

**AGENCY REVIEW**

**CURRY COUNTY COMMUNITY HEALTH**

**July 1 – 29, 2016  
Oregon Health Authority  
Public Health Division**

November 28, 2016

Mr. Thomas Huxley, Chair  
Curry County Board of Commissioners  
94235 Moore Street, Suite 122  
Gold Beach, OR 97444

Dear Commissioner Huxley:

The triennial onsite agency review of Curry Community Health was conducted between July 1 and 29, 2016. The Oregon Health Authority Public Health Division evaluated county 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. Program areas with compliance findings are indicated with an asterisk. Programs included in the compliance review were:

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

An summary report is enclosed which includes a list of specific compliance findings and areas of strength. We urge you to review this document as it contains important information about your public health programs and their requirements.

Our team will work closely with Curry Community Health to resolve the findings and notify you by letter upon resolution.

A full report has been sent to Ken Dukek, CEO of Curry Community Health. We think the report will be of assistance to CCH staff and their continuing efforts to provide quality public health services to your community.

Our office will contact Ken Dukek to inquire if you would like to meet with us to go over findings and answer any questions. We leave it to the local Board of Commissioners to decide if this meeting of the Local Public Health Authority (LPHA) is attended by one or more of the commissioners.

The Curry Community Health public health team is composed of committed professionals who deliver quality public health services to your community. The citizens of Curry County are fortunate to have this agency providing comprehensive public health services.

We thank you for assuring that the compliance findings are corrected and for the strong public health work you do for the community.

Sincerely,



Danna Drum  
Strategic Partnerships Lead

cc: Commissioner Susan Brown  
Commissioner David Brock Smith  
Curry Community Health CEO Ken Dukek

**CURRY COMMUNITY HEALTH (CCH) TRIENNIAL REVIEW  
November 2016**

**COMPLIANCE FINDINGS SUMMARY**

**Administration**

The LPHA is in compliance with all program requirements.

**Babies First! and Perinatal Programs**

The LPHA is in compliance with all program requirements.

**Civil Rights**

The LPHA is in compliance with all program requirements.

**Communicable Disease**

The LPHA is in compliance with all program requirements.

**Drinking Water Services**

The LPHA must complete the following to be in compliance with program requirements:

1. The LPHA must respond to emergencies.
  - a. LPHA must develop an emergency response plan that addresses public water system emergencies, including waterborne disease outbreaks, spills, operational failures and water system contamination.  
DUE DATE TO COMPLY: 11/30/2016
  - b. The emergency response plan must be reviewed and updated annually.  
DUE DATE TO COMPLY: 11/30/2016
  
2. The LPHA must conduct independent enforcement actions.
  - a. LPHA shall take independent enforcement actions against licensed facilities which are public water systems, for violations of maximum contaminant levels and monitoring and reporting requirements. See Program Element 50 3.b.ii; Foodborne Illness Prevention Program Policy 09-95.  
DUE DATE TO COMPLY: 02/28/2017
    - i. LPHA must carry out independent enforcement action where appropriate with the licensed facilities that are public water systems with microbial and M&R violations.
    - ii. Lucas Pioneer Ranch & Lodge – no coliform sample since November 2013, a PNC with a system score of 12.

- b. LPHA must report these actions and water system status to the state Drinking Water Services (DWS) program and provide documentation via contact reports to DWS outlining the independent enforcement actions carried out, and steps the systems are taking to correct violations.

DUE DATE TO COMPLY: 02/28/2017

3. The LPHA must investigate water quality alerts.

- a. The LPHA shall investigate all water quality alerts for detections of regulated contaminants. See Program Element 50 3.b.v., Monitoring Resources.

DUE DATE TO COMPLY: 02/28/2017

- i. LPHA must respond to all water quality alerts for E. coli and nitrate >10 mg/L, and any other acute MCL exceedance immediately.
- ii. LPHA must respond to all water quality alerts for coliform within the same day.
- iii. LPHA must respond to all other water quality alerts as soon as possible.
- b. The LPHA shall consult with and advise water system operators on actions to ensure that follow-up sampling is completed and that any confirmed water quality violations are resolved.

