



# Accreditation Board Meeting Minutes

*November 17, 2023*

*9:30 a.m. – 1:30 p.m.*

*Cardinal Room, DPH Building 3, 5605 Six Forks Road, Raleigh NC  
Zoom*

**Board Members Present:**

Mr. David Stanley, Chair  
Karen Powell  
Dr. Rhonda Stephens  
Kevin Austin  
Dr. Benjamin W. Tillett  
Dr. Susan Haynes Little  
Calvert Jeffers  
Anna Schenck  
Ms. Virginia Niehaus  
Marielena Moreno-Garcia  
Kim Smith  
Dan Brummitt  
Jerry Parks

**Board Members Absent:**

Malishai Woodbury  
John Rouse  
Bertadean Baker

**Staff Present:**

Margaret Benson Nemitz  
Faith McHale  
Eliza Allen  
Amy Joy Lanou  
David Stone

**Site Visitors Present:**

Heath Cain  
Wes Gray  
Rebecca McLeod  
Victoria Hudson  
Tommy Jarrell  
Pamela Brown

**Guests:**

Eunice Inman (Site Visit Coordinator)  
Jim Hawhee  
Marsha Branch  
Unidentified Zoom Attendee (1312626579)

**Catawba County Public Health**

Jennifer McCracken  
Melissa Kirkpatrick  
Dakota Spurling

**Lenoir County Health Department**

Pamela Brown  
Kiahna Johnson

**Craven County Health Department**

Scott Harrelson  
Jennifer Blackmon  
Amber Tabarrini

**Anson County Health Department**

Evonne Burr  
Dana Thomas

**Stanly County Health Department**

David Jenkins  
Doshia Swaringen

**Macon County Public Health**

Kathy McGaha  
Melissa Setzer

**Harnett County Health Department**

Ainsley Johnson  
Mary Jane Sauls  
Debra Hawkins

**Nash County Health Department**

William Hill  
Mandy Bailey  
Patricia Hamilton

## Welcome

Board Chair David Stanley introduced himself and welcomed participants to the meeting. Board Members Kim Smith, Dan Brummitt, and Marielena Moreno-Garcia were introduced as new board members since the June board meeting. Board members and NCLHDA staff introduced themselves.

Board Chair Stanley introduced approval of the minutes as the first agenda item.

**Chair Stanley entertained a motion to approve the June 2023 minutes. Board Member Dr. Benjamin Tillett made a motion to approve. Board Member Jerry Parks seconded the motion. The motion passed unanimously.**

## Accreditation Adjudication Process & Site Visit Reports

Interim Administrator Margaret Benson Nemitz began the process by sharing some information regarding logistics for the meeting, including a reminder about the State Ethics Act. She reminded the Board that if any members have any real or perceived conflict of interest to please verbally inform the rest of the Board that they will be recusing themselves from voting.

Board Member Brummitt acknowledged that he would recuse himself from voting for Granville Vance Public Health's adjudication. Interim Administrator Benson Nemitz explained that Board Member Brummitt would step out of the meeting room during Granville Vane Public Health's adjudication period.

### **Granville Vance Public Health Accreditation Adjudication**

Board Member Brummitt left the room before the adjudication process began.

Chair Stanley began the adjudication process for Granville Vance Public Health. Lead Site Visitor Heath Cain shared his report. He noted a best practice of the health education going on in the county, including their on-site wastewater installers course. Mr. Cain, on behalf of the Site Visit Team, recommended reaccreditation.

**Chair Stanley stated that the Site Visit Team had recommended Granville Vance Public Health be reaccredited and asked if someone would make a motion. Board Member Parks made a motion to approve, and Board Member Anna Schenck seconded the motion. The motion passed unanimously.**

Following the motion, Board Member Brummitt rejoined the meeting.

### **Catawba County Public Health Accreditation Adjudication**

Chair Stanley began the adjudication process for Catawba County Public Health. Lead Site Visitor Heath Cain shared his report. He noted several best practices, including: health education workers assigned to every zip code in order to address differences in health outcomes within the county, the health department's enrollment in the North Carolina Department of Labor Carolina Store Program which focuses on occupational safety and health, and their work with Duke research. Mr. Cain, on behalf of the Site Visit Team, recommended reaccreditation with honors.

