

Kate Brown, Governor

# AGENCY REVIEW

# **North Central Public Health District**

# February-March, 2017

Prepared by Oregon Health Authority Public Health Division



Kate Brown, Governor



800 NE Oregon Street, Suite 930 Portland, OR 97232 Telephone: 971-673-1222 FAX: 971-673-1299 TTY: 971-673-0372

June 30, 2017

Mr. Scott Hege, Chair Wasco County Commissioner Chair, North Central Public Health District Board 511 Washington St, Ste 302 The Dalles, OR 97058

Dear Commissioner Hege:

The triennial onsite agency review of North Central Public Health District (NCPHD) was conducted in February 1 through March 28, 2017. The Oregon Health Authority Public Health Division reviewed NCPHD public health programs for compliance with state and federal public health laws and compliance with the Financial Assistance Agreement.

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

Administration*	Health Officer
Babies First! and Perinatal	Immunizations*
Civil Rights*	Reproductive Health*
Communicable Disease	Sexually Transmitted Infections
Drinking Water Services*	Tobacco Prevention & Education
Fiscal*	Tuberculosis
Food, Pool Lodging Health & Safety*	Vital Records
Health Security, Preparedness and Response	

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.

Please note that the results of this triennial review are very good. Our team is working closely with the NCPHD Public Health Director and Local Public Health Administrator, Teri Thalhofer, to resolve all the findings.

A full report with all documentation from the review will be sent to Teri Thalhofer. 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.

Danna Drum will be meeting with the NCPHD Board of Health on July 11 to review findings and answer any questions.

Overall, agency reviewers find NCPHD to be composed of a committed team of professionals who deliver quality public health services to your community. The citizens of Wasco, Sherman and Gilliam Counties are very fortunate to have this agency providing comprehensive public health services.

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

Sincerely,

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Danna Drum Strategic Partnerships Lead

andren O. Easter

Andrew Epstein Local Health Department Consultant

Enclosures

cc: David Anderson, NCPHD Board William Hamilton, NCPHD Board Tom McCoy, Sherman County Commissioner Fred Schubert, NCPHD Board Vice-Chair Steve Shaffer, Gilliam County Commissioner Michael Takagi, NCPHD Board Roger J. Whitley, NCPHD Board Teri Thalhofer, Public Health Director Linda Thompson, NCPHD Board



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June 30, 2017

#### North Central Public Health District Triennial Review Report

This is an overview report of the February 1 – March 28, 2017 triennial review of North Central Public Health District (NCPHD). This report is a summary of individual reports from participating programs put together by the Oregon Health Authority (OHA) Office of the State Public Health Director. Detailed individual reports will be sent to Teri Thalhofer, NCPHD Public Health Director. We urge you to review this document as it contains important information about your public health programs and their requirements.

NCPHD received federal funds of \$462,083 including \$158,361 for the WIC Program for fiscal year 2016. NCPHD also received \$71,655 General Fund and \$93,666 other funds for the same period.

**Report Prepared by**: Danna Drum, Strategic Partnerships Lead, and Andrew Epstein, Local Health Department Consultant, Office of the State Public Health Director

# **COMPLIANCE FINDINGS SUMMARY**

#### **Administration**

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

1. Update mandatory reporting policy to include abuse of mentally ill and those with development disabilities. **Due date to comply: 9/30/2017** 

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

The LPHA is in compliance with all program requirements.

# **Civil Rights**

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

1. Develop a policy and procedure for cooperating with OHA's investigative process and acting promptly on discrimination complaints. **Due date to comply: 9/30/2017** 

#### **Communicable Disease**

The LPHA is in compliance with all program requirements.

#### **Drinking Water Services**

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

- 1. Investigate water quality alerts for detections of regulated contaminants. Due date to comply: 5/22/2017 RESOLVED
- 2. Conduct water system survey significant deficiency follow-ups to verify that all deficiencies are corrected. **Due date to comply: 5/22/2017 RESOLVED**

#### <u>Fiscal</u>

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

- 1. Comply with federal regulations consistent with OMB-A-133 Sub Part C, 45 *CFR 74.21 Standard for Financial Management Systems, 45 CFR 92.20 HHS Standards of Financial Management Systems* which requires grantee to bill clients for Title X family Planning services showing the total charges/cost for the services provided as well as allowable discounts given. Current billing statement shows only total charges and not total charges as well as allowable discounts.
  - a. LPH must institute changes to correct current billing statement to clients. The amended client billing statement must clearly show total charges to clients as well as allowable discounts. Due date to comply: 6/9/2017 RESOLVED

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

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

1. Maintain an inspection rate of 100% for all licensed facilities. The Organizational Camp Program is below the compliance rate. **Due date to comply: 12/29/2017** 

#### **Health Officer**

The LPHA is in compliance with all program requirements.

