

## LPHA Triennial Review – Methods and timeframe for conducting remote reviews <a href="Updated 5/17/2021">Updated 5/17/2021</a>

## **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
  - Parameters around dates/times for virtual meetings to occur within designated month(s) of the LPHA's review
  - Preferred remote communications platform (e.g. Zoom, MS Teams or phone conference call)
- 2. While we remain under the current public health emergency and under restrictions on non-essential travel, reviews will continue to be conducted remotely using methods described below for each program.
- 3. The usual time period to be reviewed for most programs will be the three years leading up to 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.
- 4. OHA 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 relying solely on email communications.
  - Discussion of compliance findings (or possible findings), corrective action and due dates.
  - Exit interview with LPH Administrator or designee (optional)
- 5. Reviewer will send draft completed program review tool and program review report to local program contact to review for accuracy before finalizing documents.
- 6. 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 corrective action items appearing as past due when the overview report is ready to send to the LPHA governing body, the LPHA may request due date extensions.



## 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) and document those on the review toolReviewer will send list of policies or other documentation that the LPHA needs to submit for the review.
	-If LPHA prefers to complete the review tool by email without a virtual meeting, then the reviewer will complete as much of the tool as possible based on information on-file and then send partially completed tool to LPHA to make corrections and/or additions.
Babies First!	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 conducted to fill in details and address any questions or areas of concern. Client record reviews will not be conducted unless requested by LPHA. Items from review tool that cannot be completed without review of client records will be deferred. Variances to caseload, supervision, team meeting, and home visit schedule requirements will be allowed during Covid-19 Public Health Emergency.
Maternal Child and Adolescent Health	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 conducted to fill in details and address any questions or areas of concern.
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 conducted 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	-OHA will ask LPHA to complete administrative sections of the EH review tool and will follow up
Lodging Health	with any questions.
and Safety	-OHA will review inspection records in the HealthSpace database. OHA will review the previous three years from the date of the initial scheduled review. However, inspection frequency requirements will not be assessed for 2020 because many LPHAs halted field work during the pandemic.
	-Any compliance findings will be addressed with an implementation plan submitted by the county. After the pandemic and/or the Governor's Emergency orders have ended, a timeline will be established by OHA to determine when LPHAs should be back in compliance for inspection rates in all licensed facility programs.
Health Officer	-Reviewer verifies Health Officer medical license status
Treaten Officer	-A statement from the LPH Administrator attesting that Health Officer is performing required duties will be accepted in lieu of usual 30-minute review meeting 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, with optional follow-up call to discuss any questions and review results.
Immunization	The Immunization Program has temporarily suspended immunization triennial reviews while their reviewer staff have been shifted to support the COVID-19 response. The following describes how reviews will be conducted when they resume, timeframe TBD (possibly summer 2021):
	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 complete the review tool based on program records and information provided by the local program. A virtual meeting with the local program will be conducted to fill in details and address any questions or areas of concern. Client record reviews will not be conducted unless requested by LPHA. Items from review tool that cannot be completed without review of client records will be deferred. Variances to caseload, supervision, team meeting, home visit schedule and community advisory board requirements will be allowed during Covid-19 Public Health Emergency.



Program Review name	How review will be conducted		
Public Health Emergency Preparedness	For some reviews, HSPR may do a desk audit of documents followed by a one hour follow up virtual call/meeting to answer questions and discuss any follow-up. The resumption of full PHEP reviews will depend on the intensity of the ongoing COVID-19 response, as well as how well the LPHA is resourced for staff. This will be determined on a case-by-case basis in communication between the OHA PHEP REC and the local PHEP Coordinator.		
Reproductive Health (PE 46)	Desk audit followed by a call to review results.		
Sexually Transmitted Disease	<ul> <li>-Reviews postponed from prior to July 2021 will not be conducted. Instead, Orpheus data for sections D and E on the review tool will be provided by OHA and any areas in need of improvement will be highlighted.</li> <li>- Reviews scheduled for July 2021 and later: 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. LPHAs may request a scaled back review consisting only of a data report (as described above for postponed reviews) if preferred.</li> </ul>		
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. For the duration of the COVID-19 public health emergency, HPCDP may scale back some of the documentation and detail needed for the review.		
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. Until the end of the COVID-19 public health emergency, TB triennial reviews will not be conducted for LPHAs with no TB cases in the last three years.		
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. Onsite reviews will resume when the restriction on non-essential state travel is lifted.		
WIC, Breastfeeding Peer Counseling, Farm Direct Nutrition Program	Remote review will be conducted using Zoom, Teams and/or phone conference, whichever works for the local WIC agency. A waiver from the USDA allows WIC biennial reviews to be conducted remotely but does not change or eliminate what needs to be reviewed.		

