

AGENCY REVIEW

LANE COUNTY HEALTH & HUMAN SERVICES

August 5 – 23, 2013
Prepared by
Oregon Health Authority
Public Health Division

Laurie Smith, RN, MPH
Public Health Nursing Consultant

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>OFFICE OF THE PUBLIC HEALTH DIRECTOR</p> <p>COMMUNITY LIAISON</p> <p>ADMINISTRATION</p> <p>If a schedule of fees has been adopted,</p> <ol style="list-style-type: none">1. Fees for public health services are reasonably calculated not to exceed the cost of the services performed.2. LPHA is charging fees according to this schedule. ORS 431.415(3) <p>Provide documentation of recent cost analysis and comparison with current schedule of fees.</p> <p>The LPHA must assure that written policies and procedures exist to guide staff in maintaining appropriate confidentiality standards. Add the following to your existing policies and procedures:</p> <ul style="list-style-type: none">• Assure policies and procedures are signed by a responsible person currently employed by the agency.• Confidentiality of HIV records OAR 333-012-0270• Immunization records ORS 433.092 & ORS 433.280• Release of protected health information with authorization• Release of protected health information without authorization <p>The LPHA must assure the pharmacy license is displayed conspicuously in the pharmacy or place of business to which it applies.</p> <p>For more detailed information, please see the completed program review tool in section <u>2</u>.</p>	<p style="text-align: center;">12/30/13</p> <p style="text-align: center;">11/30/13</p> <p style="text-align: center;">Resolved 8/13</p>

LANE COUNTY HEALTH & HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

BABIES FIRST!

The LPHA is in compliance with all program requirements.

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

REVIEWER: Fran Goodrich

RESPONDENTS: Pam Stuver and
MCH Staff members

LANE COUNTY HEALTH AND HUMAN SERVICES	
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 is in compliance with all program requirements.</p> <p>For more detailed information, please see the completed program review tool in section <u>4</u>.</p>	
REVIEWER: Laurie Smith	RESPONDENT: Karen Gillette

LANE COUNTY HEALTH AND HUMAN SERVICES

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: Matt Laidler

RESPONDENT: Cindy Morgan

LANE COUNTY HEALTH & HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR HEALTH PROTECTION

DRINKING WATER SERVICES (DWS)

After the five month priority non-complier (PNC) review, the LPHA shall send written notice to the owner or operator (copy to DWS) when the water system can return to compliance within three months. This includes a compliance schedule listing corrective actions required and a deadline for each action. The LPHA shall follow up to ensure corrective actions are implemented.

9/30/13

- Provide follow-ups on water system to ensure violations have been corrected. Include documentation of activities. Also consider developing a written procedure with reference to DWS written PNC procedures.

After the five month priority non-complier (PNC) review, the LPHA shall prepare and submit to DWS a written report for a formal enforcement action when the water system cannot return to compliance within three months. The report needs to include the LPHA's evaluation of the reasons for non-compliance by the water supplier.

9/30/13

- Assure reports are consistently being submitted to DWS. Consider developing a written procedure.

The LPHA shall follow-up on water system surveys to verify that any significant deficiencies have been corrected. If all deficiencies are not corrected, place the systems on corrective action plans. To achieve compliance with this program element:

11/30/13

- Contact the following high-priority systems with potential water quality deficiencies and verify all deficiencies have been corrected, or place the systems on corrective action plans. Supply documentation to DWS.
 - Diamondwoods Maintenance (95085)

LANE COUNTY HEALTH & HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

- Harwoods Mobile Manor (00422)
- Ikes Lakeside Pizza (91821)
- Lane Co Parks-Peninsula (95110)
- Stockman’s Café/Eugene Livestock (93974)
- White Branch Youth Camp (91783)
- Blue River Water District (00125)
- Emerald Valley Mobile Home Park (00995)
- Fernridge Mobile Estates (00421)
- NACO West Resort CG-So Jetty (91866)

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

REVIEWER: Tom Mitchell

RESPONDENT: Sarah Puls, Jeff Lang

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

OFFICE OF THE STATE PUBLIC HEALTH DIRECTOR

FISCAL

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

- Submit completed cost analysis study. Federal auditor recommends updating the cost analysis every 2 years.

