

**AGENCY REVIEW**

**CLACKAMAS COUNTY**

**PUBLIC HEALTH DIVISION**

**January 6-31, 2014**

**Prepared by**

**Oregon Health Authority**

**Public Health Division**

**Tom Engle, RN**

**Public Health Nursing Consultant**

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIME  
LINE FOR  
CHANGE**

**OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR**

**COMMUNITY LIAISON**

**ADMINISTRATION**

1. Provide

- a. Copy of public health fee schedule
- b. Documentation that the public health fees are set by the Board of County Commissioners
- c. Documentation that the fees are set based on cost of service.

5/1/2014

2. Assure policies, procedures, and standing orders are in place and signed by the Health Officer for drug dispensing, storage, security, and accountability.

5/1/2014

3. Implement separate drug dispensing records.

4/1/2014

4. Assure that all policies, procedures, protocols, and standing orders that guide or direct nurse patient practice are signed by a current physician.

4/1/2014

**For more detailed information, please see the completed review tool in section 2.**

**REVIEWER: Tom Engle**

**RESPONDENT: Dana Lord**

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION**

**PERINATAL & BABIES FIRST!**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tools in sections 3 and 12.**

**REVIEWER:** Fran Goodrich

**RESPONDENTS:** Cathy Perry, and  
MCH Staff

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR**

**COMMUNITY LIAISON**

**CIVIL RIGHTS**

The LPHA must assure civil rights compliance responsibilities are met.

- Provide documentation that the Civil Rights Self Assessment has been reviewed by the LPHA.
- Provide documentation that there is a plan to improve any deficient areas identified by the Civil Rights Self Assessment.

4/1/2014

**For more detailed information, please see the completed program review tool in section 4.**

**REVIEWER:** Tom Engle

**RESPONDENT:** Dana Lord

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PUBLIC HEALTH PRACTICE**

**ACUTE AND COMMUNICABLE DISEASE PROGRAM**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 5.**

**REVIEWER:** June Bancroft

**RESPONDENT:** Cathy Perry

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIME  
LINE FOR  
CHANGE**

**CENTER FOR HEALTH PROTECTION**

**DRINKING WATER**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 6.**

**REVIEWER:** Tony Fields

**RESPONDENT:** Julie Black

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

<b>COMPLIANCE FINDINGS</b>	<b>TIMELINE FOR CHANGE</b>
<p><b>OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR</b></p> <p><b>FISCAL</b></p> <p>The LPHA must maintain internal controls consistent with OMB A-133 §_300.</p> <p>This includes at a minimum:</p> <ul style="list-style-type: none"> <li>• Supervisor must review, sign and date Unit Batch Summary reconciliation before depositing to bank.</li> <li>• Write off policy provided. Administrator must review and sign before finance manager writes off uncollectible accounts.</li> </ul> <p>The LPHA must base Family Planning/Title X charges on a schedule of discounts (SOD) consistent with Guidelines: 42 CFR 59.5_Section 6.</p> <p>This includes at a minimum:</p> <ul style="list-style-type: none"> <li>• Submit cost analysis study as reasonable basis for charging fees to clients. <i>Repeat finding from 2008 and 2011.</i></li> </ul> <p><b>For more detailed information, please see the completed program review tool in section <u>7</u>.</b></p>	<p>04/30/2014</p> <p>04/30/2014</p> <p>04/30/2014</p>
<b>REVIEWER:</b> Marivic Tupaz	<b>RESPONDENT:</b> Sherry Whitehead

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR HEALTH PROTECTION**

**FOOD, POOL, AND LODGING HEALTH & SAFETY**

The LPHA must clearly state on the food inspection report if a Priority(P)/Priority Foundation(Pf) violation has been resolved at the time of the semi-annual inspection and document specifically how the P/Pf violation was corrected. [OAR 333-012-0055\(3\)\(d\)\(A-D\)](#)

4/30/14

The LPHA must conduct a recheck inspection within 14 days for Priority/Priority Foundation violations that were not corrected during the inspection. [OAR 333-012-0055\(3\)\(e\)](#)

