

## **Public Health Accreditation Board Requirements – Domains 2 and 6 Recommendations for the County of Ventura**

The County of Ventura Health Services Agency Public Health Department applied for national public health accreditation from the Public Health Accreditation Board (PHAB) in October 2012. The Public Health Institute (PHI) received an Accreditation Support Initiative grant from the National Association of County and City Health Officials (NACCHO) in December 2012 to provide technical assistance to California’s local health departments. The scope of work for this project includes assisting Ventura County with engaging the Department of Environmental Health to ensure documentation of the standards for PHAB Domains 2 and 6. The Department of Environmental Health resides within the County government but outside of the Health Services Agency.

Ventura County staff completed a SWOT analysis on each of the PHAB Domain 2 and 6 standards and measures. The results of this internal analysis were reviewed and several recommendations were made after discussions with the staff. Targeted technical assistance is being provided to each domain lead regarding the documents collected, suggestions for documents to locate from other departments, and templates to develop documents that did not exist (e.g. policies, procedures, and protocols).

There are two primary recommendations for dedicated projects that will require staff time and leadership support to complete by the October 31, 2013 deadline for PHAB submission.

**Recommendation One, Domain 6: Develop a policies and procedures for a standardized approach to the legislative review process.** This will include developing a process to collect and track all legislative reviews. It is recommended that the department assign the coordination and tracking of legislation to someone on staff as part of the job-related duties. This should align with any legislation related activities that exist within the County. If there is a legislative lead on the county-level administrative staff, it is recommended to include this person on the development of the public health department’s policy, procedure, and/or protocol. There also should be a link with any legislative activities done by the Department of Environmental Health. Anyone in that department performing these types of job functions should be consulted as well.

**Recommendation Two, Domain 2: Finalize the Epidemiology Response Plan and ensure that it contains the required items listed under PHAB Domain 2 Standard 1.** These shall include protocols that would address all six specific public health topic areas in Measure 2.1.1: Communicable Disease, Sexually Transmitted Diseases, Injury, Chronic Disease, Chemical Exposure, and Drinking Water Contamination. For those items that the department is not primarily responsible, the staff should develop a short protocol of activities that would occur if requested to assist another governmental entity such as the Department of Environmental Health or the California State Department of Public Health.

**The table** below lists each of the standards and measures by domain with documented results of the discussion with the Ventura County team leads for Domains 2 and 6.

<b>Domain 2: Investigate health problems and environmental public health hazards to protect the</b>
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community		
Standard 2.1 – Conduct timely investigations of health problems and environmental public health hazards		
	Observations	Recommendations
<b>Measure 2.1.1 – Maintain protocols for investigation process</b>	Once completed the Epi Response Plan should meet this measure	<p>Ensure that it will include all types of investigations:</p> <ul style="list-style-type: none"> <li>• Suspected or identified health problems</li> <li>• Environmental and occupational public health hazards*</li> </ul> <p>Health problems to include:</p> <ul style="list-style-type: none"> <li>• Communicable disease</li> <li>• Sexually transmitted diseases</li> <li>• Injury – CDRT?</li> <li>• Chronic disease – check with State re: cancer registry</li> <li>• Chemical emissions – DEH</li> <li>• Drinking water contamination – DEH</li> </ul> <p>Develop a flow chart. Mention when appropriate, contact other departments in the response section (e.g. there should be a bullet point for notifying environmental health if epi staff identify an illness that requires their response). Inquire with PHAB about occupational public health hazards because if there is a public health hazard, the department will follow its protocols regardless of setting.</p>
<b>Measure 2.1.2 – Demonstrate capacity to conduct an investigation of an infectious or communicable disease</b>	Need <u>two</u> program audits/evaluations and <u>one</u> AAR. Two AARs (H1N1 2009-10 and Measles) appear to comply.	Identify a third report to be used for this measure. School exercise AAR for part 1 and H1N1 2009 AAR for part 2.
<b>Measure 2.1.3 – Demonstrate capacity to conduct investigations of non-infectious health problems, environmental, and/or occupational public hazards</b>	Need <u>only one</u> example and Hazmat spill report may suffice.	Something to think about - Has the chronic disease staff produced any reports analyzing a specific chronic disease or multiple diseases (diabetes, cancer, etc.)?
<b>Measure 2.1.4 – Work</b>	Need <u>two</u> agreements of any	Suggest finding another report

