Understanding Public Health Accreditation Documentation for Public Health Laws and Governance Domains

David Stone | NIHB Public Health Summit | April 12, 2016

phaboard.org
What in the world are Domains 6 & 12 all about?
Welcome
Introductions
Becoming PHABulous

- PHAB Update
- Assistance
- Domains 6 & 12
- Standards & Measures
- Accreditation Process
- Documentation Basics

phaboard.org
PHAB’s Goal

The goal of the voluntary national accreditation system is to improve and protect the health of the public by

advancing and ultimately transforming the quality and performance

of state, local, Tribal and territorial public health departments.
What’s Going On?

• PHNCI
• AIC - Reaccreditation
• Think Tanks
• Evaluation
• Fees
Accreditation Activity as of April 2016

Type of Health Department

<table>
<thead>
<tr>
<th>Type of Health Department</th>
<th>Accredited</th>
<th>In Process</th>
<th>Total in e-PHAB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local</td>
<td>101</td>
<td>149</td>
<td>250</td>
</tr>
<tr>
<td>State</td>
<td>16</td>
<td>17</td>
<td>33</td>
</tr>
<tr>
<td>Tribal</td>
<td>.</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Centralized States</td>
<td>1/67</td>
<td>.</td>
<td>1/67</td>
</tr>
<tr>
<td>Integrated System</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-Jurisdictional</td>
<td></td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>Number of HDs</td>
<td>117+1 system</td>
<td>178</td>
<td>296</td>
</tr>
<tr>
<td>Population (Unduplicated)</td>
<td>153,999,823</td>
<td>76,742,613</td>
<td>230,742,436</td>
</tr>
</tbody>
</table>

Applicant Names Are Kept Confidential
Accreditation Process

1. Preparation
2. Registration & Application
3. Document Selection & Submission
4. Site Visit
5. Accreditation Decision
6. Reports
7. Reaccreditation
Pop Quiz!

Which step includes document submission?
CHART YOUR PATH TO ACCREDITATION

Documentation Requirements
I just don't know what to do!!
Getting Started With Documentation
When To Prepare Docs?

• HDs should prepare their docs BEFORE they gain access to Doc Submission access in e-PHAB

• Identify, Locate, Develop, Select, Save, Review, and Update Documentation Early
Links To Current Documentation

Don’t create just to meet the measures.
Draw from current documentation.
Challenges and Gaps

- Past Documentation
- Community Engagement
- Defining the Process
- Showing Implementation
- Building on the Foundation
General Guidance

- Current & in use when submitted
- Draft documents not accepted
- No confidential information
- Within past 5 years unless otherwise required
- Paperless process
  - “Hard copy” submitted electronically
- Submit in acceptable file formats

See Standards and Measures page 9
General Guidance

• Make sure every document is dated
• Make sure every document includes evidence of authenticity
• Don’t upload sideways documents
• Don’t upload drafts
• Don’t upload documents with blank signature lines
From Where?

“WHAT” is in place, not “HOW” it got there or “WHO” developed it
What is a date?

- Created Date
- Revised Date
- Reviewed Date
- Amended Date
- Effective Period

Must be on/in the Document

See Standards and Measures page 7
What is a Signature?

“Evidence Of Authenticity”
- HD Logo
- HD Director Signature
- HD Abbreviation
- HD E-mail Address
- Membership List

You Only Need One!

See Standards and Measures page 8
Selecting Examples

• Documents may be used for more than one measure
  – i.e., can use same document more than once
• Different Program Areas
• No. of Examples ≠ No. of Documents
Appropriate Examples

- Access To Clinical Services
- Chronic Disease Prevention
- Communicable Disease
- Community Health
- Environmental Health
- Health Education
- Health Promotion
- WIC
- Injury Prevention

- Maternal & Child Health
- Emergency Preparedness
- Laboratory Services
- Management/Administration
- Governance
- Prevention
  - Behavioral Health
  - Substance Abuse
  - Violence

See Standards and Measures page 9
Inappropriate Examples

- Individual Patient Care and Interventions
- Health Care Facilities Licensure & Certification
- Professional Licensing Programs
- Health Care Financing Systems (E.G., Medicaid)
- Social Services Support Programs
- Animal Health
Tips for Success

• Make sure to provide the right number of examples per Required Documentation
• Make sure to “tell the story” using the upload title, upload description, and Measure Narrative
• Make sure to be point the site visit team in the right direction
• Don’t include examples from inappropriate programs or activities
Pop Quiz!

Which example is not appropriate for documentation?

a) food and lodging inspections
b) partner violence prevention
c) primary care clinic visits
d) community immunization rates
e) preparedness exercises
Pop Quiz!

