Contract Memorandum 2008-018

Date: July 8, 2008

To: Tom Sebastian, CEO, Compass Health
Donna Konicki, *bridgenways*
Michael Watson, Lake Whatcom RTC
Andy Byrne, Whatcom Counseling and Psychiatric Center
Rod Elin, Catholic Community Services Northwest
Claudia D'Allegrì, Sea Mar
Anne Deacon, Snohomish County Coordinator
Tom Robinson, Volunteers of America
Doug Benjamin, Behavioral Health Director, Interfaith
Sue Closser, CEO, Sunrise Services
Yvonne Ito, Executive Director, LKI

From: Chuck Benjamin, Executive Director

Subject: Critical Incident (CI) Reporting

Providers are likely aware that in March of this year, the Regional Support Networks (RSN) were directed to stop providing the names of clients who were reported as victims of sexual assault. To that end, North Sound Mental Health Administration (NSMHA) directed providers to use Jane Doe, John Doe, or anonymous client for this category of critical incident reporting.

Within three weeks, the Mental Health Division (MHD) retracted their directive to not report names, after discussion with the Federal Compliance Officer, the AG's office, and the Public Disclosure Officer. MHD believes it does not violate confidentiality, VOCA, or reporting mandates.

NSMHA requested an opinion from our attorney as we believe this is sensitive information that perhaps was unnecessary in reporting the nature of the incident. Our legal counsel advises that it appears to be our contractual obligation to report.

We believe at this time that we must follow the directive to give PHI including name of victims of sexual assault and other critical incidents.

Thank you for following this direction and continuing to give all information requested on the Critical Incident Reporting form when reporting a CI.

cc: Heather Fennell, Compass Health
Kathy McNaughton, Catholic Community Services
Kay Burbidge, Lake Whatcom
Pamala Benjamin, Whatcom Counseling and Psychiatric Center
Adam Horn, Volunteers of America
Jonathan Vander Schuur, Sea Mar
Rebecca Clark, Mental Health Program Coordinator Skagit County
Barbara LaBrash, San Juan County Coordinator
Whatcom County Coordinator
Jackie Henderson, Island County Coordinator
Contract File