

Michigan Department of Community Health

Summary of new rules: “Reporting of Non-suicidal, Non-medicinal Chemical Poisoning” (R 325.71-R 325.75) - Effective date: September 18, 2007

The Michigan Department of Community Health (MDCH) has promulgated rules to mandate reporting of non-suicidal, non-medicinal chemical poisoning (hereafter referred to as chemical poisoning). The purpose of these rules is to place poisoning from environmental or occupational chemical exposures under public health surveillance so that follow-up actions can be taken to prevent further morbidity and mortality. These rules exclude reporting of chemical poisonings that are self-inflicted or related to drugs or other medicinals. Strategies for their prevention are beyond the scope of the intent of these rules.

The rules follow traditional public health surveillance practice first established for communicable disease. This practice includes the mandatory reporting of individuals with certain health conditions, followed by the application of this information to public health disease control and prevention activities. These rules have one feature that distinguishes them from other mandatory public health reporting systems. They specify that health professionals and health facilities are required to report only when asked to do so by MDCH or a local health department. This reduces the burden of reporting, and allows MDCH and local health departments to direct resources to poisonings of immediate public health concern.

These rules also permit health professionals and health facilities to report without MDCH or local health department request. This allows them to alert public health officials of potential public health problems, including those potentially related to acts of terrorism, within the public health exemption to the confidentiality requirements of the Health Insurance Portability and Accountability Act (HIPAA).

Although some chemical poisonings data are available, there is insufficient information in existing data sources to determine the causes of these incidents and thus insufficient information to target prevention activities. By mandating reporting of personal identifiers and diagnostic information, these rules allow MDCH and its local public health partners to conduct the detailed epidemiologic follow-up necessary to ascertain cause and target interventions to prevent additional illness.