



OREGON STATE PUBLIC HEALTH DIVISION
Office of the State Public Health Director

Kate Brown, Governor



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October 25, 2018

The Honorable Pete Runnels, County Judge
Harney County Court
450 N Buena Vista
Burns, OR 97720

Dear Judge Runnels:

The triennial onsite agency review of Harney County Health Department was conducted June 4 through July 25, 2018. The Oregon Health Authority Public Health Division reviewed county public health programs for compliance with state and federal public health laws and compliance with the Intergovernmental Agreement for the Financing of Public Health Services and the Intergovernmental Agreement for Environmental Health Services.

The review included the appraisal of items in 15 program areas, listed below. Program areas with compliance findings are indicated with an asterisk.

Administration	Public Health Emergency Preparedness
Babies First! and Perinatal	Reproductive Health
Civil Rights	Sexually Transmitted Infections
Communicable Disease*	Tuberculosis
Fiscal*	Vital Records
Food, Pool Lodging Health & Safety*	WIC*
Health Officer	WIC Farm Direct Nutrition Program*
Immunizations*	

An overview report is enclosed which 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 the Harney County Health Department Director, Jolene Cawlfeld, to resolve all the findings.

A full report with all documentation from the review will be sent to Jolene Cawlfeld. We think the report will be of assistance to your public health staff in their continuing efforts to provide quality public health services to your community.

Our office will contact Jolene Cawlfeld 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 the Harney County Health Department to be composed of a committed team of professionals who deliver quality public health services to your community. The citizens of Harney County are very fortunate to have this agency providing 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 Harney County Health Department is providing.

Sincerely,

A handwritten signature in dark ink, appearing to read "Danna Drum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Danna Drum
Strategic Partnerships Lead

A handwritten signature in dark ink, appearing to read "Andrew Epstein". The signature is cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Epstein".

Andrew Epstein
Public Health Systems Consultant

Enclosure

cc: Mark Owens, Harney County Commissioner
Patty Dorroh, Harney County Commissioner
Jolene Cawlfeld, Harney County Health Department Director



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Harney County Health Department Triennial Review Report

This is an overview report of the June 4 - July 25, 2018 triennial review of Harney County Health Department (HCHD). 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 Jolene Cawlfeld, Harney County Health Department Director. We urge you to review this document as it contains important information about your public health programs and their requirements.

Note: An interim review of HCHD was conducted in August 2017 as part of the statewide transition to a new triennial review schedule. In some cases, as noted below, if a state program conducted a full program review in 2017, then for the June-July 2018 triennial review that program may have not conducted a new review or may have conducted a modified review.

Harney County Health Department received from OHA Federal funds of \$86,729 for fiscal year 2017. The Health Department also received \$8,349 from State General Fund Support and \$37,429 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

A modified administrative review was conducted. No compliance issues were identified.

Babies First! And Perinatal

The LPHA is in compliance with all program requirements.

Civil Rights

A modified civil rights review was conducted. No compliance issues were identified.

Communicable Disease

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

1. Annual review of the bloodborne pathogen protocol (last reviewed in December 2016). **RESOLVED 7/11/2018**
2. Infection control training for employees with potential occupational exposure to bloodborne pathogens. **RESOLVED 7/11/2018**

Fiscal

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

1. Comply with 2CFR Part 200.414-416 Appendix VII to Part 200- States and Local Government and Indian Tribe Indirect Cost Proposals, which requires the LPHA to have an approved indirect cost rate; allocate indirect charges to programs proportionately or appropriately; and have an indirect rate agreement or certificate of indirect cost allocation if grantee uses an indirect rate to charge federal programs. **RESOLVED 8/22/2018**
 - a. Produce an indirect cost allocation policy/certificate of indirect cost allocation that will specify adopted options and the rate. (This is required because the LPHA opted to charge federal programs a de minimus rate rather than a negotiated indirect rate.)
 - b. Clearly identify in the indirect cost allocation policy what is included in the indirect cost pools and programs charged indirect cost.

