



November 5, 2021

Washington State Board of Health  
PO Box 47990  
Olympia, WA 98504-1990

**RE: Notifiable Conditions Effective Date Delay**

Dear Chair Grellner, Vice Chair Pendergrass, and Board of Health members,

On behalf of the Washington State Hospital Association, thank you for the opportunity to provide feedback on the Department of Health's (DOH) request to delay the effective date for the updated Notifiable Conditions regulations found in Chapter 246-101 WAC. WSHA strongly supports DOH's recommendation and encourages the Board to adopt the request. Doing so will provide DOH the ability to complete the technical work necessary to implement the updated Notifiable Conditions rules.

However, the steps hospitals must take to comply with the updated rules are complex and will take significant time to implement once DOH finishes its technical work. **Because of this, WSHA requests the Board provide at least a 120-day window between the completion date for DOH's information technology updates and the date hospitals begin reporting.**

Once DOH finishes its technical work, hospitals will need time to adapt to DOH's new systems and forms. Hospitals will need to update their registration systems to collect the new patient demographic information to complete the new case report forms DOH issue. Hospitals will also need to integrate the new data elements into their electronic health record (EHR) systems to ensure proper information input and storage. Doing so will require many hospitals to work with their external EHR vendors to complete the system updates, which could add time to compliance preparations. EHR updates also require staff training to ensure proper data entry. Additionally, hospitals will need to adjust their workflows to ensure that the newly required data is transferred efficiently between departments, such as laboratories and infection control departments.

Providing additional time to hospitals will help ensure that hospitals are fully prepared to report in accordance with the new systems and forms established by DOH. This can help prevent incomplete and inaccurate data submissions to DOH and local health jurisdictions, which will ensure that the data collected by state and local agencies is useful for responding to public health issues.

Thank you again for the opportunity to comment on DOH's recommendation to the Board. Should you have additional questions on WSHA's recommendations, please contact David Streeter, [DavidS@wsha.org](mailto:DavidS@wsha.org) or Chelene Whiteaker, [CheleneW@wsha.org](mailto:CheleneW@wsha.org).

Sincerely,

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