

AGENCY REVIEW

BAKER COUNTY HEALTH DEPARTMENT

May 12-23, 2014
Prepared by
Oregon Health Authority
Public Health Division

Monica A. Darco, RN
Public Health Nursing Consultant

BAKER COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p data-bbox="186 436 1006 472">OFFICE OF THE PUBLIC HEALTH DIRECTOR</p> <p data-bbox="186 520 600 556">COMMUNITY LIAISON</p> <p data-bbox="186 604 527 640">ADMINISTRATION</p> <p data-bbox="186 688 1071 724">The LPHA is in compliance with all program requirements.</p> <p data-bbox="186 991 1071 1066">For more detailed information, please see the completed program review tool in section <u>2</u>.</p>	
REVIEWER: Monica Darco	RESPONDENT: Robin Nunn

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

BABIES FIRST! PROGRAM

The LPHA is in compliance with all program requirements.

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

REVIEWER: Francine Goodrich

RESPONDENT: Alicia Hills, Susan Spears and Robin Nudd

BAKER 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.

9/1/14

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

REVIEWER: Monica Darco

RESPONDENT: Robin Nudd

BAKER COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p data-bbox="191 436 954 472">CENTER FOR PUBLIC HEALTH PRACTICE</p> <p data-bbox="191 520 1117 556">ACUTE AND COMMUNICABLE DISEASE PROGRAM</p> <p data-bbox="191 604 1075 640">The LPHA is in compliance with all program requirements.</p> <p data-bbox="191 1033 1075 1113">For more detailed information, please see the completed program review tool in section 5.</p>	
REVIEWER: Matt Laidler	RESPONDENT: Alicia Hills

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR

FISCAL

The LPHA must maintain internal controls consistent the Procurement/Inventory/ Property Management to meet the Title X and federal grant requirements: OMB A-133 §_300; 45 CFR 92.20; 45 CFR 74.21; 45 CFR 74.47; 45 CFR 92.36;

This includes at a minimum:

- Periodic inventory should be reviewed and signed by another person to ensure the accuracy of count and balances with the perpetual inventory records of family planning supplies and pharmaceuticals.
- Evaluate contractor performance and documents if contractors have met the terms, conditions and specifications of the contract.

The LPHA must ensure that charges meet the Title X and federal grant requirement: 42 CFR 59.5 (a) (8). Title X Guidelines: Section 6.3.

- Ensure that Schedule of Discounts provided by federal and state is properly implemented and reviewed before charging clients.

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

06/30/2014

06/30/2014

06/30/2014

REVIEWER: Marivic Tupaz

RESPONDENT: Robin Nudd, Nancy Staten

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR HEALTH PROTECTION

FOOD, POOL, & LODGING HEALTH AND SAFETY

The LPHA must document if a benevolent temporary restaurant has received an inspection or a consultation in lieu of an inspection. [OAR 333-012-0055\(1\)\(c\)\(B\)](#)

8/29/14

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\(3\)\(d\)\(A-D\)](#)

8/29/14

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

REVIEWERS: Erica Van Ess and Cindy Robinson

RESPONDENT: Craig Geddes

BAKER COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>CENTER FOR PUBLIC HEALTH PRACTICE</p> <p>IMMUNIZATION PROGRAM</p> <p>The LPHA is in compliance with all program requirements.</p> <p>For more detailed information, please see the completed program review tool in section <u>9</u>.</p>	
<p>REVIEWER: Amanda Timmons and Mallory Metzger</p>	<p>RESPONDENT: Alicia Hills</p>

BAKER COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>OFFICE OF THE PUBLIC HEALTH DIRECTOR</p> <p>COMMUNITY LIAISON</p> <p>LABORATORY</p> <ul style="list-style-type: none"> • Annual personnel competency testing is documented for all individuals performing laboratory tests, including physicians and mid-level practitioners. 42CFR493.1235 • Refrigerator temperature must be monitored and documented. 42CFR493.1252(b) <p>For more detailed information, please see the completed program review tool in section <u>10</u>.</p>	<p>9/1/14</p> <p>9/1/14</p>
REVIEWER: Monica Darco	RESPONDENT: Alicia Hills

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

PERINATAL PROGRAMS

The LPHA is in compliance with all program requirements.

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

REVIEWER: Francine Goodrich

RESPONDENT: Alicia Hills, Susan Spears, and Robin Nudd

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

Reproductive Health Program Federal Review March 31st, 2014

- There is no medical record evidence that shows that adolescents are receiving counseling regarding parental involvement or how to resist attempts to engage in sexual activities
- There is no evaluation of contractor performance and documentation that contractors have met the terms, conditions and specifications of the contract

6/23/2014

7/22/2014

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

REVIEWER: Connie Clark and Capt. Glass, RN, Region X

RESPONDENT: Alicia Hills

BAKER COUNTY HEALTH DEPARTMENT

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 13.