Chair Stanley asked Health Director Jennifer McCracken if she wanted to share anything about the site visit experience. Ms. McCracken stated that she appreciated the way the site visit team worked with the staff.

Chair Stanley and Ms. McCracken discussed some of the partnerships the health department had with the universities in the area.

**Chair Stanley stated that the Site Visit Team had recommended Catawba County Public Health be reaccredited with honors and asked if someone would make a motion. Board Member Tillett made a motion to approve, and Board Member Smith seconded the motion. The motion passed unanimously.**

Chair Stanley briefly reminded meeting attendees in the room that there would be a group picture taken after the adjudication portion of the meeting was completed.

#### **Lenoir County Health Department Accreditation Adjudication**

Chair Stanley began the adjudication process for Lenoir County Health Department. Lead Site Visitor Wes Gray shared his report. He noted the health department's best practice of using a community health assessment to identify obesity as a priority and increasing physical activity among youth as a strategy to address this, their cooperation with the SPCA and other advocacy groups when developing new policies for animal control, and using email correspondence between the health director and board members to ensure board approval before taking action. Mr. Gray shared that the Site Visit Team was able to designate 145 of 147 activities as met. Mr. Gray, on behalf of the Site Visit Team, recommended reaccreditation with honors.

Chair Stanley asked Health Director Pam Brown if she wanted to share anything about the site visit experience. Ms. Brown expressed thanks to the Site Visit Team and the Lenoir County Health Department staff team, including the Agency Accreditation Coordinator, Kiahna Johnson, whom she invited to speak. Ms. Johnson shared that the site visit team was welcoming and supportive and she thanked the staff team, noting that they had been working to be accredited with honors for the last six years.

Chair Stanley asked Ms. Brown about the local appropriation funding and if its changes in the last few years were a result of the COVID-19 pandemic. Ms. Brown confirmed this. Board Member Parks noted that it was impressive that the health department went from conditional accreditation to accreditation with honors.

**Chair Stanley stated that the Site Visit Team had recommended the Lenoir County Health Department be reaccredited with honors and asked if someone would make a motion. Board Member Karen Powell made a motion to approve, and Board Member Virginia Niehaus seconded the motion. The motion passed unanimously.**

#### **Craven County Health Department Accreditation Adjudication**

Chair Stanley began the adjudication process for Craven County Health Department. Lead Site Visitor Wes Gray shared his report. He noted best practices of the team utilizing data to inform projects, the primary care services provided through the attached FQHC, and the health department providing low-cost prescription drugs to clients. Mr. Gray shared that the Site Visit Team was able to designate 147 of 147 activities. Mr. Gray, on behalf of the Site Visit Team, recommended reaccreditation with honors.

Chair Stanley asked Health Director Scott Harrelson if he wanted to share anything about the site visit experience. Mr. Harrelson introduced the Agency Accreditation Coordinator, Amber Tabarrini, and the Deputy Health Director, Jennifer Blackmon, and acknowledged their hard work.

There was further discussion of some of the best practices Mr. Harrelson had learned regarding integrating the services of an FQHC with the health department.

**Chair Stanley stated that the Site Visit Team had recommended the Craven County Health Department be reaccredited with honors and asked if someone would make a motion. Board Member Smith made a motion to approve, and Board Member Moreno-Garcia seconded the motion. The motion passed unanimously.**

#### **Anson County Health Department Accreditation Adjudication**

Chair Stanley began the adjudication process for Anson County Health Department. Lead Site Visitor Rebecca McLeod shared her report. Ms. McLeod shared that the Site Visit Team was able to designate 147 of 147 activities. Ms. McLeod, on behalf of the Site Visit Team, recommended reaccreditation with honors.

Chair Stanley asked Health Director Evonne Burr if she'd like to share anything. Ms. Burr thanked her staff team and introduced Dana Thomas, the agency accreditation coordinator.

Chair Stanley and Board Member Parks congratulated Ms. Burr and the team for the accomplishment.

**Chair Stanley stated that the Site Visit Team had recommended the Anson County Health Department be reaccredited with honors and asked if someone would make a motion. Board Member Parks made a motion to approve, and Board Member Tillett seconded the motion. The motion passed unanimously.**

#### **Stanly County Health Department Accreditation Adjudication**

Chair Stanley began the adjudication process for Stanly County Health Department. Site Visitor Rebecca McLeod shared her report. She noted best practices of disseminating information relevant to public health needs to elected and appointed officials, and their education and training policies for employees. Ms. McLeod shared that the Site Visit Team was able to designate 146 of 147 activities. Activity 33.5 was not met. Ms. McLeod, on behalf of the Site Visit Team, recommended reaccreditation with honors.