DUE DATE TO COMPLY: 02/28/2017

- i. LPHA shall immediately consult with and advise water system operators on actions to ensure follow-up sampling is conducted for E. coli, nitrate >10 mg/L and any other acute MCL exceedance.
- ii. By the end of the same day the alert is generated LPHA must consult with and advise water system operators on actions to ensure follow-up sampling is conducted for coliform alerts for coliform. See Coliform Alert Response Procedure.
- iii. As soon as possible the LPHA must consult with and advise water system operators on actions to ensure follow-up sampling is conducted for all other alerts.
- c. The LPHA shall advise water system operators on carrying out required public notices. OAR 333-061-0042.

DUE DATE TO COMPLY: 02/28/2017

- i. Immediately advise water system operators on carrying out Tier 1 public notices. See Public Notice Resources and Templates.
- ii. As soon as possible advise water system operators on carrying out Tier 2 and Tier 3 public notices. See Public Notice Resources and Templates.

4. The LPHA shall resolve priority non-compliers (PNC).
  - a. The LPHA shall provide assistance to EPA water systems that are designated PNCs (Priority Non-compliers) to resolve violations and return them to compliance. See Program Element 50 3.b.vii.  
DUE DATE TO COMPLY: 02/28/2017
  - b. The LPHA shall review system scores at least monthly for PNC systems and contact the water system operators of PNC systems to discuss unaddressed violations and ways to correct the noncompliance, including carrying out public notification as required. See Program Element 50 3.b.vii.(a) (1-2).  
DUE DATE TO COMPLY: 02/28/2017
  - c. The LPHA shall submit public notices received and contact reports on LPHA follow-up actions to DWS on a monthly basis. See Program Element 50 3.b.vii.(a)(3) and 4.c. As public notices are issued due to violations and received from water systems, LPHA shall submit to DWS compliance inbox.  
DUE DATE TO COMPLY: 02/28/2017
  - d. The LPHA shall review all persistent PNCs at five (5) months after being designated a PNC to determine if water system can be returned to compliance within eight (8) months of the PNC designation. See Program Element 50 3.b.vii (b).
  - e. LPHA shall submit a report to DWS with a compliance schedule listing corrective actions and deadlines, if the system can be returned to compliance within eight (8) months of the PNC designation; OR, if the system cannot be returned to compliance within eight (8) months of the PNC designation, LPHA shall prepare and submit to DWS a request for formal enforcement. See Program Element 50 3.b.vii.(c-d). PNC resolution process should be followed.  
DUE DATE TO COMPLY: 02/28/2017
  
5. The LPHA must track and follow up on enforcement actions.
  - a. After DWS issues an enforcement action, LPHA shall monitor the corrective action schedule and verify completion of each corrective action by the water supplier. See Program Element 50 3.b.ix  
DUE DATE TO COMPLY: 02/28/2017
  - b. LPHA shall document all contacts and verifications and submit documentation of such to the DWS, including failure by the water supplier to meet any corrective action date.  
DUE DATE TO COMPLY: 02/28/2017
  - c. Notice shall be submitted to DWS within 30 days after all corrections are completed.

DUE DATE TO COMPLY: 02/28/2017

### **Fiscal**

The LPHA must complete the following to be in compliance with all program requirements:

DUE DATE TO COMPLY: 03/28/2017

1. The LPHA is not in compliance with federal regulations consistent with 2 CFR Part 22 Appendix B No 8 which requires sub recipient to use time sheet/activity reports to allocate the payroll to various programs. CCH is allocating payroll cost to various federal programs based on the budget rates and not actual time reported by employees on the time sheet.
  - a. CCH must use time sheet/activity reports signed by employees and approved by supervisors/ managers to allocate payroll costs to various federal/state funded programs. CCH must refrain using budget labor distribution percentages to charge payroll costs to programs.
  
2. The CCH is not in compliance with federal regulations consistent with OMB A-133 Subpart C; 45 CFR 74.21 Standard for Financial Management Systems, 45CFR 92.20, which requires sub recipient to have proper system and procedures for handling cash and checks, including a written policy and procedure for handling payments received from the clients at the time of services as well as written procedures for preparation and reconciliation of cash and cash deposit.
  - a. CCH must develop an effective internal control system to handle cash and cash equivalents received at different locations consistent with its accounting policy manual. The systems/process must include among other things a daily/timely physical cash counting and verification of cash and reconciled with records in the daily transaction postings.

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

The LPHA must complete the following to be in compliance with all program requirements:

DUE DATE TO COMPLY: 12/31/2016

1. The LPHA must maintain an inspection rate of 100% for all licensed facilities. The following programs are below the compliance rate: Mobile Food Units and Swimming Pools and Spas.

