February 8, 2021

Jennifer McGuirk, MPA, CIA
Multnomah County Auditor
501 SE Hawthorne Blvd., Room 601
Portland, OR 97214

Dear Auditor McGuirk,

Thank you and your staff for your work on the First Audit Report to Multnomah County's Pandemic Response. This report provides us with an opportunity to reflect on our achievements and incorporate insights that would help us continually improve our ongoing efforts to address what may be the greatest operational challenge the County has encountered in its history. We appreciate the auditor's recognition that the County pivoted quickly and provided significant, effective responses to the many facets of the COVID-19 crisis, even as the shape and scope of the pandemic evolved, and continues to evolve even today.

Throughout this epidemic, Multnomah County has been at the forefront of the response, leading in public health messaging, providing safety net services and supporting our community. The courage, dedication and tenacity of our staff, volunteers and providers who have worked on the front lines of the pandemic response are deeply appreciated. The audit review was completed in December 2020, and as such, provides a snapshot of our ongoing response to this crisis. Multnomah County continues its active COVID-19 emergency response and recovery efforts.

We have outlined specific responses for each of the recommendations from your office below.

Recommendation 1
Upon issuance of the report, County Public Health officials should revise guidance on the public facing website for nonprofit shelter providers within County boundaries to improve clarity, in line with state requirements.

The Joint Office of Homeless Services and the County's Public Health Division hold routine meetings with shelter providers and other community-based organizations to ensure that they have the latest COVID-19 guidance. The County's current COVID-19 webpage incorporates Centers for Disease Control and Prevention (CDC) and State guidance by reference and through links. The Joint Office of Homeless Services agrees that clear guidance is important and will work with the Public Health Division to review and ensure alignment between the shelter provider guidance from the CDC and State, and the language on the County's public-facing COVID-19 website.

Recommendation 2
Joint Office of Homeless Services management should include clauses to follow Public Health guidelines in new contracts with shelter providers and in new amendments to contracts with shelter providers.

The Joint Office of Homeless Services, with support from the Public Health Division, has been actively engaged with all its contracted shelter providers, as well as many non-contracted shelter providers, to assist them in understanding and implementing COVID-19 health and safety protocols. We will incorporate language in all new and amended shelter contracts that directs contractors to follow Public Health guidelines related to addressing the risk of COVID-19 infection in shelter settings.

Recommendations 3 and 4
These recommendations were for the Sheriff's Office.

Recommendation 5
Immediately upon the issuance of this report, we recommend that Department of Community Justice managers consistently enforce face covering policies with their staff.

We agree that consistent enforcement of face covering policies is important and have taken steps to respond to the recommendations in the audit. These actions include:
- Detention Community Justice Managers (CJMs) were directed by the Division Director, Deena Corso and the Senior Manager, Craig Bachman, on Dec. 31, 2020, to speak with all employees in person or by phone to reinforce mask-wearing expectations for both staff and youth.
- Additional signage has been posted throughout the facility to remind employees (and youth) of mask-wearing expectations.

- A formal progressive discipline process was implemented in December (starting with a Letter of Expectations) for staff who are not wearing their mask appropriately.
- A formal progressive discipline process has been implemented (starting with a Letter of Expectations) for staff who are not enforcing mask-wearing by youth.
- The Detention Senior Manager is following up with CJMs regarding individual conversations with staff, reinforcing expectations.

The position with primary responsibility for implementing these actions is the Senior Manager for Detention & Residential Services.

Recommendation 6
The Adult Care Home Program should perform a review of all recent communication with each ACH and ensure that each ACH has received sufficient information and is aware of requirements and guidelines pertaining to the pandemic. A particular focus is needed in the areas of exposure, infection control, physical distancing and reporting. A review should be performed as soon as possible and no later than 30 days from issuance of this report. If contact is needed the contact should be made within at least 90 days from the issuance of this report.