#### Health Security Preparedness and Response

The LPHA is in compliance with all program requirements.

#### **Immunizations**

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

- Comply with Standard for Vaccine Administration. Due date to comply: 7/1/2017
  - a. Update HPV standing order; update order in all standing order locations.
  - b. Add two missing orders: Guidelines for Adverse Events, and Sites for Vaccine Administration.
- 2. Comply with Standard for Delegate Agencies.
  - a. Update delegate addendum with South Gilliam Health Center (000077). **Due date to comply: 7/1/2017**
- 3. Comply with Vaccine Billing Standards. Due date to comply: 7/1/2017
  - a. Determine and use actual costs associated with vaccine administration.
  - b. Charge appropriate fees for Billable Vaccine (use OIP published Billable Vaccine Price list).
- 4. Provide technical assistance to birthing hospitals when the rate of birth dose hepatitis B vaccine administration drops below 80%.
  - a. Create an action plan to provide technical assistance to the local hospital to address low rates of birth dose hepatitis B vaccine administration. **Due date to comply: 7/15/2017**
- 5. Comply with standards requiring that LPHAs achieve VFC vaccine accounting excellence in all LPHA-operated clinics in the most recent quarter.
  - a. Create an action plan for improving their accountability rating to 95% or better. **Due date to comply: 7/15/2017**

# **Reproductive Health**

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

- 1. Comply with Title X requirement 8.1. Due date to comply: 4/15/2017 RESOLVED
  - a. Ensure that staff is informed that family planning (FP) services must be provided on a voluntary basis; that a client's receipt of FP services may not be used as a prerequisite to receipt of any other services and that they may subjected to prosecution if they coerce or try to coerce any person to

undergo an abortion or sterilization procedure

- b. Ensure each client signs a consent form that states FP services are voluntary, receipt of FP services is not a prerequisite of any other services and they cannot be coerced to use a specific contraception method.
- 2. Comply with Title X requirement 8.6.
  - a. Ensure that staff has been provided training on family involvement counseling. **Due date to comply: 4/15/2017 RESOLVED**
- 3. Comply with Title X requirement 9.7.
  - a. Update written clinical protocols to the State's revised protocols. **Due date to comply: 7/1/2017 RESOLVED**
- 4. Comply with Title X requirement 9.12.
  - a. Ensure that all staff have been formally informed to encourage family participation in the decisions of minors to seek FP services. **Due date to comply: 4/15/2017 RESOLVED**
- Comply with Title X requirement 11. Due date to comply: 6/15/2017 RESOLVED
  - a. Develop a community advisory committee of persons broadly representative of the population to be served.
  - b. Develop an engagement plan which specifies ways that the community members will be involved in developing, assessing and/or evaluating the family planning program.

# Sexually Transmitted Infections

The LPHA is in compliance with all program requirements.

# **Tobacco Prevention & Education Program**

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.

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#### **PROGRAM OVERVIEW AND STRENGTHS**

#### **Administration and Civil Rights**

North Central Public Health District provides public health services to the residents of Wasco, Sherman and Gilliam Counties. The public health administrator is Teri Thalhofer, RN, BSN and the health officer is Mimi McDonnell, MD. The district provides a wide range of public health services in the three-county area. Both Teri Thalhofer and Mimi McDonnell are engaged public health leaders in their community.

Over the last several years, the partnership between NCPHD and the local hospital has improved with increased collaboration and trust. These partners have developed an appreciation for each organization's specific roles and responsibilities which has resulted in improved trust related to communication in emergencies.

NCPHD and its community partners have been successful in securing other funding for public health work that is either under-funded or not funded at all, including childhood obesity prevention.

NCPHD has been actively engaged in working with Tribal members living along the Columbia River and other partners to identify how best to provide services to this community with unique needs.

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

Services are provided to the Maternal and Child Health population through the Maternity Case Management (MCM) and Babies First! Home Visiting programs as well as Oregon Mother's Care (OMC). These programs within NCPHD served 53 MCM and 134 Babies First! clients in calendar year 2016. Some of the strengths and achievements of these programs include: efforts to coordinate home visiting referrals through Home Visiting Connections; experienced Registered Nurse (RN) staff; integration of Community Health Workers into the home visiting program; partnership with the Women, Infants and Children (WIC) program; support for staff training; and meeting all program requirements.

