



PUBLIC HEALTH DIVISION  
Office of the State Public Health Director  
Kate Brown, Governor

Oregon  
**Health**  
Authority

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November 28, 2018

The Honorable Scott W. Myers, Judge  
Grant County Court  
201 S Humbolt  
Canyon City, OR 97820

Dear Judge Myers:

The triennial review of Grant County was conducted May 22 through August 8, 2018. The Oregon Health Authority (OHA) Public Health Division reviewed county public health programs (including programs administered by its subcontractor) for compliance with state and federal public health laws and compliance with the Intergovernmental Agreement for the Financing of Public Health Services (Public Health IGA) and the Intergovernmental Agreement for Environmental Health Services.

The review included the appraisal of items in 14 program areas, listed below. Program areas with compliance findings are indicated with an asterisk.

Administration	Immunizations*
Babies First! and Perinatal	Public Health Emergency Preparedness*
Civil Rights	Reproductive Health
Communicable Disease	Sexually Transmitted Diseases
Fiscal*	Tobacco Prevention & Education
Food, Pool Lodging Health & Safety*	Tuberculosis
Health Officer	Vital Records

OHA piloted revised Administrative and Civil Rights triennial review tools which included new contracting components as part of this review. There were several Civil Rights and Administrative findings related to contracting, and one finding related to employment of the local public health administrator, which will be considered official compliance findings if not resolved by the dues dates noted in the enclosed report.

The enclosed overview report includes a list of the specific compliance findings, descriptions of programs, quality assurance recommendations and areas of strength

identified throughout the review. We urge you to review the report as it contains important information about your public health programs and their requirements.

Our team is working closely with Kimberly Lindsay, Grant County Local Public Health Administrator, to resolve all the findings. A full report with all documentation from the review will be sent to Kimberly Lindsay. We think the report will be of assistance to public health staff in their continuing efforts to provide quality public health services to your community.

Our office will contact Kimberly Lindsay to determine if you would like to meet with us to go over findings and answer any questions. If you would like such a meeting, we leave it to the County Court to determine if this meeting of the Local Public Health Authority occurs with one or more of the commissioners present.

Overall, agency reviewers find Grant County and Grant County's subcontractor, Community Counseling Solutions, to be composed of a committed team of professionals who deliver quality public health services to your community. The citizens of Grant County are fortunate to have Grant County Court ensure the provision of comprehensive public health services.

We thank you for ensuring that all compliance findings are resolved and for your support for the strong public health work Grant County is providing.

Sincerely,



Danna Drum  
Strategic Partnerships Lead



Andrew Epstein  
Public Health Systems Consultant

Enclosure

cc: Jim Hamsher, Grant County Commissioner  
Rob Raschio, Grant County Commissioner  
Kimberly Lindsay, Local Public Health Administrator, Grant County



**November 28, 2018**

## **Grant County Triennial Review Report**

This is an overview report of the May 22 – August 8, 2018 triennial review of public health programs administered by Grant County and its subcontractor, Community Counseling Solutions. This report is a summary of individual reports from participating programs compiled by the Oregon Health Authority (OHA) Office of the State Public Health Director. Detailed individual reports will be sent to Kimberly Lindsay, Local Public Health Administrator. We urge you to review this document as it contains important information about your public health programs and their requirements.

Grant County received from OHA Public Health Federal funds of \$97,593 for fiscal year 2017. The County also received \$130,994 from State General Fund Support and \$43,792 Other Funds for the same period.

**Report Prepared by:** Andrew Epstein, Public Health Systems Consultant, Office of the State Public Health Director

## **COMPLIANCE FINDINGS SUMMARY**

### **Administration and Civil Rights**

As part of this review, OHA piloted revised Administrative and Civil Rights triennial review tools, which included new items related to subcontracting and employment of the local public health administrator. In addition, OHA recently issued a new guidance document for local public health authorities (LPHAs) clarifying requirements related to subcontractor monitoring. Therefore, the following Administrative and Civil Rights review findings will not be considered official compliance findings if they are resolved by the dates noted below. Items not resolved by the dates listed will become official compliance findings, and new due dates to comply will be negotiated with Grant County.