4/30/14

**For more detailed information, please see the completed program review tool in section 8.**

**REVIEWERS:** Dave Martin and Cindy Robinson

**RESPONDENT:** Julie Hamilton

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIME  
LINE FOR  
CHANGE**

**CENTER FOR PUBLIC HEALTH PRACTICE**

**HIV PREVENTION PROGRAM**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 10.**

**REVIEWER: Larry Hill**

**RESPONDENTS: Cathy Perry, Philip Mason, Paul Lewis, Ami Fladoos**

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**1.6.14**

**IMMUNIZATION PROGRAM**

95% of all state-supplied vaccines are coded correctly per age-eligibility guidelines.

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LPHA will manage its state-supplied and private vaccine inventory to avoid borrowing from either stock unnecessarily. Clackamas County has experienced difficulty assuring a supply of flu vaccine for privately insured children, resulting in the need to borrow from state-supplied stock.

LPHA must use thermometers that are certified according to NIST or ASTM standards, and continuous-recording.

LPHA will assure that "DO NOT DISCONNECT" signs are posted on the circuit breaker that corresponds to your vaccine refrigerator/freezer.

LPHA will document on the patient's vaccine administration record the following: name of vaccine and date given, date VIS was given and publication date, name of vaccine manufacturer, lot number, signature and title of person who gave the vaccine, clinic address. This is a requirement of Statute 42 U.S. Code 300aa-25.

LPHA will assure 95% of all state-supplied vaccine coded correctly per age-eligibility guidelines.

Follow up visit scheduled for March 13<sup>th</sup>; Corrective action plan due April 14<sup>th</sup>.

Corrective Action Plan (for 2014-15 Influenza Season) due 5/1/14.

Provide evidence of calibration of temperature monitoring equipment at Canby SBHC by 5/1/14.

Provide evidence of sticker-placement at circuit breaker at Canby SBHC by 5/1/14.

Compliance was unable to be determined at site visit; follow up visit scheduled for 3/13/14.

Compliance was unable to be determined at site visit; follow up visit scheduled for 3/13/14.

No Billable doses coded at Oregon City SBHC, Canby SBHC, Gladstone Health &

<p>LPHA will assure Monthly Vaccine Reports are submitted to OIP.</p> <p>School law data entry will be completed 23 days after the third Wednesday in February.</p> <p>LPHA shall follow state retention policies. Currently Clackamas County retention schedule differs from state schedule with regard to Vaccine Administration Record.</p>	<p>Wellness.</p> <p>Corrective Action Plan due by 5/1/14.</p> <p>Corrective Action Plan due by 5/1/14.</p> <p>Corrective Action Plan due by 5/1/14.</p>
<p><b>REVIEWERS:</b> Mimi Luther, Kathy Scott, Susan Weiner</p>	<p><b>RESPONDENTS:</b> Dana Lord, Erica Gillespe, Apryl Herron, Carloee Asher</p>

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION**

**REPRODUCTIVE HEALTH PROGRAM**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 13.**

**REVIEWER:** Connie Clark

**RESPONDENT:** Mary Horman

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIME  
LINE FOR  
CHANGE**

**CENTER FOR PUBLIC HEALTH PRACTICE**

**SEXUALLY TRANSMITTED INFECTIONS**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 14.**

**REVIEWER: Larry Hill**

**RESPONDENT: Cathy Perry, Philip Mason, Paul Lewis, Ami Fladoos**

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION**

**TOBACCO PREVENTION AND EDUCATION PROGRAM**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 15.**

**REVIEWER:** Sabrina Freewynn

**RESPONDENTS:** Scott France, Jamie Zetner, Kirsten Ingersoll, Dana Lord, Larry MacDaniels

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PUBLIC HEALTH PRACTICE**

**TUBERCULOSIS**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 16.**

**REVIEWER:** Heidi Behm

**RESPONDENT:** Cathy Perry, Paul Lewis, Ami Fladoos, Jan Rodriguez

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PUBLIC HEALTH PRACTICE**

**VITAL RECORDS**

The LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 17.**

**REVIEWER:** Judy A. Shiochi  
Vital Records Field Liaison

**RESPONDENT:** Sherry Whitehead,  
Registrar

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS – 2014**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION**

