
 <p>Behavioral Health Department Alameda County Health</p>	<p>Signed by:  By: _____ Karyn L. Tribble, PsyD, LCSW, Director</p>
<p>POLICY TITLE</p> <p>Reporting Disorders Characterized by Lapses of Consciousness</p>	<p>Policy No: 503-1-2</p> <p>Date of Original Approval: 10/15/1997</p> <p>Date(s) of Revision(s): 1/25/2022, 5/12/2026</p>

PURPOSE

This policy describes the responsibility of Alameda County Behavioral Health Department (ACBHD) and its providers to understand and implement the requirement to report disorders characterized by lapses of consciousness to the appropriate agency to support safety when driving.

AUTHORITY

- [California Health and Safety Code, §103900](#)
- [California Code of Regulations \(CCR\), Title 17, §§2800 to 2812](#)

SCOPE

All ACBHD County-Operated programs, in addition to entities, individuals, and programs providing specialty mental health services (SMHS) and substance use disorder (SUD) services under a contract or subcontract with ACBHD are required to adhere to this policy.

POLICY

Every physician shall report immediately to the local health officer in writing, the name, date of birth, and address of every client at least 14 years of age or older whom the physician has diagnosed as having a case of a disorder characterized by lapses of consciousness, using the [Confidential Morbidity Report \(CDPH 110c\)](#) issued by the State of California Department of Public Health (DPH).

All clients must be informed of this report, and within the bounds of the client's right to privileged communication and their need to know, family members should also be informed.

PROCEDURE

- I. When a physician has diagnosed a disorder characterized by lapses of consciousness in a client 14 years of age or older, they shall notify the local health officer within seven (7) calendar days, using the [Confidential Morbidity Report \(CDPH 110c\)](#) available online through the Alameda County Communicable Disease Director at <https://acphd.org/communicable-disease/disease-reporting-and-control/reporting-forms/>.
- II. Physicians then send the completed forms to the Alameda County Public Health Department, Communicable Disease Division, as outlined in form CDPH 110c:

Alameda County Public Health Department
Division of Communicable Disease Control & Prevention
1000 Broadway, Suite 500
Oakland, CA 94607
Phone: (510) 267-3200

- III. A physician shall not be required to notify the local health officer of a client with a disorder characterized by lapses of consciousness if:
 - A. The client's sensory-motor functions are impaired to the extent that the client is unable to ever operate a motor vehicle, or
 - B. The client states that they do not drive and states that they never intend to drive, and the physician believes these statements made by the client are true, or
 - C. The physician previously reported the diagnosis and, since that report, the physician believes the client has not operated a motor vehicle, or
 - D. There is documentation in the client's medical record that another physician reported the diagnosis and, since that report, the physician believes the client has not operated a motor vehicle.

- IV. However, if a physician reasonably, and in good faith, believes that the reporting of a client will serve the public interest, they may report a client's condition even if it may not be required under the department's definition of disorders characterized by lapses of consciousness.

- V. All physicians must inform clients when their information is provided to the health officer to support the public interest.
 - A. Providers must inform clients verbally and in writing. A copy of the notification should be maintained in the client's record.

- VI. Only physicians are mandated to report. Non-physicians who become aware of clients with reportable conditions are encouraged to bring these concerns to a physician's attention; however, non-physicians may not directly report under the terms of this policy, due to the lack of liability protection under State law.

NON-COMPLIANCE

- I. Failure to report a disorder characterized by lapses of consciousness may lead to physical liability if the client becomes involved as a driver in a motor vehicle accident.

- II. It could also become grounds for disciplinary action against the physician's license to practice medicine.

- III. Contractors not in compliance with contract provisions, or with State or Federal law and/or regulations, shall be immediately responsible for remedy.

- IV. ACBHD may, at its discretion, issue a Corrective Action Plan (CAP) or Contract Compliance Plan (CCP), as appropriate.

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- V. The cost to implement the CAP or CCP shall be borne by the Contractor.
- VI. Staff shall report incidents of non-compliance to their department manager, who shall submit those incidents of non-compliance to ACBHD Quality Management (QM).
- VII. Incidents of non-compliance shall be submitted within 15 days of reasonable awareness of the non-compliance.
- VIII. Failure to address identified issues may result in further action by ACBHD up to and including program termination, as specified in [ACBHD Policy # 1302-1-1](#), Contract Compliance and Sanctions for ACBHD-Contracted Providers.
- IX. Staff shall not face retribution for submitting incidents of non-compliance.
- X. Any communication that contains protected health information (PHI) or otherwise confidential information (e.g., as defined by the Health Insurance Portability and Accountability Act (HIPAA), 42 Code of Federal Regulations (CFR), Part 2, etc.) shall be sent through secure methods such as email with secure encryption.

CONTACT

ACBHD Office	Current As Of	Email
Office of the Medical Director	5/7/2026	Angela.Coombs@acgov.org

DISTRIBUTION

This policy will be distributed to the following:

- ACBHD Staff
- ACBHD Contract Providers
- Public

ISSUANCE AND REVISION HISTORY

Original Authors: ACBHD Staff

Original Date of Approval: 10/15/1997 by ACBHD Director

Revision Author	Reason for Revision	Date of Approval by (Name, Title)
Vanessa Baker, Adult Older Adult System of Care (AOASOC), Older Adult Division Director	Updated to meet new state requirements.	1/25/2022 by Dr. Karyn Tribble, Behavioral Health Director
Dr. Angela Coombs, Associate Medical Director, Office of the Medical Director	Updated formatting and acronyms, added hyperlinks, added default language to Non-Compliance section.	5/12/2026 by Dr. Karyn Tribble, Behavioral Health Director

DEFINITIONS

Term	Definition
Alzheimer’s disease and related disorders	Those illnesses that damage the brain causing irreversible, progressive confusion, disorientation, loss of memory and judgement.
Diagnose	To identify the existence of a medical condition in a client.
Disorder characterized by lapses of consciousness	Those medical conditions that involve: <ul style="list-style-type: none">• A loss of consciousness or a marked reduction of alertness or responsiveness to external stimuli, and• The inability to perform one or more activities of daily living, and• The impairment of the sensory motor functions used to operate a motor vehicle.
Sensory motor functions	The ability to integrate seeing, hearing, smelling, feeling and reacting with the physical movement, such as depressing the brake pedal of a car to stop the car from entering an intersection with a green traffic light to avoid hitting a pedestrian crossing the street.

APPENDICES

- [Confidential Morbidity Report \(CDPH 110c\)](#)