

# The Impact of the Jamestown S’Klallam Tribe’s Opioid Treatment Center on Clallam County Fire District No. 3

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## Purpose

Research was initiated to determine what impact if any on Clallam County Fire District No.3 (CCFD3) could result from the Jamestown S’Klallam Tribe (JSKT) facility being built on South 9<sup>th</sup> Street in Sequim. By “impact on the Fire District” it is meant, any effect on the resources and operations of the District that affect our ability to provide emergency services to the community.

## History

The Board asked me to include in my research how this project developed, as it is important in order to understand what the project is, how it will operate, and ultimately whether there is an effect on the District. The District’s first awareness of this project was when the story was published in the Peninsula Daily News announcing that 7.2 Million dollars was included in the State’s Capital Budget for the construction of a Medication Assisted Treatment Clinic (MAT) to be operated by the JSKT. The JSKT has not provided information to the Fire District in advance, nor has it approached the district since the announcement. In his open letter date August 12, 2019, Clallam County Commissioner Mark Ozias states, “One of the most direct ways to stay informed is to attend meetings of the Clallam County Behavior Health Advisory Committee.” He continued to list other organizations that hold public meetings such as the Clallam County Board of Health, the Olympic Community of Health (OCH), and specifically the advisory committee of the Salish Behavioral Health Organization (SBHO) “at which the Jamestown’s Healing Campus project was previewed in 2018”.

I have reviewed the published meeting minutes of the above named organizations as well as the meeting minutes of the Executive Board of the SBHO for all of 2018 and what is currently available for 2019. Based on the comprehensive review of these documents, Substitute House Bill 1102, press coverage and District records I have compiled the following evolution of the JSKT “Healing Campus”.

- October 3, 2017 SBHO Opioid Treatment Programs FAQ – **13) How will it be decided where to locate the program?** There will be one placed in Kitsap County and one in Clallam County. For optimum participation, clinics should be located near population centers in areas accessible by public transportation. The entity selected to manage the OTP services will have the expertise in siting these programs and will make recommendations to the municipality (County or City)<sup>i</sup>
- March 2, 2018 SBHO Advisory Board – BayMark secured leases in both Bremerton and Port Angeles and were working on permitting process.<sup>ii</sup>
- April 6, 2018 SBHO Advisory Board – Jefferson Healthcare Medicare Medication Assisted Treatment Support Grant Request. Grant Request included “this proposal focuses on training 15 of those providers. This would ensure patients have access across all five primary care clinics and across all care teams within those clinics, and would open up access to this treatment to 450 patients in Jefferson County.”<sup>iii</sup>

- April 20, 2018 SBHO Executive Board – E-Board minutes<sup>iv</sup> reflect tabling the request, but Advisory Board meeting agenda<sup>v</sup> shows an April 20 approval by E-Board. No further discussion of the grant after April 2018.
- July 17, 2018 Clallam County Board of Health – Regional Opioid Response “The Regional Opioid Response Plan included Jefferson, Kitsap, and Clallam counties and organization through the Olympic Community of Health (OCH). It’s been 18 months now and based on Clallam County’s plan: to expand treatment practices and prevent overdoses by distributing of Naloxone<sup>®</sup> - There are groups around all of these areas. We’ve improved prescribing practices – the OCH has paid to help many of our clinics to redesign and to treat chronic pain in a safe way. Expanding treatment – Clallam County has been dramatic in this area.”<sup>vi</sup>
- August 3, 2018 SBHO Advisory Board - Opiate Treatment Program “BayMark has finalized its contract with the Salish BHO and has facilities identified in Port Angeles and Bremerton and is currently preparing for the next steps. However, the Jamestown S’Klallam Tribe recently announced they intend to incorporate MAT services into their clinic. BayMark does not want to compete with the tribes as the dosage rate for tribes is \$427/dose and BayMark received only \$20/dose. BayMark is currently discussing whether to move forward; the Salish BHO has requested a discussion by the Executive Board meeting on August 17<sup>th</sup>”<sup>vii</sup>
- September 7, 2018 SBHO Advisory Board – Opiate Treatment Program “Jamestown S’Klallam has announced their intent to open an OTP in Sequim. The degree to which this impacts BayMark’s (BAART) plan to open in Port Angeles is still being evaluated. Staff will provide and update.”<sup>viii</sup>
- October 5, 2018 SBHO Advisory Board – OPT “BayMark is actively working on their Port Angeles Facility. They have not finalized their lease in Kitsap County. We are attempting to coordinate a meeting between BayMark and Jamestown S’Klallam to address BayMark’s concerns regarding financial sustainability of their clinic in Port Angeles.”<sup>ix</sup>
- April 28, 2019 Washington State Capital Budget Passed – SHB 1102 passed by the House of Representatives appropriated to the Department to Commerce \$7,200,000 for Jamestown S’Klallam Behavioral Health in a Behavioral Health Capacity Grant.<sup>x</sup>
- May 6, 2019 PDN Article Announces \$7.2 Million capital budget appropriation for “... for Phase 1 of a behavioral health center in Sequim that will be jointly operated by the Jamestown S’Klallam Tribe of Blyn, Olympic Medical Center of Port Angeles and Jefferson Healthcare hospital of Port Townsend.” to be constructed in 2021.<sup>xi</sup>
- May 31, 2019 PDN Article announces JSKT purchase of property and plan of \$20,000,000 behavior health center with support from a State Capital Budget appropriation of \$7,200,000 grant. Phase 1 (MAT) to be constructed in 2020 and completed in 2021 and Phase 2 (in-patient facility) constructed 2021 and completed in 2022.<sup>xii</sup>
- June 27, 2019 Informal Meeting with City of Sequim (COS) and JSKT – The Fire District was invited by COS Community Development Director Barry Berezowsky to an informal meeting with the JSKT and Rice Fergus Miller Architecture. The JSKT was not aware that the district had been invited, but did not object to the district participating in the discussion.<sup>xiii xiv</sup>

