

AGENCY REVIEW

HARNEY COUNTY HEALTH DEPARTMENT

August 1 – November 4, 2014

**Prepared by
Oregon Health Authority
Public Health Division**

**Monica Darco, RN
Public Health Nursing Consultant**

HARNEY COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR	
COMMUNITY LIAISON	
ADMINISTRATION	
The LPHA must assure that there is a licensed professional nurse who directs nursing practice.	11/2014 Resolved 9/2014
The LPHA must have a written policy on clients accessing their own records. ORS 192.553 (b)	11/2014
The LPHA must have a written policy on release of records in the case of subpoenas. 45 CFR part 164.512 (e)(ii)	11/2014
For more detailed information, please see the completed program review tool in section 2.	
REVIEWER: Monica Darco	RESPONDENT: Steven Grasty

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

BABIES FIRST!

The LPHA is in non-compliance with one program requirement.

Babies First! – Item 19 on the Babies First! Review Tool states:
“All TCM case managers utilize the most current version of the
TCM Assessment and Plan Form and TCM Visit Form documents
provided by the Center for Prevention and Health Promotion.”
OAR 410-138-0060 (11) (c)
Client record review noted that the current TCM forms (11/11)
were not used.

Resolved
9/2014

**For more detailed information, please see the completed
program review tool in section 3.**

REVIEWER: Francine Goodrich

RESPONDENT: Amy Paul and Steve
Grasty

HARNEY COUNTY HEALTH DEPARTMENT

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.

90 Days

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

REVIEWERS: Jan Kaplan

RESPONDENT: Steven Grasty

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

ACUTE AND COMMUNICABLE DISEASE PROGRAM

The LPHA is out of compliance for BBP/exposure plan. The last time the plan was reviewed and updated was July 2011. This should be updated yearly.

9/6/2014
Resolved
10/2014

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

REVIEWER: Theresa Watts

RESPONDENT: Marilyn Scheen,
Charlie Ewing

HARNEY COUNTY HEALTH DEPARTMENT

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: Tia Skerbeck

RESPONDENT: John Combs

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR

FISCAL

Travel: 2 CFR Part 225 Appendix B No 43 *Travel Costs*; CFR 74.21 *Standard for Financial Management Systems*

1. Need to update the travel policy. Have a document from the County Courthouse they are to be following but it 1) isn't signed, 2) they are not using the Travel Expense Voucher as stated in the document.
2. Use the proper forms as outlined in the policy
3. Standard Per Diem rates – no procedure for handling exceptions, need to update federal in-state rates.

December 15, 2014

December 15, 2014

December 15, 2014

Purchasing, Equipment and Inventory OMB A133 Subpart C; 2CFR Part 225, Appendix B; LPHA's Notice of Grant Award including: 1) *Separation of duties*, 2) *Authorization and approval*, 3) *Custodial and security arrangements*.

1. The Purchasing Procedure was not approved, signed off nor had an effective date.
2. The current procedure does not address separation of duties. Currently there is not a separation of duties between ordering and receipt of materials, goods or medical supplies.
3. The current procedure does not address packing slips. Packing slips need to be attached to invoices and need to be signed by another person than the person ordering them.
4. The procedure does not address 45 CFR 74.43 *Open and Free Competition*.
5. Approvals for payment are not consistently obtained before payment.
6. The Purchasing procedure needs to be updated and address the items listed above.

December 15, 2014

December 1, 2014

Medications and supplies:

