

## ATTACHMENT 1. CUSTOMER FEEDBACK AND RELATED EHS ACTIVITIES

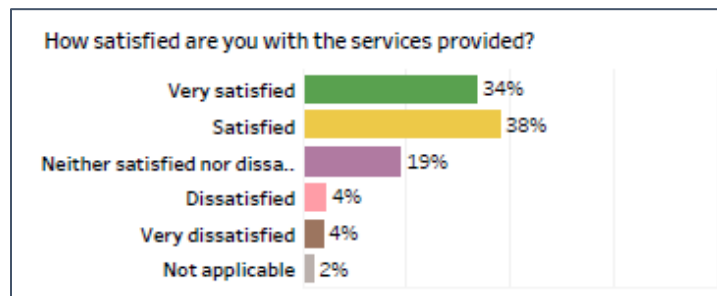
### Introduction

EHS rate-based programs actively engage with permit holders through regular inspections, plan review processes, training, newsletters, and regular meetings with participants and partners. The Food & Facilities Section holds quarterly meetings with business leaders, business owners, food establishment operators, and community-based organizations. The OSS Program meets quarterly with an OSS Technical Advisory Committee of interested and impacted parties (e.g. realtors, builders, OSS industry, property owners, and environmental organizations), the Vashon Pollution Identification and Correction Advisory Committee, and the Poverty Bay Shellfish Protection District Advisory Group. These opportunities for collaboration ensure customer needs and concerns are continuously addressed and incorporated into the programs' work.

As part of the rate study, EHS asked permit-holders for feedback on their permit experience through an anonymous 6-question survey. Links to the survey were emailed to customers, shared through relevant program newsletters, posted on the EHS website, and shared during site visits.

The survey (available in English, Spanish, Chinese, Korean, Russian, Thai, and Vietnamese) had 515 responses. Although the response rate was low relative to the number of permit-holders and thus subject to potential response bias, the vast majority (72%) of respondents were satisfied with EHS services (Figure 1).

Figure 1: Business Responses to Service Satisfaction



### Customer Feedback

Customer feedback gathered through EHS's ongoing and tailored engagement opportunities, can be summarized in four overarching areas:

- 1) Improve turnaround times and responsiveness from EHS, especially related to plan review processes and timelines.
- 2) Limit service fee increases, especially for small businesses and property owners.
- 3) Provide technical assistance and education on permit application submittals and BOH code compliance.
- 4) Respond quickly to public health concerns, complaint investigations, and concerns about unpermitted businesses.

It is a priority for EHS to hear from customers and to improve services in response to customer needs; this is an ongoing effort during and beyond the rate study process. The proposed rate changes aim to strike the right balance to address these needs and considerations while recognizing that EHS responsiveness has both public health and financial impacts on customers. EHS seeks to provide stronger customer service through shorter turnaround times, technical

assistance, and responding to public health concerns, including complaints, requires adequate resourcing.

## **Efficiency and Equity Opportunities**

EHS has many efforts underway to improve the efficiency, equity, and effectiveness of EHS services related to customer and community feedback. This section incorporates examples of progress made on priorities identified during this and the previous rate study, ongoing customer engagement, and action steps moving forward. These efforts are part of the broader Public Health Strategic Plan with a goal to advance identified values, including equity, co-creating solutions with community partners, and being accountable to high standards with transparent communication about EHS operations.

### ***1) Faster turnaround times and responsiveness.***

EHS is working hard towards faster turnaround times across all programs. However, capacity is dependent on staffing resources. As one significant example of progress, EHS reduced the food plan review response time from 74 days at the start of the year to 24 days as of September 2024.

EHS action step: EHS will continue to seek efficiencies and prioritize changes to support faster timelines where possible.

### ***2) Limiting service fee increases.***

EHS's full cost recovery mandate and the related lack of funding to subsidize less-than-cost permits remain the primary barriers to establishing a more equitable fee structure. The law is clear that Public Health cannot charge more than the actual costs of providing services (plus reasonable reserves) and costs cannot be shifted to some categories of permittees to benefit other categories of permittees.<sup>1</sup>

Due to these budget limitations, EHS has focused on identifying service efficiencies and alternative payment structures to limit cost increases and address other barriers to entry for small businesses and historically disadvantaged communities.