**SPECIAL SUPPLEMENTAL NUTRITION PROGRAM FOR  
WOMEN, INFANTS AND CHILDREN (WIC)**

- Assure that processing standards are met or temporary extensions are approved by the state WIC program (Policy 605). *This is a repeat finding from 2012*
- Assure that if a participant does not attend scheduled second nutrition education, that vouchers are printed according to local procedure (Policy 835).
- Assure that a monthly physical inventory is performed with the actual voucher stock on hand (Policy 500).

March 1, 2014

March 1, 2014

March 1, 2014

**For more detailed information, please see the completed program review tool in section 18.**

**REVIEWER:** Beth Lanham

**RESPONDENTS:** Julie Aalbers and  
Heidi Bates

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS – 2014**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION**

**WIC BREASTFEEDING PEER COUNSELING (BFPC)  
PROGRAM**

- LPHA is in compliance with all program requirements.

**For more detailed information, please see the completed program review tool in section 18.**

**REVIEWER:** Kelly Sibley

**RESPONDENTS:** Julie Aalbers and  
Heidi Bates

**CLACKAMAS COUNTY PUBLIC HEALTH DIVISION**

**COMPLIANCE FINDINGS – 2014**

**TIMELINE  
FOR  
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION**

**WIC FARM DIRECT NUTRITION PROGRAM (FDNP)**

- Assure that the FDNP check register is filled out correctly (including issue date and participant ID) (Policy 1100).

March 1, 2014

**For more detailed information, please see the completed program review tool in section 18.**

**REVIEWERS:**

Maria Menor and Beth Lanham

**RESPONDENTS:**

Julie Aalbers and Heidi Bates

PUBLIC HEALTH DIVISION  
Office of the State Public Health Director, Community Liaison  
John A. Kitzhaber, MD, Governor



800 NE Oregon Street, Suite 930  
Portland, OR 97232  
(971) 673-1222 Voice  
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March 31, 2014

The Honorable John Ludlow, Chair  
Clackamas County Board of Commissioners  
2051 Kaen Road  
Oregon City, OR 97045

Dear Commissioner Ludlow:

The triennial onsite agency review of Clackamas County Public Health Division was conducted between January 6 and 31, 2014. 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 approximately 1,105 separate items in 17 program areas. While there are some areas that need attention, keep in mind the vast majority of findings were positive.

A full report, including the specific timelines for correction, has been sent to Dana Lord, Public Health Administrator. Staff in the Office of Community Liaison will work with her to document resolution of the findings.

We think the report will also be of assistance to your public health staff in their continuing efforts to provide quality public health services to your community. Please send a written response within ten days affirming that you will meet the timelines for correcting the compliance findings. Once all the required elements are successfully completed, we will write you a letter to confirm that and close the file for this review.

Our office will contact Dana and your office to arrange an exit interview to go over the findings and answer any questions. We leave it to the local Board to decide if this meeting of the Local Public Health Authority (LPHA) and the Health Administrator is attended by one or more of the commissioners.

### **Programs included in the compliance review**

Administration	Immunizations
Babies First!	Perinatal
Civil Rights	Reproductive Health
Communicable Disease	Sexually Transmitted Infections
Drinking Water	Tobacco Prevention & Education
Fiscal	Tuberculosis
Food, Pool & Lodging	Vital Records
Health and Safety	WIC, WIC Breastfeeding Peer
Health Officer	Counseling, WIC Farm Direct
HIV Prevention	Nutrition Program

### **Commendations**

Several program reviewers submitted commendations to Community Liaison as listed below.

A wonderful example of community collaborative work related to Healthcare Transformation is the MCH services being the recent recipient of two new “expansion of service” opportunities, both with fiscal support from local CCO organizations. Both projects will begin in early 2014 “Bringing Health Home” is a collaborative effort with the Clackamas Housing Authority with support from Health Share CCO. This project will examine the issue of access to care along with the frequency of ED use among its members that reside at four residential housing units in Clackamas County. PHN, Concetta Branson, will spend time (10 hours/wk. total) at the four locations providing wellness advocacy for the residents.