#### **Communicable Disease**

NCPHD Communicable Disease (CD) investigations are completed by Jeremy Hawkins. In the triennial period there were 177 reportable disease conditions and

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20 reported outbreaks. Jeremy is a new CD investigator who onboarded to his position very quickly and adeptly. Jeremy collaborates closely with nursing staff at the health district whenever needed and he feels supported when clinician input is required. NCPHD nurtures strong relationships with summer camps and long term care facilities, two types of residential settings at high risk for outbreaks. Staff also work collaboratively with the hospital, ensuring timely case reporting. Colleagues at the Public Health Division report strong, positive working relationships with all NCPHD staff, referring to Jeremy as "awesome" and "motivated." NCPHD's effective transition to new staff and CD investigator onboarding could serve as a model to other LPHAs in Oregon.

#### **Drinking Water Services**

The Drinking Water program provides services to public water systems that result in reduced health risk and increased compliance with drinking water monitoring and maximum contaminant level requirements. The Drinking Water program reduces the incidence and risk of waterborne disease and exposure of the public to hazardous substances potentially present in drinking water supplies.

Services provided through the Drinking Water program include investigation of occurrences of waterborne illness, drinking water contamination events, response to spills, emergencies, and inspection of water system facilities. The Drinking Water program reports data to the Oregon Health Authority Drinking Water Services Program as necessary for program management and to meet federal Environmental Protection Agency (EPA) Safe Drinking Water Act program requirements.

The environmental health team at NCPHD is a competent and professional group, and the Drinking Water Program is well operated. The program works cooperatively with the 71 water systems it regulates and with the state Drinking Water Program to help assure safe drinking water for Wasco, Sherman, and Gilliam Counties.

#### **Fiscal**

It appears that the department 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 commitment to quality, fairness and accuracy.

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

The NCPHD Environmental Health Program is doing an excellent job providing Environmental Health services to the community. Inspection rates for licensed facilities are in compliance for all program areas with the exception of the Organizational Camp Program. The licensed facility inspection reports have good documentation and proper follow-up as required.

John Zalaznik and Kevin Dworschak have been state standardized and satisfactory completion and maintenance of the standardization process complies with the field review portion of the triennial review. Staff exhibited good communication skills with operators and employees of the food service facilities during the standardization certification.

# Health Officer

Dr. Mimi McDonnell serves as the NCPHD Health Officer and is an engaged public health leader.

#### Health Security, Preparedness and Response

NCPHD's Public Health Emergency Preparedness Program is coordinated by Tanya Wray. In addition to coordinating the Emergency Preparedness Program, Ms. Wray also coordinates the Wasco County Medical Reserve Corps and serves as the Health District's Public Information Officer, supporting emergency public information and warning as well as community outreach and education. The Emergency Preparedness Program – Program Element 12 contract also funds portions of the following positions: Communicable Disease Control Investigator (.80 FTE), Clinical Programs Supervisor (.10 FTE), and Health Officer (.15 FTE). The program also receives the following in-kind support: Director (.20 FTE); RN (.15 FTE); Administrative Support Staff (.20 FTE).

NCPHD's Emergency Preparedness program demonstrated many notable strengths including the following examples:

- The program has developed a robust Emergency Operations Plan, which was updated and signed by Wasco, Sherman and Gilliam Counties' Emergency Managers, NCPHD Board of Health, Mid-Columbia Medical Center and Oregon Health Authority in February 2016.
- All NCPHD staff have received training on Incident Management and the Incident Command System.
- The program has developed a comprehensive multi-year Training and Exercise Plan (TEP). NCPHD tracks areas for improvement identified in

exercises and real events and incorporates this information into the ongoing maintenance of the TEP, ensuring a continuous cycle of evaluation and improvement.

- NCPHD maintains access to Everbridge (reverse 911) through Wasco, Sherman and Gilliam Counties to push emergency notifications to citizens.
- NCPHD convenes regional Preparedness Meetings on a quarterly basis. Participation includes respresentation from such local partners as: public health, OHA, local healthcare systems/hospitals, emergency management, fire/EMS, law enforcement, American Red Cross and other partners.
- NCPHD supports enhanced community readiness by hosting the Wasco County Medical Reserve Corps.