EHS has taken multiple steps over the past five years to limit service fee increases and advance equity goals. This includes several priorities identified in the 2019 rate study.

- **Travel time and deployment.** During COVID-19, EHS changed how staff deployed to the field. Instead of an EHS office in downtown Seattle or Bellevue, EHS inspectors can now deploy remotely to their inspection locations, which reduces commute time and increases the time spent with customers.
- **Proration and fee changes.** The Food & Facilities Section and Solid Waste Program implemented quarterly permit proration options to support customers financially, including small businesses. The OSS Program reduced OSS repair permitting

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<sup>1</sup> See RCW 70.05.060(7); BOH 2.06.008(A)-(C)). The BOH does not have budgetary authority and cannot subsidize fees; however, before budget cuts in 2009, the King County Council used to fund permit subsidies for schools, nonprofits, temporary events, and mobile food commissaries.

requirements to improve payment equity and increase participation, thereby decreasing public health risk.

- **Increasing access to commissary and commercial kitchens.** The Food & Facilities Section identified barriers faced by new mobile food entrepreneurs, including 1) the cost of commissary kitchens,<sup>2</sup> 2) the initial cost to acquire mobile food units,<sup>3</sup> 3) access to restrooms,<sup>4</sup> and 4) access to street use permits.<sup>5</sup> In response, the section has made significant progress in increasing access to commercial kitchens, by creating an online searchable database with a map and information on available commissary kitchens. EHS also provided COVID recovery funding for commissary kitchen vouchers (available December 2021 – March 2023) to 42 food vendors to subsidize the cost of using a commissary kitchen and conducted site assessments at a few community centers and faith-based organization locations free of charge to determine what they needed to meet code for their use as a commissary kitchen.

Partnering with mobile food vendors and community partners to address barriers remains a focus. Recent work includes making additional updates to the commissary kitchen database to allow criteria-focused searches and help characterize existing commissary kitchen capacity in the County; expanding access to commercial kitchens through collaborations with various community centers and faith-based organizations; and identifying additional sources of funding needed to extend the successful commissary kitchen voucher system to help offer food vendors low- or no-cost access to kitchen spaces.

- **OSS code changes and equitable wastewater infrastructure.** The OSS Program is working to lower costs for property owners through proposed OSS code changes and longer-term through the Equitable Wastewater Futures project focused on identifying wastewater treatment solutions for King County's over 37,000 urban OSS, many of which are past their intended lifespan. The program uses an equitable wastewater infrastructure analysis dashboard to inform community-level planning and seeking funding opportunities to support conversions to sewer in low-income, urban areas.

EHS action steps: a) EHS will continue to look at avenues to make services more accessible, including examining other jurisdictions' equity approaches in fee structures and identifying potential changes to the law and codes that would reduce regulatory barriers. b) EHS is exploring ways to reduce costs and the time required for lower-risk food businesses to become permitted, both with and without proposing BOH code changes. If BOH code changes are needed to implement new procedures, EHS anticipates bringing them to the BOH in 2025. c) Given the cost

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<sup>2</sup> For food to be sold to the public it must be prepared in a kitchen in compliance with code requirements. For mobile and temporary event food businesses, access to commissary kitchens can be a barrier that many vendors face because they are limited in number and are costly to rent. The cost of commercial kitchens can range from \$800 to \$1,500 a month for 15-20 hours of usage per week.

<sup>3</sup> Mobile food units can range from \$5 - \$20k for carts and \$60-70k for food trucks.

<sup>4</sup> For mobile food units to operate in one location for more than one hour, they need access to a restroom. Obtaining a restroom agreement from nearby businesses can be costly or challenging.

<sup>5</sup> Unless they are on private property, they must also purchase a street use permit from SDOT. The cost for a street use permit can be several hundred dollars.

barriers of sewer connections for urban OSS, the proposed BOH OSS code changes include a waiver process to permit OSS replacements when sewer connections are not feasible.