The Adult Care Home Program (ACHP) has reviewed all communication since September 2020 with Adult Care Home providers regarding COVID-19, with particular focus on the review of communication regarding exposure, infection control, physical distancing and reporting. While not a part of this audit, ACHP also included recent communications regarding vaccine distribution in their review.

The ACHP review found that consistent communications regarding COVID-19 protocols were delivered through monthly newsletters, ongoing individual provider contacts and through their updated ACHP website. Providers were also emailed information about training opportunities through Regional Webinars and Oregon Care Partners Training. In addition, all providers and ACHP staff were required to take Oregon Care Partners' COVID-19 training.

Since Sept. 1, 2020, ACHP has issued Precautionary Conditions to 100 providers who had actual or suspected cases of COVID-19. Attached to each of these Conditions was additional information about exposure, infection control, physical distancing and reporting.

We believe this review complies with the recommendation of the audit.

Recommendation 7
As soon as possible, the County's OR OSHA COVID-19 temporary rule implementation committee should complete all new OSHA requirements:
   a. *Risk assessment, infection control plan, protocols for potential exposure, and employee training.*

Note: management reports that substantial work toward this recommendation has been completed. This work occurred between the time the report was written and when it was issued. We acknowledge that work has been done, but we did not audit that work. We are leaving the recommendation in the report, so we can follow up on the recommendation thoroughly.

The County is in the process of completing all new OR-OSHA requirements related to risk assessment, infection control, protocols for potential exposure and employee training. The OR-OSHA COVID-19 temporary rule was not adopted until November 2020; the County could not finalize implementation plans until the final rule was adopted. Prior to and since final adoption, however, the Risk Management unit of Finance & Risk Division, Department of County Management (DCM), has led implementation efforts, which include a multidisciplinary project team.

Exposure Risk Assessments (ERA) have been completed and employee feedback has been received. Infection Control Plans are currently being completed based on the ERAs and ERA feedback. Protocols for exposure management are completed and presently managed by DCM and Central Human Resources.

General training was due for completion by employees by Jan 25, 2021, and was promoted through articles in Wednesday Wire and Multco Matters, as well as notifications within Workday. Additional specialized training will follow the initial round of general training.

Recommendation 8
By March 2021, Central Human Resources should develop a method for employees to provide COVID-19 related feedback anonymously.

Multnomah County Personnel Rule 3-32 Reporting Improper Governmental Conduct includes within its subject matter "Mismanagement" (§ 3-32-015), as well as a section labelled "Reporting" that includes the County Auditor and Good Government Hotline as avenues for reporting mismanagement (§ 3-32-030.C.4. & 5. and H.1. & 2.), among

others. The County will continue to reinforce and publicize these methods as available means for anonymously reporting concerns and feedback related to COVID-19.

The Auditor has indicated a preference that the County not use the Good Government Hotline to report COVID-19 feedback. If a separate means of reporting is necessary, we believe that Rule 3-32 should be amended to reflect this preference and will look to the Auditor's Office to let us know their preference.

Recommendation 9
By March 2021, the Chair or her designee should provide employees with a point of contact for COVID-19 safety coordination.

The County designated Michelle Cross, Risk Services Manager, as its point of contact for COVID-19 safety coordination in April 2020. That designation was communicated contemporaneously with the appointment. Ms. Cross' designation as Safety Coordinator will be communicated further, and will be added to the County's COVID-19 Employee Information and Resources page on Multco Commons.

Recommendation 10
Based on responses to our office's employee survey, it appears that applying policies is an ongoing challenge. Upon issuance of the report and periodically thereafter, the Chair or her designee should reiterate to managers and employees her expectations that safety policies and recommendations are followed, including the requirement that employees telework as much as possible.

As County Chair, I have communicated in multiple all-staff emails, and the County generally has communicated in technical COVID-19 response articles in the Wednesday Wire, Multco Matters, and Management Monthly, that County leadership expects maximum use of teleworking by supervisors and staff, and that my expectations regarding safety policies and recommendations should be followed. That messaging will continue for the duration of the pandemic.

