



800 NE Oregon Street Portland, OR 97232-2187 Voice: 971-673-1222

FAX: 971-673-1299

November 8, 2018

The Honorable N. Lynn Morley, Judge Wheeler County Court 401 Fourth St. P.O. Box 447 Fossil, OR 97830

#### Dear Judge Morley:

The modified triennial review of Wheeler County was conducted June 5 through July 24, 2018. The Oregon Health Authority (OHA) 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 (Public Health IGA) and the Intergovernmental Agreement for Environmental Health Services. This review was modified as part of a multi-year transition to a regional triennial review schedule; the last full triennial onsite review was conducted in 2016 and the next regular triennial review will occur in 2021.

The review included the appraisal of items in 13 program areas, listed below. Program areas with compliance findings are indicated with an asterisk.

Administration
Babies First! and Perinatal
Civil Rights
Communicable Disease
Fiscal\*
Food, Pool Lodging Health & Safety\*
Health Officer

Immunizations\*
Public Health Emergency Preparedness\*
Sexually Transmitted Infections
Tobacco Prevention & Education
Tuberculosis
Vital Records

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 Karen Woods, Wheeler County Public Health Program Coordinator, to resolve all the findings. A full report with all documentation from the review will be sent to Karen Woods and Dr. Robert J Boss, Wheeler County Local Public Health Administrator. 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.

As part of OHA's subcontractor monitoring protocols, at the time of each triennial review OHA requests copies of current subcontracts from the Local Public Health Authority (LPHA). A review of contracts between Wheeler County and Dr. Boss, and between Dr. Boss and Asher Community Health Center, identified several areas that need to be addressed for Wheeler County to be in compliance as an LPHA with current public health statutes and rules. Because those requirements were not included in the administrative review tool that was in effect at the time of the Wheeler County review, those issues are being addressed separately from the triennial review compliance findings.

Our office will contact Karen Woods 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 Wheeler County and Wheeler County's subcontractors to be composed of a committed team of professionals who deliver quality public health services to your community. The citizens of Wheeler County are fortunate to have Wheeler 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 Wheeler County is providing.

Sincerely,

Danna Drum

Strategic Partnerships Lead

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Andrew Epstein

Public Health Systems Consultant

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Enclosure

cc: Robert J Boss, MD, Wheeler County Public Health Administrator Karen Woods, Wheeler County Public Health Program Coordinator Robert L. Ordway, Wheeler County Commissioner Debbie Starkey, Wheeler County Commissioner





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#### **November 8, 2018**

### Wheeler County Triennial Review Report

This is an overview report of the June 5 - July 24, 2018 modified triennial review of public health programs administered by Wheeler County and its subcontractors. 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 Dr. Robert J. Boss, Local Public Health Administrator, and Karen Woods, Wheeler County Public Health Program Coordinator. We urge you to review this document as it contains important information about your public health programs and their requirements.

Wheeler County received from OHA Public Health Federal funds of \$58,474 for fiscal year 2017. The County also received \$134,120 from State General Fund Support and \$18,446 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. While there were no official compliance findings from the Administrative Review, a review of public health subcontracts in preparation for the review identified several areas that need to be addressed for Wheeler County to be in compliance as a Local Public Health Authority (LPHA) with current public health statutes and rules. Because those requirements were not included in the administrative review tool that was in effect at the time of the Wheeler County review, those issues are being addressed separately from the triennial review.

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

The LPHA is in compliance with all program requirements.

## **Civil Rights**

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

#### **Communicable Disease**

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

#### **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. Develop a system to monitor the fiscal operations of Asher Community Health Center (ACHC), and Community Counseling Solutions (CCS) as sub-recipients providing various Public Health Services (Immunization, Family Health and School Based Services) for Wheeler County residents, with contract requirements including all applicable laws, rules and funding requirements.
  - b. Provide a written policy and procedure for the fiscal monitoring of ACHC and CCS.
  - c. Create review tool and use the tool to conduct periodic reviews of fiscal operations of ACHC and CCS as part of the monitoring process to ensure the subcontractors fully comply with federal and contract terms, applicable laws, procedures and 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** 