### ***3) Technical assistance and education on permit application and code compliance.***

EHS recognizes that customers need different types of assistance to meet code requirements and navigate services. In response, EHS uses a range of approaches to support customers, including:

- **Sanitarian of the Day.** The Food & Facilities Section and the OSS Program offer Sanitarian of the Day phone resources. Anyone with technical questions can reach a technical expert and receive timely support. This includes questions about starting a food business or buying a property that may need an OSS. The public regularly uses this resource.
- **Partnerships with community groups and industry associations.** As described in the customer feedback section, EHS has ongoing engagement, relationships, and collaborations with relevant community groups and industry associations across lines of business.
- **Food establishment educational visits.** Educational visits provide consultation/training to discuss risk reduction while verifying proper food handling, food source, food storage, and general cleanliness. Violations are written as notes and observations are not scored. The visits can help operators understand how to comply with the food code and how to prepare for a future inspection.
- **Mobile food guide.** The mobile food unit plan review and permitting guide supports the permit application process by outlining a checklist of all forms and permits that need to be submitted to EHS for review and approval before the business can open. The plan review process helps operators better understand and comply with industry and regulatory requirements and helps ensure the public health and safety of a facility without undue financial burdens.
- **Language access.** EHS is hiring multilingual staff, using King County's on-demand language line translation services, and offering customers translated educational materials to increase access to services.

EHS action steps: a) The Food & Facilities Section is expanding community partnerships to support new food vendors with the permit processes. b) EHS will work to develop a standard equity review process for substantive BOH code changes and state policy proposals, building on the equity review process developed for the OSS code revisions.

### ***4) Responsiveness to public health concerns, complaint investigations, and concerns about unpermitted businesses.***

EHS programs respond to public and business concerns regarding public health threats (e.g., food safety, OSS failures) and code non-compliance. Examples include:

- **Pet business permit suspension website.** The Pet Business Program launched a new website and email alert list in 2024 to inform the public about pet business suspensions and closure notices. EHS developed and promoted this resource in response to requests from concerned constituents.

- **Unpermitted food businesses.** As a result of economic and logistical hardships, some food businesses/vendors are either unaware of the requirements needed to obtain a permit to operate or lack the resources to do so. EHS is investing in strategies to help food vendors successfully overcome barriers to the permitting process, create livelihoods for their families, and contribute to a diverse food culture while ensuring food safety for the public. These strategies include: providing multilingual services, training staff to provide accessible technical support and quality inspections, helping vendors identify commissary kitchens, lowering financial barriers by offering prorated permit fees, advocating for the creation of additional places where permitted vendors are allowed to operate, informing the public about food safety by expanding window placarding to include mobile units, fostering partnerships to support the needs of mobile food unit operators, and establishing community engagement groups to inform EHS policies and educate operators.

When Public Health is alerted of an unpermitted vendor, staff visit to share information with the vendor about how to permit their business and suspend the vendor's operations as needed. With an increase in unpermitted vendors who demonstrate a disregard for permitting requirements, EHS coordinates with agency partners to address this issue.

#### EHS action steps:

- a) The pet business landscape has changed significantly in the last decade, with a large amount of growth in the industry, especially in pet daycares and boarding facilities. While the proposed fees for pet businesses will help increase EHS's oversight and technical assistance capacity for the industry, the program will continue to experience a funding gap and not meet full cost recovery requirements. EHS will review this issue more closely in 2025-26 and expects to return to the BOH with recommendations to close the funding gap.
- b) EHS is moving to a new permitting software, Tyler Enterprise Permitting and Licensing, in 2025. While this will impact staff and customers as staff get trained on the system and customers learn how to use the system, the overall impacts will be positive. The new software will automate many processes and allow customers to do more online. A mobile version will support field staff to enter data, submit reports, manage workflows and workloads, and facilitate handoffs between team members.

EHS strives to invest in long-term improvements to service delivery. To this end, EHS has advanced many identified priorities based on staff, customer, and community feedback and will continue to invest in reviewing program efficiencies and equity opportunities in the years to come to better serve the rate-payers and the King County community. EHS is committed to regularly and intentionally engaging with customers and impacted communities to improve services, identify creative new solutions, and center equity in approaches.