

AGENCY REVIEW

LAKE COUNTY PUBLIC HEALTH OFFICE

June 4 – July 16, 2014
Prepared by
Oregon Health Authority
Public Health Division

Monica Darco, RN
Public Health Nursing Consultant

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR</p> <p>COMMUNITY LIAISON</p> <p>ADMINISTRATION</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>2</u>.</p>	
REVIEWER: Monica Darco	RESPONDENT: Mary Wilkie

LAKE COUNTY PUBLIC HEALTH OFFICE

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

BABIES FIRST!

- Program has not met the expectation of entering data for all enrolled clients into ORCHIDS, or providing data by another method, by September 30th of each year. [PE 42 (3)(c)(ii)]
- TCM Reporting – Program is not utilizing current required TCM assessment and visit follow-up forms (November 2011 Revision), [OAR 410-138-0060 (11) (c)]

9/4/2014

9/4/2014

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

REVIEWER: Francine Goodrich

RESPONDENTS: Jill Harlan and Mary Wilkie

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR</p> <p>COMMUNITY LIAISON</p> <p>CIVIL RIGHTS</p> <p>The LPHA must assure civil rights compliance responsibilities are met.</p> <ul style="list-style-type: none"> • 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. <p>For more detailed information, please see the completed program review tool in section 4.</p>	<p>10/1/2014 <i>Resolved</i> <i>6/24/2014</i></p> <p>10/1/2014</p>
REVIEWER: Monica Darco	RESPONDENT: Mary Wilkie

LAKE COUNTY PUBLIC HEALTH OFFICE	
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: June Bancroft	RESPONDENT: Mary Wilkie

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p data-bbox="186 436 1144 472">OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR</p> <p data-bbox="186 520 332 556">FISCAL</p> <p data-bbox="186 604 1079 640">The LPHA is in compliance with all program requirements.</p> <p data-bbox="186 991 1079 1066">For more detailed information, please see the completed program review tool in section 6.</p>	
<p data-bbox="186 1077 771 1150">REVIEWER: Carole Yann and Dave Coleman</p>	<p data-bbox="824 1077 1388 1150">RESPONDENTS: Mary Wilkie and Anne Crumrine</p>

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
CENTER FOR HEALTH PROTECTION	
FOOD, POOL, AND LODGING HEALTH & SAFETY	
1. The LPHA must document whether a consultation or inspection was conducted for profit and non-profit temporary restaurants. OAR 333-012-0055(1)(c)(B)	9/30/14
2. The LPHA must have at least one Environmental Health Specialist on staff, or through contract, that has a current certification from the Authority as a Food Service Standardization Officer. OAR 333-012-0060(3)(c)	9/30/14
For more detailed information, please see the completed program review tool in section 7.	
REVIEWERS: Eric Pippert	RESPONDENT: Greg Farnam

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
CENTER FOR PUBLIC HEALTH PRACTICE	
IMMUNIZATIONS	
<p>Timeliness of data entry into ALERT IIS within 14 days of vaccine administration is 65% at North Lake County clinic. Compliance measure is 95% of vaccines entered within 14 days of administration.</p>	Resolved 6/20/2014
<p>Both Lakeview and North Lake sites lacked a current, signed Standing Order for PPV23.</p>	Resolved 6/18/2014
<p>For more detailed information, please see the completed program review tool in section <u>9</u>.</p>	
REVIEWER: Sara Beaudrault and Sydney Running	RESPONDENT: Mary Wilkie and Lilli George

LAKE COUNTY PUBLIC HEALTH OFFICE

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

OFFICE OF THE 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:

Refrigerator temperature must be monitored and documented.
[42CFR493.1252\(b\)](#), Waived tests per manufacturer instructions
[42CFR 493.15e](#)

10/1/2014

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

REVIEWER: Monica Darco

RESPONDENT: Mary Wilkie

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>CENTER FOR PREVENTION AND HEALTH PROMOTION</p> <p>PERINATAL PROGRAM</p> <ul style="list-style-type: none"> • Program has not met the expectation of entering data for all enrolled clients into ORCHIDS, or providing data by another method, by September 30th of each year. [PE 42 (3)(c)(ii)] <p>For more detailed information, please see the completed program review tool in section 11.</p>	<p>Immediately</p>
<p>REVIEWER: Francine Goodrich</p>	<p>RESPONDENT: Jill Harlan and Mary Wilkie</p>

LAKE COUNTY PUBLIC HEALTH OFFICE

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

REPRODUCTIVE HEALTH

The LPHA shall comply with all Reproductive Health program requirements by adding the following components:

- Annual training for Lake County Public Health Office staff must be provided and documented on: Mandatory Reporting, confidentiality, family involvement counseling, sexual coercion counseling, services provided are on a voluntary basis, and family planning services are not a prerequisite to receipt of other services.
- Lake County Public Health Office staff must be informed annually they may be subject to prosecution if they coerce or attempt to coerce any person to undergo an abortion or sterilization.
- Lake County Public Health Office must develop a written policy on providing counseling to minors on how to resist attempts to coerce minors into engaging in sexual activities.