## **Description of JSKT Healing Campus Activities**

This description is limited to the stated activities for what has been called “Phase 1” of the JSKT “Healing Campus”. This description is gleaned from attending an informal meeting between the JSKT, their architect, and the City of Sequim staff, as well as printed media coverage and the publications made available at the JSKT meeting on August 8, 2019 and on their website at

<https://jamestownhealingcampus.org/>

Phase 1 is purported to include Medication Assisted Treatment (MAT) for Opioid Use Disorder, primary health care, child care, both individual and group therapy, as well as transportation to and from the facility. All services are available to both tribal and non-tribal members. Services will only be available to residents of Clallam and Jefferson County.<sup>xv</sup>

The goal of the Phase 1 MAT Clinic is to decrease opioid overdoses and the illegal diversion of prescription drugs into the community.<sup>xvi</sup> This is to be accomplished through the “... daily doses of methadone, Suboxone and Vivitrol in a 15,000-square-foot building that could grow to about 25,000 square feet.” The facility is planned to serve 125 patients initially with capacity ramping up to 250 patients in a couple of years.<sup>xvii</sup>

The MAT facility is planned to operate Monday through Saturday from approximately 6:00 AM with the last dose being administered around 11:00 AM. During the informal meeting on June 27<sup>th</sup>, Brent Simcosky of the JSKT stated that they anticipated approximately 50% of the patients utilizing the clinic’s transportation services and the balance getting to and from the campus on their own. Mr. Simcosky said that the transportation services would be delivered through a fleet of vans (12 to 15 passengers each) owned and operated by the JSKT. At the August 8, 2019 meeting, Mr. Simcosky stated the shuttles would be “A couple of mini-vans”.

The patient is expected to remain on the campus from 1-3 hours each day. No loitering on the campus is allowed, “All patients leaving the property must leave the way they came. In other words, if a family member brings the patient to the clinic, they must also bring them home. Those who arrive by transportation van must leave the property in the transportation van.”<sup>xviii</sup>

## **Concerns of Potential Impacts**

### **Concern 1. Campus will generate addition calls for service.**

Being a medical facility, there is the potential for it to generate 911 calls for clients that experience a need for an evaluation by a paramedic and/or transportation to definitive care while on campus. It is inferred, from the JSKT emphasis on “wrap around care” and the importance of the primary health and dental care uniquely available at their campus, that at least some of the patients will be in less than adequate physical health. These patients may experience an event requiring an evaluation by a paramedic and possibly transport to the hospital. Additionally, a medical professional may discover either during evaluation or treatment a condition that needs evaluation and possibly transport to the hospital.

One of three medications is administered during MAT of Opioid use disorder<sup>xxix</sup>. Methadone, buprenorphine, and naltrexone are used for short-acting opioids such as heroin, morphine, and codeine, as well as semi-synthetic opioids like oxycodone and hydrocodone. People may safely take medications used in MAT for months, years, several years, or even a lifetime.<sup>xx</sup> The potential side effects of each medication is listed in the table below.

