

## Report in response to King County Ordinance 17941, Section 98

Environmental Health Proviso 2, King County 2015/16 Biennial Budget

August 30, 2015

### Proviso Item A: Auditor's Report on Review of Implementation of Recommendations

*"...the county auditor reports that the environmental health services division has fully implemented Recommendation #5 of the September 11, 2013, performance audit of environmental health services, i.e., to implement a rigorous approach to staff allocations addressing the four best practice factors identified by the county auditor, which include a defined staffing methodology with staffing standards and performance measures related to caseloads and workloads."*

The Environmental Health Services division report to the auditors on the implementation of the 2013 auditor's recommendations included illustrations of staffing methodology steps and criteria that are being used in the Division. The implementation report has been reviewed and on July 31, 2015 the auditor determined that Recommendation #5 has been completed.

Best practices for assessing staff workloads were defined by reference in the auditor's report:

1. Define the work – caseload numbers and workload measures
2. Use points of comparison – look at historical data and explore business process improvements through mapping and other operational tools
3. Set resources to needs – link workloads to FTEs, estimate seasonal workloads, and track performance goals
4. Validate the model – look at external benchmarks, analyze performance metrics periodically

Division-wide, we have developed human resource tools and established metrics for hiring of positions that employs the four best practices that were identified in the auditor's report, including a practice of providing workload / caseload data and estimated hours to complete the workload for each position request.

EHS programs have a wide range of work types, and therefore workloads and staffing standards. Some are straightforward data such as number of permits and inspections. Other workloads are more complicated, research and policy-oriented such as updating ordinances. These metrics also vary by position, are dynamic in project focus, and undergo continuous improvement.

Metrics alone do not make the final decision. The forms we now use ensure that hiring supervisors are prompted to describe the workload in narrative and metrics:

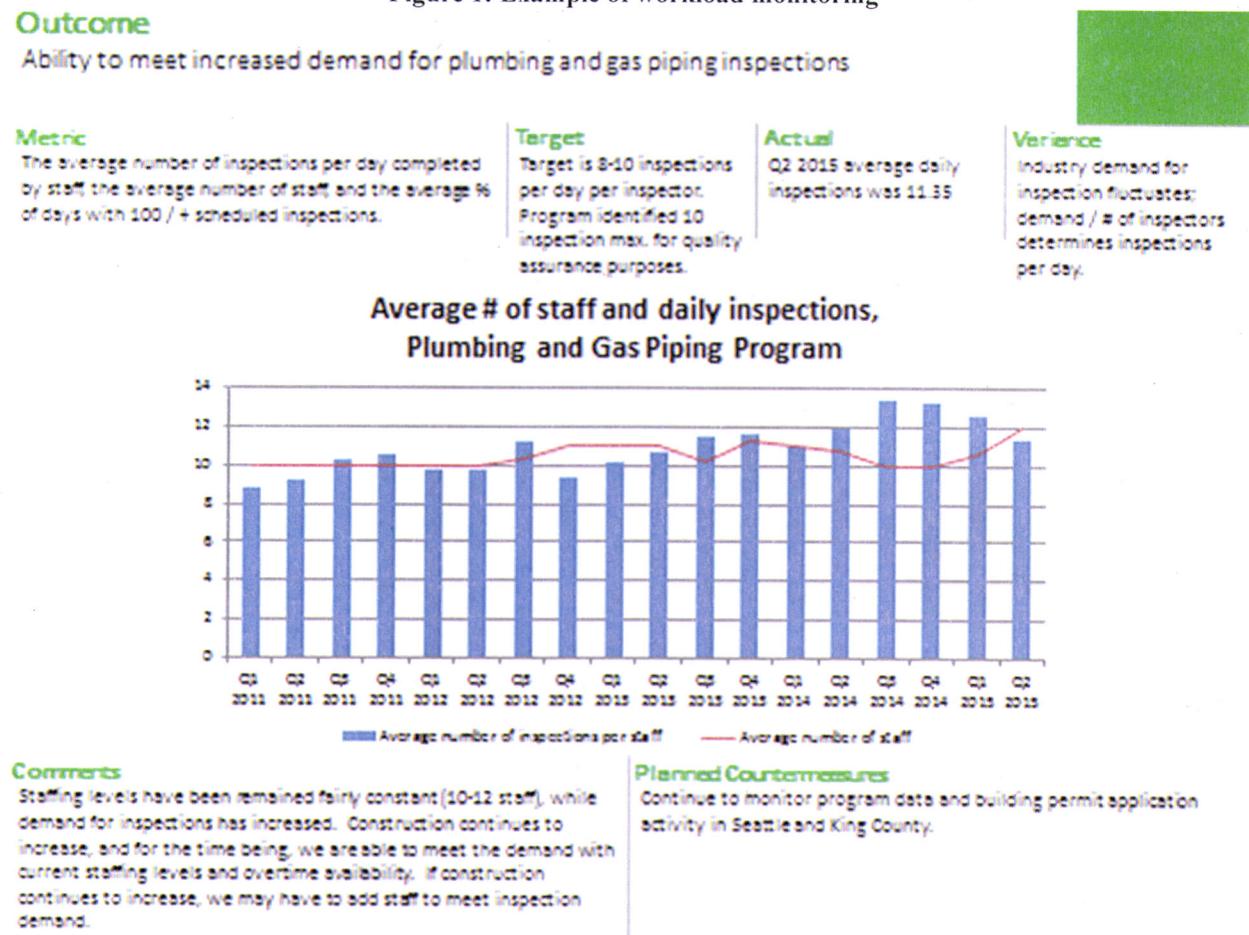
- should it be career service, TLT, STT
- can the additional workload be addressed through temporary overtime
- is the workload seasonal, annual, or one-time
- technical training investment vs. productive work time

