Minutes - Clinton County Board of Health **Public Meeting held** July 18th, 2019 - 7:30 a.m.

Clinton County Administration Building - Conference Room "B" 1900 N. 3rd St., Clinton

Board Members

Dr. Mary Malcom

Present

Dr. O. Daniel Osaro

Absent

Dr. Sheryl Ernst

Absent

Jean Morgan, RN, BSN, MSED

Present

Don Thiltgen

Present

Staff Present

Shane McClintock, Director to the Board of Health

Kelli Eggers, Administrative Assistant to the Board of Health

Others Present

Michele Cullen, Genesis VNA

Jocelyn Meyer, Brideview CMHC

Nancy Burns, Emergency Management

Joanne Hermiston, Women's Health Services

Kati McNeme, EveryStep, MCAH/ISmile

Thomas Barnes, Clinton County Planning & Zoning

Angie Eacker, Community Healthcare

Leslie Mussmann, ASAC

Jim Irwin, Board of Supervisors

Malcom called the meeting to order at 7:30 a.m. Roll call showed 3 members present. It was moved by Thiltgen, seconded by Morgan, to APPROVE the May 23rd, 2019 minutes as submitted. Motion carried 3-0.

AGENDA ITEM III – BOARD OF HEALTH

Malcom stated that the Public Health Advisory Council for Boards of Health no longer exists. In attempt to be cost saving, they are eliminating volunteer boards. This has removed the public watch dog from the IDPH. The Trauma System Advisory Council is also affected. Their membership has been cut even though the last time mileage reimbursement was requested was five years ago. Emergency Medical Services Advisory Council still exists, however they are no longer receiving reimbursement for mileage or meals. There are two other public advisory boards that have been affected as well. This has been passed by the legislature. As stated in the Notice of Intended Action: "Amendments to The Volunteer Health Provider Program, Center for Rural Health and Primary Care, Emergency Medical Services Advisory Council, Trauma System Advisory Council, and Government Public Health Advisory Council are taking place. The Iowa Code defining the Iowa Collaborative Safety Net Provider Network was removed in the 2019 Iowa Acts HF766. The proposed amendment will rescind the rule for

'Expenses of the team members.' This act removes the statutory authority for the establishment of an advisory committee to the center for rural and primary care. 2019 Iowa Acts House File 766, sec. 84 removed the requirement for reimbursement of expenses of members of the Emergency Medical Services Advisory Council. Expenses can no longer be paid. The Trauma System Advisory Council shall consist of seven members. The number of members was previously undefined and could be as high as the total number of organizations or entities named. The amendment removes the ability to pay for expenses to the council members as well. Sections 72 through 74 removes all references to the governmental public health advisory council from Iowa Code." McClintock asked what the savings estimate would be. Malcom replied that it would basically be less government. No one has turned in miles for years with TSAC. She was unsure about EMSAC. Those who serve on those boards are volunteering one day of their time every 8 weeks and traveling to Des Moines. Thiltgen mentioned regarding old business, the tanning inspections have been eliminated in the county. No one has heard back yet from the city of DeWitt Administrator. Eggers noted the attachment of tanning businesses that are registered in the county with IDPH. Morgan noted that so much in revenue in agriculture in the area has been lost. Many farmers only have 75% of their crops in. Revenue for the west side of the state is probably worse than the east. Malcom noted that Clinton County is 99 for amount in growth with -4% as stated in the newspaper.

AGENDA ITEM IV - COMMITTEE REPORTS

- **A.** Finance No updates.
- **B.** Personnel No updates.
- **C.** Total Quality Management No updates.

AGENDA ITEM V – DEPARTMENT REPORTS

- A. Environmental Services- McClintock noted that regarding the Outback Subdivision, there is one plot with a problem. Originally Advantex was going to be used for the septic system. This system was already installed, but is missing a part. The owner is having trouble getting in touch with the company to rectify the situation. McClintock has also made several attempts to contact the company. He has left voicemails to no avail. It seems they are having a dispute with the owner of the system. McClintock feels we have helped as much as we can with the situation and it is now a legal matter. Malcom asked to clarify that it is only one lot. McClintock said yes, there is a lot that the owner has with an original plan for the lot adjacent to it to hook on to the same system. This may not happen at this point, they made need their own system. There are 15 lots in the subdivision, and the remaining 14 lots have had nothing going on yet. Barnes noted there are actually now 9 lots with changes that have been made. McClintock stated that all other lots should be able to do another system other than Advantex.
- **B.** Genesis VNA & Hospice—Thiltgen motioned to APPROVE the request for approval to sign Fiscal Year 20 Emergency Preparedness Contracts, Morgan seconded. Motion carried

