**LPHA Triennial Review – Methods and timeframe for conducting remote reviews**

**Draft 8/1/2020**

**Overall process**

1. Kari or Andrew will have a call with LPH Administrator (or designee) to discuss timeframe to complete reviews and LPHA preferences including:
   * Compliance-only reviews or compliance and quality assurance
   * Schedule virtual meetings and/or exit interviews in advance for each individual program review, or schedule meetings only if required for a specific program (e.g. for virtual chart reviews) or if there are compliance findings to discuss.
   * Parameters around dates/times for virtual meetings to occur within designated months of the LPHA’s review
   * Preferred remote communications platform (e.g. Zoom, Skype and/or phone conference)
2. To the maximum extent possible, reviews will be conducted via desk audit, with the reviewer at OHA-PHD completing the review tool based on data and documents already available to reviewer. The reviewer may request that the local program submit additional information or documents if needed, and/or may offer that local program staff can enter required information directly into the review tool.

1. Program reviewer will schedule a virtual meeting or conference call for:
   * Visual inspection, observation or discussion if required for completion of the review tool, or if a virtual meeting would be preferred by both parties rather than additional written communication.
   * Discussion of compliance findings (or possible findings), corrective action and due dates.
   * Exit interview with LPH Administrator or designee (optional)
2. Reviewer will send draft completed program review tool and program review report to the local program contact to review for accuracy before finalizing documents.

1. The triennial review overview letter and report to be emailed by OHA-PHD to the LPHA governing body following the review (after LPH Administrator reviews for accuracy) will include a statement acknowledging that LPHAs have needed to divert staffing and other resources towards COVID-19 response.
   * If the longer window of time for completing individual program reviews results in compliance findings corrective action items appearing as past due when the overview report is ready to send to the LPHA governing body, due date extensions may be requested.

**Triennial review methods during time of COVID-19 response**

| **Program Review name** | **How review will be conducted** |
| --- | --- |
| Administrative | -Reviewer will review existing records on file at OHA-PHD (e.g. Administrator appointment and notification of subcontracts, if applicable).  -Reviewer will send list of policies or other documentation that the LPHA needs to submit for the review.  -LPHA can enter additional content into review tool, if needed, or schedule brief conversation to discuss. |
| Babies First! | -Reviewer will review program data.  -Reviewer will send a list of questions that LPHA needs to answer and policies and procedures that need to be submitted for the review.  -LPHA will be asked to do a pre-review of client charts using chart review tool.  -Virtual meeting where charts will be viewed by reviewer and results of chart review discussed. |
| Maternal Child and Adolescent Health | -Reviewer will review Title V report and plan.  -Reviewer will send a list of questions that LPHA needs to answer.  -Reviewer will review Oregon Mothers Care program data (if applicable). |
| Civil Rights | LPHA will complete and send to the reviewer the Civil Rights Self-Assessment. |
| Communicable Disease | Reviewer will review aggregate data reports and other records to complete the review tool. Webinar or call will be offered to review results. |
| Drinking Water Services | Reviewer will complete the review tool based on program records and information provided by the local program. A virtual meeting with the local program will be offered to fill in details and address any questions or areas of concern. |
| Fiscal | Reviewer will request that the LPHA submit documents required for the review. |
| Food, Pool and Lodging Health and Safety | -FPL staff will review inspection records in HealthSpace database  -FPL will ask LPHA to complete administrative sections of the EH review tool.  -Field review and standardization requirements will be waived until in-person field visits resume.  -OHA has the ability to approve alternate inspection models, which can count as an annual or semiannual inspection. One model that is being considered is a COVID-19 consultation/complaint response combined with an abbreviated facility inspection that focuses on critical risk factors (i.e., hand washing, cross contamination, temperature control). This would allow LPHAs to prioritize their time addressing the biggest health risks at their regulated facilities. OHA will extend leniency over LPHAs meeting inspection quotas during triennial reviews for the foreseeable future. |
| Health Officer | -Reviewer verifies Health Officer medical license status  -A statement from the LPH Administrator attesting that HO is performing required duties will be accepted in lieu of usual 30-minute review call with the Health Officer. |
| HIV Care and Treatment | Virtual meeting for remote review for charts if client documents not uploaded to database. Determine if LPHA wants to upload client documents to database, which would allow chart review to be done without being present. Policy documents and process related information on tool can be emailed. |
| HIV Prevention | Desk review of required documentation. |
| Immunization | Reviewer completes as much of the tool as possible based on Oregon Immunization Program information, and then sends partially completed tool to LPHA to make corrections and/or additions. If needed, arrange a summary video call to iron out any unanswered questions and review signatures on Standing Orders and Vaccine Information Statements.  Alternatively, any needed clarification and images of signature pages could be submitted via email. |
| Nurse-Family Partnership | -Reviewer will review program data.  -Reviewer will send a list of questions that LPHA needs to answer and policies and procedures that need to be submitted for the review.  -LPHA will be asked to do a pre-review of client charts using chart review tool.  -Virtual meeting where charts will be viewed by reviewer and results of chart review discussed. |
| Public Health Emergency Preparedness | HSPR will do a desk audit of documents followed by a one hour follow up virtual call/meeting to answer questions and discuss any follow-up. |
| Reproductive Health (PE 46) | Desk audit followed by a call to review results. |
| Sexually Transmitted Disease | Reviewer will complete review tool fields based on Orpheus data and then send it to the LPHA for local staff to complete the other fields and return it to the reviewer with supporting documents (e.g. required policies) attached as needed. |
| Tobacco Prevention and Education Program (TPEP) | HPCDP will provide the option of the reviewer compiling information for the TPEP review tool based on documents the local program has submitted including reports and policies. The draft report will be provided to the LPHA to review and provide additional detail if needed.  An optional Zoom call can be set up to go over report details and any compliance findings. |
| Tuberculosis | A chart review is required to determine if TB case management services are being provided appropriately. This will be conducted via Zoom or Skype call. |
| Vital Records | Zoom call will be conducted to allow reviewer to have a tour of office including visually seeing storage of certificate paper, go through review tool, and allow time for questions or clarification on county vital records requirements. |
| WIC, Breastfeeding Peer Counseling, and Farm Direct Nutrition Program | Remote review will be conducted using Zoom, Skype and/or phone conference, whichever works for the local WIC agency. WIC staff will try to complete as many remote reviews as possible before Sept 30th, 2020, when USDA waivers to conduct reviews remotely expire. The waivers only allow for remote reviews and do not change or eliminate what needs to be reviewed. Ability to complete reviews remotely after Sept 30th will require congressional action, giving UDSA waiver authority past Sept 30th. |