Chair Stanley asked Health Director David Jenkins if he wanted to share anything about the site visit experience. Mr. Jenkins invited Agency Accreditation Coordinator Doshia Swaringen to share her thoughts. Ms. Swaringen commended the Stanly County staff and thanked the Site Visit Team. Mr. Jenkins commented that he was thankful for the Site Visit Team.

Chair Stanley and Mr. Jenkins discussed the one missed activity and some of the challenges associated with meeting activities that include working with county government. Board Member Tillett commended the work that the Stanly County Health Department had done, especially in their reduction of deaths related to opioid overdose. Board Member Powell and Ms. Swaringen discussed some of the strategies used to motivate staff to work toward reaching their accreditation goals.

**Chair Stanley stated that the Site Visit Team had recommended the Stanly County Health Department be reaccredited with honors and asked if someone would make a motion. Board Member Tillett made a motion to approve, and Board Member Brummitt seconded the motion. The motion passed unanimously.**

### **Macon County Public Health Accreditation Adjudication**

Chair Stanley began the adjudication process for Macon County Public Health. Site Visitor Victoria Hudson shared a report on behalf of Lead Site Visitor LEEANNE WHISNANT. She noted best practices within environmental health and activity 27.3. The health department had received feedback about their application process and spent time focusing on quality improvement of the process. Ms. Hudson shared that the Site Visit Team was able to designate 144 of 147 activities. All activities not met were within personnel records. Ms. Hudson, on behalf of the Site Visit Team, recommended reaccreditation.

Chair Stanley asked Health Director Kathy McGaha if she wanted to share anything about the site visit experience. Ms. McGaha noted the many changes that had taken place over the last six years and how that affected their accreditation process. Ms. McGaha thanked Site Visit Coordinator Eunice Inman for her help in the accreditation process.

**Chair Stanley stated that the Site Visit Team had recommended the Macon County Public Health be reaccredited and asked if someone would make a motion. Board Member Calvert Jeffers made a motion to approve, and Board Member Moreno-Garcia seconded the motion. The motion passed unanimously.**

### **Harnett County Health Department Accreditation Adjudication**

Chair Stanley began the adjudication process for Harnett County Health Department. Lead Site Visitor Tommy Jarrell shared his report. He noted best practices of patient confidentiality and security, noting the health department's unique process of checking in patients. He also noted their relationship with Campbell University and the low-turnover rate among the staff. Mr. Jarrell shared that the Site Visit Team was able to designate 147 of 147 activities. Mr. Jarrell, on behalf of the Site Visit Team, recommended reaccreditation with honors.

Chair Stanley asked the representatives from Harnett County if they wanted to share anything about the site visit experience. Deborah Hawkins, the Lead AAC shared that Health Director John Rouse could not be present for the adjudication meeting. Ms. Hawkins asked the other accreditation staff to introduce themselves. AAC Mary Jane Sauls introduced herself and noted that the process went very smoothly and reflected on what the accreditation team had learned over the years. Next, Ainsley Johnson, the Director of Nursing, introduced herself. She noted that it was her first accreditation process and she felt very supported by the Site Visit Team and other colleagues throughout the state.

Chair Stanley asked the representatives how the population growth within Harnett County had affected the work of the health department. Ms. Hawkins explained that the growth had resulted in a need for additional services and that they'd been anticipating how to continue growing to meet those needs, including recruiting more volunteers.

**Chair Stanley stated that the Site Visit Team had recommended the Harnett County Health Department be reaccredited with honors and asked if someone would make a motion. Board Member Smith made a motion to approve, and Board Member Powell seconded the motion. The motion passed unanimously.**

### **Nash County Health Department Accreditation Adjudication**

Chair Stanley began the adjudication process for Nash County Health Department. Lead Site Visitor Pam Brown shared her report. She noted the unfortunate timing of the county's AAC leaving her position right as

the accreditation materials were due. Ms. Brown noted best practices of a detailed weekly report that the Health Director sends to the Board of Health each week, a clear policy revision process, strong environmental health documentation, and a detailed succession plan for moving the health department forward. Ms. Brown shared that the Site Visit Team was able to designate 116 of 147 activities. She also noted that there had been no additional evidence submitted after the site visit. Ms. Brown, on behalf of the Site Visit Team, recommended conditional reaccreditation.