90 days
**Partially
resolved
7/2014**

60 days
**Resolved
7/2014**

60 days

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

REVIEWER: Linda McCaulley

RESPONDENT: Beth Hadley

LAKE COUNTY PUBLIC HEALTH OFFICE

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

SEXUALLY TRANSMITTED INFECTIONS (STI)

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: Beth Hadley

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>CENTER FOR PREVENTION AND HEALTH PROMOTION</p> <p>TOBACCO PREVENTION AND EDUCATION 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>14</u>.</p>	
REVIEWER: Sabrina Freewynn	RESPONDENT: Beth Hadley, TPEP Coordinator (South); Lilli George, TPEP Coordinator (North)

LAKE COUNTY PUBLIC HEALTH OFFICE

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 15.

REVIEWER: Lindsey Lane

RESPONDENT: Mary Wilkie

LAKE COUNTY PUBLIC HEALTH OFFICE	
COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>CENTER FOR PUBLIC HEALTH PRACTICE</p> <p>VITAL RECORDS</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>16</u>.</p>	
REVIEWER: Judy Shioishi	RESPONDENT: Mary Wilkie, Registrar, Sandra Cobian and Andrienne Thornton, Deputy Registrars

LAKE COUNTY PUBLIC HEALTH OFFICE

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"> • Develop local WIC policies and procedures within the framework of USDA, Federal and State requirements. (Policy 420) <i>This is a repeat finding from 2012.</i> | <p>September 30, 2014</p> |
| <ul style="list-style-type: none"> • Have all staff who provide WIC services complete all required training modules and document in TWIST. (Policy 440) <i>This is a repeat finding from 2012.</i> | <p>September 30, 2014</p> |
| <ul style="list-style-type: none"> • Document CPA participation in quarterly in-services. (Policy 660) | <p>September 30, 2014</p> |
| <ul style="list-style-type: none"> • Take and document anthropometric measurements correctly. (Policy 625 & 628) | <p>August 31, 2014</p> |
| <ul style="list-style-type: none"> • Take biochemical measurements within the appropriate timeframes. (Policy 625) | <p>August 31, 2014</p> |
| <ul style="list-style-type: none"> • Issue ineligibility and/or graduation letters within the appropriate timelines. (Policy 636) | <p>Resolved June 30, 2014</p> |
| <ul style="list-style-type: none"> • Assure a connection is made between the participant's program eligibility and desired health outcomes. (Policy 820) <i>This is a repeat finds from 2010 and 2012.</i> | <p>September 30, 2014</p> |
| <ul style="list-style-type: none"> • Appropriately document NE topics discussed with the participant. (Policy 830) | <p>September 30, 2014</p> |

LAKE COUNTY PUBLIC HEALTH OFFICE

COMPLIANCE FINDINGS – 2014

**TIMELINE
FOR
CHANGE**

- Document participant attendance in TWIST. (Policy 606) *This is a repeat finding from 2012.*

- Follow the local agency high-risk participant referral protocol. (Policy 661)

- Assure the participant’s care plan is accurate and related to the participant’s risk. (Policy 830)

- Review voucher security and audit trails quarterly. (Policy 500)
This is a repeat finding from 2012.

August 31, 2014

September 30, 2014

September 30, 2014

Resolved June 30, 2014

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

REVIEWER: Sara Sloan

RESPONDENT: Jill Harlan

LAKE COUNTY HEALTH DEPARTMENT

COMPLIANCE FINDINGS – 2014

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

WIC FARM DIRECT NUTRITION PROGRAM (FDNP)

- The LPHA is in compliance with all program requirements.

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

REVIEWER: Maria Menor, Sara Sloan

RESPONDENT: Jill Harlan

July 30, 2014

The Honorable Dan Shoun, Chair
Lake County Board of Commissioners
Lake County Courthouse
513 Center Street
Lakeview, OR 97630

Dear Commissioner Shoun:

The triennial onsite agency review of Lake County Public Health Office was conducted between June 4 and July 16, 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 493 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 Mary Wilkie, 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 Mary 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 Health & Safety	Tuberculosis
Health Officer	Vital Records
Immunizations	WIC, WIC FDNP

Commendations

Several program reviewers submitted commendations to Community Liaison as follow:

Lake County is doing a great 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.

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

TPEP benefits greatly from the knowledge base and the experience of their tobacco control field staff. Staff look for opportunities to improve the health of the community and best use the limited resources available. TPEP are tenacious and demonstrate commitment to furthering social norm changes around tobacco use. All of these things benefit the community and clients by creating environments where people can live healthier lives.

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.