Medication	Listed Side Effects
Buprenorphine	Nausea, vomiting, constipation, muscle cramps, cravings, inability to sleep, distress and irritability, and fever <sup>xxi</sup>
Methadone	Difficulty breathing, shallow breathing, feel lightheadedness or faint, chest pain, fast or pounding heartbeat, and hallucinations or confusion <sup>xxii</sup>
Naltrexone	Upset stomach or vomiting, Diarrhea, headache, sleep problems/tiredness, and joint or muscle pain <sup>xxiii</sup>

Table 1. Stated Side Effects of Medications used in MAT for Opioid Use Disorder

A majority of the side effects listed in table 1. will typically result in a 911 response and request for a paramedic evaluation and possible transport to a hospital.

Since the campus will be open from 6:00 until at least the early afternoon, these calls for service occur during the District’s peak activity period, or the time of day where the demand for Fire District responses is the most. As shown in Figure 1. The middle of the day has the greatest frequency of calls with the hours that begin at 0700 and 1700 with approximately 66% of the calls in a 24 hour period occurring during those hours.

During these peak hours the District is already strained to meet the demand for responses. Daily, all four of the District Medic units are concurrently assigned to calls and are clearing one call in order to respond to another. The district does not have the ability meet an increased demand during this time of day without addition units, which requires additional staff.

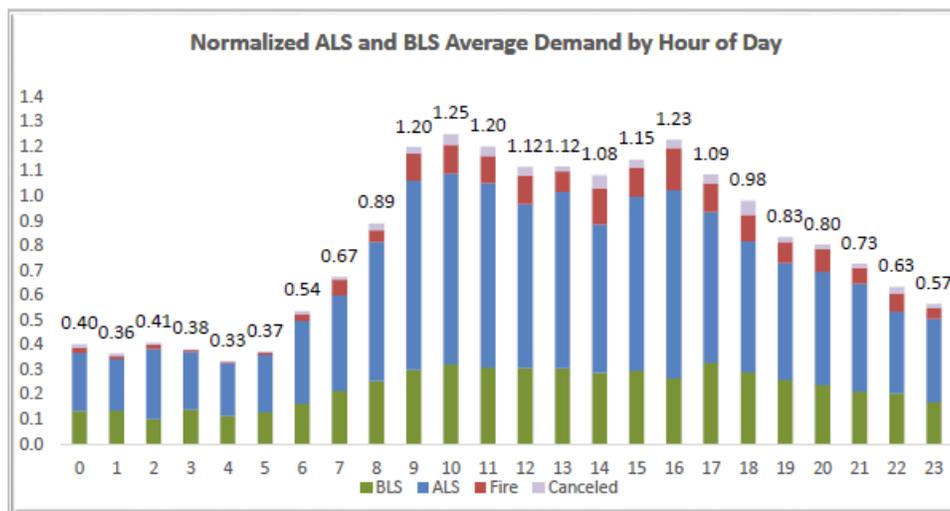


Figure 1. <sup>xxiv</sup>

The City of Anacortes Fire Department (AFD) was contacted as they are the emergency medical services provider for the Didgwalic Wellness Center operated by the Swinomish Tribe. This is the only facility found that offered both additional medical services similar to what the JSKT is offering, as well as shuttle transportation to and from the facility from outside the community. They reported that in the previous 18 months, the AFD responded to the Didgwalic facility three times<sup>xxv</sup>.

With only three calls for service in 18 months, the Didgwalic facility does not appear to have a significant impact on their response capability. The AFD responds to approximately 50% of the number of calls of CCFD3. Based solely on the AFD numbers, it could be speculated that CCFD3 would see approximately four responses per year to the JSKT MAT clinic. Four responses a year would not constitute a significant impact the District's response capability. However, you cannot draw a reliable conclusion from a single data source.

**Concern 2. Additional calls for service will be generated by patients who remain in the vicinity.**

The District currently responds to calls for service in the city of Sequim and surrounding area for medical emergencies and requests for evaluation due to alcohol, mental/behavioral health, substance abuse/overdose, and drug/alcohol withdrawal. Although all of these responses are not directly attributable to opioid use disorder patients that are the target patient of the JSKT MAT clinic, these are the types of events that should be monitored in order to determine if an impact to the District develops.

When asked if the AFD had seen an increase in calls for service from patients of the Didgwalic clinic outside of the facility, they were unable to provide an answer. First, they are not able to identify patients they responded to as being or not being patients of the clinic. Second, it was their anecdotal impression that the Didgwalic clinic was "... near the refinery in the industrial area and people don't come in to town" <sup>xxvi</sup> A review using google maps confirmed that the clinic is approximately four miles from the edge of the City of Anacortes. Figure 2.