## Reviews conducted outside of triennial review:

Program	<b>How will your program's review be conducted?</b> (If applicable, note any changes from the usual process of on-site reviews).
Reproductive	Program is exploring ways to move some of the usual site review time to a mix of onsite, zoom, desk
Health (Clinical	audit, and observation.
services)	
School-Based	Virtual visit review process that include records review and staff interviews started in January 2021.
Health Center	Visits will remain virtual until there is clearance from the state to travel and clearance from school
	and medical sponsors to have additional people onsite.
Vaccine for	CDC has authorized Oregon's plan for conducting virtual VFC visits. As of April 2021, the
Children (VFC)	Immunization program is not able to plan for those visits for at least another three to four months.
	The program will begin COVID vaccine site visits (nearly identical to VFC visits) in May or June 2021.



**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. For all LPHAs with postponed (2020-2021) or upcoming (2021) triennial reviews, Kari Christensen or Andrew Epstein will aim to conduct pre-review calls with LPH Administrator or designee in June or July 2021 to negotiate review timeframe and parameters.

Note that this proposed schedule will remain subject to change depending on OHA and LPHA staff capacity.

LPHA (initially	Current status	Review Schedule – OSPHD would work with each
scheduled review		LPHA to determine preferred month(s) for
month)		completing triennial reviews.
Curry, Umatilla, Yamhill	Unresolved compliance findings	Reviewers will check with local contacts on
	from 2019-2020 reviews	status of past due findings corrective action.
North Central (Feb-Mar	All reviews have been	July-Aug. 2021 – Reviewers will finalize tools and
2020)	conducted.	reports for reviews already conducted.
Hood River (Feb-Mar	Reviews postponed: MCH, Fiscal	July-Aug. 2021 – Conduct fiscal and MCH review.
2020)		Reviewers will finalize tools and reports for
Paker (April May 2020)	Reviews postponed: All except	completed reviews.
Baker (April-May 2020)	Vital Records	July-Sept. 2021
Malheur (April-May	Reviews postponed: MCH,	July-Sept. 2021
2020)	Admin, CR, HO, Fiscal, FPL, DW.	
Klamath (June-July	Reviews postponed: MCH, CD,	July-Sept. 2021
2020)	DW, fiscal, FPL, PHEP, RH, STD,	
	TB	D. L. G. C. 2004
Lake (June-July 2020)	Reviews postponed: MCH, CD,	July-Sept. 2021
Union / August Cont	STD	Luly Cont. 2021
Union (August-Sept. 2020)	Postponed	July-Sept. 2021
Linn (Oct-Nov 2020)	Postponed	July-Oct. 2021
Benton (Oct-Nov 2020)	Postponed	July-Oct. 2021
Lincoln (Dec 2020)	Postponed	July-Nov. 2021
Multnomah (Feb 2021)	Postponed	August-Dec. 2021
Polk (March 2021)	Postponed	August-Dec. 2021
Jackson (April 2021)	Postponed	August-Dec. 2021
Douglas (May 2021)	Postponed	August-Dec. 2021
Grant/Harney/Wheeler	Postponed	August-Dec. 2021
(June/July 2021)		
Jefferson (Aug/Sept		Sept-Dec. 2021
2021)		
Crook (Aug/Sept 2021)		Sept-Dec 2021
Columbia (Oct/Nov		Oct 2021-Jan. 2022
2021		
Clatsop (Oct/Nov 2021)		Oct 2021-Jan. 2022
Washington (Jan. 2022)		Feb-March 2022
Tillamook (Feb. 2022)		Feb-March 2022
Marion (March 2022)		March 2022
Lane (April 2022)		April 2022
Deschutes (May 2022)		May 2022
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