# **Health Officer**

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

## **Immunizations**

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

1. LPHA must ensure that all clinical immunization staff complete a minimum of one hour of continuing education in immunizations annually. **RESOLVED 9/4/2018** 

#### **Public Health Emergency Preparedness**

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

- 1. Review and update the Emergency Support Function #8 (ESF-8) supporting plans that are more than five years old to ensure accuracy and reflection of lessons learned during trainings and exercises. **Due date to comply:** 12/27/2018
  - a. Create a table of contents for the ESF-8 All-Hazards Base Plan that lists all active ESF-8 supporting plans and includes the following:
    - i. Date of last update for each supporting plan.
    - ii. Date of next scheduled review and update for each supporting plan, which must be no more than five years from the last update or June 30, 2019 for those that already exceed five years.
  - b. Create a "Record of Changes" cover sheet for each ESF-8 supporting plan so that future updates can be easily identified.
  - c. Update ESF-8 base plan

### **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.

#### PROGRAM OVERVIEW AND STRENGTHS

# Administration, Civil Rights and Health Officer

Wheeler County and its subcontractors provide an array of public health services including Communicable Disease Prevention and Investigation, Environmental Health, Immunizations, Maternal and Child Health, Vital Records and Tobacco Prevention programs. The Wheeler County Court is the governing body of the Local Public Health Authority (LPHA). As a medical doctor, Dr. Robert J. Boss is both the Local Public

Health Administrator and the Health Officer. Karen Woods is the Public Health Program Coordinator.

Dr. Boss and Karen Woods are long-time public health leaders in Wheeler County who have ensured the delivery of high quality public health services. They have developed partnerships with organizations including Asher Community Health Center, which provides immunizations, maternal and child health services and school-based health services; Community Counseling Solutions, which provides school-based mental health services; and Grant County, which provides environmental health services.

#### Program strengths include:

- Wheeler County has a strong collaboration with Asher Community Health Center which provides public health, primary care and dental services to community members.
- Immunizations are provided at no cost to all students. Schools are informed of immunization services when they open in August.
- Wheeler County has a tobacco-free properties policy
- The School-Based Health Center in Mitchell provides access to health care services for students as well as other members of the community.

## **Babies First! & Perinatal**

Wheeler County has chosen to focus on child physical activity and oral health as the priorities in their new Title V Maternal and Child Health Block Grant Program plan. A partnership is in place with Asher Community Health Center for this work.

The Babies First! model in Wheeler County is to offer a "Welcome" home visit to all families with newborns. Wheeler County receives notification of births to Wheeler County residents from the state Vital Records Office. After receiving the notification, Wheeler County staff reach out to families to offer a home visit.

## Program strengths:

- Partnership with Asher Community Health
- Universal Home Visiting model
- Experienced home visitor

## **Communicable Disease**

Wheeler County did not have any communicable disease cases that required interview or investigation since the last triennial review, and there were no outbreaks reported during the review period. Case creation is timely and despite the low incidence of cases, Karen

Woods monitors electronic laboratory reporting closely and creates cases quickly when needed.

#### **Fiscal**

Wheeler County Local Public Health Administrator Dr. Robert Boss entered into a service agreement with Asher Community Health Center (ACHC) to provide some public health services to the people of Wheeler county. The services include Immunization, Family Health Services and School Based Health Center. In addition, the contractor provides supportive services such as use of some of their facilities, equipment and bookkeeping services, as well as providing fiscal and programmatic oversight of the implementation of the agreement. Karen Woods, Wheeler County Public Health Program Coordinator, coordinates Immunization, Family Health services, Communicable Disease and the Tobacco Prevention and Education Program (TPEP).

Wheeler County Public Health (WCPH) has contracted with Community Counseling Solution (CCS) to provide mental health services at the Mitchell School-Based Health Center (MSBHC).

Fiscal operations of Public Health Funds is contracted to ACHC, which also provides programmatic and fiscal oversight of the implementation of the contract. The Fiscal Officer of WCPH works part-time and is also the Chief Financial Officer of ACHC. ACHC has sound internal controls and accounting system to safeguard assets, to detect and prevent errors in a reasonably and timely manner. The operation is organized and efficient with a commitment to quality, fairness and accuracy.