- 3-0. An informational handout was submitted. **Cullen** stated they do not have the contracts in their hands yet due to the lack of a current fiscal agent. Because of this, we are getting more in funding. The Community Health Needs Assessment was submitted in June. There is a summary in the attached report. The Trauma Informed Alliance has continued with Connections Matter training. Anyone wanting trained can call **Cullen** or **Houzenga**. Ace Interface training will happen August 8th. Regarding adverse childhood experiences, having greater than 4 of the markers increases your chances of diseases and other issues later in life. The Move More Initiative hosted the Hyvee Kids' Fit Day. The event had a great turn out that included a fit kit instructor. August 28th is the annual Splash Dash. \$17,000 was received for the 5-2-1-0 funding. The groups will meet in August to go through the action plans. The Eat Well continues with donation gardens taking produce to the 5 donation gardening sites. Iowa State Extension offers fliers with guidance on preparing healthy meals with the produce. **Cullen** noted she will send **Eggers** numbers regarding the federal awards received last fiscal year.
- C. Hillcrest Family Services/WIC- Unable to attend.
- D. Early Childhood Iowa/DECAT- Not in attendance.
- E. Clinton Substance Abuse Council (GIC & CDC)- Unable to attend.
- F. Women's Health Services— Hermiston noted they have been busy with their normal outreach and events. They have been to LumberKings games, Felix Adler Day, and an event for National HIV Testing Day. Go Red for Women event is tomorrow. An annual oversite review was done in early July focusing on privacy and confidentiality and it went great. Staff has attended Iowa Medicaid trainings with all the recent changes. Staff has also attended the Human Trafficking training. The CAPP Grant was received that they applied for and that is initially a two year grant with an option for a third year based on performance and funding. The Wise Guys program funding was denied this year. Hermiston thanked everyone for their support. Funding at the federal level is still pending regarding Title X nationwide. The House passed a bill that was increasing the funding, but the Senate hasn't acted yet. The Title X changes are also still pending. They were slated to go into effect May 3rd, but several lawsuits put that on hold. An emergency injunction to put a hold on the rules went in place. On June 20th, 3 judges overruled the injunction, so the rules are back into effect. Another injunction was put into place to ask for a larger group for a rehearing which was granted on July 3rd.
- **G.** Area Substance Abuse Council (ASAC)/New Directions- Informational report submitted. Mussmann states they received the Justice Assistance Grant (JAG) with Clinton County to work with electronic nicotine devices on July 1st. This was received at \$22,666 with a \$5666 match. ASAC has asked the Board of Supervisors to be involved, they in turn would like the Board of Health involved. Mussmann noted the report submitted with the grant objectives. They would like to increase community awareness about the dangers of using nicotine devices. They will do a media campaign, presentations, and work with local law enforcement at all of the schools to create a diversion program. If the kids get ticketed for devices, they would have to go through an educational

program. If they finish the program the ticket could be diverted. The sub group Breath Easy would go through with strategic prevention trying to solve the issues and figure out how the county wants to deal with it. ASAC will provide technical assistance. Mussmann asked the board if they wanted to be involved. Malcom questioned if they are looking for a letter of support or something more substantial. Mussmann wondered if they wanted to be on the coalition group, or would just like updates. Thiltgen stated he is on the Camanche DeWitt Coalition and they recently took young students to Des Moines regarding these issues to work with Senator Conyers. Mussmann noted they are separate entities. Thiltgen motioned to provide a letter of support for the JAG Grant, Morgan seconded. Motion carried 3-0. In addition, board members will attend meetings as their schedules permit, and would like updates at board meetings.