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 (restaurants, mobile food units, bed and breakfast, swimming pools and spas, traveler's accommodations, and recreation parks).
Due date to comply: 1/1/2019

2. Complete a National Swimming Pool Foundation-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 have one hour of continuing education in immunizations annually. **RESOLVED 6/25/2018**

Public Health Emergency Preparedness

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

1. Create a table of contents for the Emergency Support Functions (ESF) #8 All-Hazards Base Plan that lists all active ESF-8 supporting plans, annexes, and appendices and includes the following:
 - a. Date of last update for each supporting plan.
 - b. Date of next scheduled review and update for each supporting plan, annex, or appendix, which must be no more than five years from the last update or June 30, 2019 for those that already exceed five years.**Due date to comply: 12/4/2018**
2. Create a "Record of Changes" cover sheet for each ESF-8 supporting plan, annex, or appendix so that future updates can be easily identified. **Due date to comply: 12/4/2018**

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 TPEP program was not reviewed because a full review was conducted in August 2017. No compliance issues were identified.

Tuberculosis (TB)

The LPHA is in compliance with all program requirements.

Vital Records

The LPHA is in compliance with all program requirements.

WIC

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

1. Ensure all staff who provide WIC services complete all required training modules, modules are documented in TWIST, and supporting Training Supervisor documentation is kept in clinic file. (Policy 440) **Due date to comply: 10/31/2018**
2. Ensure Breastfeeding Coordinator meets the qualifications as outlined in policy. (Policy 710) **RESOLVED: 10/22/2018**
3. Ensure processing standards for WIC applicants are met. (Policy 605) **Due date to comply: 9/30/2018**
4. Ensure 'eligibility pending' box is checked when applicable. (Policy 616) **Due date to comply: 10/31/2018**
5. Ensure anthropometric measurements are documented correctly. (Policy 625) **Due date to comply: 10/31/2018**
6. Ensure program rights and responsibilities document is reviewed with the participant. (Policy 635) **Due date to comply: 11/30/2018**
7. Ensure ineligibility and graduation letters are issued within appropriate timelines. (Policy 636) **Due date to comply: 10/31/2018**
8. Ensure all applicable risk are selected. (Policy 670) **Due date to comply: 1/31/2019**
9. Ensure the Competent Professional Authority changes the risk level from medium to high when required. (Policy 661) **Due date to comply: 1/31/2019**

- 10.Ensure the food package assignment is appropriate for the participant's category and nutritional risk. (Policy 769) **Due date to comply: 10/31/2018**
- 11.Ensure the Infant Fresh Fruit and Vegetable required education is provided and documented. (Policy 769) **Due date to comply: 10/31/2018**
- 12.Ensure measurements, health questionnaires and diet questionnaires are completed for the mid-cert health assessments. (Policy 646). **Due date to comply: 1/31/2019**
- 13.Ensure referrals made are documented in TWIST. (Policy 885) **Due date to comply: 10/31/2018**
- 14.Ensure voter registration is offered using the required question. (Policy 480) **RESOLVED 8/31/18**
- 15.Ensure the agency reports voter registration activity weekly or monthly to the Elections Division. (Policy 480) **Due date to comply: 11/30/2018**
- 16.Ensure nutrition counseling topics and materials offered are based on scientifically based nutrition standards. (Policy 820) **Due date to comply: 11/30/2018**
- 17.Ensure staff demonstrate minimum competency in participant centered skills during nutrition counseling sessions. (FNS Policy Memorandum 2006-5) **Due date to comply: 1/31/2019**
- 18.Ensure the participant is actively involved in setting a nutrition related next step. (Policy 820) **Due date to comply: 10/31/2018**
- 19.Ensure if a participant does not attend scheduled quarterly nutrition education, benefits are issued according to policy. (Policy 835) **Due date to comply: 10/31/2018**
- 20.Ensure if quarterly nutrition education was attended, it is documented per policy. (Policy 830) **Due date to comply: 10/31/2018**