Chair Stanley asked Health Director Mr. William Hill if he'd like to share anything about the site visit experience. Mr. Hill acknowledged that much of the health department's evidence had been missing. He noted that he thought the staff had responded well to the COVID-19 pandemic, and he noted changes among accreditation staff and the DSS department and the challenges that these changes presented, as well as his dual role of health director and DSS director. He acknowledged the staff team who helped with the accreditation process.

Chair Stanley discussed the impact of a health director having dual roles and how challenging that can be. Chair Stanley asked if the health department was looking to bring in any additional leadership to help. Mr. Hill explained that a new Deputy Health Director would be joining the staff team. He also explained that they are recruiting a DSS director.

Dr. Haynes Little noted that she had worked with Nash County several years prior as a consultant and was shocked to read the report that they had been recommended for conditional accreditation. She asked Mr. Hill to explain his strategic plan for getting accredited moving forward. Mr. Hill noted some of the challenges of the last few years and how there hasn't been a meeting with the Board of Health in quite some time. He noted that a strategic plan would include regular meetings and setting benchmarks to reach goals. Nash County staff commented that there is a plan being put in place to keep accreditation staff accountable on a quarterly basis. Their goal for the future is to be reaccredited with honors. Dr. Haynes Little acknowledged that Mr. Hill could use this accreditation report to advocate for the need for designated accreditation staff. There was discussion about there being a lack of a human services board meeting for a year, though Mr. Hill noted that he shared a weekly report with the Board. Dr. Tillett asked if Mr. Hill thought having a consolidated board resulted in any challenges for advocacy. Mr. Hill said no. Chair Stanley asked how much him having to manage the DSS department was a distraction from the health department. Mr. Hill said it's been a huge distraction and that he looks forward to the new Deputy Health Director beginning.

Interim Administrator Benson Nemitz explained the process for conditional reaccreditation.

**Chair Stanley stated that the Site Visit Team had recommended the Nash County Health Department be conditionally accredited and asked if someone would make a motion. Board Member Kevin Austin made a motion to approve, and Board Member Brummitt seconded the motion. The motion passed unanimously.**

## Other Business

### Board Discussion

Chair Stanley opened up discussion about the complaint received from Mr. Jim Hawhee about Wake County Health Department. Interim Administrator Benson Nemitz explained the process that had begun. She

shared that the Board is required to follow the process outlined in the operational guidelines. She also shared that DHHS is working with Wake County on corrective action and that the Board will need to consider if this complaint and the resulting actions should be included within Wake County's next site visit review in 2025. Board Member Powell asked for Board Member Niehaus' take on the matter. Board Member Niehaus shared that her understanding is that Wake County is in the process of reorganizing to address the issues raised. They have indicated they're aiming for mid-February of next year. Board Member Niehaus' perspective is that there is no action for the Board to take other than to refer to agencies that can work with Wake County to address the issues that were raised. Board Member Parks pointed out that there were several things in the complaint that do not concern the NCLHDA program, and he suggested that this complaint be pointed out to the Site Visit Team during the next site visit in Wake County so that there is a record that the Board appropriately responded to the complaint. Chair Stanley asked Board Member Niehaus for her opinion on if the Board needs to ratify what staff have already done. Board Member Niehaus shared her recommendation that the Board ratify what staff had already done and noted that the operational guidelines outline the actions the board can take. She explained that there isn't an action for the Board to take on Wake County's accreditation status at this time, but the Board can suggest referral to other agencies and can have the Site Visit Team look at it, as these are two options outlined in operational guidelines. Board Member Brummitt said statute alludes to the Board doing continuous monitoring, yet accreditation is a point in time. He asked if the Board has an obligation to continuously monitor Wake County, and then acknowledged that the statute doesn't provide any process for this continuous monitoring. Chair Stanley explained that this is why the staff have looked to other entities to better support that process. Board Member Parks asked if DHHS will have any documentation about the reorganization. Board Member Niehaus stated that the operational guidelines allow the Board to request the documentation from the County. Board Member Brummitt suggested that going forward, documentation is maintained to protect the Board. Chair Stanley suggested that this be revisited during the March Board meeting.