**Reviews conducted outside of triennial review:**

| **Program** | **How will your program’s review be conducted?** (If applicable, note any changes from the usual process of on-site reviews). |
| --- | --- |
| Reproductive Health (Clinical services) | Program is exploring ways to move some of the usual site review time to a mix of onsite, zoom, desk audit, and observation. |
| School-Based Health Center | All visits are on hold for Fall and early Winter. The state program will be developing a virtual review process to include records reviews, visual inspection and staff interviews. |
| Vaccine for Children (VFC) | CDC requires certain parts of the required visits to be done in person. The Immunization program is looking into creating a process for checking compliance through virtual methods. While this will not meet federal requirements, the CDC has notified the Oregon Immunization Program that awardees will not be penalized for not meeting required in person compliance visits. |

**Triennial Review Schedule –** OHA-PHD recognizes the need to be flexible given the unknowns of possible surges in COVID-19 cases and the impact on LPHAs. The following is a proposed timeframe for catching up on postponed triennial reviews and getting back on schedule.

(Note for WIC biennial reviews that were scheduled to occur through September 2020: WIC reviews must be completed by 9/30/2020 before USDA waiver allowing remote reviews expires. Some WIC reviews will be conducted prior to the September resumption of triennial reviews.)

| **LPHA (initially scheduled review month)** | **Current status** | **Review Schedule Option 1: Longer review windows to get back on schedule** | **Review Schedule Option 2: Longer review windows to allow greater flexibility for reviewers and local staff** |
| --- | --- | --- | --- |
| Curry, Umatilla, Josephine, Yamhill, and Clackamas | Unresolved compliance findings from 2019-2020 reviews | Reviewers will touch base with local program contacts to check on status of past due compliance findings corrective action. | Same as option 1 |
| North Central (Feb-Mar 2020) | **Reviews postponed:** MCH, CD, DWS, PHEP, STD, TB, Vital Records | Oct- Dec. 2020 – Reviewers will complete postponed reviews and (starting in August) finalize tools and reports for reviews conducted before TR pause | Same as option 1 |
| Hood River (Feb-Mar 2020) | **Reviews postponed:** MCH, CD, DWS, Fiscal, HIV Care and Treatment, Immunizations, PHEP, STD, Vital Records | Oct- Dec. 2020 – Reviewers will complete postponed reviews and (starting in August) finalize tools and reports for reviews conducted before TR pause | Same as option 1 |
| Baker (April-May 2020) | **Reviews postponed** | Oct 2020- Jan 2021 | Same as option 1 |
| Malheur (April-May 2020) | **Reviews postponed** | Oct 2020- Jan 2021 | Same as option 1 |
| Klamath (June-July 2020) | **Reviews postponed** | Oct 2020- Jan 2021 | Same as option 1 |
| Lake (June-July 2020) | **Reviews postponed** | Oct 2020- Jan 2021 | Same as option 1 |
| Union (August-Sept. 2020) | **Reviews postponed** | Oct 2020- Jan 2021 | Same as option 1 |
| Linn (Oct-Nov 2020) |  | Nov 2020- Jan 2021 | Nov 2020 – Feb. 2021 |
| Benton (Oct-Nov 2020) |  | Nov 2020- Jan 2021 | Nov 2020 – Feb. 2021 |
| Lincoln (Dec 2020) |  | Dec 2020- Jan 2021 | Dec 2020-March 2021 |
| Multnomah (Feb 2021) |  | Feb 2021 | Feb 2021-May 2021 |
| Polk (March 2021) |  | March 2021 | March 2021-June 2021 |
| Jackson (April 2021) |  | April 2021 | April 2021-July 2021 |
| Douglas (May 2021) |  | May 2021 | May 2021-August 2021 |
| Grant/Harney/Wheeler (June/July 2021) |  | June/July 2021 | June 2021-September 2021 |

**Note:** The usual time period for the triennial review for most programs will be the three years ending with the month before the initially scheduled review month, unless otherwise communicated by an individual program reviewer, or if a change is agreed between OHA-PHD and the LPH Administrator (or designee). Under scheduling option 2, whenever possible future reviews would be conducted within the originally scheduled month, while allowing for flexibility if needed by state or local staff involved with COVID-19 response.