# **Immunizations**

Under the expert direction of Dianne Kerr and her staff, the NCPHD Immunization Program continues to offer quality immunization services to its residents. The program has developed strong partnerships within their community. For example, they regularly visit staff and residents at Flagstone Senior Living Center to discuss the importance of immunizations for seniors. They also run regular PSAs in the local newspaper to keep residents informed about the need for annual flu immunizations. Dianne is a strong and enduring advocate for immunizations in NCPHD.

# **Reproductive Health**

NCPHD provides family planning services to all individuals who request their services. During 2015- 2016, NCPHD reduced family planning program hours due to a decrease in their budget, which contributed to a 34% decrease in clients over the last couple of years. More recently, NCPHD has been able to increase their family planning hours which will provide more access for their clients.

Ninety percent of clients seen at NCPHD are at or below 138% of Federal Poverty Level. Thirty-eight percent of clients served at NCPHD are Hispanic or Latino. The staff are respectful of each individual's culture and serve all who seek family planning services.

NCPHD provides all birth control methods and has a high percentage of clients using most and moderately effective methods. Implants and IUD/IUS are available to all qualified clients at the time of their appointment with the medical provider when requesting one. NCPHD family planning staff is very engaged to increase

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their client numbers. They have engaged with other community groups to assess what services are being provided, and to determine what they can do to ensure Wasco, Sherman and Gilliam residents are being served.

#### **Sexually Transmitted Infections**

NCPHD provides STD services for Wasco, Sherman, and Gilliam counties out of its location in The Dalles. The majority of the STD morbidity for the health district is contained within Wasco County. The county has seen slight periodic increases in gonorrhea cases (consistent with trends seen regionally and statewide), and a sustained increase in early syphilis cases from no cases from 2007-2012, to a high of three cases in 2016. HIV morbidity has also increased from one case between 2011 and 2014 to two cases in 2015 and three cases in 2016.

NCPHD benefits from extremely dedicated staff working on HIV/STD case investigations and in STD clinical services. Staff report a close working relationship with their Health Officer which results in positive outcomes for their program as a whole. The reviewer was impressed by the strong system North Central has in place for screening, treatment, follow-up, and prevention of STDs. The quality of their HIV/STD case work as evidenced by data in the Oregon Public Health Epidemiology User System (ORPHEUS) is outstanding. The program is to be complimented for its commitment to quality assurance activities as evidenced through routine surveillance case record reviews and medical chart audits. They also provide a model for other public health programs in their outreach to local clinics and hospital systems around HIV/STD prevention and care.

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

NCPHD has continued to implement its TPEP program through a comprehensive approach that includes facilitating community partnerships, creating tobacco-free environments, countering pro-tobacco influences, promoting quitting of tobacco among adults and youth, and reducing the burden of tobacco. NCPHD has fulfilled all responsibilities related to local enforcement of the Oregon Indoor Clean Air Act, including responding to complaints of violation.

NCPHD TPEP staff have done excellent work promoting adoption of tobacco-free properties policies and providing technical assistance to support policy implementation. Outreach to local elected officials and other decision makers regarding the hazards of tobacco (as the leading cause of preventable death in the state) and inhalant delivery systems helped lead to adoption of 100% tobacco-free properties policies by NCPHD, Columbia Gorge Community College, North Wasco Park and Recreation District, One Community Health, and Moro City Park. The TPEP program is working with Wasco, Sherman and Gilliam Counties to promote 100% tobacco-free policy for all county properties.

Program staff have built positive relationships with a variety of community partners throughout the three counties within NCPHD, and are recognized by decision makers and partners as experts in tobacco prevention. Program staff have supported efforts to strengthen referrals to the Oregon Tobacco Quit Line and other tobacco cessation resources with the two CCOs that serve the counties within NCPHD, as well as with One Community Health and Mid-Columbia Medical Center. During this review period, the TPEP program conducted a tobacco retail assessment to provide the groundwork for exploring policy options to address availability and promotion of tobacco in the retail setting, and is currently exploring policy options to raise the minimum age of purchase of tobacco to 21. The program collaborates effectively with the Hood River County TPEP program and the Regional Health Equity Coalition (Mid-Columbia Health Equity Advocates) to achieve shared goals, and has obtained additional funding to support this work including a grant from the OHSU Knight Cancer Research Foundation and CCO funds. The City of The Dalles Blue Zones project is expected to provide additional opportunities for a collaborative approach to achieving tobacco prevention goals.

Program staff participate in required trainings and technical assistance activities, submit work plans and reports in a timely manner, and demonstrate an ongoing commitment to advancing program efforts toward social norm changes around support of tobacco prevention.