collaboratively through established governmental and community partnerships on investigations of reportable/disease outbreaks and environmental public health issues	<p>type:</p> <ul style="list-style-type: none"> <li>• MOU with DEH once completed will meet one of the two required documents.</li> <li>• Animal Control Contract.</li> </ul> <p>Need <u>two</u> examples of working with partners to conduct investigations:</p> <ul style="list-style-type: none"> <li>• H1N1 2009-10 AAR</li> <li>• Pesticide Incident Report – not sure if this meets the requirement</li> </ul> <p>Provided PH lab list of services.</p>	or AAR that involves partners. Are there any reports from an outbreak stemming from something related to environmental health in last five years (e.g. foodborne illness stemming from a restaurant, waterborne illness stemming from polluted ocean water, etc.)? Norovirus investigation could be used to demonstrate this.
<b>Measure 2.1.5 – Monitor timely reporting of notifiable/reportable diseases, lab test results, and investigation results</b>	Disease tracking log appears to meet the requirements. Laws relating to the reporting of notifiable/reportable diseases are present.	None
<b>Standard 2.2 – Contain/mitigate health problems and environmental public health hazards</b>		
	<b>Observations</b>	<b>Recommendations</b>
<b>Measures 2.2.1 – Maintain protocols for containment/mitigation of public health problems and environmental public health hazards</b>	None provided	Any of the following plans may meet this if written or revised within the last five years: All hazards plan, smallpox plan, Cities Readiness (anthrax release, chem. prophylaxis), etc. Check to see if DEH has anything that could meet this measure. Use protocol for nuclear event.
<b>Measure 2.2.2 – Demonstrate a process for determining when the All Hazards Emergency Operations Plan (EOP) will be implemented</b>	Provided Epi Response Plan – activation is a separate document. No environmental health plan. Cluster evaluation documents provided.	Need protocols specific to Environmental Health (e.g. Environmental Health Response Plan). This plan also would need to identify when All Hazards Plan is activated.
<b>Measure 2.2.3 – Complete an AAR following events</b>	Draft protocols used for this one	Finish the protocols and ensure that they address this measure (page 64-65 of Guidance) Create a list of significant events.
<b>Standard 2.3 – Ensure access to laboratory and epidemiological/environmental public health expertise and capacity to investigate and contain/mitigate public health problems and environmental public health hazards</b>		
	<b>Observations</b>	<b>Recommendations</b>
<b>Measure 2.3.1 – Maintain provision for 24/7 emergency access to epidemiological and environmental public health</b>	Authority provided, but missing policies and procedures outlining how the health department maintains 24/7 access.	Develop policies and procedures for this or determine if DEH has one and adapt it to the PH Department.

resources capable of providing rapid detection, investigation and containment/mitigation of public health problems and environmental public health hazards	Call down list provided. Emergency Response Plan regarding mutual aid provided.	
Measure 2.3.2 – Maintain 24/7 access to laboratory resources capable of providing rapid detection, investigation and containment of health problems and environmental public health hazards	Lab certification provided. Lab influenza Emergency Response Plan contains a small statement to address this requirement of policies and procedures that assure 24/7 coverage. Specimen Processing Procedures provided.	None
Measure 2.3.3 – Maintain access to laboratory and other support personnel and infrastructure capable of providing surge capacity	Lab Influenza Emergency Response Plan mentions surge capacity. List of staff provided. Equipment inventory provided. MRC training schedule provided. Draft Red Cross MOA.	Would this plan be used for other disease testing surges? Is there a training schedule for staff that may get reassigned to address surge? Finalize Red Cross MOA and specifically include lab surge in addition to other staffing surge to meet this measure.
Measure 2.3.4 – Demonstrate that Tribal, state, and local health departments work together to build capacity and share resources to address Tribal, state, and local efforts to provide for rapid detection, investigation, and containment/mitigation of public health problems and environmental public health hazards	Emergency Operations Manual addresses mutual aid. BDS Exercise AAR	None
<b>Standard 2.4 – Maintain a plan with policies and procedures required for urgent and on-urgent communications</b>		
	<b>Observations</b>	<b>Recommendations</b>
2.4.1 – Maintain written protocols for urgent 24/7 communications	No written communication protocols. Contact report provided. After hours call service provided	Written communication protocols need to be developed. Find out if San Diego can share theirs with Ventura.
2.4.2 – Implement a system to receive and provide health alerts and to coordinate an appropriate public health response	CAHAN info provided. CD 24/7 Contact Report provided	Although basic requirements are met in this measure, operationally it does not meet the department’s needs. QI project to improve ability to