- H. Bridgeview Community Mental Health Center— Newsletter submitted. Speak Out Against Suicide gave Bridgeview \$15,000 to aid in the mental health surveys at local schools. In June, they also received \$10,000 from the Glow Walk. Bridgeview has now received \$25,000 in the last few months to help pay for the screening programs and coordinate these with the schools. This also goes toward the deficit that is almost always there for school based services. The grand total to date received from these two events is \$131,021. In the 2018-2019 school year, 318 students received therapy, which is 50% of the number of youth that Bridgeview serves total. 635 youth up to age 17 were seen in the last fiscal year. 2465 unduplicated adults were seen. They have a few therapists moving away or leaving, so they are hoping to have some new hires. Bridgeview is still trying to purchase a building next to the old Ashford call center in the Lyons Technology Park. The closing date has been moved, but they hope to have it soon as the south campus of MercyOne is closing next summer.
- I. Center for Alcohol & Drug Services, Inc. (CADS)- Not in attendance.
- J. Emergency Management- Burns stated that flooding has still been a big issue in their department. The state individual assistance has kicked in but there is not enough damage in Clinton County for federal assistance. \$5000 can be received at maximum for state help but is also income based. A few individuals have taken advantage of this. The city of Camanche, Clinton County Secondary Roads, and Clinton County Conservation all reached the federal level to kick in public assistance. This is for cities and infrastructure only. Camanche had a lot of sewer and road damage. Malcom asked that there could be some federal money available if all goes well. Burns said yes, possibly, but it is a long process. The Run, Hide Fight trainings continue. One was held with Clinton School District support staff. The plan is for teachers and students to train next. Nestle Purina and Ipsco have both requested the active shooter trainings. Stop the Bleed trainings are also ongoing with 874 people trained so far. Wild Rose Casino did three sessions recently, as well as the Calamus Fire Department, and United Methodist Church. Support staff at MercyOne will be scheduled as well. Kits are being sent to the school districts. The Reception Center training was completed which is part of the Radiological Emergency Preparedness training. This is done yearly. If for some reason there is a radiological emergency, and evacuation is necessary, they would direct people to the

reception center to see if they are contaminated. They can decontaminate there before they are allowed to leave the county. They have a unit similar to a metal detector to test this and also a handheld device for testing vehicles. Fire departments have been trained and they would set up the center and run it as Emergency Management would be at their operations center. Next year this training will be FEMA graded. On October 10th, they will do an off year Radiological Emergency Preparedness training. A CERT therapy dog response was held last week after the 12 year old child from Clinton was killed in an accident. They held a grief support hour for family, students, and teachers. Dan Howard has received bids for the drone program. They are going through bids and deciding which to go with and reviewing policies for the program. Two new medical examiner investigators were recently hired and will start training today. Thiltgen requested to attend a Stop the Bleed training.

- K. Community Health Care, Inc- Eacker stated they are busy with physical season. They are also busy with dental sealants, cleanings, and updating vaccines. They are focusing on updating vaccines while patients are in for their physicals or even just for a routine visit like a common cold. They are working to get their diabetic patients educated and under control. The coordinator has been meeting with patients before they see the provider and following up with them monthly. This seems to be working well with patients. CHC is taking new patients. Some weeks there is a wait list which consists typically of just a 3-5 day wait before they get a call.
- L. EveryStep/MCAH- McNeme noted effective July 1st, Iowa Total Care and Amerigroup are the two Medicaid providers. All members are in an open choice period. As families are seen at WIC, eligibility is being checked and they are assisting them if changes are needed. They are still finding that a lot of families are confused or haven't received their cards yet. Iowa Total Care requires prior authorization for almost all of the services provided through Maternal Health. This is concerning as they rely on Medicaid reimbursement to keep this afloat. Theresa Kauffman is a nurse practitioner in Clinton and she started placing fluoride varnish at well child visits which is a big plus in our area. It is part of a state wide initiative, Cavity Free Iowa. ISmile services have been at the Ericksen Center this summer for day camp programs. 107 dental screenings took place with 24 identifying as high risk. The YWCA and Zion will have summer programs as well. They also plan on being at the Back to School Bash August 15th. Funding was received from Early Childhood Iowa to do preschool dental screenings. This will start September 1st. Additional funding was received this year to purchase oral health education kits for the preschools with consent return rates over 90%. Thiltgen asked McNeme if this was her last meeting with the board. McNeme replied yes, her last day is August 15th.