1. Medications need to be logged in and inventoried with

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>another staff member.</p>	<p>December 15, 2014</p>
<p>Accounting System OMB A-133 subpart C; CFR 74.21; 45.CFR 02.20, Accepted Internal Control Procedures</p> <ol style="list-style-type: none"> 1. There is not a policy or a procedure for accounting controls. Create a policy for Accounting Controls – use the sample sent. 	<p>December 15, 2014</p>
<p>Cash Management: OMB A-133 Subpart C; 45 CFR 74.21; 45 CFR 92.20, Title X Family Planning Guidelines, separation of duties</p> <ol style="list-style-type: none"> 1. There is a procedure, it needs to be modified to include endorsing a check as soon as it is received. 	<p>December 15, 2014</p>
<ol style="list-style-type: none"> 2. Bills and Receivables: Need a policy for write-offs and a procedure for uncollectible accounts. 	<p>December 15, 2014</p>
<p>PH Services and Fees and Title X – Family Planning Charges: Title X Guidelines section 6.3, Title X Program Guides, 45 CFR59.5 (a)(6-8), OPA 08-01 Verification of income, OPA97-1, ORS 432.425 (3).</p> <ol style="list-style-type: none"> 1. The Cost Analysis of services has not been completed. Complete the Cost Analysis of Services 	<p>December 15, 2014</p>
<p>The majority of compliance findings were a lack of policies and procedures. The staff were very willing to address these issues and want to bring them into compliance.</p>	
<p>For more detailed information, please see the completed program review tool in section 7.</p>	
<p>REVIEWER: Carole Yann and Jayne Bailey</p>	<p>RESPONDENTS Steve Grasty, Brandi Dahl, Charlie Ewing</p>

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS for WIC	TIMELINE FOR CHANGE
OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR	
FISCAL	
<p>Travel: 2 CFR Part 225 Appendix B No 43 <i>Travel Costs</i>; CFR 74.21 <i>Standard for Financial Management Systems</i></p> <ol style="list-style-type: none"> 1. Need to update the travel policy. Have a document from the County Courthouse they are to be following but it 1) isn't signed, 2) they are not using the Travel Expense Voucher as stated in the document. 2. Use the proper forms as outlined in the policy 3. Standard Per Diem rates – no procedure for handling exceptions, need to update federal in-state rates. 	<p>December 15, 2014</p> <p>December 15, 2014</p> <p>December 15, 2014</p>
<p>Purchasing, Equipment and Inventory OMB A133 Subpart C; 2CFR Part 225, Appendix B; LPHA's Notice of Grant Award including: 1) <i>Separation of duties</i>, 2) <i>Authorization and approval</i>, 3) <i>Custodial and security arrangements</i>.</p> <ol style="list-style-type: none"> 1. The Purchasing Procedure was not approved, signed off nor had an effective date. 2. The current procedure does not address separation of duties. Currently there is not a separation of duties between ordering and receipt of materials, goods or medical supplies. 3. The current procedure does not address packing slips. Packing slips need to be attached to invoices and need to be signed by another person than the person ordering them. 4. Approvals for payment are not consistently obtained before payment. 5. The Purchasing procedure needs to be updated and address the items listed above. 	<p>December 15, 2014</p>
<p>Accounting System OMB A-133 subpart C; CFR 74.21; 45.CFR 02.20, Accepted Internal Control Procedures</p> <ol style="list-style-type: none"> 1. There is not a policy or a procedure for accounting controls. 	<p>December 15, 2014</p>

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS for WIC

**TIMELINE
FOR
CHANGE**

Create a policy for Accounting Controls – use the sample sent.

The majority of compliance findings were a lack of policies and procedures. The staff is very willing to address these issues and want to bring them into compliance.

For more detailed information, please see the completed program review tool in section 7.

REVIEWER: Carole Yann and Jayne Bailey

RESPONDENTS Steve Grasty, Brandi Dahl, Charlie Ewing

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR HEALTH PROTECTION

FOOD, POOL, AND LODGING HEALTH & SAFETY

The LPHA is in compliance with all program requirements.

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

REVIEWERS: Eric Pippert

RESPONDENT: John Combs

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

IMMUNIZATIONS

The LPHA must operate under current, signed Model Standing Orders. The standing order for Inactivated Influenza Vaccine is out of date and must be updated.

Complete.
Corrected
during onsite
visit 8/11/14.

The LPHA must resolve all compliance issues identified during the VFC site visit. During the site visit, the Vaccine Information Statements in Spanish for rotavirus and HPV4 were identified as out-of-date.

Complete.
Corrected
during onsite
visit 8/11/14.