Which example is not appropriate for documentation?

a) food and lodging inspections
b) partner violence prevention
c) primary care clinic visits
d) community immunization rates
e) preparedness exercises
The Standards & Measures
Framework

- Domain
- Standard
- Measure
- Required Documentation
- Guidance

Purpose

Significance

Number of Examples

Timeframe of Document

phaboard.org
The 12 Domains

1. Conduct assessments focused on population health status and health issues facing the community
2. Investigate health problems and environmental public health hazards to protect the community
3. Inform and educate about public health issues and functions
4. Engage with the community to identify and solve health problems
5. Develop public health policies and plans
6. Enforce public health laws and regulations
7. Promote strategies to improve access to healthcare services
8. Maintain a competent public health workforce
9. Evaluate and continuously improve processes, programs, and interventions
10. Contribute to and apply the evidence base of public health
11. Maintain administrative and management capacity
12. Build a strong and effective relationship with governing entity
Assessing Documents

- Domain
- Standard
- Measure
- Required Documentation
- Guidance

Purpose
- Significance

Number of Examples
- Timeframe of Document
Standard 6.1: Review existing laws and work with governing entities and elected/appointed officials to update as needed.

**MEASURE**

**Measure 6.1.1 A**
Laws reviewed in order to determine the need for revisions

**PURPOSE**

The purpose of this measure is to assess the health department’s analysis of public health laws and other laws that have public health implications to ensure that they are consistent with evidence-based public health and newly emerging public health issues and information. The assessment of laws should consider individual or community cost, inconvenience, impact on systemic health inequities, and regulatory alternatives and sanctions, in addition to the public health program benefits of the law.

**SIGNIFICANCE**

Health departments need to be aware of current public health laws and of laws that are not specific to public health but have public health implications, for example, zoning, recreation related, animal related, or transportation laws. These types of laws can have significant impact on health equity. The laws that the health department reviews need not be only laws that the health department enforces. They may also be laws that others enforce but that impact public health, for example, helmet use laws, school nutrition requirements, sale of tobacco products to minors, animal rabies vaccination laws, or school requirements for proof of childhood vaccinations. Program staff of the health department reviews these laws to ensure that they are consistent with evidence-based public health practices and emerging public health issues.

**REQUIRED DOCUMENTATION**

1. Reviews of public health laws or laws with public health implications that include the following:

**GUIDANCE**

1. The health department must document its evaluation of laws for their public health implications.

   Reviews may be of a law that the health department enforces or of a law that the health department has no legal authority to enforce, but that has implications for the health of the public in the jurisdiction of the health department. The documentation may address the review of enforcement protocols and/or adherence to protocols and not of a law itself. This is a program review and does not require the review by a lawyer.

   Documentation could be, for example, meeting minutes, reports, presentations, memos, or some other record of the discussion of the review and findings. They could also be in the form of policy agendas, position papers, white papers, and legislative briefs, including recommendations for amendments.

   Health departments must document that the review of the law included:

**NUMBER OF EXAMPLES**

2 examples that are from different programs

**DATED WITHIN**

Reviews completed within 3 years
**MEASURE 6.1.1 A, continued**

<table>
<thead>
<tr>
<th>a. Evaluations of laws for consistency with public health evidence-based and/or promising practices; and consideration of the impact on health equity</th>
<th>a. Consideration of evidence-based practices, promising practices, or practice-based evidence. The impact of the law on health equity in the health department’s jurisdiction, if any, must also be considered.</th>
</tr>
</thead>
<tbody>
<tr>
<td>b. Use of model public health laws, checklists, templates, and/or exercises in reviewing law</td>
<td>b. The use of model public laws, check lists, templates, or some other standard outline or guide. The standard outline or guide could be developed by the health department or by others. Due to the limited availability of evidenced-based practices or promising practices in Tribal communities, Tribes may provide examples of practice-based evidence used to adapt models or create models based on a cultural framework or traditional forms of governance.</td>
</tr>
<tr>
<td>c. Input solicited from key stakeholders on proposed and/or reviewed laws</td>
<td>c. Input from key partners and stakeholders. Input may be sought through, for example, public notice, town forums, meetings, hearings, or request for input on the health department’s web page.</td>
</tr>
<tr>
<td>d. Collaboration with other levels of health departments when the laws impact on them</td>
<td>d. Collaboration with other levels of government health departments. State health departments must document that it has collaborated with Tribal or local health departments in reviewing laws that may impact those Tribal or local health departments. This collaboration may involve state health departments providing assistance to Tribal or local health departments as they review and revise laws or it may involve obtaining Tribal or local input on new state laws or revisions of state laws. Specifically, states must consult with Tribal governments on laws that may impact them or for which they are requesting assistance for implementing within Tribal jurisdictions. Documentation of state collaboration could be minutes or summaries of meetings held by the state with Tribal and/or local public health officials; agenda, minutes, and any resulting documents from meetings with stakeholders; summaries of comments from town meetings, hearings, or comments received through a website.</td>
</tr>
</tbody>
</table>
Local health departments must document how they consult with Tribes when reviewing laws that impact multiple jurisdictions, for example, disease reporting, isolation and quarantine, and immunizations.

Tribal health departments must document work with its local Tribal units (i.e. Chapter Houses, Pueblos, or Districts), in addition to other partners, when reviewing existing laws and revising or creating new laws.

