



COVID-19 County Tier Adjudication Request FOR Del Norte County

Requested week for Tier Assignment Adjudication: 11/04/2020

Background

On August 28, 2020, Governor Gavin Newsom unveiled the [Blueprint for a Safer Economy](#), a statewide, stringent and slow plan for a safe progression of opening more businesses and activities in light of the pandemic. The plan imposed risk-based criteria on tightening and loosening COVID-19 allowable activities and defined a minimum length of time between changes to assess how any movement affects the trajectory of the disease based on a county's disease transmission metrics. As part of this framework, a county tier adjudication process was established to offer local jurisdictions the opportunity to raise questions concerning data discrepancies or other similar errors in the tier assignment process.

A county may submit this form as an official request to enter into a tier adjudication process.

Timing and Processing of An Adjudication Request

Counties must submit their intent to request tier adjudication no later than Monday at 6pm regarding their tier metrics for that week. The full county tier adjudication form & any supporting documentation must be submitted by Wednesday at 5pm. Once a county enters into tier adjudication with CDPH, the county's tier assignment at the time of the request will be held in the current tier until adjudication is complete.

An adjudication process cannot delay a tier change by more than one tier reporting period (the process cannot cross beyond the next Tuesday's tier assignment), and the county will be assigned to the tier determined by CDPH no later than Monday of the following week. If a request for adjudication concerns movement from Tier 2 to Tier 1, schools in the county that have not yet reopened may not reopen during tier adjudication.

The State Health Officer or designee will review and approve the final decision. CDPH will also post the request form and a summary of the final decision on the [CDPH website](#) after the county tier adjudication request package (completed form and supporting documents) and discussion between State and local officials have been completed.

Reason for Adjudication Request- select all that apply and provide an explanation:

- ☐ **DATA DISCREPANCY:** Using similar methodology for calculating the blueprint metrics, the county identifies a discrepancy between state and local data.
- Does the discrepancy pertain to adjusted case rate, test positivity or both?
 - Please describe any additional detail pertaining to the discrepancy.
 - If the data discrepancy involves non-ELR data, please refer to Appendix A for instructions on the format and information that should be included as supporting documentation.

Please enter relevant information for States consideration

☒ **Other additional justification to be considered:**

Please provide relevant qualitative/contextual elements for the States consideration
Please see attached.

In addition to your county's completed COVID-19 COUNTY TIER ADJUDICATION FORM, please include:

- Supporting data documentation following the instructions in Appendix A
 - How many separate documents will be provided, excluding this form, in connection with this request: 1
 - Please list names of any files being provided to ensure we have everything you intend to have reviewed in connection with this request:

A completed data summary table (see [Appendix A](#))

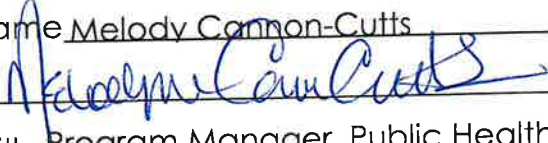
Note: if a County is delayed in its submission of required information to inform the adjudication process, CDPH can elect to end or deny the adjudication request.

Instructions for submission:

1. Submit request for tier adjudication to CDPH at countytieradjudication@cdph.ca.gov no later than Monday, 6pm.
2. Submit county tier adjudication form, data summary table, and supporting documents, as separate documents, to CDPH no later than by 5pm Wednesday (within 2 days after the request for tier adjudication was sent) at countytieradjudication@cdph.ca.gov.
3. Data file should be sent encrypted. Does not need to be in zipped files.

I Melody Cannon Cutts hereby attest that I am duly authorized to sign and act on behalf of Del Norte County. I certify that the information provided in the county tier adjudication request is true, accurate and complete to the best of my knowledge.

I understand and consent that the California Department of Public Health (CDPH) will post this information on the CDPH website and is public record.

Printed Name Melody Cannon-Cutts
Signature 
Position/Title Program Manager, Public Health
Date 11/18/20

CDPH Determination

Date of Determination: _____

Appendix A:

Format Requested: Excel Files (send encrypted email if contains PHI)

1. Metric: Adjusted Case rate discrepancy- related adjudication

Fields that we need information on:

Test Submitter	Episode Date*	Unique Case IDs	ELR or non-ELR	Test info (positive/negative)	Confirmation of Address (county suffices) of case
N/A					

* Data should align with dates used for CDPH tier assignment.

2. Metric: Testing Positivity and/or Volume discrepancy- related adjudication

Fields that we need information on:

Test Submitter ¹	Specimen collection date*	Unique Case IDs	ELR or non-ELR	Test info (positive/negative)	Type of test used (PCR/Antigen/POC)	Confirmation of Address (county suffices) of case

* Data should align with dates used for CDPH tier assignment.

Download the [Tier Adjudication Summary Table](#) (Excel)

¹ Counties are requested to submit a list of labs that are not reporting to CalREDIE via ELR or CalREDIE compatible csv files. Please indicate if these labs are currently in the process of onboarding onto CalREDIE.



COUNTY OF DEL NORTE
DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH BRANCH

400 L Street
Crescent City, California 95531

Phone
(707) 464-3191

Heather Snow, Director
Warren Rehwaldt, M.D, Health Officer

Fax
(707) 465-1783

November 18, 2020

Tier Adjudication Statement, Del Norte County, 11/18/2020

Beginning in late October, on or about 10/21/2020, staff at Pelican Bay State Prison (PBSP) began a higher level of transmission of SARS CoV 2 virus among themselves and inmates at the facility. The timelines for transmission and contacts strongly suggest that a core group of officers were "sharing" the virus among themselves and their colleagues, as well as a small number of inmates. This event has been accelerated by virtue of the fact that many of the involved staff were not using proper source control measures in a consistent manner.