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

REVIEWER: Amanda Timmons and
Jody Anderson

RESPONDENT: Marilyn Scheen

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR

COMMUNITY LIAISON

LABORATORY

The LPHA must comply with 42 CFR part 493 the Clinical Laboratory Improvement Amendments (CLIA). Consult with Laboratory Liaison to bring manual into compliance. Assure that:

1. Annual personnel competency testing is documented for all individuals performing laboratory tests, including physicians and mid-level practitioners. [42CFR493.1235](#)
2. Protocols for equipment monitoring and calibration are in laboratory manual, and written records of these procedures are available. [42CFR493.1254](#), [42CFR493.1255](#)

11/2014

11/2014

For more detailed information, please see the completed program review tool in section 11.

REVIEWER: Monica Darco

RESPONDENT: Steven Grasty

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

PERINATAL

The LPHA is in compliance with all program requirements.

For more detailed information, please see the completed program review tool in section 12 .

REVIEWER: Francine Goodrich

RESPONDENT: Amy Paul, Steve Grasty

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

**CENTER FOR PREVENTION AND HEALTH PROMOTION
REPRODUCTIVE HEALTH**

- Sub-recipient must cite National Standards in protocols for contraceptive methods, elevated blood pressure, clinical breast exam, mammography, male services, Pap testing and management, and STI treatment
- Sub-recipients are obligated to establish and maintain personnel policies that comply with applicable federal and state requirements, including Title VI of the Civil rights Act, Section 504 of the Rehabilitation Act of 1973, Title I of the Americans with Disabilities Act, and the annual appropriations language
- Sub-recipient must have written policies that are consistent with the HHS Office for Civil Rights policy document, *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*
- Sub-recipients are required to establish policies to prevent employees, consultants, or members of governing bodies from using their positions for purposes that are, or give the appearance of being, motivated by a desire for private financial gain for themselves or others
- Sub-recipients must provide evaluation of contractor performance and document that contractors have met the terms, conditions and specifications of the contract.

11/1/14
Resolved
11/10/14

12/1/14

12/1/14

12/1/14

12/1/14

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

REVIEWER: Connie Clark

RESPONDENT: Marilyn Scheen

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
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: Marilyn Scheen,
Charlie Ewing

HARNEY COUNTY HEALTH DEPARTMENT

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

RESPONDENT: Steve Grasty

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

TUBERCULOSIS

The LPHA is out of compliance with the following program requirements:

1. TB Exposure & Control Plan is in place and updated.

Plan is in place but is missing section on employee screening and assessment. LPHA will submit missing section.

2. Standing Orders for TB are written, in place and updated as needed.

Some standing orders are in place, but others are missing. LPHA will submit missing standing orders.

10/18/2014
Resolved
9/14

10/18/2014
Resolved
9/14

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

REVIEWER: Lindsey Lane

RESPONDENT: Steve Grasty,
Marilynn Scheen, Amy Paul

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

CENTER FOR HEALTH STATISTICS

VITAL RECORDS MANAGEMENT

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. Shioishi

RESPONDENT: Steven Grasty,
Brandi Dahl, Kriss Renfro

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS – 2014

TIMELINE FOR CHANGE

CENTER FOR PREVENTION AND HEALTH PROMOTION

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

- | | |
|--|------------------------|
| <ul style="list-style-type: none"> ● Assure outreach activities are completed and documented at least annually via the media to inform potential participants, particularly minorities, of the availability of the WIC program. (Policy 452 and 470) <i>This is a repeat finding from 2012.</i> | <p>October 3, 2014</p> |
| <ul style="list-style-type: none"> ● Develop a local procedure on implementing voter registration. (Policy 420 and 480) <i>This is a repeat finding from 2012.</i> | <p>October 3, 2014</p> |
| <ul style="list-style-type: none"> ● Assure staff who provide WIC services complete all required training modules and completed modules are documented in TWIST. (Policy 440) <i>This is a repeat finding from 2012.</i> | <p>October 3, 2014</p> |
| <ul style="list-style-type: none"> ● Assure there is documentation on file demonstrating that the LA has conducted a self-evaluation of their program operations, including those of associated clinics, at a minimum of every other year. (Policy 215) <i>This is a repeat finding from 2006, 2008, 2010 and 2012.</i> | <p>October 3, 2014</p> |
| <ul style="list-style-type: none"> ● Assure processing standards met, or temporary extensions approved by the state WIC program. (Policy 605) <i>This is a repeat finding from 2012.</i> | <p>October 3, 2014</p> |
| <ul style="list-style-type: none"> ● Physical Assessment: Assure anthropometric measurements are taken and documented correctly. (Policy 625 and 628) <i>This is a repeat finding from 2012.</i> | <p>October 3, 2014</p> |
| <ul style="list-style-type: none"> ● Assure ineligibility or graduation letters are issued within required timeframes. (Policy 636) <i>This is a repeat finding from 2012.</i> | <p>October 3, 2014</p> |