12/31/2013

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

REVIEWER: Marivic Tupaz

RESPONDENT: Lynise Kjolberg,
Ann Becker, Ronald Hjelm

LANE COUNTY HEALTH AND HUMAN SERVICES

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: Dave Martin

RESPONDENT: Jeff Lang

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

HEALTHY COMMUNITIES

The LPHA is in compliance with all program requirements.

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

REVIEWER: Sabrina Freewynn

RESPONDENT: Karen Gillette, Karen Gaffney

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

**HUMAN IMMUNODEFICIENCY VIRUS (HIV)
PREVENTION**

The LPHA is in compliance with all program requirements.

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

REVIEWER: Larry Hill

RESPONDENTS: Cindy Morgan,
Karen Gillette

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS	TIMELINE FOR CHANGE
<p>CENTER FOR PUBLIC HEALTH PRACTICE</p> <p>IMMUNIZATIONS</p> <p>The LPHA shall replace outdated Vaccine Information Statements (VISs); HPV in English & Spanish; PCV13 in English and Spanish; and Tdap in Spanish.</p> <p>The LPHA shall provide technical assistance to McKenzie-Willamette Hospital with a goal to raise hospital-based HBsAg (hepatitis B surface antigen) screening to 95% of delivering moms. In 2012, McKenzie-Willamette had only 87% of delivering moms screened.</p> <p>The LPHA shall provide technical assistance to Sacred Heart and Peace Harbor Hospitals with a goal to raise birth dose hepatitis B vaccine administration to 80% of newborns. In 2012, Sacred Heart had only 58% of newborns immunized and Peace Harbor had only 27% immunized.</p> <p>For more detailed information, please see the completed program review tool in section <u>12</u>.</p>	<p><u>Completed</u> at the time of visit</p> <p>9/30/13 Resolved 10/2/13</p> <p>9/30/13</p>
<p>REVIEWER: Mallory Metzger, Lorraine Duncan</p>	<p>RESPONDENT: Cindy Morgan, Pat Dodson</p>

LANE COUNTY HEALTH AND HUMAN SERVICES

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). Assure that:

- Products currently in use are matched to those in the procedure manual.
- Annual personnel competency testing is documented for all individuals performing laboratory tests. Document competency testing for urine pregnancy testing done by public health staff.

Resolved
8/20/13

11/30/13

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

REVIEWER: Laurie Smith

RESPONDENT: Cindy Morgan

LANE COUNTY HEALTH & HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

PERINATAL PROGRAM

The LPHA is in compliance with all program requirements.

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

REVIEWER: Fran Goodrich

RESPONDENT: Pam Stuver and
MCH Home Visiting Staff

COMMUNITY HEALTH CENTERS OF LANE COUNTY

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

REPRODUCTIVE HEALTH

The LPHA must add citation of Title X funding to the Pregnancy Resources brochure.

9/18/13
Resolved
8/19/2013

The Community Participation Committee must meet at least annually in order to participate in the development, implementation and evaluation of the program.

11/13/13

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

REVIEWER: Connie Clark

RESPONDENT: Ivy Kohler

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PUBLIC HEALTH PRACTICE

**SEXUALLY TRANSMITTED INFECTIONS (STI)
PROGRAM**

The LPHA is in compliance with all program requirements.

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

REVIEWER: Doug Harger

RESPONDENT: Karen Gillette, Cindy
Morgan, Kelly Reed

LANE COUNTY HEALTH AND HUMAN SERVICES

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 17.

REVIEWER: Sabrina Freewynn

RESPONDENT: Karen Gillette, Karen Gaffney

LANE COUNTY HEALTH AND HUMAN SERVICES

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 18.

REVIEWER: Heidi Behm, Lindsey Lane

RESPONDENT: Kelly Reed, Cindy Morgan, Karen Gillette

LANE COUNTY HEALTH AND HUMAN SERVICES

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 19.

REVIEWER: Judy A. Shioishi

RESPONDENT: Karen Gillette

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

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

- Assure that participant's rights and responsibilities are offered and explained with completion of the participant signature form at each certification. (Policy 635)

9/30/13

For more detailed information, please see the completed program review tool in section 20.