Another project is the “Asthma Healthy Homes” program implementation, (a shared partnership with Washington and Multnomah counties). This effort is receiving support from CCO Family Care. PHN, Mary Horman, will provide nursing support for this program.

### **Strengths:**

- Excellent continuum of MCH services that includes Oregon MothersCare, Maternity Case Management, Babies First! and CaCoon programming.
- MCH staff has a combined long work history with programs and thus exhibit an expertise level of home visiting nursing practice.

- High functioning OMC program with great skill demonstrated by OMC Coordinator, Elsi Elkins and staff members, including Cover Oregon staff worker, Julie Hertel.
- National Accreditation process is moving forward with onsite national review expected in 6 months.
- Collaboration with County FQHC supports MCH Home Visiting program services to prenatal clients.
- Community Health Worker, Elizabeth Baca provides excellent support and expertise to the MCH Home Visiting programs in her current role. She also provides interpretive support for Spanish speaking clients along with PHN, Concetta Branson.

The LPHA's drinking water program continues to be a solid performer among the 28 LPHAs with drinking water agreements. Clackamas County has completed all of their assigned water system surveys for the last three years, and seven of the community water systems surveyed had no deficiencies and were designated as an "outstanding performer". This designation qualifies this system to be surveyed every five years rather than every three because of the proficiency of their utilities and operations. The high standards demonstrated by several of the water systems in LPHA's jurisdiction is a direct reflection on the drinking water staff's good working relationships with operators, technical skills, and dedication to supporting and encouraging operators to achieve excellence.

Clackamas County Tobacco Prevention and Education Program (TPEP) has consistently promoted policy change for tobacco-free environments in a variety of settings, including county properties, parks, community colleges, and health clinics.

TPEP benefits greatly from the strong knowledge base and the many years of tobacco control field experience of their staff. TPEP staff demonstrates commitment to furthering social norm changes around tobacco use.

TPEP has done excellent work promoting strategies and resources addressing tobacco-related diseases and supporting prevention and self-management of chronic conditions through collaboration with other departments within the county.

Clackamas County is doing an excellent job of providing Environmental Health services to the community. The overall inspection rate for licensed facilities is excellent with all program areas in compliance.

During the field review, staff met all of the required elements of a thorough inspection. Staff exhibited good communication skills with operators and employees of the food service facilities during the field review. Staff is focusing on critical risk factors that are most associated with foodborne illness.

## **Compliance Findings Summary**

### **Administration**

1. Provide:
  - a. Copy of public health fee schedule,
  - b. Documentation that the public health fees are set by the Board of County Commissioners. And
  - c. Documentation that the fees are set based on cost of service.
2. Assure policies, procedures, and standing orders are in place and signed by the Health Officer for drug dispensing, storage, security, and accountability.
3. Implement separate drug dispensing records.
4. Assure that all policies, procedures, protocols and standing orders that guide or direct nurse patient practice are signed by a current physician.

### **Babies First!**

The LPHA is in compliance with all program requirements.

### **Civil Rights**

The LPHA must assure civil rights compliance responsibilities are met.

- Provide documentation that the Civil Rights Self Assessment (CRSA) has been reviewed by the LPHA.
- Provide documentation that there is a plan to improve deficient areas identified by the CRSA.

### **Communicable Disease**

The LPHA is in compliance with all program requirements.

### **Drinking Water**

The LPHA is in compliance with all program requirements.

### **Fiscal**

The LPHA must maintain internal controls consistent with OMB A-133 §\_300. This includes at a minimum:

- Supervisor must review, sign and date Unit Branch Summary reconciliation before depositing to bank.
- Write off policy provided. Administrator must review and sign before finance manager writes off uncollectible accounts.