HARNEY COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS – 2014

TIMELINE FOR CHANGE

- Assure a connection is made between the participant’s program eligibility and desired health outcome. (Policy 820) *This is a repeat finding from 2008, 2010 and 2012.* October 3, 2014

- Infants must receive a mid-cert health assessment, including completion of the diet questionnaire. (Policy 646) October 3, 2014

- Assure participants and caregivers, who are eligible to vote, are given an opportunity to register to vote at both certification and recertification and a monthly report is sent to the Elections Division. October 3, 2014

- Assure nutritionally high risk WIC participants are referred to the R.D. according to local agency protocol. (Policy 661) October 3, 2014

- Assure a monthly voucher inventory and a quarterly voucher security and audit trails are completed. (Policy 500) October 3, 2014

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

REVIEWER: Mary Rhode

RESPONDENT: Amy Paul

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
(971) 673-1299 FAX

December 1, 2014

The Honorable Steven Grasty, Judge
Harney County Court
Courthouse
450 N Buena Vista
Burns, OR 97720

Dear Judge Grasty:

The triennial onsite agency review of Harney County Health Department was conducted between August 1 and November 4, 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 788 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 you, and staff in the Community Liaison Office will work with you 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 you to arrange an exit interview to go over the findings and answer any questions. We leave it to you to decide if this meeting is attended by public health staff and one or more of the commissioners.

Programs included in the compliance review

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

Commendations

Several program reviewers submitted commendations to Community Liaison as follow:

Immunizations

Overall, it is clear that Harney County Health Department works hard to meet the immunization compliance standards. During the compliance visit, we discussed the rationale for using status codes in ALERT IIS for managing patient population and provided hands-on training on using and changing patient status codes. Harney County Health Department met all compliance issues except having up-to-date standing orders. During the visit, the current inactivated influenza vaccine standing order was not filed with the other orders. The current, signed order was found and filed before the end of the site visit.

As part of the immunization review, we complete a site visit in accordance with CDC requirements for Vaccine for Children (VFC) providers. Documents included in the review are the VFC Provider Follow-up Plan and the Reviewer Follow-up Action Plan. On the reviewer, plan there is information about requirements 3.6 and 3.7, availability of vaccine information statements (VIS). Typically, health departments keep English and Spanish versions on hand. The Spanish version of rotavirus and HPV4 were out of date, but updated versions were downloaded and printed during the on-site visit.

Babies First! and Perinatal (MCH)

Harney County Health Department appears to be an agency well-connected with community partner agencies and residents across the county. Staff members are cross-trained to work in multiple programs, an efficient effort to provide the best service with limited resources. At the time of the triennial review, MCH Coordinator, Barbara Rothgeb, was out on leave. MCH nurse, Amy Paul, was the primary respondent. She is

an experienced nurse with OB background. Amy also coordinates WIC and is pending her certified lactation consultant board exam results.

Tobacco Prevention and Education Program (TPEP)

Harney County Tobacco Prevention and Education Program has promoted policy change for tobacco-free environments in a variety of setting, including county properties, the hospital, fairgrounds, and state properties.

TPEP benefits greatly from the knowledge base of their tobacco control field 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 within the County Health Department and health care institutions.

TPEP successfully recruited key stakeholders within a tight time-frame to participate in a Community Readiness Assessment Pilot, an evaluation developed by the state Tobacco Prevention and Education Program.

Drinking Water

The program handled all of its required 2011, 2012 and 2013 water survey work, completing 100% of its surveys before the December 31 deadline in all three years. The program has been consistent and timely in responding to water quality alerts over the past three years with typical response times within three days of notification of the alerts. Several water system files were reviewed and good documentation of work performed was present.