Board Member Kevin Austin moved that the Board would send a letter requesting that Wake County provide an update about their situation before the March Board meeting. Chair Stanley seconded the motion.

Board Member Parks suggested including language about communicating with DHHS. Board Member Niehaus suggested expanding the motion to include requesting Wake County provide an update before the March Board meeting, requesting that program staff work with the county and NC DPH to ensure appropriate assistance is being given, and directing staff to maintain the documentation that's been submitted so far and will be submitted for the next accreditation review.

Board Member Austin accepted these suggestions as a friendly amendment to the original motion.

Board Member Parks asked if the Board had any response for Mr. Hawhee. Interim Administrator Benson Nemitz explained that Mr. Hawhee was present in the meeting, and per operational guidelines he will receive an update after the Board meeting.

**Board Member Austin motioned that the Board request the following: Wake County provide an update before the March Board meeting, Accreditation program staff work with county and NC DPH to ensure appropriate assistance is being given, and program staff maintain the documentation that's been submitted so far and will be submitted for next accreditation review. Board Member Brummitt seconded the motion. The motion passed unanimously.**

### **Committee Reports**

In Board Committee Chair John Rouse's absence, Board Member Austin provided an update from the Standards and Evidence Committee, noting that the committee met via Zoom and exchanged emails to review changes to the HDSAI Interpretation document. Board Member Austin explained there had been some improvements made and he believed the document was ready to be approved. Interim Administrator Benson Nemitz added that the committee was recommending two things: that all changes in the 2024 draft document be approved and that the Board considers accepting a second version of the document with retrospective edits. Interim Administrator Benson Nemitz explained that the initial changes made in the document were minimal and were outlined in the committee report. She explained that the changes in the second version would integrate the 2020-2021 retrospective edits during the COVID executive orders within the 2024 HDSAI Interpretation. She explained that this does not change how site visits are currently being conducted, and that this change is just a streamlining of the process. Adding these phrases will save time because AACs will have all guidance in one place to better understand the process rather than emailing staff for clarification.

**Board Member Powell made a motion to accept the changes to the 2024 documents and Board Member Kim Smith seconded the motion. The motion passed unanimously.**

Board Member Niehaus shared an update from the Policy and Procedures Committee and explained that after review, the committee suggests making changes to the Process Operational Guidelines. She noted for historical context that a previously formed Ad Hoc committee was tasked with reviewing the guidelines and recommended changes in several areas, including the complaint process, which were adopted by the Board. Board Member Niehaus explained that the Policy and Procedures Committee worked to further clean up the language describing the complaint process to reflect the scope of the Board's review and the actions the Board can take and to more clearly outline the process of submitting and responding to a complaint. Changes appear on Page 10 and in Appendix 9. Board Member Niehaus stated that the guidelines make clear that revocation of accreditation is not an action the Board can take in response to a complaint.

**Board Member Schenck motioned to accept the committee's edits. Board Member Brummitt seconded the motion. The motion passed unanimously.**

Chair Stanley asked Board Member Parks to share an update from the Strategic Planning Committee. Board Member Parks shared that the committee would be meeting at a later date.

### **Other Business**

Chair Stanley asked Interim Administrator Benson Nemitz to share about Board member updates. Interim Administrator Benson Nemitz shared there is still one vacancy on the Board, within the board of health category. She also noted that Board Member Dr. Rhonda Stephens would be leaving the Board in December. Finally, she noted that she would be in touch with current Board members whose terms were coming to a close to see if they would like to recommit to another term.

Next, Interim Administrator Benson Nemitz shared program data with the board including the cycle report, an overview of accreditation status, the most activities missed, and suggestions for QI. She noted that on average, health departments missed 4.4 activities with a median of one missed activity. She also noted that there was an average of 9 activities suggested for quality improvement per health department, with a median of 6. Interim Administrator Benson Nemitz explained that this was consistent with recent trends.



The Board discussed the data, noting the positive trend that there is consistency in site visitors' assessment of health departments, with a lack of bias. Interim Administrator Benson Nemitz explained that the changes made with the HDSAI and Site Visitor training has helped with this.