A review of the District's 2018 data resulted in the following incident counts; 47 ETOH (alcohol), 88 Psych/Behavioral, 47 Substance Abuse/Overdose, 16 Withdrawal (Alcohol & drug)<sup>xxvii</sup>. If there is a significant change in these incident types, the District could perform a more granular analysis to determine if these changes occur because of the JSKT MAT facility.

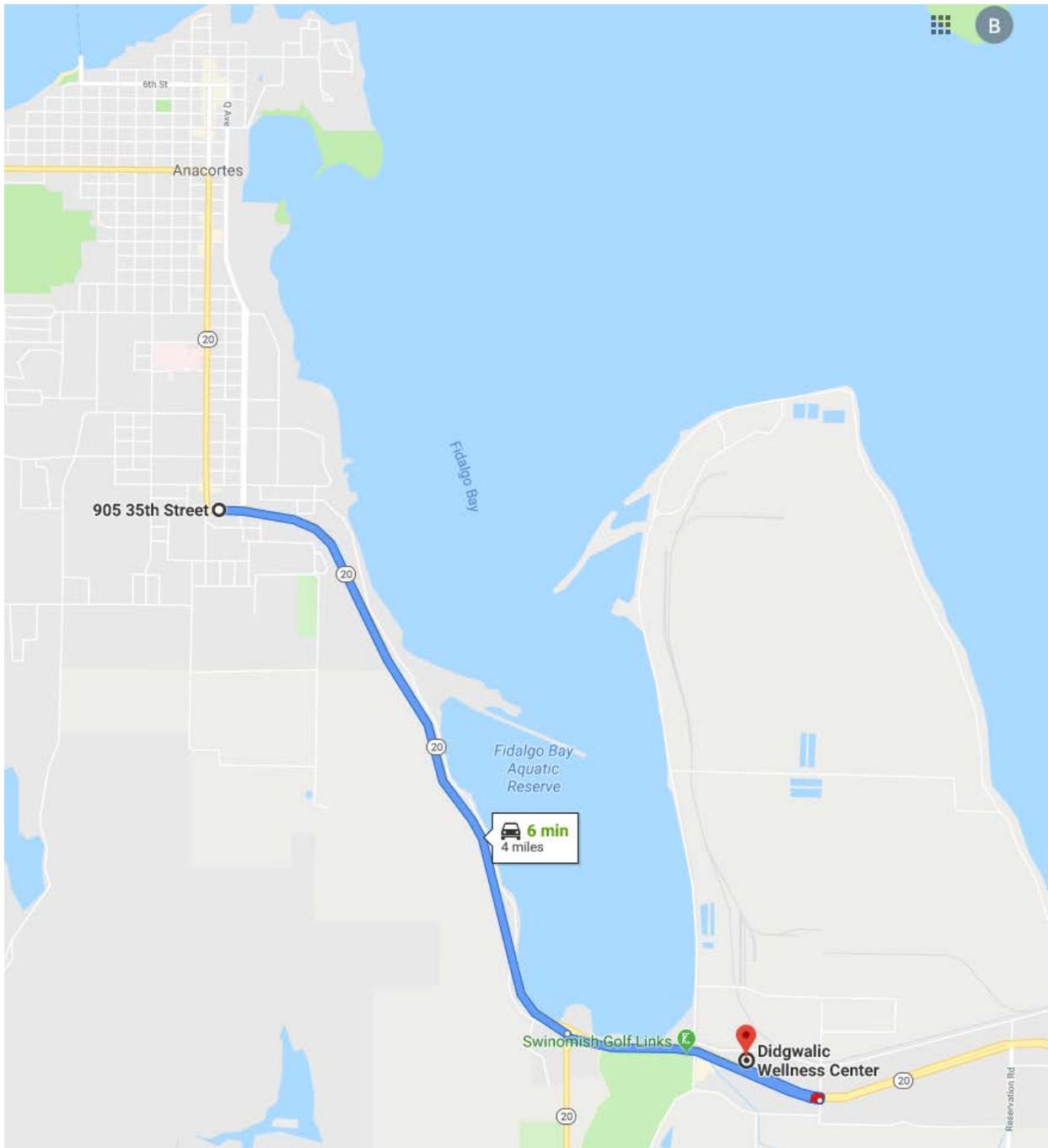


Figure 2. Google Maps Didgwalic Wellness Center to City of Anacortes<sup>xxviii</sup>

## **Recommendations**

Since it is not possible to make a reliable prediction of the potential impact of the JSKT Healing Campus on CCFD3 and the District's ability to deliver service to the community, mitigating measures can not be requested at this time. However, with there is enough uncertainty and concern to request a mechanism be put in place to enable the District to request mitigation measures when impacts are identified and are attributed to the JSKT Healing Campus.