### **Administrative**

The LPHA must do the following to comply with program requirements:

1. Adopt a subcontractor monitoring policy that complies with legal and contractual requirements and submit policy to OHA for review. **Compliance finding if not resolved by: 4/1/2019**

2. Provide a written description of how the LPHA will monitor the programmatic performance of its subcontractor, if not fully described in the subcontractor monitoring policy. **Compliance finding if not resolved by: 4/1/2019**
  
3. Submit a revised contract between Grant County Court and subcontractors who perform public health services funded through the Public Health IGA with OHA. Subcontracts or IGAs that an LPHA executes to perform a public health service or activity must clearly describe the service or activity being performed, any applicable federal or state statutes or rules or local ordinances that are applicable to the service or activity, and the manner in which the LPHA will oversee and monitor the contractor or public body to ensure compliance with all applicable federal or state statutes or rules, local ordinances or other funding requirements as outlined in the IGA for Public Health Services or other agreements. **Compliance finding if not resolved by: 3/1/2019**
  
4. Ensure that the local public health administrator is paid as a county employee for the portion of her work required for public health governance functions and subcontractor monitoring (if Administrator is responsible for contract monitoring) on behalf of the LPHA. Notify OHA of the amount of the Administrator's FTE paid by Grant County as a county employee. **Compliance finding if not resolved by: 12/31/2018**

#### Civil Rights

The LPHA must do the following to comply with program requirements:

1. Submit a completed copy of the Civil Rights Review Tool/Self-Assessment to document that the required policies (Table A of the review tool) have been adopted by the LPHA. **Compliance finding if not resolved by: 3/1/2019**

#### **Babies First! And Perinatal**

The LPHA is in compliance with all program requirements.

#### **Communicable Disease**

The LPHA is in compliance with all program requirements.

#### **Fiscal**

The LPHA must do the following to comply with program requirements:

1. Comply with 2CFR200.331, which requires that when federal funds are passed through to sub-recipients, there should be a sub-recipient monitoring plan as well as written policy and procedures, and comply with Financial Assistance Agreement Exhibit E, Section 4, Subcontractor Monitoring, which requires the LPHA to monitor each sub-contractor's delivery of program fiscal performance. **Due date to comply: 4/1/2019**
  - a. LPHA needs to create and develop a system to monitor the fiscal compliance of Community Counseling Solution (CCS).
  - b. Provide a written policy and procedure for the fiscal monitoring of CCS.
  - c. Conduct periodic Fiscal review of CCS as part of the monitoring process to ensure the subcontractor fully complies with contract terms, applicable laws, rules and FAA funding requirements.

### **Food, Pool and Lodging Health & Safety**

The LPHA must do the following to comply with program requirements:

1. Complete all required inspections in the program areas that are below the compliance rate for inspection frequencies (restaurants, mobile food units, and traveler's accommodations). **Due date to comply: 1/1/2019**
2. Complete a National Swimming Pool Foundation (NSPF) certified pool operator course or equivalent. **Due date to comply: 3/31/2019**

### **Health Officer**

The LPHA is in compliance with all program requirements.

### **Immunizations**

The LPHA must do the following to comply with program requirements:

1. LPHA must have a policy requiring all clinical staff to complete one hour of continuing education in immunizations annually. **Resolved: 6/25/2018**
2. LPHA did not meet the performance measure of achieving accounting excellence in all LPHA-operated clinics in the most recent quarter. Contact the Oregon Immunizations Program to discuss strategies related to vaccine ordering and expired vaccine. **Resolved: 7/31/2018**

### **Public Health Emergency Preparedness**

The LPHA must do the following to comply with program requirements:

1. Complete the following actions for the LPHA's emergency response plans. **Due date to comply: 12/31/2018**
  - a. Add a table of contents.
  - b. Add response partner contacts lists.
  - c. Add contact list for agencies that serve persons with access and functional needs.
  - d. Print the plan.
  - e. Make the printed plan easily accessible to all LPHA staff.