Lake County WIC has established an effective partnership with Lake District Hospital. In the fall of 2013, the Stork Lunch and Learn gatherings began with prenatal education and a free lunch which are open to pregnant women and their support person. During these quarterly events, WIC and hospital staff work collaboratively to provide information on various topics including breastfeeding and oral health. In January of 2014, the Family Follow-up Program began. WIC staff work with the hospital's lactation specialist with the goal of supporting breastfeeding and increasing duration rates. This partnership is a win/win for WIC and the hospital by strengthening referrals to services both agencies provide.

Compliance Findings Summary

Administration

The LPHA is in compliance with all program requirements.

Babies First!

- Program has not met the expectation of entering data for all enrolled clients into ORCHIDS, or providing data by another method, by September 30 of each year. [PE 42 (3)(c)(ii)]
- Targeted Case Management (TCM) Reporting – Program is not utilizing current required TCM assessment and visit follow-up forms (November 2011 Revision), [OAR 410-138-0060(11)(c)]

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.

Communicable Disease

The LPHA is in compliance with all program requirements.

Fiscal

The LPHA is in compliance with all program requirements.

Food, Pool and Lodging Health & Safety

- The LPHA must document whether a consultation or inspection was conducted for profit and non-profit temporary restaurants. OAR 333-012-0055(1)(c)(B)
- The LPHA must have at least one Environmental Health Specialist on staff, or through contract, who has a current certification from the Authority as a Food Service Standardization Officer. OAR 333-012-0060(3)(c)

Immunizations

- Timeliness of data entry into ALERT IIS within 14 days of vaccine administration is at 65% at North Lake County Clinic. Compliance measure is 95% of vaccines entered within 14 days of administration.
- Both Lakeview and North Lake sites lacked a current, signed standing order for PPV23.

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:

- Refrigerator temperature is monitored and documented. 42 CFR 493.1252(b)
Waived tests per manufacturer instructions. 42CFR 493.15e

Perinatal

- Program has not met the expectation of entering data for all enrolled clients into ORCHIDS, or providing data by another method, by September 30 of each year. [PE 42 (3)(c)(ii)]

Reproductive Health

The LPHA shall comply with all Reproductive Health program requirements by adding the following components.

- Annual training for Lake County Public Health Office staff must be documented on: Mandatory Reporting, confidentiality, family involvement counseling, sexual coercion counseling, services provided are on a voluntary basis, and family planning services are not a prerequisite to receipt of other services.
- Lake County Public Health Office staff must be informed annually that they be subject to prosecution if they coerce or attempt to coerce any person to undergo an abortion or sterilization.

- Lake County Public Health Office must develop a written policy on providing counseling to minors on how to resist attempts to coerce minors into engaging in sexual activities.

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

- Develop local WIC policies and procedures within the framework of USDA, federal and state requirements. (Policy 420) *This is a repeat finding from 2012.*
- Have all staff who provide WIC services complete all required training modules and document in TWIST. (Policy 440) *This is a repeat finding from 2012.*
- Document CPA participation in quarterly in-services. (Policy 660)
- Take and document anthropometric measurements correctly. (Policies 625 & 628)
- Issue ineligibility and/or gradation letters within the appropriate timelines. (Policy 636)
- Assure a connection is made between the participant's program eligibility and desired health outcomes. (Policy 820) *This is a repeat finding from 2010 and 2012.*
- Appropriately document NE topics discussed with the participant. (Policy 830)
- Document participant attendance in TWIST. (Policy 606) *This is a repeat finding from 2012.*
- Follow local agency high-risk participant referral protocol. (Policy 661)
- Assure the participant's care plan is accurate and related to the participant's risk. (Policy 830)
- Review voucher security and audit trails quarterly. (Policy 500) *This is a repeat finding from 2012.*

WIC Farm Direct Nutrition Program (FDNP)

The LPHA is in compliance with all program requirements.

Other

Health Officer

Lake County's Health Officer is Spencer Clarke, MD.

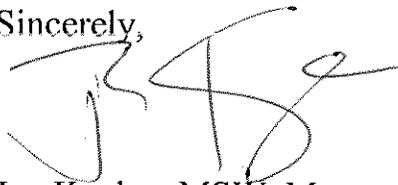
Laboratory

Lake County Public Health Laboratory is certified under the Clinical Laboratory Improvement Amendments (CLIA) as a Waived Laboratory. The laboratory director listed for CLIA is Spencer Clarke, MD. The laboratory CLIA number is 38D0664024, and their laboratory certificate is valid until September 5, 2014. Laboratory testing occurs under this certificate at 100 North D Street Suite 100, Lakeview, Oregon 97630 and at the Christmas Valley location. The following tests are performed: hemoglobin by Hemocue and urine pregnancy. There have been no complaints or issues reported to the CLIA program about this laboratory in the past three years.

Summary

Overall, agency reviewers believe Lake County Public Health Office 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 Office

cc: Ken Kestner, Lake County Commissioner
Mary Wilkie, Public Health Administrator
Bradley Winters, Lake County Commissioner