REVIEWER: Vernita Reyna

RESPONDENT: Connie Sullivan

LANE COUNTY HEALTH AND HUMAN SERVICES

COMPLIANCE FINDINGS

**TIMELINE
FOR
CHANGE**

CENTER FOR PREVENTION AND HEALTH PROMOTION

WIC FARM DIRECT NUTRITION PROGRAM (FDNP)

- Assure that FDNP check register pages are completed correctly. (Policy 1100)

9/30/13
Resolved
Aug 2013

For more detailed information, please see the completed program review tool in section 20.

REVIEWER: Vernita Reyna,
Maria Menor

RESPONDENT: Connie Sullivan

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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October 2, 2013

The Honorable Faye Stewart, Chair
Lane County Board of Commissioners
125 E 8th Avenue
Eugene, OR 97401

Dear Commissioner Stewart:

The triennial onsite agency review of Lane County Health and Human Services was conducted between August 5 and 23, 2013. 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 1,516 separate items in 19 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 Karen Gaffney, Public Health Administrator. Community Liaison staff will work with her to document resolution of the findings. We think the report will also be of assistance to your health office 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 Karen 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	HIV Prevention
Babies First!	Immunizations
Civil Rights	Laboratory
Communicable Disease	Perinatal
Drinking Water	Reproductive Health
Fiscal	Sexually Transmitted Infections
Food, Pool, and Lodging Health and Safety	Tobacco Prevention & Education
Health Officer	Tuberculosis
Healthy Communities	Vital Records
	WIC and WIC Farm Direct Nutrition Program

Compliance Findings Summary

Administration

If a schedule of fees has been adopted,

1. Fees for public health services are reasonably calculated not to exceed the cost of the services performed.
2. LPHA is charging fees according to this schedule. ORS 431.415(3)

Provide documentation of recent cost analysis and comparison with current schedule of fees.

The LPHA must assure that written policies and procedures exist to guide staff in maintaining appropriate confidentiality standards. Add the following to your existing policies and procedures:

- Assure policies and procedures are signed by a responsible person currently employed by the agency.
- Confidentiality of HIV records ORS 333-012-0270
- Immunization records ORS 433.092 & ORS 433.280
- Release of protected health information with authorization
- Release of protected health information without authorization

The LPHA must assure the pharmacy license is displayed conspicuously in the pharmacy or place of business to which it applies.

Babies First!

The LPHA is in compliance with all program requirements.

Civil Rights

The LPHA is in compliance with all program requirements.

Communicable Disease

The LPHA is in compliance with all program requirements.

Drinking Water

After the five month priority non-complier (PNC) review, the LPHA shall send written notice to the owner or operator (copy to DWS) when the water system can return to compliance within three months. This includes a compliance schedule listing corrective actions required and a deadline for each action. The LPHA shall follow up to ensure corrective actions are implemented.

- Provide follow-ups on water system to ensure violations have been corrected. Include documentation of activities. Also consider developing a written procedure with reference to DWS written PNC procedures.

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- Assure reports are consistently being submitted to DWS. Consider developing a written procedure.

The LPHA shall follow-up on water system surveys to verify that any significant deficiencies have been corrected. If all deficiencies are not corrected, place the systems on corrective action plans. To achieve compliance with this program element:

- Contact the following high-priority systems with potential water quality deficiencies and verify all deficiencies have been corrected, or place the systems on corrective action plans. Supply documentation to DWS.
 - Diamondwoods Maintenance (95085)
 - Hardwoods Mobile Manor (00422)
 - Ikes Lakeside Pizza (91821)
 - Lane Co. Parks-Peninsula (95110)
 - Stockman's Café/Eugene Livestock (93974)
 - White Branch Youth Camp (91783)
 - Blue River Water District (00125)
 - Emerald Valley Mobile Home Park (00995)
 - Fernridge Mobile Estates (00421)
 - NACO West Resort CG-So Jetty (91866)

Fiscal

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

- Submit completed cost analysis study. Federal auditor recommends updating the cost analysis every two years.