### **Reproductive Health**

The LPHA is in compliance with all program requirements.

### **Sexually Transmitted Diseases**

The LPHA is in compliance with all program requirements.

### **Tobacco Prevention & Education Program (TPEP)**

The LPHA is in compliance with all program requirements.

### **Tuberculosis (TB)**

The LPHA is in compliance with all program requirements.

### **Vital Records**

The LPHA is in compliance with all program requirements.

### **Women, Infants and Children (WIC)**

The WIC biennial review was conducted August 28-30, 2017. The LPHA must do the following to comply with all program requirements:

1. Ensure that the training supervisor meets the qualifications as outlined in policy (Policy 440). **Resolved: 3/6/2018**
2. Ensure that "eligibility pending" is checked and "No Proof" affidavit signed if all proofs are not provided (Policy 616). **Resolved: 3/30/2018**
3. Ensure that timeframes are met for blood work (Policy 625). **Resolved: 3/30/2018**

4. Ensure that the food package assignment is appropriate for the participant's category and nutrition risk and that it is documented, if required (Policy 769).  
**Resolved: 3/30/2018**
5. Ensure that a connection is made between the participant's program eligibility and desired health outcomes (Policy 820). **Resolved: 12/11/2017**
6. Ensure that there is medical documentation on file to support the food package assignment (Policy 765). **Resolved: 12/11/2017**
7. Ensure that nutrition education is provided to all participants at certification and recertification (Policy 820). **Resolved: 12/11/2017**
8. Ensure that the local agency high risk participant referral procedure is followed (Policy 661). **Resolved: 12/11/2017**
9. Ensure that a care plan is documented for high risk participants (Policy 661).  
**Resolved: 6/14/2018**
10. Ensure that the local WIC coordinator or appropriate designee completes the separation of duties audit every two weeks (Policy 595). **Resolved: 12/11/2017**

### **WIC Farm Direct Nutrition Program (FDNP)**

The FDNP biennial review was conducted in August 2017. The LPHA is in compliance with all program requirements.

## **PROGRAM OVERVIEW AND STRENGTHS**

### **Administration, Civil Rights and Health Officer**

Grant County contracts with Community Counseling Solutions (CCS) to operate the Grant County Health Department, which provides an array of public health services including Communicable Disease Prevention and Investigation, Environmental Health, Maternal and Child Health, Reproductive Health, Vital Records, Public Health Emergency Preparedness and Tobacco Prevention programs. Grant County Court is the governing body of the local public health authority. Kimberly Lindsay is the Local Public Health Administrator. Dr. David Hall is the Health Officer.

Program strengths include:

- Under the leadership of Kimberly Lindsay and Health Department Manager Jessica Winegar, strong, collaborative partnerships have been developed with the Blue

Mountain Hospital District and other entities within Grant County to reach health improvement objectives. CCS staff are active with the Eastern Oregon Coordinated Care Organization Community Advisory Council and the Early Learning Hub. Other partnerships include working with the school district to operate the School Based Health Center, working with the Grant County jail to help get health policies up to date, and participation in the Eastern Oregon Public Health Modernization Collaborative.

- CCS has an exemplary track record of involvement with community-based programs and community-driven initiatives, including a teen fair and annual health fairs, well child visits, diabetes and chronic pain management classes, and other health promotion activities.
- Grant County is a model for integration of physical, mental and dental health. The Rural Health Center that CCS operates creates a “no wrong door” environment for community members to access health care services. Through the Rural Health Center, warm handoff referrals can easily be made to WIC or other services offered by CCS/Grant County Health Department. The Certified Community Behavioral Health Clinic and the Dental Clinic are also important parts of the integrated network to increase access to public health and health care services.
- The Health Officer, Dr. Hall, is available for consultation with Grant County Health Department staff and is engaged in partnerships with community health and medical partners to improve service delivery through activities, including: supporting health fairs, conducting adolescent wellness exams and coordinating around communication to the public on issues such as promotion of flu shots. Dr. Hall acts as a strong champion for public health through his involvement in various boards and community organizations.