The LPHA must base Family Planning/Title X charges on a schedule of discounts consistent with Guidelines: 42 CFR 59.5 Section 6. This includes at a minimum:

- Submit cost analysis study as reasonable basis for charging fees to clients. *Repeat finding from 2008 and 2011.*

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

The LPHA must clearly state on the food inspection report if a Priority(P)/Priority Foundation (Pf) violation has been resolved at the time of the semi-annual inspection and document specifically how the P/Pf violation was corrected. OAR 333-012-0055(3)(d)(A-D)

The LPHA must conduct a recheck inspection within 14 days for Priority/Priority Foundation violations that were not corrected during the inspection. OAR 333-012-0055(3)(e)

### **HIV Prevention**

The LPHA is in compliance with all program requirements.

### **Immunizations**

- 95% of all state-supplied vaccines are coded correctly per age-eligibility guidelines
- LPHA will manage its state-supplied and private vaccine inventory to avoid borrowing from either stock unnecessarily. Clackamas County has experienced difficulty assuring supply of flu vaccine for privately insured children, resulting in the need to borrow from state-supplied stock.
- LPHA must use thermometers that are certified according to NIST or ASTM standards and are continuous-recording.
- LPHA will assure that “DO NOT DISCONNECT” signs are posted on the circuit breaker that corresponds to vaccine refrigerator/freezer.
- LPHA will document on the patient’s vaccine administration record the following:
  - Name of vaccine and date given,
  - Date VIS was given and publication date,
  - Name of vaccine manufacturer,
  - Lot number,

- Signature and title of person who gave the vaccine, and
- Clinic address.

This is a requirement of Statute 42 U.S. Code 300aa-25.

- LPHA will assure Monthly Vaccine Reports are submitted to OIP.
- School law data entry will be completed 23 days after the third Wednesday in February.
- LPHA shall follow state retention policies. Currently, Clackamas County retention schedule differs from state schedule with regard to Vaccine Administration Record.

### **Perinatal**

The LPHA is in compliance with all program requirements.

### **Reproductive Health**

The LPHA is in compliance with all program requirements.

### **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**

The LPHA is in compliance with all program requirements.

### **Vital Records**

The LPHA is in compliance with all program requirements.

### **WIC**

- Assure that processing standards are met or temporary extensions are approved by the state WIC program. (Policy 605) *This is a repeat finding from 2012.*
- Assure that if a participant does not attend scheduled second nutrition education, that vouchers are printed according to local procedure. (Policy 835)
- Assure that a monthly physical inventory is performed with the actual voucher stock on hand. (Policy 500)

### **WIC Breastfeeding Peer Counseling**

The LPHA is in compliance with all program requirements.

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

Assure that the FDNP check register is filled out correctly (including issue date and participant ID). (Policy 1100)

**Other**

**Fiscal**

Clackamas County Health, Housing and Human Services received federal funds for several programs totaling \$1,726,544, including \$1,017,400 for the WIC Program for fiscal year 2013. The State General and Other Funds were a source of \$1,050,565 for that period as well. It appears that the county public health division has sufficient internal controls to adequately safeguard assets and to detect and prevent errors in a timely manner. The review indicated a well-run fiscal operation with satisfactory accounting controls, purchasing procedures and attention to detail. The operation is well organized and efficient with a commitment to quality, fairness, and accuracy.

**Health Officer**

The Health Officer is Paul Lewis, MD.

**Laboratory**

The Clackamas laboratory was not reviewed. We recommend the county contact the Oregon State Public Health Laboratory for a consultation visit.

**Summary**

Overall, agency reviewers believe Clackamas County Public Health Division is composed of a committed team of health care professionals who deliver quality public health services to the community. We thank you for both your attention to correcting these few compliance findings and for the strong public health work you do for the community.

Sincerely,



Jan Kaplan, MSW, Manager  
Community Liaison

cc: Cindy Becker, DHHHS Director  
Jim Bernard, Clackamas County Commissioner  
Dana Lord, Public Health Administrator  
Paul Savas, Clackamas County Commissioner  
Martha Schrader, Clackamas County Commissioner  
Tootie Smith, Clackamas County Commissioner