AGENDA ITEM VI – BOARD OF SUPERVISORS

Irwin stated that the Board of Supervisors are looking at doing a county wide lead based paint grant program through ECIA. This would be a 1 % - 2 million dollar project with the county being responsible for 10% of that funding. This would be over 42 months. Currently the cities of Maquoketa and Clinton are doing a similar grant program. The county would have a 6–8

month overlap. This is an unusual grant as it is available to rural residents, where it is typically cities. It is also based on the income of the occupants of the home and not the owner. Irwin asked the board their input on this grant. His opinion is that it is a great way to update these homes with high levels of lead paint. In 2015, 25.2% of children under 6 years of age were tested for led. Of those, 28 came back with elevated blood levels. In 2016, 33.9% were tested with 19 that came back elevated. This is for houses built prior to 1978. Along with the age of the home, it is also income based. Approval is also based on the ability for the contractor to get the projects done. Only certain contractors are approved for the process. Up to \$35,000 per house is allowed. Malcom stated that the one time she was involved with a child with elevated lead levels, it was hard to identify resources to rehab the home, so she believes this grant would be helpful. Cullen agrees that it would be helpful as previously, many of the children with elevated levels have come from rental homes. Sometimes the landlords asks people to move, sometimes they chose to move themselves. Cullen noted that rates of elevated levels are changing as well. Irwin said since 1978, a lot of the homes have been updated already. Residences of a child under the age of 6 would be included in this grant, but also a home of a grandparent or daycare would be considered if that child spends at least 10 % of their time at that residence. Thiltgen noted that ECIA went through this matter at their board meeting last night. The Board of Health unanimously agrees that this grant would be very beneficial to the county. Irwin noted he went to Iowa City with Supervisor Srp yesterday. This was a rather eye opening experience regarding mental health. Several other county staff was present. They spoke with Johnson County about their Data-Driven Justice Initiative. They were 1 of 3 across the nation that were chosen to implement a potential process of tracking individuals with nonviolent crimes. This involved 883 individuals who were high users of drug or alcohol that were once in jail. Many were related to having been homeless. Of those 883, 26 were high users and they all met up for a meeting. It was found that 4 individuals over 4 years cost Johnson County 2.2 million dollars for services between ambulance rides, times with deputies dealing with the situations, and emergency calls. Thus, they are developing a system to track individuals with a profile (name, alias, triggers, what deescalates a situation, last contact, physical abuse). With this, a 24 unit, one bedroom efficiency complex was built for 2.7 million dollars. It is funded from Johnson County and local cities. 33% of the cost is passed back on to the individuals through their social security or if they do have income. The individuals that they were having the most contact with were sheltered first to get them off the streets and stop some of the issues. This is hard to say how it fits into Clinton County just yet but was certainly eye opening to the sheriffs and supervisors. Thiltgen noted how frustrating it was that the state mandated mental health budgets be ran down. When the county did that and others did not, the law was changed. Irwin noted yes, and it cannot be brought back. Our region was set at a rate of \$30.78 per resident with 300,000 residents in the region. This is based on our cost for mental health from 2015. Last year our region spent 12.4 million dollars, so there is about a 4 million dollar gap. A year ago, they passed legislation that only 20% of our balances could be carried over. So a 1.3 million dollar one time funding was used to get balances down so we would fall below the 20%. This year, a new legislation allows a 40% carry over and is based on each county. Because we spent down the balance, we will not catch up. On top of that, Jackson and Cedar counties do not uses services like the other 3 counties in the region, so they will not be able to fund into our region at the high level. Our cost is now \$49.55 per individual. The region average is around \$43. It is estimated that next year there will only be \$300,000 to \$800,000 carry over

which leads to a major issue next year. **Thiltgen** said he spoke with Kelly of ECIA and they will get on board with this as well and have a meeting with the legislative session.

AGENDA ITEM VII - PUBLIC COMMENT

Malcom stated that she and all of the other board members received a letter of complaint on July 16th, 2019 from Michael Kopp. He is out of town and cannot attend the meeting. Malcom asked whether anyone would like her to read it aloud or attach in the minutes. It was noted that the letter and Malcom's response letter would be in the July 18th, 2019 board minutes as an attachment. It appears that he wants to know whether a control box is required for his Advantex septic system. The response letter from Malcom notes that the Health Department regulates the design, construction and installation of on-site treatment systems. They sample private on-site treatment systems, and provide assistance with complaints relating to sewage treatment and disposal system. In doing those things, we have to follow regulations from the lowa DNR which are specified in lowa Code. The response letter referred to the lowa Code. The complainant feels like he is not getting adequate guidance regarding the system and he was referred to the Onsite Wastewater Training Center of lowa.

AGENDA ITEM VIII – OLD BUSINESS

Thiltgen will revisit with the city of DeWitt Administrator regarding tanning regulations and how to manage this. **McClintock** stated getting in touch with Scott County would be good to determine who they were working with on their inspections, etc.

AGENDA ITEM IX - New Business

NONE

AGENDA ITEM X – Next Meeting date

September 12th, 2019 and November 7th, 2019 at 7:30 am at the Clinton County Administration Building, Conference Room "B".