Harney County's Drinking Water Program is in the hands of very competent and professional environmental health specialists. It is well organized and operated and works cooperatively with state Drinking Water Program staff to help assure safe drinking water for the 25 water systems it supervises.

Food, Pool and Lodging Health & Safety Program

Harney County is doing an excellent job of providing Environmental Health services to the community. Inspection frequencies in the food, pool and traveler accommodations areas are excellent.

John Combs has completed the state standardization process. Completion and maintenance of this certification complies with the field review portion of the triennial review.

Compliance Findings Summary

Administration

The Local Public Health Authority (LPHA) must assure there is a licensed professional nurse who directs nursing practice.

The LPHA must have a written policy on clients accessing their own records. ORS 192.553(b)

The LPHA must have a written policy on release of records in the case of subpoenas. 45 CFR part 164.512 (e)(ii)

Babies First!

Item 19 on the Babies First! Review Tool states: "All TCM case managers utilize the most current version of the TCM Assessment and Plan Forms and TCM Visit Form documents provided by the Center for Prevention and Health Promotion". OAR 410-138-0060(11)(c)

Client record review noted that the current TCM forms (11/11) were not used.

Civil Rights

The LPHA must assure civil rights compliance findings 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.

Communicable Disease

The LPHA is in compliance with all program requirements.

Drinking Water

The LPHA is in compliance with all program requirements.

Fiscal

Travel: 2 CFR Part 225 Appendix B No. 43 *Travel Costs*; CFR 74.21 *Standard for Financial Management Systems*

1. Need to update the travel policy. Have a document for the County Courthouse they are to be following, but it 1) isn't signed, 2) they are not using the Travel Expense Voucher as stated in the document.
2. Use the proper forms as outlined in the policy.
3. Standard Per Diem rates – no procedure for handling exception, need to update federal in-state rates.

Purchasing, Equipment and Inventory: OMB A133 Subpart C; 2 CFR Part 225, Appendix B; LPHA's Notice of Grant Award including: 1) *Separation of duties*, 2) *Authorization and approval*, 3) *Custodial and security arrangements*.

1. The Purchasing Procedure was not approved, signed off nor had an effective date.
2. The current procedure does not address separation of duties. Currently there is not a separation of duties between ordering and receipt of materials, goods, or medical supplies.
3. The current procedure does not address packing slips. Packing slips need to be attached to invoices and need to be signed by a person other than the one who ordered them.
4. The procedure does not address 45 CFR 74.43 *Open Free Competition*.
5. Approvals for payment are not consistently obtained before payment.
6. The purchasing procedure needs to be updated and address items listed above.

Medications and Supplies:

1. Medications need to be logged in and inventoried with another staff member.

Accounting System OMB A-133 subpart C; CFR 74.21; 45 CFR 02.20, Accepted Internal Control Procedures

1. There is not a policy or a procedure for accounting controls. Create a policy for Accounting Controls – use the sample sent.

Cash Management: OMB A-133 Subpart C; 45 CFR 74.21; 45 CFR 92.20, Title X Family Planning Guidelines, separation of duties:

1. There is a procedure, but it needs to be modified to include endorsing a check as soon as it is received.
2. Bills and Receivables: Need a policy for write-offs and a procedure for uncollectible accounts.

PH Services and Fees and Title X – Family Planning Charges: Title X Guidelines Section 6.3, Title X Program Guides, 45 CFR 59.5(a)(6-8), OPA 08-01 Verification of Income, OPA 97-1, ORS 432.425(3):

1. The Cost Analysis of services has not been completed. Complete the Cost Analysis of Services.

The majority of compliance findings were a lack of policies and procedures. The staff was very willing to address these issues and want to bring them into compliance.

Food, Pool and Lodging Health & Safety

The LPHA is in compliance with all program requirements.

Immunizations

The LPHA must operate under current, signed Model Standing Orders. The standing order for Inactivated Influenza Vaccine is out of date and must be updated.

The LPHA must resolve all compliance issues identified during the VFC site visit. During the site visit, the Vaccine Information Statements in Spanish for rotavirus and HPV4 were identified as out-of-date.