### **Recommendation #1**

I Recommend the CCFD3 Board of Commissioners formally request a commitment from the JSKT to engage in continued close coordination with the Fire District to mitigate any impacts to the Fire District as a result of the Healing Campus operations as they have done with law enforcement. <sup>xxix</sup>

### **Recommendation #2**

The District should monitor on a quarterly basis the incident types ETOH (alcohol), Psych/Behavioral, Substance Abuse/Overdose, Withdrawal (Alcohol & drug) and analyze for increases in those call types. Any significant increases should trigger a more granular review of those incidents to identify, if possible, the causality.

### **Recommendation #3**

If an impact caused by the JSKT Healing campus is identified, the District engage the JSKT in a resolution process to mitigate the impact.

### **Recommendation #4**

The District should continue to seek like facilities and request information from the Fire Departments serving them in order to identify potential impacts.

## **END NOTES**

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<sup>i</sup> Salish Behavioral Health Organization Opioid Treatment Programs FAQ. October 3, 2017. Retrieved from [https://www.kitsapgov.com/hs/SBHO%20Documents/MAT\\_FAQ\\_100317.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/MAT_FAQ_100317.pdf)

<sup>ii</sup> Minutes of the Salish Behavioral Health Organization Advisory Board, Friday March 2, 2018. Approved Friday April 6, 2018. Retrieved from [https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB\\_AGENDA\\_PACKETS.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB_AGENDA_PACKETS.pdf)

<sup>iii</sup> Salish Behavioral Health Organization Advisory Board, April 6, 2018 meeting packet attachment 6.a.1. Retrieved from [https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB\\_AGENDA\\_PACKETS.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB_AGENDA_PACKETS.pdf)

<sup>iv</sup> Minutes of Salish Behavioral Health Organization Executive Board meeting Minutes, Friday April 20, 2018. Approved Friday June 15, 2018. [https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOEB\\_AGENDA\\_PACKETS.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOEB_AGENDA_PACKETS.pdf)

<sup>v</sup> Salish Behavioral Health Organization Advisory Board, April 6, 2018 meeting packet. Retrieved from [https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB\\_AGENDA\\_PACKETS.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB_AGENDA_PACKETS.pdf)

<sup>vi</sup> Minutes of the Clallam County Board of Health, July 17, 2018. Retrieved from <http://websrv7.clallam.net/forms/uploads/BOH20180717140345.pdf>

<sup>vii</sup> Minutes of the Salish Behavioral Health Organization Advisory Board, Friday August 3, 2018. Approved Friday September 7, 2018. Retrieved from [https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB\\_AGENDA\\_PACKETS.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB_AGENDA_PACKETS.pdf)

<sup>viii</sup> Salish Behavioral Health Organization Advisory Board, September 7, 2018 meeting packet. Retrieved from [https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB\\_AGENDA\\_PACKETS.pdf](https://www.kitsapgov.com/hs/SBHO%20Documents/2018SBHOAB_AGENDA_PACKETS.pdf)

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- <sup>xi</sup> Peninsula Daily News. State approves funds for Peninsula-wide behavioral health facility. Paul Gottlieb. May 6, 2019. Retrieved from <https://www.peninsuladailynews.com/politics/state-approves-funds-for-peninsula-wide-behavioral-health-facility/>
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- <sup>xiii</sup> Electronic mail to Dan Orr from Barry Berezowsky. June 3, 2019. Subject: Informal meeting with Rice, Fergus, Miller regarding Tribe/OMC medical center behind Costco. Retrieved from Clallam County Fire District 3 email archive.
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- <sup>xv</sup> Peninsula Daily News. *POINT OF VIEW: Medication assisted treatment clinic plans described*. Ron Allen. July 22, 2019. Retrieved from <https://www.peninsuladailynews.com/opinion/point-of-view-medication-assisted-treatment-clinic-plans-described/>
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- <sup>xix</sup> Jamestown S’Klallam Tribe. Frequently Asked Questions. Web page. Retrieved from <https://jamestownhealingcampus.org/faqs/>
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- <sup>xxv</sup> Phone interview. Nick Walsh, Medical Services Officer, Anacortes Fire Department. July 17, 2019.
- <sup>xxvi</sup> Phone interview. Nick Walsh, Medical Services Officer, Anacortes Fire Department. July 17, 2019.
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