AGENDA ITEM XI – ADJOURNMENT

Motion by **Thiltgen**, seconded by **Morgan**, to adjourn. Motion carried unanimously. Meeting was adjourned at 8:43 a.m.

Respectfully Submitted,

Kelli Eggers, Administrative Assistant to

the Board of Health

Approved

Dr. Malcom, Chairperson, Board of Health

Attachments can be viewed by contacting the Board of Health at the Clinton County Satellite offices.

PUBLIC HEALTH DEPARTMENT [641]

Notice of Intended Action

The Public Health Department hereby proposes to amend Chapter 88, "Volunteer Health Provider Program," Chapter 90, "Iowa Child Death Review Team," Chapter 110, "Center for Rural Health and Primary Care," Chapter 130, "Emergency Medical Services Advisory Council," Chapter 138, "Trauma System Advisory Council," and Chapter 186, "Governmental Public Health Advisory Council," Iowa Administrative Code.

Legal Authority for Rule Making

This rule making is proposed under the authority provided in 2019 Iowa Acts House File 766, Sections 66, 82, 70, 84, 78 and Iowa Code chapter 147A, and 2019 Iowa Acts House File 766, sections 72-74.

State or Federal Law Implemented

This rule making implements, in whole or in part, 2019 Iowa Acts House File 766, Sections 66, 88, 70, 84, 78 and Iowa Code chapter 147A, and sections 72-74.

Purpose and Summary

The Iowa Code defining the "Iowa Collaborative Safety Net Provider Network" was removed in the 2019 Iowa Acts HF766. The Proposed amendments to Chapter 88 will remove the definition for "Specialty care referral network" because it no longer exists, amend the definition of "Specialty health care provider office" to remove the reference to the "Iowa Collaborative Safety Net Provider Network" and rescinds subrule 88.5(3) due to the elimination of the referenced specialty care referral network.

2019 Iowa Acts House File 766, sec 82., amended Section 135.43, subsection 2, unnumbered paragraph to remove a sentence that stated, "The members of the team are eligible

2019 Iowa Acts House File 766. Sections 72 through 74, removes all references to the governmental public health advisory council from Iowa Code. House File 766 removes the underlying statutory authority for Chapter 186. This proposed amendment will rescind Chapter 186.

Fiscal Impact

This rule making has no fiscal impact to the state of Iowa.

Jobs Impact

After analysis and review of this rule making, no impact on jobs has been found.

Waivers

Any person who believes that the application of the discretionary provisions of this rule making would result in hardship or injustice to that person may petition the Department for a waiver of the discretionary provisions, if any, pursuant to the Department's waiver and variance provisions contained in 641—Chapter 178.

Public Comment

Any interested person may submit comments concerning this proposed rule making. Written comments in response to this rule making must be received by the Department no later than 4:30 p.m. on August 6, 2019. Comments should be directed to:

Susan Dixon

Lucas State Office building

321 East 12th Street

Des Moines, Iowa 50319

Email: susan.dixon@idph.iowa.gov

Public Hearing

641—110.1(135) Purpose and scope. The following rules developed by the department of public health govern the organization of the center for rural health and primary care within the bureau of oral and health delivery systems of the department of public health.

ITEM 6. Rescind the definition(s) of "Center for rural health and primary care advisory committee" in rule 641—110.2(135).

ITEM 7. Rescind and reserve rule **641—110.4(135)**.

ITEM 8. Rescind and reserve rule **641—110.5(135)**.

ITEM 9. Rescind and reserve rule **641—110.6(135)**.

ITEM 10. Rescind and reserve rule 641—130.7(147A).

ITEM 11. Amend rule 641—138.3(147A) as follows:

641—138.3(147A) Appointment and membership.

138.3(1) The <u>seven members</u> of TSAC shall be appointed by the director from the recommendations of the organizations listed in subrule 138.3(4).

138.3(2) Appointments shall be for two-year staggered terms, which shall expire on June 30.

138.3(3) Vacancies shall be filled in the same manner in which the original appointments were made for the balance of the unexpired term.

138.3(4) Membership. The voting membership of the TSAC shall be comprised of <u>seven</u> members, appointed by the director, who are selected from the pool of individuals one representative nominated <u>recommended</u> from <u>each of</u> the following organizations <u>or entities</u>:

- a. American Academy of Pediatrics.
- b. American College of Emergency Physicians, Iowa chapter.
- c. American College of Surgeons, Iowa chapter.
- d. Department of public health.