### **Babies First! & Perinatal**

The Grant County Health Department (GCHD) staff that implement the Perinatal and Babies First! programs are a dedicated duo of nurses who provide crucial Maternal Child Health services to families. These services are provided within an environment of limited resources where staff members work in multiple programs with limited FTE assignment. GCHD is well-connected with community partner agencies and services are well-established. MCH Nurse Home Visitor staff members are cross-trained to work in multiple programs.

Jessica Winegar, Health Department Manager and Nursing Supervisor, and Jennifer Workman, RN, MCH Nurse Home Visitor, were both newly hired at the time of the 2015 triennial review. This 2018 triennial review indicates successful improved

implementation of nursing assessment skills and organizational capabilities for both MCH Nurse staff members.

Program strengths:

- The School Based Health Center (SBHC), established in May 2015, continues at the local high school, Grant Union High. Jessica Winegar and Jennifer Workman each devote work hours for coverage at the SBHC. GCHD Nurse Practitioner, Karen Triplett, also provides clinic coverage at the SBHC. This is an excellent example of the addition of a vital health resource that serves families with a focus on the adolescent population.
- Jessica Winegar and Jennifer Workman provide support and resources to at-risk families. Both participate in community agency meetings focused on service provision for prenatal clients, adult caregivers, young children through age five, and children with special health needs up to age 21. Their collaborative working relationship has contributed to the success of maintaining the MCH Nurse Home Visiting programs.

### **Communicable Disease**

Communicable disease investigations are conducted by John Combs. In the triennial review period, 44 diseases were reported, 10 of which required an interview.

John Combs is an experienced CD investigator who also has expertise in environmental health and preparedness, which is helpful during outbreak investigations and situations requiring surge capacity. John is dedicated to his work, making home visits and provider visits when cases are hard to reach on the phone. Oregon Health Authority Public Health Division staff report that he is a pleasure to work with and is very responsive to phone calls and emails. Jessica Winegar is a supportive supervisor who attends trainings to keep her communicable disease knowledge up to date so she can support John when needed.

### **Fiscal**

Grant County Health Department's mission is to protect the health of all Grant county residents by preventing disease, injury, premature death, and disability: promoting healthy lifestyles, behaviors and environment, and responding to disaster, disease outbreaks and epidemics through organized community efforts. Since 2013, the LPHA has contracted with Community Counseling Services (CCS), a nonprofit entity to administer, manage and implement Public Health Programs in Grant County.

The LPHA (Grant County) does not have a Fiscal Unit to oversee and monitor the Fiscal operations of CCS. Therefore, this review was conducted at the LPHA's contractor, CCS. The CCS Fiscal Administration Unit has sufficient internal controls to adequately

safeguard assets, to detect and to prevent errors in a timely manner. The operation appears organized and efficient enough with a commitment to quality, fairness and accuracy. CCS was found to comply with the terms of contracts and federal guidelines. However, the LPHA is not in compliance with certain Fiscal requirements, as described in the compliance findings section of this report.

### **Food, Pool and Lodging Health and Safety**

John Combs, Environmental Health Supervisor, is the inspector who provides licensure, inspection and enforcement of facilities under ORS 624, 448, and 446, which includes food facilities, swimming pools and spas, tourist accommodations, organizational camps.

John Combs has successfully completed the state standardization certification process, which provides inspectors the opportunity to subject their Food Code knowledge and inspection skills to a uniform system of measurement. Satisfactory completion of the standardization process complies with the field review portion of the triennial review.

### **Immunizations**

Grant County provides comprehensive immunization services to their community. They have done an excellent job maintaining communication with the labor and delivery department at Blue Mountain Hospital with an emphasis on raising the rate of Hepatitis B screening for delivering mothers. They also focus on the importance of the birth dose of hepatitis B vaccine.

### **Public Health Emergency Preparedness (PHEP)**

Grant County receives \$37,000 to fund its PHEP program, 79 percent of which is dedicated to staffing, including a 0.35 FTE PHEP coordinator. The PHEP program coordinates effectively and creatively with its limited community partners to ensure community preparedness.