21. Ensure staff are following state policy regarding serving relatives, friends, and coworkers. (Policy 620) **Due date to comply: 9/30/2018**
22. Ensure appropriate designee audits the separation of duties report every two weeks. (Policy 595) **Due date to comply: 11/30/2018**
23. Ensure local shelter that serves WIC participants is in alignment with WIC requirements to homeless facilities and documentation of communication with shelter is on file. (Policy 655) **Due date to comply: 10/31/2018**
24. Ensure expenditures reflected for nutrition and breastfeeding promotion meet the program expenditure requirements. (Policy 315) **Due date to comply: 9/30/2018**

WIC Farm Direct Nutrition Program (FNDP)

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

1. Ensure nutrition education concerning the consumption of fresh fruits & vegetables is made available to FNDP participants. (Policy 1100)
RESOLVED: 10/25/2018
2. Ensure orientation to the FNDP program includes all required elements. (Policy 1100, 3.0-3.6) **RESOLVED: 10/25/2018**
3. Ensure check issuance documentation is in TWIST as soon as possible, preferably within 24 hours of distribution to participants. (Policy 1100).
RESOLVED 8/31/2018
4. Ensure check issuance documentation is in TWIST as soon as possible, preferably within 24 hours of distribution to participants. (Policy 1100)
RESOLVED: 10/25/2018

PROGRAM OVERVIEW AND STRENGTHS

Administration and Civil Rights

Harney County Health Department (HCHD) provides an array of public health services including Communicable Disease Prevention and Investigation,

Environmental Health, Maternal and Child Health, Reproductive Health, Vital Records and Tobacco Prevention programs. The Harney County Court is governing body of the Local Public Health Authority (LPHA). County Judge Pete Runnels is the Local Public Health Administrator. Jolene Cawlfeld is the Health Department Director. Sarah Laiosa, DO, serves as the Health Officer.

Program strengths include:

- HCHD Director Jolene Cawlfeld provides direction to the department's programs and insights into how HCHD can grow and best allocate staff resources to meet needs. While Jolene is an experienced Nurse Practitioner continues to be a vital part of clinical services delivery, her efforts in support of staff training and retention, as well as time savings resulting from implementation of an electronic records system, have allowed her to spend more of her time directing and strengthening the overall public health work of the department.
- Community members can now access primary health care services through High Country Health and Wellness, which is based at HCHD. Rural Health Clinic designation is expected to be achieved soon. HCHD continues to bring in higher than projected revenues from clinical services, including revenues from the primary care clinic.
- HCHD's WIC program has a positive reputation with the community. HCHD obtained a grant from OHA to make their office more welcoming and kid-friendly. Additionally, a part-time social worker has been hired to work with kids primarily through play therapy, geared toward providing trauma-informed care.
- HCHD along with North Central Public Health District and other Eastern Oregon counties is participating in the Eastern Oregon Modernization Collaborative, which has established a regional epidemiology team working toward the goal of decreasing gonorrhea rates through shared education and targeted interventions.
- In addition to strengthening Health Department practices, Jolene Cawlfeld has continued to become more active in community public health efforts and increase collaboration with partner organizations, including the coordinated care organization (CCO), behavioral health and tribal health. Jolene is the local Eastern Oregon CCO Local Community Advisory Council (LCAC) chairperson and attends Regional Community Advisory Council meetings. LCAC participants include partners from mental health, early childhood,

Oregon Department of Human Services, senior center, hospital, the other primary care clinic in Burns, and Oregon Health Plan members from the community.

Babies First! & Perinatal

The HCHD Director and nurse staff are dedicated to maintaining the MCH Nurse Home Visiting programs as part of their services offered for county families.

Program strengths include:

- Dedicated Public Health Director and program staff.
- Public Health Director Jolene Cawlfeld and Nurse, Barb Rothgeb are both Family Nurse Practitioners and long-time residents of Harney County who are well-connected in the community and are trusted providers.
- HCHD is in the final process of certification requirements to be granted federally approved status as a “Rural Health Center.”