Recommendation 11
Prior to adding in-person capacity at County locations, we recommend that Facilities and Property Management ensure that necessary building modifications, including the installation of partitions, and filter upgrades in HVAC systems have been completed.

The Facilities and Property Management Team has been a leading member of the County's Safe Spaces Team, a multidisciplinary team responsible for addressing the infrastructure requirements for County programs that need to provide services within a County building during the pandemic. This team works in partnership with the designated departmental program staff to ensure that the facility meets re-opening requirements.

A checklist is used to ensure that all aspects have been addressed, including any necessary partitions and HVAC filter upgrades. Per guidance from Risk Management, the checklist advises programs to first make any administrative program changes, then reach out to Facilities to advise on any possible engineering changes, and lastly to look at ways to modify the physical space to create physical distancing and barriers.

We believe that this multidisciplinary approach creates safer working conditions for staff who must report in person and meets the intent of the recommendation of this audit.

Recommendation 12
Prior to adding in-person capacity at County locations, we recommend that Facilities and Property Management work with its janitorial contractors to ensure that each location has sufficient staffing capacity to ensure the enhanced cleaning recommended by the CDC.

As previously discussed, the Safe Spaces team addresses a range of topics to facilitate a safe re-opening of services. Janitorial services are evaluated based on the specific requirements of the program. Janitorial contractors are responsible for adjusting their staff to meet the cleaning requirements at each facility.

Our janitorial partners ensure our buildings remain a safe and clean work environment. They increased the level of cleaning using a COVID-19, EPA-approved disinfectant to focus on increased disinfection of primary touchpoints, including door knobs, railings, drinking fountains and horizontal surfaces. This approach is based on CDC guidelines. Additionally, the Health Department's guidelines note that a one-time deep clean is not effective. Routine cleaning services are provided by the County's janitorial services contractors, Relay Resources and ABM, as described by OR-OSHA requirements (once every 24 hours and using CDC-recommended products as listed in EPA's N list).

We believe this approach is in line with the recommendation in this audit.

Recommendation 13

We are told that the County is currently in the process of adding COVID-19 specific cleaning and disinfecting requirements into its contracts with janitorial providers. We recommend that Facilities and Property Management complete these contractual requirements prior to programs adding substantial in-person capacity at County locations.

The County's Facilities and Property Management Division is ensuring janitorial services meet CDC and OR-OSHA requirements. The County's two providers are required to follow CDC guidelines and requirements per the industry standard. As previously noted, the Safe Spaces team addresses janitorial services as part of the re-opening process.

In addition, the Facilities and Property Management Division is renegotiating its contracts as part of the contract renewal process later this year. At that time, we will add language to address cleaning and disinfecting requirements for pandemics, such as COVID-19. The approach is to add broader language, rather than virus-specific language, since these will be multi-year contracts.

Recommendation 14

By July 2021, department directors should provide County-owned computers to employees who frequently telework and should emphasize using County-owned computers for employees who occasionally telework. The County should also provide employees with any other equipment typically used by one person to telework effectively, such as computer mice, computer monitors, and headsets. These examples are meant to be descriptive, not exhaustive.

We agree that it is important for employees to use County-owned computers for teleworking and have created a system to provide employees with County-owned computers and technology that they can use from home, as well as accessible technology support services. When County employees were required to telework if their job could effectively be performed outside of the office, the Information Technology Division of the Department of County Assets transitioned to full remote worker support. Since then, the IT Help Desk call and chat volume has skyrocketed.