		send alerts/notification. CAHAN used by EPO but Communicable Disease has a system about to expire. Need to identify a method to ensure that alerts are able to be sent to providers.
<b>Domain 6: Enforce public health laws</b>		
<b>Standard 6.1 – Review existing laws and work with governing entities and elected/appointed officials to update as needed</b>		
	<b>Observations</b>	<b>Recommendations</b>
<b>Measure 6.1.1 – Review laws to determine the need for revisions</b>	CHEAC Hot Sheets were identified and provided; however, there is no documentation that the department actively does anything with this information. There is no formal system for the review of laws.	Develop a policy and procedure for the review of laws. Develop a form to record the analysis. Assign a staff lead for coordinating and tracking of the process. Ask DEH if they have any of this so public health might be able to adapt or use anything already existing within the County government.
<b>Measure 6.1.2 – Inform governing entity and/or elected/appointed officials of needed update/amendments to current laws and/or proposed new laws</b>	Booster Seat Bill Support letter provided. CHEAC legislative recommendation letter re: SB594. CEO's office solicits annual input for their legislative platform.	It is not clear if Ventura County is supporting CHEAC's position, thus the CHEAC letter may not meet this measure unless internal documentation shows support for this bill. Find out what the process is for the CEO's office and if a policy and procedure exists. Any local BOS actions that involved public health informing the governing entity to change local law? Participate in a conference call with the City of Pasadena to determine if their approach to meeting this standard is adaptable for Ventura's needs.
<b>Standard 6.2 – Educate individuals and organizations on the meaning, purpose, and benefit of public health laws and how to comply</b>		
	<b>Observations</b>	<b>Recommendations</b>
<b>Measure 6.2.1 – Maintain agency knowledge and apply public health laws in a consistent manner</b>	CIPP and Safe Kids – CPS Tech Update is an excellent example. Emergency Services self-training of staff on new State laws – has this been received yet? No documentation of audits, enforcement documents or logs.	Is there a training agenda? How does Ventura track staff training? Target Solutions and/or Policy Tech can be used to disseminate the laws and track staff reading them. Does the department review new laws or

		legislation during meetings? If so, meeting minutes with sign-in sheets should work. Letter to providers regarding reporting communicable disease.
<b>Measure 6.2.2 – Ensure that laws and permit/license application requirements are accessible to the public</b>	Animal Services – pet licensing information on their website Environmental Health – Food Handlers Card Law EMS – EMT/paramedic certification and licensure resources and information Communicable Disease – communicable disease and TB specific reporting instructions on their webpage	None
<b>Measure 6.2.3 – Provide information or education to regulated entities regarding their responsibilities and methods to achieve full compliance with public health related laws</b>	None	None

**Standard 6.3. – Conduct and monitor public health enforcement activities and coordinate notification of violations among appropriate agencies**

	<b>Observations</b>	<b>Recommendations</b>
<b>Measure 6.3.1 – Maintain written procedures and protocols for conducting enforcement actions</b>	CA Health & Safety Code sections, CCR Title 22 Div 9 Chapter 6, CA EMS Authority Model disciplinary orders, and VC EMS Agency Policies provided, but nothing else provided.	Work with DEH, EMS, and Communicable Disease to obtain and determine the best set of written procedures and protocols to submit. Need to identify authority and find written policies and protocols that align with the authorities.
<b>Measure 6.3.2 – Conduct and monitor inspection activities of regulated entities according to mandated frequency and/or risk analysis method that guides the frequency and scheduling of inspections of regulated entities</b>	Needs work	Find out if DEH keeps this information.
<b>Measure 6.3.3 – Follow procedures and protocols for both routine and emergency situations requiring enforcement activities and complain follow-up</b>	Needs work	Possible example – the bats incident.
<b>Measure 6.3.4 – Determine patterns or trends in compliance from enforcement activities and complaints</b>	Needs work	Find out if DEH analyzes trends
<b>Measure 6.3.5 – Coordinate notification of violations to the public, when required, and coordinate the sharing of information among appropriate agencies about enforcement activities, follow-up activities, and trends or patterns</b>	Needs work	Check with DEH and Air Pollution Control Other programs to look at: tobacco or car seat safety enforcement