Communicable Disease (CD)

CD and outbreak investigations are conducted by Barbara Rothgeb; administrator Jolene Cawlfeld provides back-up when needed. Barb is an experienced nurse with significant training and communicable disease experience. In the review period, there were 56 cases reported, of which 21 required interviews. There was also one outbreak reported and investigated during the review period.

The CD team does an exceptional job investigating reports of communicable disease. Case interviews are timely and thorough. Despite having relatively few reports of communicable disease (as compared with more populous LPHAs), Harney county stays up-to-date on investigative guidelines, interviewing techniques, and outbreak investigation tools and methods.

Fiscal

It appears that HCHD has sufficient internal controls to adequately safeguard assets, to detect and prevent errors in a timely manner. The operation is fairly organized and efficient with a commitment to quality, fairness and accuracy.

Food, Pool and Lodging Health and Safety

Harney County contracts with Grant County to provide Environmental Health Services. John Combs, Environmental Health Supervisor, is the inspector who is currently providing 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.

Health Officer

The Health Officer, Dr. Sarah Laiosa, reviews HCHD protocols and ensures guidelines are being followed related to medical issues and outbreaks. The Health Officer is available for consultation with HCHD staff and provides direct patient care as a provider and medical director of the primary care clinic at the Health Department. In addition to being the Harney County Health Officer, Dr. Laiosa serves in several other medical roles including medical director for Eastern Oregon CCO where she supports regional health improvement efforts.

Immunizations

Harney County provides community education and immunizations in a small community with only a couple of local clinics. The LPHA is providing significant outreach to all local public schools, including providing immunizations during registration.

Harney County received a grant from Eastern Oregon Coordinated Care Organization for immunization outreach to increase rates among 2-year-olds. They have posted a billboard on the edge of Burns, are conducting outreach to parents at local locations, and are conducting drawings for parents who respond to reminder phone calls. These efforts are beginning to make a difference in completion rates for preschoolers. The Oregon Immunization Program looks forward to partnering on more immunization improvement and community outreach projects.

Public Health Emergency Preparedness (PHEP)

Harney County Health Department receives approximately \$38,000 annually from the OHA Public Health Division to operate its PHEP program, which supports a 0.5 FTE coordinator who also serves as the county's .5 FTE emergency manager.

While the PHEP program struggled during the first two of the three years covered in this review, the hiring of a new Public Health Director and PHEP coordinator in mid-2017 resulted in significant program improvements and increased compliance.

The LPHA has created an extensive crisis emergency risk communications plan that several other counties have requested to use as a basis for developing their own plans. HCHD staff have a commendable level of training to support an emergency response impacting the health of Harney County residents and visitors.

Reproductive Health

The HCHD clinic located in Burns is located across the street from the Harney District Hospital and the Federally Qualified Health Center. The Health Department has consistent hours Monday to Friday 8:30-12PM and 1-5PM. Walk-in appointments are worked into the schedule, as needed. HCHD provides clinical services with a Family Nurse Practitioner and Registered Nurse according to National Standards for Quality Family Planning services. The Director is a Family Nurse Practitioner who was raised in the community and has worked in the community for several years.

HCHD provides outreach for services at both regularly scheduled events and additional events requested by community and local schools. HCHD conducts routine outreach at the High school and Middle school with parents and students.

Medical services are provided according to national standards of care, ensuring quality family planning services. Documentation of appropriate education and anticipatory guidance are noted on the Client Visitation Records (CVR) for the encouragement of preventive healthcare.

HCHD effectively screens for financial eligibility and financial need according to Title X. They also effectively screen for Contraceptive Care eligibility.

Harney County's 2005 teen (10-17 year old) pregnancy rate of 8.9 per 1000 persons decreased to a rate in 2015 too low to state without identifying specific persons. During the same time period, the statewide teen pregnancy rate decreased by 54% from 9.5 to 4.4 per 1,000 persons.

HCHD reproductive health medical staff have demonstrated that they provide care according to the United States Preventative Services Task Force standards. Staff in

the Family Planning clinic provide excellent family planning care with an emphasis on counseling, education and access to long-acting reversible contraceptives.