ITEM 12. Rescind and reserve rule **641—138.9(147A)**.

ITEM 13. Rescind and reserve 641—Chapter 186.

Rection 7/14/19
MALLON

To - Clinton board of health

From - Michael kopp

im out of town this week and im sorry I was snowed in for jan. meeting which I thank all members for changing to 2 acre lots =best for all!!

Approx. 5 years ago I installed a advantax septic system in the subdivision which the county wanted me to use only orenco company[advantax]

It was installed by the company iowa waste and water in des moines at a total cost for entire system to be approx. \$24,000 and the iowa waste and water for all components = approx.\$13,500 which I paid in full for complete system

At that time I was not ready for control box and the installer said he would take it back to office for now?

Approx. 1 year later [and 4 years ago now]- I called iowa waste and water at least 50 times -to find out the salesman had sold it to a person in souix city ia? And its not their problem because the installer was a subcontractor???

The advantax companys main office will not answer any questions! and even from the main office in Oregon- twice I was told to talk to shane than hang up

In February I went into dewitt office asking 2 questions =can we move forward with 2 acre lots? I need help getting the control box from advantax since the county wanted me to use this company and I cannot get the control box . which was paid for? what is this \$24,000 system worth and what now? Shane and tom said we will call were busy now?

I went to the dewitt office in march-april-may-june-july with no info and no hurry when I said to both -do you understand how much mony this cost me daily waiting for you answers [didn't seem to care]

Asked my attorney to help and he call shane and was told that he didn't know anything about the control box! Not true

In sept I had a meeting with board of supervisors asking for help -dan syrp call the dewitt office but change from shane!

In October I went out to dewitt I was getting a building permit when shane came into the office and told me to stop coming in here asking the same questions-I said I was getting building permit and he left [ive been in and out of this office for 45years and never 1 problem]

After asking bob mcgee for help -in jan 2019 tom barnes found time to put me on the agenda 2 years since I first asked for help?

Mary E. Malcom, DO

2614 212th Street DeWitt, Iowa 52742

Mary.E.Malcom@alumni.dmu.edu

Michael J. Kopp 3727 292nd Street Camanche, Iowa 52730-9622

July 16, 2019

Dear Mr. Kopp:

Yesterday I received your letter postmarked July 13, 2019. I plan to read your letter during the Public Comment portion of the Board of Health meeting Thursday, July 18, 2019. In addition, the agenda calls for a discussion from Environmental Services regarding Advantex Systems for Outback Subdivision. Shane McClintock, whom I believe is the "Shane" referenced in your letter, is Director of Environmental Services for Clinton County. In Clinton County, the duties normally performed by the County Sanitarian are performed by the Director of Environmental Services.

If I understand your letter correctly, your question is whether a control box is required for your advantax [sic] septic system to function correctly.

Per https://www.clintoncounty-ia.gov/page/Onsite_Wastewater_Treatment.aspx, Clinton County Health Department:

- 1. regulates the design, construction and installation of all private on-site treatment systems installed in Clinton County,
- 2. samples private on-site treatment systems, and
- 3. provides assistance with complaints relating to sewage treatment and disposal system.

Per https://www.iowadnr.gov/Environmental-Protection/Water-Quality/Private-Septic-Systems, while performing these duties, the county must comply with minimum standards developed by the Iowa Department of Natural Resources. Iowa Administrative Code Chapter 69 details the minimum standards required of private sewage disposal systems.

(<u>https://www.legis.iowa.gov/docs/ACO/chapter/567.69.pdf</u>) Please note that "control box" is not defined within IAC 567-69.1(2), and I do not know its function within your septic system.

It is my understanding that the intent of IAC 567-69 is to prevent the discharge of sewage into Iowa waterways, including underground reservoirs. Your question of whether your septic system will function properly without a control box appears to be a technical matter. I have neither the training nor expertise to give you any guidance on this matter, and it appears from your letter that you are receiving insufficient guidance from the county sanitarian, Advantex, and Iowa Waste and Water. From my limited research, it appears to me that Onsite Wastewater Training Center of Iowa, located at the DMACC Ankeny campus, may have the resources to provide you with technical advice. Their website is http://www.wastewatertraining.com/

I hope this is helpful to you, and not just one more source of frustration.

Sincerely,

Mary E. Malcom, DO Chair, Clinton County Board of Health