Program strength: Prior to FY18, the PHEP contract did not require planning efforts specific to persons with access and functional needs. However, although not required, during this review period the LPHA chose to conduct many planning activities, exercises and actual events specifically related to persons with access and functional needs during this review period. For example, in FY17 coordination with Blue Mountain Hospital, emergency medical services, and other response partners, the Grant County PHEP program conducted a full-scale communicable disease/medical surge exercise with the local assisted living facility.

### **Sexually Transmitted Diseases (STD)**

Grant County Health Department provides STD services Monday through Friday at the John Day clinic and the Grant Union School-Based Health Center, with treatment provided at the clinic only. Grant County typically experiences low STD morbidity, with no syphilis cases and two gonorrhea cases during the review period. The 2017 chlamydia rate (335/100,000) was the highest in the past 10 years and a notable increase over the 2016 rate (84/100,000), though part of this increase may be attributed to the Rainbow Family Gathering in John Day in July 2017.

Grant County has a motivated team committed to STD prevention, with nurses assisting in case investigations, when needed, and staff engaged in various outreach endeavors. The program reviewer was particularly impressed with the staff's flexibility and embrace of both tried-and-true and modern approaches, exemplified by use of low-tech but effective outreach methods such as radio ads and health fairs, and more advanced clinical tools like the CDC treatment guidelines app. Staff are also energized by the work of the Eastern Oregon Public Health Modernization Collaborative and are planning to use the additional resources from the collaboration to improve quality assurance.

### **Tobacco Prevention & Education Program (TPEP)**

Grant County has continued to implement its TPEP program through an approach that includes facilitating community partnerships, working towards creating tobacco-free environments, promoting quitting of tobacco among adults and youth, and reducing the burden of tobacco. Grant County has fulfilled all responsibilities related to local enforcement of the Oregon Indoor Clean Air Act, including taking required action in a timely manner on complaints received through the Workplace Exposure Monitoring System (WEMS).

Grant County TPEP has promoted policy change for healthy, tobacco-free environments in a variety of settings within the county including building support for the Community Counseling Solutions tobacco-free properties policy, and helping the Blue Mountain Hospital District update their tobacco-free policy to become more comprehensive. The new Grant County TPEP Coordinator has a solid foundation in prevention that will support collaboration with the Grant County Alcohol and Other Drug Prevention Education Program (ADPEP).

The TPEP program promotes the Oregon Tobacco Quit Line by distributing cessation information at the School Based Health Clinics, teen health fairs and the Chamber of Commerce, as well as working with Len's Drugs on their cessation classes.

Program staff continue to establish and maintain strong relationships with a broad range of partners and community stakeholders including the Strawberry Wilderness

Community Clinic, Blue Mountain Hospital, Len's Drug, Safe Communities Coalition, County Court Families First Coalition Board, Fair Board, and the Chamber Board.

### **Tuberculosis (TB)**

Grant County is very low incidence for TB compared to other LPHAs in Oregon. Grant County has not had a case of TB disease or B waiver immigrant within the county during the past three years. Good infrastructure is in place to support treatment of a TB case should one occur in the county.

### **Vital Records**

Grant County was the county of birth for 47 infants last year and the registered place of death for 81 individuals. The Grant County Office of Vital Records serves their community by offering a local office where certified copies of death records are available to order by authorized individuals for the first six months after the death. Orders placed in this office are typically completed within one day.

The Grant County Office of Vital Records consistently provides excellent customer service to their customers and partners throughout the community.

The county deputy registrar, Jessica Winegar, works diligently to ensure all areas of the vital records office run smoothly and securely. The Office of Vital Records provides a positive linkage between the community and the state vital records office.

Records and reports are handled with careful attention to maintaining security and confidentiality. Local partners and state staff report excellent relationships with this office. Area funeral directors respect and appreciate the responsiveness and dedication of the staff.

### **Women, Infants and Children (WIC)**

*The following summary is from the 2017 WIC biennial review report.*

WIC's mission is to safeguard the health of low-income women, infants, and children up to age five who are at nutrition risk by providing nutritious foods to supplement diets, information on healthy eating, and referrals to health care. Delivering high quality nutrition services is essential in not only carrying out this mission, but also ensuring that WIC continues to be the premiere national public health nutrition program.