Sexually Transmitted Diseases (STD)

HCHD offers STD services five days a week at one location directly across from the Harney District Hospital and Family Care clinic. Harney County generally experiences low STD morbidity. During this review period, there were 56 chlamydia cases, nine gonorrhea cases, and no syphilis cases.

HCHD has a close working relationship with the Health District facilities and demonstrates the capacity to immediately investigate any reported STD cases. The Health Officer began working as a provider at the health department in Feb. 2018. After a proposal to open a School Based Health Center was defeated, the health department developed other strategies for reaching adolescents and young adults. School presentations addressing condoms and STDs and an STD educational forum targeting parents are planned for the upcoming school year.

Tobacco Prevention & Education Program (TPEP)

The TPEP program was not reviewed because a full review was conducted in August 2017. See the 2017 review report for a description of the TPEP program.

Tuberculosis (TB)

Harney County is very low incidence for TB compared to other LPHAs in Oregon. Harney County has not had a case of TB disease or a B waiver immigrant within the county during the past three years. The TB program has the infrastructure in place to support treatment of a TB case should one occur in the county. HCHD has strong relationships with local public health partners.

Vital Records

HCHD's Office of Vital Records serves their community by offering a local office where certified copies of birth and death records are available to order by authorized individuals. The county is limited to providing this service for the first six months after the event, whether birth or death. Orders placed in this office are typically completed within one day.

HCHD's Office of Vital Records consistently provides excellent customer service to their customers and partners throughout the community. Deputy Registrar Charlotte Campbell represented the office for this review.

Charlotte Campbell and the other members of the Vital Records team work in close collaboration to ensure all areas of the vital records office run smoothly and securely. This county is outstanding as all partners participate in the electronic records system: Oregon Vital Events Registration System (OVERS). This means 100% of their records are processed in a fully electronic manner. The local funeral home, hospital and medical examiners are all system users.

The HCHD's 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. State staff that have contact with the county report an excellent relationship with this office.

WIC

WIC's mission is to safeguard the health of low-income women, infants, and children up to age 5 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 premier 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>

The Certifier and Registered Dietician do an excellent job of continuity of care from one visit to next, including routinely updating the status of the 'Next Step'.

WIC Farm Direct Nutrition Program

The Oregon Farm Direct Nutrition Program (FDNP) provides WIC families with FDNP checks once a year to purchase fresh, locally-grown fruits, vegetables and cut herbs directly from local farmers. The 2017 Farmers Market redemption rate of 56.85% was an improvement from 2016 rate of 48.24%. (State average 68.27%)

QUALITY ASSURANCE RECOMMENDATIONS

Babies First! & Perinatal

1. Recommend an update of MCH Nurse Home Visiting Policies and Procedures to match current programming offered.
2. Recommend that MCH Home Visiting Nurse be not less than a 0.5 FTE position devoted to Nurse Home Visiting with a goal of maintaining consistent Babies First! and CaCoon programming.
3. Recommend that parent of child is identified as the Parent/Caregiver on the "Client Identification Face Page" of client record.

Public Health Emergency Preparedness

1. While the LPHA successfully responds to 24/7/365 testing, it is encouraged to maintain an on-call pool more than one person deep.

Reproductive Health

1. Post Patient Bill of Rights in a public area of the clinic.

Sexually Transmitted Infections (STD)

1. Program is encouraged to take steps to increase the percentage of gonorrhea cases containing gender of sex partners, HIV status or date of most recent HIV test, and pregnancy status (if applicable).
2. Program is encouraged to include STD educational materials among other health literature in central waiting area.



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Authority

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March 7, 2019

The Honorable Pete Runnels, County Judge
Harney County Court
450 N Buena Vista
Burns, OR 97720

Dear Judge Runnels:

The triennial onsite agency review of Harney County Health Department was conducted June 4 through July 25, 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: Mark Owens, Harney County Commissioner
Patty Dorroh, Harney County Commissioner
Jolene Cawlfeld, Harney County Health Department Director