Laboratory

The LPHA must comply with 42 CFR part 493 the Clinical Laboratory Improvement Amendments (CLIA). Consult with laboratory liaison to bring manual into compliance. Assure that:

- Annual personnel competency testing is documented for all individuals performing laboratory tests, including physicians and mid-level practitioners.
- Protocols for equipment monitoring and calibration are in laboratory manual and written records of these procedures are available. 42 CFR 493.1254, 42 CFR 493.1255

Perinatal

The LPHA is in compliance with all program requirements.

Reproductive Health

- Sub-recipient must cite National Standards in protocols for contraceptive methods, elevated blood pressure, clinical breast exam, mammography, male services, Pap testing and management, and STI treatment.

- Sub-recipients are obligated to establish and maintain personnel policies that comply with applicable federal and state requirements including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act of 1973, Title I of the Americans with Disabilities Act, and the annual appropriations language.
- Sub-recipient must have written policies that are consistent with the HHS Office for Civil Rights policy document, *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*.
- Sub-recipients are required to establish policies to prevent employees, consultants or members of governing bodies from using their positions for purposes that are, or give the appearance of being, motivated by a desire for private financial gain for themselves or others.
- Sub-recipients must provide evaluation of contractor performance and document that contractors have met the terms, conditions and specifications of the contract.

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 outreach activities are completed and documented at least annually via the media to inform potential participants, particularly minorities, of the availability of the WIC program. (Policies 452 and 470) *This is a repeat finding from 2012.*
- Develop a local procedure on implementing voter registration. (Policies 420 and 480) *This is a repeat finding from 2012.*
- Assure staff who provide WIC services complete all required training modules and completed modules are documented in TWIST. (Policy 440) *This is a repeat finding from 2012.*
- Assure there is documentation on file demonstrating that the LA has conducted a self-evaluation of their program operations, including those of associated clinics, at

a minimum of every other year. (Policy 215) *This is a repeat finding from 2006, 2008, 2010 and 2012.*

- Assure processing standards met, or temporary extension approved by the state WIC program. (Policy 605) *This is a repeat finding from 2012.*
- Physical Assessment: Assure anthropometric measures are taken and documented correctly. (Policies 625 and 628) *This is a repeat finding from 2012.*
- Assure ineligibility or graduation letters are issued within required timeframes. (Policy 636) *This is a repeat finding from 2012.*
- Assure a connection is made between the participant's program eligibility and desired health outcome. (Policy 820) *This is a repeat finding from 2008, 2010 and 2012.*
- Infants must receive a mid-cert health assessment, including completion of the diet questionnaire. (Policy 646)
- Assure participants and caregivers, who are eligible to vote, are given an opportunity to register to vote at both certification and recertification and a monthly report is sent to the Elections Division.
- Assure nutritionally high risk WIC participants are referred to the R.D. according to local agency protocol. (Policy 661)
- Assure a monthly voucher inventory and quarterly voucher security audit trails are completed. (Policy 500)

Other

Health Officer

Sharon King, M.D. is the Health Officer in Harney County.

Laboratory

Harney County Health Office is certified under the Clinical Laboratory Improvement Amendments (CLIA) as a Provider Performed Microscopy laboratory. The laboratory director listed for CLIA is Melanie Arntz, FNP. The laboratory CLIA number is 38D-0664061, and their laboratory certificate is valid until December 31, 2015. Laboratory testing occurs under this certificate at 420 N Fairview Ave., Burns, Oregon 97720. The following tests performed are: urine pregnancy, urine dip, hemocult, hemoglobin and occasional wet prep. There have been no complaints or issues raised to the CLIA program about this laboratory in the past three years.

Summary

Overall, agency reviewers believe Harney County Health Department comprises 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 compliance findings and for the strong public health work you do for the community.

Sincerely,

A handwritten signature in cursive script that reads "Meredith Perkins for". The signature is written in black ink and is positioned above the typed name of the sender.

Jan Kaplan, MSW, Manager
Community Liaison Office

cc: Dan Nichols, Harney County Commissioner
Peter Runnels, Harney County Commissioner