The most recent fact sheet for this local WIC agency can be found on the Oregon WIC website:

<http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/annual.aspx>

**Program strengths:**

1. The program has increased their outreach activities and presence at events in the community. This exposure for the WIC program has the potential to increase caseload. Examples include participation in the county fair, more frequent Facebook posts, and a radio interview on Coffee Time.
2. Jessica Winegar, Health Department Manager, has been exploring new ways to reach participants, such as texting, and completing WIC appointments along with Home Visiting appointments.
3. The program did an excellent job addressing findings from the last review as there were no repeat findings this year.

**WIC Farm Direct Nutrition Program (FDNP)**

*The following summary is from the 2017 WIC biennial review report.*

The Oregon Farm Direct Nutrition Program provides WIC families with FDNP checks once a year to purchase fresh, locally-grown fruits, vegetables and cut herbs directly from local farmers.

**QUALITY ASSURANCE RECOMMENDATIONS**

**Babies First! & Perinatal**

1. Recommend updating Maternal & Child Health (MCH) Home Visiting Policies and Procedures to reflect and support current MCH Nurse Home Visiting programs and practices with the expansion of the Babies First! program.

**Communicable Disease**

1. Recommend timely completion of case investigation – be sure to enter completion dates in Orpheus database.
2. Enter all contact interview information in Orpheus database.
3. Recommend submitting an epi curve (visual display of the onset of illness) for all potential common source outbreaks. This can be done within the outbreaks database when the case log is populated.
4. Recommend timely completion of outbreak reports – be sure to submit them electronically when data entry is complete.

**Public Health Emergency Preparedness (PHEP)**

1. Because of the travel time between Grant County and the location of the bi-monthly regional health care coalition meetings in Deschutes County, it is understandably difficult for the LPHA to attend the meetings in person. However, it is recommended that the LPHA attend the coalition meetings by webinar when

possible to assist with its regional response partnerships and to meet the PHEP program requirements.

### **Reproductive Health**

1. Recommend adding to the consent form that receipt of family planning services is not a prerequisite to receipt of any other services offered by Grant County Health Department.
2. Recommend using Ahler's data to monitor aspects of quality care.
3. Recommend obtaining collaborative agreements with social services for referrals.
4. Recommend obtaining collaborative agreements with providers of other medical services not provided on-site.
5. Recommend using Community Counseling Service's advisory committee to participate in implementation and evaluation of the family planning program.
6. Recommend developing an engagement plan which specifies ways community members will be involved in assessing and evaluating the family planning program.
7. Recommend family planning staff use client-centered counseling to ensure client understands information provided to them.

### **Sexually Transmitted Diseases (STD)**

1. Program is encouraged to take steps to increase the percentage of case reports in which race and ethnicity fields are completed.
2. Program is encouraged to take steps to increase the percentage of case reports for gonorrhea and syphilis (if present) containing gender of patient's sex partners and HIV status or date of most recent HIV test, and to utilize the Eastern Oregon Modernization Collaborative resources to assist with quality assurance as needed.



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August 13, 2019

The Honorable Scott W. Myers, Judge  
Grant County Court  
201 S Humbolt  
Canyon City, OR 97820

Dear Judge Myers:

The triennial review of Grant County was conducted May 22 through August 8, 2018. Findings were determined based on compliance with federal and state statutes or rules, the Intergovernmental Agreement for the Financing of Public Health Services and the Intergovernmental Agreement for Environmental Health Services.

A letter listing items that needed correction was sent to you after the review. The Public Health Administrator was provided a document listing the specific items and the time frame for correction.

We are very pleased to write you this letter thanking you and your staff for resolving all the compliance findings.

Sincerely,

Danna Drum  
Strategic Partnerships Lead

Andrew Epstein  
Public Health Systems Consultant

cc: Jim Hamsher, Grant County Commissioner  
Sam Palmer, Grant County Commissioner  
Kimberly Lindsay, Local Public Health Administrator