#### **Tuberculosis**

NCPHD is prepared for a case and staff are trained about tuberculosis (TB). NCPHD staff and the Health Officer are engaged and interested in learning more about TB. They contact the state TB program regularly with good questions or requests for updates.

#### Vital Records

NCPHD Vital Records serves their community by offering a local office where certified copies of birth and death records (for births and deaths occurring in Wasco and Sherman counties) are available to order by authorized individuals; Gilliam County Vital records offers a local office for copies of records for births and deaths occurring in Gilliam County. Wasco County was the place of birth for 281 infants last year and a total of 351 deaths occurred in Wasco and Sherman counties last year. Gilliam County was the county of birth for one infant last year and 13 deaths were registered in the county last year.

The vital records offices are limited to providing certified copies of birth and death records service for the first six months after the birth or death. Orders placed in NCPHD or Gilliam County offices are completed within one day. Both offices consistently provide excellent customer service to their customers and partners in the community.

Community partners interviewed during the NCPHD Vital Records visit included staff members at the local hospital and local funeral home directors, all of whom report excellent relationships with the vital records office. Staff members in the state office who work with the local staff report a similar high regard for the work of this office. Similarly, community and state staff members who have worked with the Gilliam County Vital Records office report excellent relationships with the county office.

# QUALITY ASSURANCE RECOMMENDATIONS

# **Communicable Disease**

- 1. Review and revise (if needed) the previous active surveillance SOP so it can be reincorporated into the LPHAs plans.
- 2. Collect race and ethnicity data for all cases that require investigation.

# **Drinking Water Services**

- 1. NCPHD staff should notify OHA staff whenever a water system is placed on a boil order via DWS phone duty at (971) 673-2269, prior to and in addition to sending an e-mail about the situation. DWS staff are obligated to route boil order information to senior OHA leadership, and if the recipient of the e-mail is out of the office we will miss the advisory. (971) 673-0405 is staffed M-F, and can ensure the appropriate notifications are made. Notifications outside of normal business hours should be routed to the PH Duty Officer, (971) 246-1789
- 2. When completing contact reports, please ensure NCPHD staff reference the

appropriate Alert ID. During the file review, many missing contact reports were located without Alert ID numbers. As contact reports are tracked by Alert ID, failing to reference the Alert ID number will make associating your work with the alert impossible.

- NCPHD's emergency response plan has some outdated contact information for DWS. During normal business hours, DWS staff may be reached at (971) 673-0405. Outside of normal business hours, please contact the PH Duty Officer at (971) 246-1789 (Cell), or (503) 938-6790 (pager).
- 4. Water system surveys have continued to improve over the last year, but NCPHD staff would benefit from an internal review to ensure all of the template data has been removed from final documents, that survey and cover letter data are internally consistent, and that routine spelling & grammar mistakes are corrected prior to submitting the documents to OHA & the water system.

#### **Reproductive Health**

- 1. Separate consent form and patient bill of rights.
- 2. Include patient demographics in Practice Suite.
- 3. Add an emergency contact on registration form.
- 4. Update registration form to be more LBGTQ friendly.
- 5. Develop a process for documenting disposal of expired medications.
- 6. Verify phone numbers and addresses on resources given to clients on an annual basis, include revision date on form.
- 7. Notify clients when determined by fiscal manager to waive fees for just cause when unable to pay.
- 8. Provide staff training on medical emergencies to ensure all staff know their role.





March 20, 2018

800 NE Oregon St. Portland, OR 97232-2195 Voice: 971-673-1399 FAX: 971-673-1299

Mr. Scott Hege, Chair Wasco County Commissioner Chair, North Central Public Health District Board of Health 511 Washington St, Ste 302 The Dalles, OR 97058

Dear Commissioner Hege:

The triennial onsite agency review of North Central Public Health District (NCPHD) was conducted in February 1 through March 28, 2017. The compliance findings in the review were based on federal and state statutes or rules, contract requirements, or specific minimum standards agreed to by the local health departments in Oregon.

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 send you this letter thanking you for resolving all compliance findings.

Sincerely,

Danna Drum Strategic Partnerships Lead

due Ento

Andrew Epstein Local Health Department Consultant

 cc: Tom McCoy, Sherman County Commissioner, NCPHD Board Michael Takagi, NCPHD Board Teri Thalhofer, Public Health Director Linda Thompson, NCPHD Board Leslie Wetherell, Gilliam County Commissioner, NCPHD Board Roger J. Whitley, NCPHD Board