IT staff have continued to improve the remote working experience for employees throughout the pandemic. Here is a brief summary of what has been done to date to provide employees with the tools and technology they need to telework effectively:

- Department directors and the Leadership Council were informed early in the pandemic response to have staff contact the Help Desk for telework needs.
- IT Management set up a daily triage process to address unique programs and groups within departments to solve their specific telework needs (e.g., call centers). IT Portfolio Leaders met with department leadership at a variety of levels to help identify needs and prioritize requests.
- The Commons Telework Resources site was established and updated regularly.
- Despite a national supply shortage early in the pandemic, IT Management established a process to manage laptop requests and prioritized distribution.
- IT ordered quantities of laptops as they came back into the supply chain.
- On Aug. 21, Multco Matters featured the "Bringing Home Office Equipment" article, reminding employees that they could take home any equipment they needed. Employees were asked to report any equipment they were taking home and a link was provided for tracking purposes.
- During the FY 22 Budget preparation process in summer/fall 2020, IT Management worked with many departments to convert the budgeted devices from desktops to laptops.
- IT established a "Telework Bundle," which provides a laptop, monitor, docking station, keyboard, mouse, cables, dual earpiece headset and related technology items. This is provided in a to-go bag and can be picked up safely at the Multnomah Building. This information was included in the Nov. 12, 2020 Management Monthly, and the form to make the request is accessible on Multco Commons. This is applicable to new employees joining the County, as well as existing staff.
- Printers and other equipment required for certain roles is provided upon request.
- Hotspots and charging packs are provided on a case-by-case basis based on Departmental approval.
- Mobile phones are available with appropriate manager approval.

The County has the process and infrastructure in place to support ongoing remote telework. Each department is responsible for funding the tools and technology their employees need to effectively work remotely. Outfitting an employee with the tools can be accomplished with a request to the IT Help Desk. These requirements can be conveyed through the Telework Agreement.

Recommendation 15
By February 2022, Central Human Resources should ensure the maintenance of telework information electronically, preferably in Workday to allow:

a. *Accessibility to approved or denied telework agreements at the employee, supervisory, departmental and central levels.*
b. *Electronic approvals and updating for better efficiency.*
c. *Monitoring of teleworking performance and equity.*
d. *Documentation of specific details, such as computer ID numbers, of all County equipment used to telework.*

The County's Telework Committee first convened in June 2020 and has been meeting since to address the variety of issues raised by large numbers of teleworking County staff. The committee has reviewed the issues and is recommending changes to the County's personnel rules, including those concerning "telework agreements," which are a tool more suited to voluntary teleworking rather than mandated teleworking.

In the short term, telework agreements must be managed via Google documents, as Workday is not presently configured for documentation tracking. However. Workday rolled out new functionality regarding request control in late 2020, which the team will assess. If the functionality matches the need for telework agreement management, the committee will assess its implementation.

Performance management has been managed in Workday since Go Live on January 1, 2019; the current evaluation template contemplates assessment of employees who are working remotely. At present, eligibility of approval for teleworking is driven entirely by a supervisor's assessment of the business need for working in person. However, when the County returns to a more discretionary form of teleworking approval, the Workday Team will include in its functionality assessment whether Workday may be used to measure demographic impacts of telework request approvals.

Finally, the County does not use Workday for asset tracking, as the IT Division of the Department of County Assets already has an equipment tracking mechanism, which is being used to manage employee use of County assets in teleworking.

Recommendation 16
To help ensure fairness among employees, by February 2022, Central Human Resources should indicate potential telework eligibility in County job descriptions.

Suitability for telework eligibility is not based solely upon whether the position may be eligible, but also upon the supervisor's judgement whether the performance of the individual employee and the performance management needs of the organization can

accommodate a remote work assignment. During the pandemic, performance expectations and standards have reflected the externally imposed limitations dictated by circumstances; once standards return to their unaltered level, supervisors will need to assess whether individuals' performances while teleworking would prospectively meet the full performance standards of the organization. That said, the Classification & Compensation Unit of Central Human Resources, Department of County Management will assess the best method of memorializing telework eligibility by position.

Sincerely,

Deborah Kafoury
Multnomah County Chair