REVIEWER: Larry Hill

RESPONDENT: Alicia Hills and Robin Nunn

BAKER COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p data-bbox="186 436 1198 472">CENTER FOR PREVENTION AND HEALTH PROMOTION</p> <p data-bbox="186 520 1170 556">TOBACCO PREVENTION AND EDUCATION PROGRAM</p> <p data-bbox="186 604 1076 640">The LPHA is in compliance with all program requirements.</p> <p data-bbox="186 991 1076 1066">For more detailed information, please see the completed program review tool in section <u>14</u>.</p>	
REVIEWER: Sabrina Freewynn	RESPONDENT: Torie Andrews

BAKER COUNTY HEALTH DEPARTMENT	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>CENTER FOR PUBLIC HEALTH PRACTICE</p> <p>TUBERCULOSIS</p> <p>The LPHA needs to have a TB Exposure & Control Plan in place and updated. Baker Co. did not submit a TB Exposure and Control Plan for review.</p> <p>For more detailed information, please see the completed program review tool in section 15.</p>	<p>9/1/2014</p>
REVIEWER: Heidi Behm	RESPONDENT: Alicia Hills, RN

BAKER COUNTY HEALTH DEPARTMENT

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 16.

REVIEWER: Judy A. Shioishi

RESPONDENT: Nancy Staten

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS – 2013

**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"> ● <u>Staff Training</u>: Assure staff have completed all required training modules, have achieved competency and documentation of module completion is in TWIST. (Policy 440) ● <u>Quarterly In-Services</u>: Conduct and document quarterly in-services on nutrition topics for all CPAs. (Policy 660) ● <u>Self-Evaluation</u>: Conduct a self-evaluation of program operations at a minimum of every other year. (Policy 215) ● <u>Proof of ID</u>: Use appropriate proof of ID for all participant categories. (Policy 616) ● <u>Eligibility Pending</u>: When all proofs are not provided, assure “eligibility pending” is checked. (Policy 616) ● <u>Weight Measurements</u>: Assure weight measurements are taken correctly. (Policy 628) ● <u>Blood work Timelines</u>: Assure the timelines for blood work are met. (Policy 625) ● <u>Equipment Maintenance</u>: Document routine maintenance and cleaning of the blood testing equipment and keep on file for 6 months. (Policy 626) ● <u>Participant Signature Forms</u>: Assure copies of Participant Signature Forms are retained for the required time period. (Policy 426) ● <u>Health Assessment</u>: Assure a full health assessment is completed, including screening for alcohol and drug use. (Policies 626 & 880) ● <u>Risk Codes</u>: Assure all applicable risks are selected.(Policy 670) | <p>Resolved
September 2013</p> <p>Resolved
August 2013</p> <p>Resolved
August 2013</p> <p>Resolved
August 2013</p> <p>Resolved
August 2013</p> <p>Resolved
September 2013</p> <p>Resolved
September 2013</p> <p>Resolved
August 2013</p> <p>Resolved
August 2013</p> <p>Resolved
September 2013</p> <p>Resolved
September 2013</p> |
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BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS – 2013

**TIMELINE
FOR
CHANGE**

- Health Outcome Statement: Make a connection between the participant’s program eligibility and desired health outcome. (Policy 820) Resolved
August 2013
- Infant Mid-Cert Assessments: Assure all required components of the infant mid-cert health assessment are completed. (Policy 646) Resolved
August 2013
- Information about Alcohol, Tobacco and Drugs: Assure participants are provided the appropriate information about alcohol, tobacco and drug use. (Policy 880) Resolved
August 2013
- Second Nutrition Education: Assure second nutrition education is offered. (Policy 820) *This is a repeat finding from 2011.* Resolved
August 2013
- Vouchers and Second Nutrition Education: Assure if second nutrition education is not attended, only one month of vouchers are printed, according to local procedure. (Policy 835) Resolved
September 2013
- Voucher Audits: Review voucher security and audit trails quarterly using the required voucher audit log form in Policy 500. (Policy 500) Resolved
August 2013
- Voucher Printing: Assure vouchers are printed at the time the participant is at the clinic for second nutrition education appointment. (Policy 505) Resolved
August 2013
- Separation of Duties: Establish a regular monitoring system to use when separation of duties is not possible. (Policy 595) Resolved
September 2013

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

REVIEWER: Karen Bettin

RESPONDENT: Anna Clark

BAKER COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS – 2013

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

WIC FARM DIRECT NUTRITION PROGRAM (FDNP)

- Assure FDNP checks are signed for by the participant. (Policy 1100)

RESOLVED
August 2013

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

REVIEWERS:

Karen Bettin & Maria Menor

RESPONDENT:

Anna Clark

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



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June 20, 2014

The Honorable Fred Warner, Chair
Baker County Board of Commissioners
1995 Third Street
Baker City, OR 97814

Dear Commissioner Warner:

The triennial onsite agency review of Baker County Health Department was conducted between May 12 and 23, 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 489 separate items in 16 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 Robin Nudd, Public Health Assistant Director. 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 Robin 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	Laboratory
Babies First!	Perinatal
Civil Rights	Reproductive Health
Communicable Disease	Sexually Transmitted Infections
Fiscal	Tobacco Prevention & Education
Food, Pool and Lodging	Program
Health & Safety	Tuberculosis
Health Officer	Vital Records
Immunizations	WIC

Commendations

Some program reviewers submitted commendations to the Office of Community Liaison as follow:

Immunizations

Overall, it is clear that Baker County Health Department works hard to meet the immunization compliance standards. During the compliance visit, we discussed the importance of submitting monthly vaccine reports. Currently, this is not a compliance finding, but we would encourage staff to focus on timely reporting.