Food, Pool and Lodging Health & Safety

The LPHA is in compliance with all program requirements.

Healthy Communities

The LPHA is in compliance with all program requirements.

HIV Prevention

The LPHA is in compliance with all program requirements.

Immunizations

The LPHA shall replace outdated Vaccine Information Statements (VISs); HPV in English and Spanish; PCV 13 in English and Spanish; and Tdap in Spanish.

The LPHA shall provide technical assistance to McKenzie-Willamette Hospital with a goal to raise hospital-based HbsAg (hepatitis B surface antigen) screening to 95% of delivering moms. In 2012, McKenzie-Willamette had only 78% of delivering moms screened.

The LPHA shall provide technical assistance to Sacred Heart and Peace Harbor Hospitals with a goal to raise birth dose hepatitis B vaccine administration to 80% of newborns. In 2012, Sacred Heart had only 58% of newborns immunized and Peace Harbor had only 27% immunized.

Laboratory

The LPHA must comply with 42 CFR part 493 the Clinical Laboratory Improvement Amendments (CLIA). Assure that:

- Products currently in use are matched to those in the procedure manual.
- Annual personnel competency testing is documented for all individuals performing laboratory tests. Document competency testing for urine pregnancy testing done by public health staff.

Perinatal

The LPHA is in compliance with all program requirements.

Reproductive Health

The LPHA must add citation of Title X funding to the Pregnancy Resources brochure.

The Community Participation Committee must meet at least annually in order to participate in the development, implementation and evaluation of the program.

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 participant's rights and responsibilities are offered and explained with completion of the participant signature form at each certification. (Policy 635)

WIC Farm Direct Nutrition Program (FDNP)

Assure that FDNP check register pages are completed correctly. (Policy 1100)

Other

Fiscal

Lane County Health and Human Services received Federal funds for several programs totaling \$2,015,100 including \$1,238,590 for the WIC Program for fiscal year 2013. The State General and Other Funds were a source of \$922,627 for that period as well. It appears that the County Health Department has sufficient internal controls to adequately safeguard assets, to detect and prevent errors in a timely manner. The operation is well organized and efficient with a commitment to quality, fairness, and accuracy.

Health Officer

Patrick Luedtke, MD joined Lane County Health and Human Services in December 2010 on a limited base. However, since June 2011 he has been full time; splitting his time equally between the Community Health Center and the Lane County Public Health Services. Dr. Luedtke has been a practicing physician for about 20 years. He has a Master in Public Health. He worked previously as the state epidemiologist and the state lab director in Utah. Dr. Luedtke is the chair of the Health Officers caucus in the Conference of Local Health Officials. He is working on developing a “welcome kit” for new health officers to help orient them to the role.

Laboratory

Lane County Health and Human Services is certified under the Clinical Laboratory Improvement Amendments (CLIA) as a Provider Performed Microscopy lab until February 19, 2015. Patrick Luedtke, MD, is listed as the lab director. The Community Health Center (CHC) at the same location is covered under a different CLIA certificate, as is the River Stone clinic in Springfield.

Public Health Emergency Preparedness

This review is conducted annually through a separate process, and is not included in this report.

School Based Health Centers (SBHC)

Lane County currently has two distinct school-based systems. Bethel School District and Peace Health co-sponsor the Cascade Middle School SBHC. Lane 4J School District and Dr. Tony Diehl co-sponsor North Eugene and Churchill SBHCs. South Eugene and Sheldon SBHCs, formerly sponsored by Lane 4J and Dr. Diehl, were closed in June 2013. The three current Lane County SBHCs are certified through the end of the 2013-2015 biennium.

The Community Health Center of Lane County continues to operate Springfield High School SBHC, although this SBHC is not state certified and does not receive any state funding. This center was decertified in December 2011 for non-compliance.

Summary

Overall, agency reviewers believe Lane County Health and Human Services staff is composed of a committed team of 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: Jay Bozievich, Lane County Commissioner
Pat Farr, Lane County Commissioner
Karen Gaffney, Public Health Administrator
Karen Gillette, Public Health Manager
Sid Leiken, Lane County Commissioner
Pete Sorenson, Lane County Commissioner