2. The LPHA must document on the food service inspection report how priority and priority foundation violations have been resolved at the time of the semi-annual inspection. If the priority/priority foundation violation has not been corrected, a recheck inspection must be conducted within 14 days.

### **Health Security, Preparedness and Response**

The LPHA is in compliance with all program requirements

### **Health Officer**

The LPHA is in compliance with all program requirements

### **Immunizations**

The LPHA must complete the following to be in compliance with all program requirements:

DUE DATE TO COMPLY: 08/18/2016 **RESOLVED**

1. The LPHA must operate under current standing orders signed by their health officer.
  - a. Updated standing orders for PPV23 & PCV13 must be signed by the health officer for Curry Community Health, Dr. Jon Park.
2. LPHA must implement a process for managing their active patient population in ALERT IIS using status codes such as deceased and inactive/MOGE.
3. LPHA must implement their action plan to provide technical assistance to the local hospital to address low rates of birth dose hepatitis B vaccine administration and screening for HBsAg status.
4. LPHA must create a plan for engaging with local labs and healthcare providers to improve reporting of HBsAg-positive pregnant women.

### **Reproductive Health**

The LPHA is in compliance with all program requirements

### **Sexually Transmitted Infection**

The LPHA is in compliance with all program requirements

### **Tobacco Prevention and Education Program**



The LPHA must complete the following to be in compliance with all program requirements:

1. LPHA must assure that its local tobacco program is staffed at the appropriate level, depending on the level of funding, as specified in the award of funds for this program element.

DUE DATE TO COMPLY: 09/30/2016 **RESOLVED**

2. LPHAs that complete fewer than 75% of the planned activities in its local program plan for two consecutive calendar quarters in one state fiscal year shall not be eligible to receive funding under this program element during the next state fiscal year.

DUE DATE TO COMPLY: 06/30/2017 **RESOLVED**

### **Tuberculosis**

The LPHA is in compliance with all program requirements.

### **Vital Records**

The LPHA is in compliance with all program requirements.

## **SUMMARY OF STRENGTHS**

### **Administration**

- CEO Ken Dukek is dedicated to providing comprehensive health services to the community. Ken demonstrates exceptional organizational abilities, strong work ethics and a commitment to their department and to the community.
- Health Officer Jon Park is new to his position, but already is demonstrating a strong commitment to learning and to his community to provide comprehensive public health services.
- Curry Community Health has utilized planning processes to articulate a vision of health for their community and to engage staff and the community in taking steps to improve the community's health
- Curry Community Health often collaborates with community partners to bring comprehensive services to the entire county.

### **Communicable Disease**

The CD staff are quickly available to respond to communicable disease needs in the county. Staff went above and beyond on a recent suspected Legionella case. They are

always a pleasure to work with and respond quickly when necessary. Their response to a cat positive for rabies in a rural area is a good example. In addition, staff appropriately ask for assistance as needed and inform the state program when they are going to be out of the office.

### **Drinking Water Services**

The drinking water program staff are committed to promoting public health and taking actions to protect the public's health. Staff maintain professional working relationships with the 51 water systems they oversee. Staff attend all state Drinking Water Services sponsored trainings.

### **Public Health Emergency Preparedness**

The Curry Community Health Public Health Preparedness Coordinator is managed by the public health administrator which allows the coordinator to have greater access to public health program managers for integration of preparedness across public health programs and assessment, review and implementation of preparedness practices and procedures. Curry Community Health has built a medical reserve corp of a good size and composition in just a couple of years. They have updated plans and procedures and have completed several basic safety drills. The preparedness program has become well-established as a resource for Curry County residents.

### **Food, Pool and Lodging**

Curry County inspection staff has been through a transition over the past few years. Long-time employees have retired and a new environmental health specialist is on staff. The lower inspection rates in some programs reflect this transition and current staff are working to improve these numbers. Staff is also committed to obtaining standardization in the near future.

### **Fiscal**

Curry Community Health has sufficient internal controls to adequately safeguard assets and detect and prevent errors in a timely manner. The operation is well-organized, monitored and efficient with a commitment to quality, fairness and accuracy. Curry Community Health has a new Finance Director. Her priorities include revitalizing financial management systems and resolving accounting problems and internal controls issues experienced in the past.

### **Immunizations**

Curry Community Health staff demonstrate an unwavering commitment to the health of their community. Susan Flemming is a strong advocate for immunizations in Curry