Based on our local data, since the onset of this recent outbreak, at least 21 officers and staff have tested positive, beginning with reports to us on 10/29/2020, as well as 4 inmates, 3 of whom resided in a designated quarantine unit that was serviced by a number of the core officer group associated with the early stage of the outbreak. In addition, there have been 13 cases of family and friends contacts of the infected officers. This total represents 47% of the recorded positive cases in Del Norte County, since the last days of October. Setting aside the cases related to the PBSP outbreak, there have been 37 other positive cases over the timeframe of 10/29/2020 to date. This would average to 1.8 cases per day over that extended timeframe, which would be under the adjusted small county weekly total of 14 (Orange Tier). The majority of case tests outside of the screening tests conducted at the prison have been processed by local healthcare facilities, with both in house result reporting and a relatively short turnaround time at a shared medical lab in the Sacramento area.

Over the same timeframe, we had only one brief hospital stay for a patient previously diagnosed with COVID-19, essentially an overnight stay, for symptoms that briefly worsened after about a week of convalescence. Our local hospital does not currently have COVID-19 admissions.

Given the above facts, we feel certain that, except for the outbreak and its consequences our county would be in a much better position with respect to the COVID-19 pandemic. We understand the potential of businesses contributing to case counts, and we have concerns about establishments in our jurisdiction that are not adhering to guidance as well as we could expect, but to date, we have not traced any case to a specific business environment, other than employees exposed elsewhere. We are aware of findings of other jurisdictions, showing business environments as being 3rd or 4th on their list of epidemiological sources. Our small county does not have the capacity to conduct such detailed surveillance, but if our experience is reflective of that of others, it does not seem to be reasonable to further restrict potential

business sources in this instance, given that a substantial portion of our caseload over the 3 weeks has been related to one specific congregate setting outbreak and not related to encounters at local businesses.

We request to be placed back to Orange Tier. We are fully aware of the recent increase in cases not related to the prison outbreak, and we realize that this may not be sustainable with the next series data analysis, but we continue to experience numerous positives directed by us to be tested. Over the timeframe above, we had 18 cases of that type, which is about 25% of our total. This is actually a bit low for us, as we usually direct about 40% of our positives to be tested, but we are finding more and more people who get tested on their own because an index case is contacting them before we do, usually while waiting for the index case results to be reported. That is actually an encouraging trend, in that at least some of the population are initiating testing on the strength of contact alone.

Blueprint for a Safer Economy

COVID-19 County Tier Adjudication



For the county of: **Del Norte**

Requested week for Tier Assignment Adjudication: 11/16/2020

Summary

Del Norte County is requesting tier adjudication for the 11/16/2020 tier assignment week based on contextual factors. They request to be placed back in the Orange Tier.

On October 29, 2020, county began receiving reports of COVID positive cases at Pelican Bay State Prison (PBSP), including at least 21 officers and staff and 4 inmates (3 of whom resided in a designated quarantine unit that was serviced by a number of the officer group associated with the early stage of the outbreak). County reported a total of 13 cases of community spread through the infected officers and staff.

California Department of Public Health excludes persons incarcerated at state or federal prisons from the Blueprint framework metrics, i.e., adjusted case rate and test positivity. However, CDPH does not exclude from the metrics cases in staff and their contacts.

The alternate case assessment criteria in the Blueprint Framework provides a small county (less than 106,000 in population) protection against sudden tier changes as a result of small increases in cases. A small county must exceed an absolute weekly case number based on its population and tier for two consecutive weeks before being required to move to a more restrictive tier. For the 11/16/2020 tier assessment (data from 11/4 – 11/10), Del Norte county data in the CalREDIE system showed 19 cases, which exceeds the absolute threshold of 14 cases required before a county of its size moves from the Orange Tier to the Red Tier.

County reports that if PBSP cases (inmate and staff) are excluded and set aside, its number of cases would fall below the threshold of 14. County calculates that it would average to 1.8 cases per day between 10/29/2020 and 11/18/2020.

Additional contextual factors reported by the county during the timeframe of the PBSP outbreak include having only one admission requiring an overnight hospital stay and no current COVID patient admissions. It reports not tracing any case to a specific business environment. Additionally, county reports a trend of individuals initiating testing after an index case contacts them and before being requested by county to be tested.

County does not provide sufficient justification to support the adjudication request. CDPH includes prison staff cases in tier assignment metrics as staff live in the community and can create community transmission outside the prison system.

The other contextual factors also do not change the absolute number of cases or any other data that CDPH considers for tier assignments. The Blueprint proscribes that increased non-pharmaceutical interventions must be adopted when certain epidemiological criteria exist in order to prevent further rapid community transmission that can result from elevated case rates. These interventions must be adopted regardless of concomitant circumstances such as the ones cited because cases can multiply exponentially in community settings. Based on County's current case rates, the Blueprint requires County to be assigned Red metrics. The contextual factors identified do not support a deviation from the Blueprint.

Determination

Del Norte County's tier adjudication request is not approved for the 11/16/2020 tier assignment. Del Norte County will be still be assigned Red metrics for that week.

Date of CDPH Determination: 11/25/2020