**LPHA Triennial Review – Methods and timeframe for resuming reviews effective 10/1/2021**

**Updated 9/XX/2021 –– DRAFT 9/14/2021**

**Overall process**

1. Kari or Andrew will communicate 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 review meetings to occur within designated month(s) of the LPHA’s review
   * If needed, LPHA may request further postponement of the LPHA’s entire triennial review or postponement of reviews for specific programs where staff capacity is limited due to COVID-19 response efforts
   * Preferences related to meeting in person vs. remote, and preferences for remote communications platform (e.g. Zoom, MS Teams or phone conference call)
2. Most programs will continue to conduct reviews remotely using methods described below for each program. Some programs may return to in-person reviews due to federal requirements or other programmatic needs and depending on state travel policy at the time each review is scheduled. Each reviewer will clearly communicate with the local program contact regarding the method to be used for the review.
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. Some OHA programs may be able to conduct reviews via desk audit only, without requiring a meeting with local program staff. The OHA reviewer will schedule a meeting (virtual or in-person) when needed for:
   * Visual inspection, observation or discussion if required for completion of the review tool, or if a virtual or in-person 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.

1. After all reviews have been conducted, Kari or Andrew will send a compilation of all program review tools and review reports to the LPH Administrator or designee, along with a summary of compliance findings, required corrective action and due dates. For all LPHA triennial reviews initially scheduled to occur through December 2021, due to limited capacity during this time of catching up on postponed reviews, the usual overview report will not be sent to the LPHA’s governing body. Instead, the LPHA governing body will receive one summary letter regarding the triennial review after all findings have been resolved.

**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 tool.  -Reviewer 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 send a request via email to start the review process and schedule the initial meeting. The review consists of two meetings via Zoom or Teams: the initial review meeting and the exit meeting. Any other communication including the submission of documents will be via email unless additional meetings are requested or required by the LPHA. |
| Food, Pool and Lodging (FPL) Health and Safety | FPL is conducting modified triennial reviews as a result of the COVID-19 emergency. In lieu of the traditional review that looks at the IGA requirements, field inspection protocols and inspection frequencies and documentation, we are only reviewing the administrative standards in the IGA. In addition, reviewer will request a brief written summary of the LPHA’s COVID-related activities over the past year and a half (contact tracing, COVID enforcement or consultation, etc.) that were conducted in lieu of inspections, and that will complete the review for this three-year cycle. |
| Health Officer | -Reviewer verifies Health Officer medical license status  -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.  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. |
| 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 | STD reviews will not be conducted for LPHA triennial reviews that were initially scheduled to be conducted through December 2021. 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. An optional Zoom call can be requested either by the STD Program or the LPHA to review the data or any other program concerns. |
| 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 | Teams video 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. WIC reviews will be conducted in-person if the USDA waiver ends. |

**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) | After receiving feedback from agencies about the clinical review methods (onsite, virtual, hybrid), the RH Program will resume onsite clinical reviews as soon as is feasible and safe. We will be flexible in our approach with each agency recognizing different limitations due to Covid response. |
| School-Based Health Center | Virtual visit review process that includes records review and staff interviews started in January 2021. Onsite visits that had been scheduled for October-December 2021 have been postponed. The state program will re=evaluate in November/December 2021 and possible resume site visits in January 2022. |
| Vaccine for Children (VFC) and COVID Vaccine Visits | As of September 2021, VFC visits are on hold; to be determined when they will resume. COVID Vaccine Visits have begun (conducted by a contractor). |

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**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 communicate with LPH Administrator or designee in October 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 triennial review (initially scheduled review month)** | **Current status** | **Review Schedule –** OSPHD would work with each LPHA to determine preferred month(s) for completing triennial reviews. The months listed below are a proposed starting point for discussion with each LPHA. |
| --- | --- | --- |
| Umatilla, Yamhill | Unresolved compliance findings from 2019-2020 reviews | Reviewers will check with local contacts on status of past due findings corrective action. |
| Hood River (Feb-Mar 2020) | **Reviews postponed:** MCH, Fiscal | Oct.-Nov 2021 |
| Baker (April-May 2020) | **Reviews postponed:** All postponed except Vital Records | Oct.-Nov 2021 |
| Malheur (April-May 2020) | **Reviews postponed:** Admin, Civil Rights | Oct.-Nov 2021 |
| Klamath (June-July 2020) | **Reviews postponed:** MCH, CD, DW, fiscal, FPL, PHEP, RH | Oct.-Nov. 2021 |
| Lake (June-July 2020) | **Reviews postponed:** MCH, CD, TPEP | Oct.-Nov. 2021 |
| Union (August-Sept. 2020) | **Postponed** | Oct.-Dec 2021 |
| Linn (Oct-Nov 2020) | **Postponed** | Nov. 2021 – Jan 2022 |
| Benton (Oct-Nov 2020) | **Postponed** | Nov. 2021 – Jan 2022 |
| Lincoln (Dec 2020) | **Postponed** | Nov. 2021 – Jan 2022 |
| Multnomah (Feb 2021) | **Postponed** | Nov. 2021 – Jan 2022 |
| Polk (March 2021) | **Postponed** | Dec. 2021 – Feb. 2022 |
| Jackson (April 2021) | **Postponed** | Dec. 2021 – Feb. 2022 |
| Douglas (May 2021) | **Postponed** | Jan- Feb 2022 |
| Grant/Harney/Wheeler (June/July 2021) | **Postponed** | Nov. 2021 -Feb. 2022 |
| Jefferson (Aug/Sept 2021) | **Postponed** | Dec. 2021 – Feb. 2022 |
| Crook (Aug/Sept 2021) | **Postponed** | Dec. 2021 – Feb. 2022 |
| Columbia (Oct/Nov 2021 |  | Dec. 2021 - Feb. 2022 |
| Clatsop (Oct/Nov 2021) |  | Dec. 2021-Feb. 2022 |
| Washington (Jan. 2022) |  | March - April 2022 |
| Tillamook (Feb. 2022) |  | March - April 2022 |
| Marion (March 2022) |  | March - April 2022 |
| Lane (April 2022) |  | April 2022 |
| Deschutes (May 2022) |  | May 2022 |