Documentation could be, for example, reports of working with local Tribal community stakeholders, for example, elected Tribal District Chairpersons, elected Tribal council committees, Tribal Community Colleges, school districts, and boards. Tribal health documentation may also include work completed with Tribal Legislative Counsel or Tribal Elected/Appointed officials, for example, District Chairpersons, Tribal Oversight Committees, and governing entities.

2. Access to legal counsel

2. The health department must document that it has access to legal counsel review and advice for use, as needed.

Documentation could be, for example, an MOU, a contract, a letter of agreement, or statement that a governmental attorney’s office has the responsibility to provide legal counsel to the health department.
Domains 6 & 12

D6 – Enforce Public Health Laws

D12 – Maintain Capacity to Engage the Public Health Governing Entity
Domain 6

1. Process for reviewing public health laws
   • Inform others when changes are needed

2. Educating the public and others on the importance and interpretation of public health laws

3. Enforcing public health laws
   • Inspections
   • Compliance
   • Analysis of compliance
Keys to Domain 6

1. Laws includes everything
2. Work within your legal structure
3. Doesn’t have to be enforced by THD
4. Includes areas such as communicable disease, immunization requirements, environmental health
Measure 6.1.1 A - Laws reviewed in order to determine the need for revisions

Measure 6.1.2 A - Information provided to the governing entity and/or elected/appointed officials concerning needed updates/amendments to current laws and/or proposed new laws
Domain 6 - Std 2

Measure 6.2.1 A - Department knowledge maintained and public health laws applied in a consistent manner

Measure 6.2.2 A - Laws and permit/license application requirements are accessible to the public

Measure 6.2.3 A - Information or education provided to regulated entities regarding their responsibilities and methods to achieve full compliance with public health related laws
Domain 6 - Std 3

Measure 6.3.1 A - Written procedures and protocols for conducting enforcement actions

Measure 6.3.2 A - Inspection activities of regulated entities conducted and monitored according to mandated frequency and/or a risk analysis method that guides the frequency and scheduling of inspections of regulated entities

Measure 6.3.3 A - Procedures and protocols followed for both routine and emergency situations requiring enforcement activities and complaint follow-up
Domain 6 - Std 3

Measure 6.3.4 A - Patterns or trends identified in compliance from enforcement activities and complaints

Measure 6.3.5 A - Coordinated notification of violations to the public, when required, and coordinated sharing of information among appropriate agencies about enforcement activities, follow-up activities, and trends or patterns
1. Operational definitions of roles, responsibilities and authorities
2. Inform governing entity about PH and HD
3. Engage governing entity in HD’s responsibilities
   • Communication
1. You define your governance and work within that structure
   a) Official
   b) Policy-making
   c) Advises
   d) Supports
Domain 12 - Std 1

Measure 12.1.1 A - Mandated public health operations, programs, and services provided

Measure 12.1.2 A - Operational definitions and/or statements of the public health governing entity’s roles and responsibilities
Domain 12 - Std 2

Measure 12.2.1 A - Communication with the governing entity regarding the responsibilities of the public health department and of the responsibilities of the governing entity
Domain 12 - Std 3

Measure 12.3.1 A - Information provided to the governing entity about important public health issues facing the community, the health department, and/or the recent actions of the health department

Measure 12.3.2 A - Actions taken by the governing entity tracked and reviewed

Measure 12.3.3 A - Communication with the governing entity about health department performance assessment and improvement
Pop Quiz!

True or False:
Documentation used as evidence for Domains 6 & 12 should reflect how you do things in your health department.

True
Wrap-Up
• Start by becoming familiar with the Standards and Measures
• Documentation reflects your department and your practices
• Your documentation matches your governance
What PHAB Does

• Answer questions about:
  – Intent & interpretation
  – Types of documentation
  – Accreditation process and timing
  – PHAB materials
  – e-PHAB

• Provide process support to the Health Department and to Site Visitors
Assist health departments in preparing for accreditation

- Resources, Templates, Advice, Consultation
Technical Assistance

1. PHAB: [WWW.PHABBOARD.ORG](http://WWW.PHABBOARD.ORG)
2. ASTHO: [WWW.ASTHO.ORG](http://WWW.ASTHO.ORG)
3. CDC: [WWW.CDC.GOV](http://WWW.CDC.GOV)
4. NACCHO: [WWW.NACCHO.ORG](http://WWW.NACCHO.ORG)
5. NALBOH: [WWW.NALBOH.ORG](http://WWW.NALBOH.ORG)
6. NIHB: [WWW.NIHB.ORG](http://WWW.NIHB.ORG)
7. NNPHI: [WWW.NNPHI.ORG](http://WWW.NNPHI.ORG)
8. PHF: [WWW.PHF.ORG](http://WWW.PHF.ORG)
9. PHQIX: [WWW.PHQIX.COM](http://WWW.PHQIX.COM)
10. RWJF: [WWW.Rwjf.ORG](http://WWW.Rwjf.ORG)
Questions?
Please complete the evaluation!
David Stone
Education Specialist
Public Health Accreditation Board
1600 Duke Street, Suite 200
Alexandria, VA 22314

dstone@phaboard.org
703-778-4549 ext. 105
703-778-4556 fax

phaboard.org