



May 2023 Public Comment on Proposed Changes to Standards & Activities

Summary Report

Introduction

In May 2023, health department staff and partners were invited to participate in an open public comment period to provide input on an early set of proposed changes to NCLHDA standards and activities. Respondents were invited to review the [Proposed Accreditation Standards & Activities](#) and submit feedback through a Qualtrics survey, which included a series of multiple choice and free response options. **81 respondents submitted feedback** through the public comment form, 96% of whom were local health department staff – primarily health directors (28) and/or Agency Accreditation Coordinators (22). Respondents also held roles on the Standards Workgroup, Site Visit Team, or other subject matter experts.

Key Takeways

Across all respondents, a large majority agreed that standards reflected activities that were important for health departments, related to work that falls under LHD responsibility, and match what respondents would expect to see. *Standard E: Equity* and *Standard G: Organizational Leadership, Governance, & Legal Services* had the least agreement, and activities within these two standards also received the most edits. Public comments included acknowledgement that proposed revisions reduce duplication, while also highlighting components that need further revisions.

Next Steps

The Accreditation Standards Workgroup has already met to start incorporating public comment feedback, and they will continue to discuss revisions to the proposed standards. Legal affairs at DPH is offering assistance in drafting the standards and activities in rulemaking language, and NCLHDA program staff are holding discussions with DPH sections to reduce duplication of monitoring.

On-going collaboration and conversations with DPH, NCALHD, AACs, and other partners as vital in developing an accreditation program that is reflective of today's public health practice and health department operations. NCLHDA plans to facilitate conversations with Board Members and people involved in the initial development of accreditation to inform the revised proposal. Balancing the need for appropriate input and desire for change, the program hopes that new rules can be adopted in 2025, with changes implemented in 2026.

Appendix 1 – Brief overview of comments for each proposed standard

Appendix 2 – Brief overview of responses on understanding of activity requirements

Appendix 3 – Table with responses on importance and relationship of proposed activities

Analysis by Standard

Standard A

Most comments offered support for the Standard. There were questions about the use of data and more integration of that into the activities. There were also comments on oversight and monitoring of some elements by DPH and how that will be linked to the requirements.

Standard B

While many comments liked the proposed activities, some thought they were too weak. There were comments on the quality of partnerships and how this can be more evenly implemented across the state. The linkage between partnerships and the CHA/CHIP was also raised.

Standard C

There were a variety of responses with questions around how this is currently in practice and changes that would be beneficial.

Standard D

Many responses noted that this set of activities are already a part of preparedness agreement addenda and the section could be met if all state requirements are met.

Standard E

Responses noted how broad the requirements are and the need to have careful interpretation, as would be the language used. There were also comments on how this would be integrated in overall work. It was unclear to some what the standard means and how it would be determined as met.

Standard F

Comments here reflected concerns over human resource policy and that some decisions on staffing are at a higher level than the department, giving limited control and influence in decisions. There were comments on the current difficulties in hiring and retaining staff, affecting their ability to comment.

Standard G

Several comments reflected lack of control in appointing governance officials and difficulty in having appointees look like the community served. Comments also noted difficulty in getting trainings and orientation scheduled for governance boards. There were also comments on application for consolidated agencies.

Standard H

There were varied comments on what the standard should check for. Some supported the standard. Some comments noted it was too general and needed more depth. A couple of comments suggested this could be assessed in other ways, such as DPH consultants.

Standard I

There was a variety of comments which reflected activity from various departments. Comments ranged from being too detailed to too vague. There were comments on elements already reviewed by DPH consultants.

Standard J

Comments varied and showed no real themes. Many addressed elements that should be requirements of the activities. There were comments that departments – large and small – would have difficulty meeting some activities.

Standard K

Comments found the standard valuable, but the activities were vague or of limited value. There were requests for more clarification, good examples and a focus on what's in current use, not past documentation. The focus should not be so heavy on compliance, which is already monitored.

Analysis by Activity

Respondents had the chance to respond to question and provide comments about each individual activity. Around 50 respondents provided activity-specific feedback within each standard.

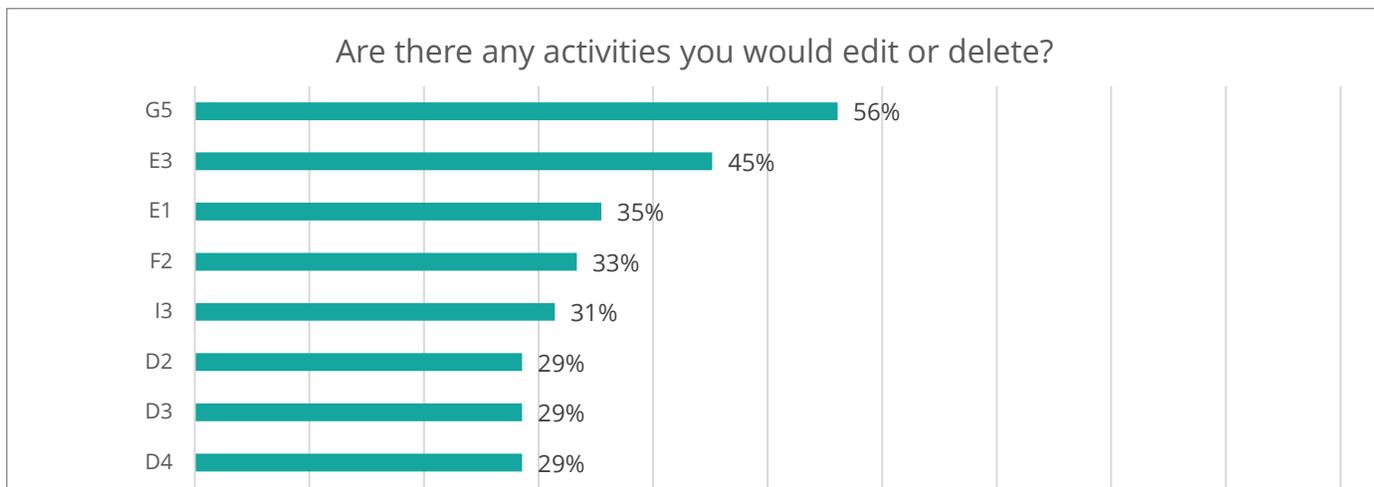
Understanding what an Activity Would Require: Across all activities on average, 92% of respondents could understand what a given activity would require of health departments.

The ten least understood activities included:



Comments to Edit or Delete an Activity: There was much more variety across activities in comments to edit or delete an activity, with some activities receiving hardly any edits, and others receiving many comments with suggested revisions or deletions.

The activities receiving the most requests to edit or delete included:



Meeting the activities in this standard is important in improving the performance of a local health department

The activities in this standard relate to work that LHDs are responsible for

The activities match what I would expect to see in the standard