# Food, Pool and Lodging Health and Safety

Wheeler County Court 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.

## **Immunizations**

Wheeler County's immunization program is operated under the supervision of Karen Woods, Wheeler County Public Health Program Coordinator. Asher Community Health

Center is contracted to provide clinical services. Karen Woods manages the public health duties such as school law and outreach. A Vaccine for Children compliance visit was conducted at the same time as this triennial review. The program had only two small findings and efforts to resolve those issues were already underway at the time of the visit.

Karen Woods is a well-known and trusted member of the community who has a strong commitment to immunization, which is helpful in supporting her efforts to promote immunization in Wheeler County.

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

Wheeler County receives \$36,000 to fund its PHEP program, 83 percent of which is dedicated to staffing, including a 0.31 FTE PHEP coordinator who effectively ensures that the program's requirements are met as best as possible.

The LPHA is an active supporter of the larger eight-county preparedness region and coordinates effectively and creatively with its limited community partners to ensure community preparedness.

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

Wheeler County Public Health contracts with Asher Community Health Center, the only health care provider in the county, to provide STD services at three sites: a primary care clinic in Fossil open five days/week; a satellite clinic in Spray open Wednesdays and Fridays; and a School-Based Health Center in Mitchell open Tuesdays and Thursdays. Wheeler County experiences minimal STD morbidity. During this abbreviated review period (10/2016 to date), there have been no syphilis cases, no gonorrhea cases since one in 2016, and two chlamydia cases in early 2018 after two years with no cases.

Despite a low STD burden, Wheeler County continues to be vigilant and committed to providing high-quality services. Due to its longtime presence in the small community, the clinic is well-known to residents and a trusted source of care and resources. The Eastern Oregon Modernization Collaborative is revitalizing STD prevention efforts across the region by facilitating relationships between counties and increasing capacity, allowing Wheeler County to more efficiently manage cases as needed with the help of a newly hired communicable disease investigator.

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

The TPEP Coordinator is well-established in the community and works to build support for tobacco prevention activities based on a strong understanding of the local political and community context.

#### <u>Tuberculosis (TB)</u>

Wheeler County is very low incidence for TB compared to other LPHAs in Oregon. Wheeler County has not had a case of TB disease or B waiver immigrant within the county during the past three years. Wheeler County has good infrastructure in place to provide clinical care to a TB case.

#### **Vital Records**

Wheeler County was the registered place of death for 12 individuals last year. The county's vital records office serves their community by offering a local office where certified copies of death records are available to order by authorized individuals. The county is limited to providing this service for the first six months after the death. Orders placed in this office are typically completed within one day.

The Wheeler County Vital Records Office consistently provides excellent customer service to their customers and partners throughout the community. The county registrar, Alicia Hankins, ensures all areas of the vital records office run smoothly and securely.

The vital records office 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. Partners within the community and local funeral homes visited during the review visit report great relationships and excellent service from this office. State staff that have contact with the county report a similar high regard for the work of this office.

## QUALITY ASSURANCE RECOMMENDATIONS

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

- 1. Continue to work with Vital Records to receive birth notifications in a timely manner. Use data to identify at-risk populations in the community.
- 2. Build relationship with WIC and Healthy Families to identify pregnant women and young families and better coordinate care for families.
- 3. Charting recommendations:
  - a. Ensure each page of documentation includes client's name and date of birth
  - b. Document the child's health care provider
  - c. Ensure all outcomes are evaluated at closing

## **Sexually Transmitted Infections (STD)**

1. Program is encouraged to implement additional strategies to publicize STD services in the community.





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Voice: 971-673-1222

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January 7, 2020

The Honorable N. Lynn Morley, Judge Wheeler County Court 401 Fourth St. P.O. Box 447 Fossil, OR 97830

Dear Judge Morley:

The triennial public health review of Wheeler County was conducted June 5 through July 24, 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: Robert L. Ordway, County Commissioner

Rick Shaffer, County Commissioner

Robert J Boss, MD, Local Public Health Administrator

Karen Woods, Public Health Program Coordinator

Brenda Snow Potter, Finance and Administration