Board Member Dr. Haynes Little asked for clarification regarding the policy that DPH employees are not permitted to be site visitors. She also asked if the Board had ever considered a time out of practice limit. If a person has been out of practice for a certain number of years, would they no longer be eligible to be a site visitor? She noted that there have been a lot of changes in the last several years, and it will be important for site visitors to be up to date on current policies and not be holding health departments to outdated policies.

Chair Stanley asked how the Board holds site visitors accountable if their performance is poor. Interim Administrator Benson Nemitz explained that there are procedures for this within the operational guidelines.

Site Visit Coordinator and guest of the Board meeting, Eunice Inman, was invited to speak by Chair Stanley. Eunice noted that there is a limit on the amount of time that can pass between when a person left working in public health and when they began working as a site visitor. Eunice noted that the site visits are a team effort and there are interpretation guidelines to help guide site visitors' recommendations. The team works together to determine whether an activity is met or not met, and this helps protect from bias within the site visit assessments. Eunice also noted that DPH employees were not eligible as site visitors because site visits are meant to be a peer-to-peer review. If someone from DPH came in to do a site visit, it would not be considered peer-to-peer.

The Board discussed the requirements for annual training for site visitors which helps keep site visitors informed and educated on updates.

Interim Administrator Benson Nemitz next shared the Annual Report video with the Board.

Interim Administrator shared strategic updates. She talked through Phase 3 updates, noting the recent formation of a Health Director Accreditation Working Group after it was recommended during the North Carolina Association of Local Health Directors October closed session to discuss accreditation. The working group includes 14 health directors from across the state. She explained that this group will be working with the Standards Workgroup regarding Phase 3 changes. She also explained that in November, the program secured some additional funding to support Phase 3 work.

Interim Administrator Benson Nemitz mentioned winter retreat plans and clarified shared goal language of incorporating original intentions and lessons learned from accreditation into the redesigned future of accreditation. Board Member Dr. Haynes Little noted the importance of being future focused in addition to looking to the past. She suggested bringing in some folks from PHAB, in addition to those who have the historical knowledge of accreditation in North Carolina. There was discussion among Board members about advantages and disadvantages of this suggestion. Interim Administrator Benson Nemitz noted that she would reach out to colleagues who work within PHAB. The Board discussed the importance of getting legislators to support accreditation within North Carolina.

Interim Administrator Benson Nemitz proposed meeting for the retreat in late March, and clarified that this retreat would be a separate event from the March Board meeting. Board Member Niehaus noted the Public Health Leaders Conference is on the 14<sup>th</sup> and 15<sup>th</sup> of March and that March 29<sup>th</sup> is Good Friday, a state holiday.

Interim Administrator Benson Nemitz shared staffing and budget updates, including that she would continue serving as the Interim Administrator through the winter 2024 site visits, with Eliza Allen, the NCIPH Operations Director, shadowing the process. She explained that the new Director of NCIPH, Amy Joy Lanou, will be attending NCLHDA meetings. Next, she shared the approved budget for FY24 and noted that program staff would be carefully tracking expenses. She also noted that program staff are in the process of exploring what ARPA and PHIG funds may be available to help support accreditation.

Interim Administrator Benson Nemitz shared the proposed schedule for upcoming Board meetings.

Chair Stanley reminded Board members that they may request printed copies of any of the Board meeting materials.

Chair Stanley asked when the rules process needs to get done. Board Member Niehaus shared that the accreditation rules will be required to go through an upcoming periodic review and readoption process. She looked it up and shared that the deadline for periodic review is currently set for November 2025. After completion of periodic review, a readoption date will be set.

Interim Administrator Benson Nemitz shared that staff would send out calendar invitations for upcoming Board meetings the week after Thanksgiving.

#### **Adjourn**

**Chair Stanley entertained a motion to adjourn the meeting. Board Member Parks made the motion to adjourn the Board meeting and Board Member Smith seconded the motion. The motion passed unanimously and the meeting adjourned.**

Next Meeting: March 8, 2023, 9:00 a.m. – 11:30 a.m. via Zoom

Respectfully submitted,



Margaret Benson Nemitz  
*Interim Administrator* | N.C. Local Health Department Accreditation Program  
UNC Gillings School of Global Public Health  
221-C Rosenau Hall, CB#8165  
Chapel Hill, N.C. 27599-8165