Baker County Health Department deserves congratulations for achieving 100% vaccine accountability at both of their sites. Every dose of vaccine the health department received has been tracked as administered, transferred to another agency, wasted or expired. It is unusual for a site to have complete accountability. Keep up the excellent work in this area.

As part of the immunization review, we complete an official site visit in accordance with CDC requirements for Vaccine for Children (VFC) providers. Included in the review documents are the VFC Provider Follow-up Plan and the Reviewer Follow-up Action Plan. On the reviewer plan, there is information about requirement 4.2A, borrowing VFC doses. According to the strict guidance of the CDC, any borrowing must be a rare, unplanned occurrence. Mallory Metzger has evaluated your borrowing and does not feel that there is a problem, but she must follow CDC protocol for follow-up. This is not a triennial review compliance issue, and Mallory will complete any necessary follow-up directly with you.

Tobacco Prevention and Education Program (TPEP)

Baker County Tobacco Prevention and Education Program has promoted policy change for tobacco-free environments in a variety of settings, including county properties, fairgrounds, state properties, and most recently, parks.

TPEP benefits greatly from the knowledge base and the experience 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 through collaboration with other departments within the county and health care institutions.

Compliance Findings Summary

Administration

The LPHA is in compliance with all program requirements.

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.

Fiscal

The LPHA must maintain internal controls consistent with the Procurement/Inventory/Property Management to meet the Title X and federal grant requirements: OMB A-133 §_300; 45 CFR 92.20; CFR 74.21; 45 CFR 74.47; 45 CFR 92.36. This includes at a minimum:

- Periodic inventory should be reviewed and signed by another person to ensure the accuracy of count and balances with the perpetual inventory records of family planning supplies and pharmaceuticals.

- Evaluate contractor performance and document if contractors have met the terms, conditions and specifications of the contract.

The LPHA must ensure that charges meet the Title X and federal grant requirement: 42 CFR 590.5(a)(8). Title X Guidelines: Section 6.3.

- Ensure that Schedule of Discounts provided by federal and state is properly implemented and reviewed before charging clients.

Food, Pool and Lodging Health & Safety

The LPHA must document if a benevolent temporary restaurant has received an inspections or a consultation in lieu of an inspection. OAR 333-012-0055(1)(c)(B)

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)

Immunizations

The LPHA is in compliance with all program requirements.

Laboratory

- Annual competency testing is documented for all individuals performing laboratory tests, including physicians and mid-level practitioners. 42 CFR 493.1235
- Refrigerator temperature must be monitored and documented. 42 CFR 493.1252(b)

Perinatal

The LPHA is in compliance with all program requirements.

Reproductive Health

- There is no medical record evidence that shows that adolescents are receiving counseling regarding parental involvement or how to resist attempts to engage in sexual activities.
- There is no evaluation of contractor performance and documentation that contractors have met the terms, conditions and specification 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 needs to have an update TB Exposure and Control Plan in place. Baker County did not submit a TB Exposure Plan for review.

Vital Records

The LPHA is in compliance with all program requirements.

Other

Fiscal

Baker County Health Department received Federal Funds for several programs totaling \$233,654 including \$78,790 for the WIC Program for Fiscal Year 2013. The State General and Other Funds were a source of \$146,321 for that period, as well. It appears that the county health department 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

Jon Schott, MD, is Baker County's Health Officer.

Laboratory

Baker County Health Department Laboratory is certified under the Clinical Laboratory Improvement Amendments (CLIA) as a Provider Performed Microscopy laboratory. The laboratory director listed for CLIA is Jon Schott, MD. The laboratory CLIA # is 38D-0666992, and their laboratory certificate is valid until December 31, 2015. Laboratory testing occurs under this certificate at the 3330 Pocahontas Road location and at the Baker High School in Baker City. The following tests performed at the Pocahontas Road location are: hemoglobin by Hemocue, urine pregnancy, urine dipstick and the physicians/clinicians perform KOH and Wet Mount smears. The following tests performed at the high school location are: hemoglobin by Hemocue, urine pregnancy and urine dipstick. There have been no complaints or issues raised to the CLIA program about this laboratory in the past three years.

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

The WIC and WIC Farm Direct Nutrition Program biennial reviews were conducted between May 13 and 15, 2013, and are included in this report. All findings have been corrected.

Summary

Overall, agency reviewers believe Baker County Health Department 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
Office of Community Liaison

cc: Mark Bennett, Baker County Commissioner
Tim Kerns, Baker County Commissioner
Robin Nudd, Assistant Public Health Director