The hiring requests are reviewed by the section manager and finance manager before they are submitted for posting. This provides a check-and-balance system that ensures managers are determining impacts and sustainability regarding:

- human resource
- finance
- strategic planning
- department-wide workforce planning
- line of business planning
- labor and human resource issues existing in the department or in the county

Below is an example used in monitoring staffing in the plumbing and gas piping program:

**Figure 1: Example of workload monitoring**



In this example in the above chart, monitoring the trend in workload and forecast information from Seattle Department of Planning and Development indicated a sustained increase in overtime in 2014. This informed the decision to request additional positions in the 2015-2016 budget and hire an additional inspector (Q2 2015).

The Food and Facilities Section monitors similar trends. The program tracks the number of inspections performed by each inspector annually, and number of permits issued annually. Currently, staffing is allocated based on an expectation of 870 restaurant inspections per year, per FTE. These targets are adjusted by supervisors to take into consideration FML, special training needs (i.e., emergency preparedness), and surge investigations for food borne illness

outbreaks. Inspectors also add overtime to conduct seasonal inspections for temporary events and farmers markets. This practice is under review and analysis to consider the following:

- a) 2014 Food Program Review recommendations from Strategica Consulting to reduce span of control of supervisors and re-assess staff workloads (consultant report attached. *KC Food Program Review, Section G*)
- b) 2013 Performance Audit, 2014 Food Program Review and Environmental Health Rate Study benchmarks against other food inspection programs across the nation with significantly fewer inspections per year per FTE (King County Auditor's Office: Performance Audit of Environmental Health Services report attached, page 17)
- c) Current research project on quality assurance and consistency of inspections in collaboration with Stanford University
- d) Current and ongoing negotiations with labor regarding
  - Workloads
  - Supervisor span of control
  - Inspector supervisory support on evenings and weekends

There is periodic review to validate assumptions and integrate changes in program operations including implementation of efficiencies. This ensures that Environmental Health meets the dynamic needs of the community. In addition to quarterly reviews of revenues and expenditures, the following documents also inform operational and program priorities:

- 2014 Food Program review
- 2014 Onsite Septic System program assessment
- 2014 Rate Study
- 2015 Strategic Plan update
- Annual rate assessments and reporting to Board of Health

Improvement projects are being piloted to build a staffing model that better predicts permit inspection backlog and optimizes the use of our talented human resources. We anticipate that these improvements in the staffing model will result in less indirect cost, resulting in lower permit rates as we are able to more specifically define direct service tasks and measure them with improved metrics. One example is in the administrative services unit; We are in the process of documenting and timing various processes to better understand the true costs of administrative processing of permits. Developing these specific metrics will inform workloads and distribution of tasks among our staff. Consistency and accuracy training, and performance tracking is also part of the project. We anticipate that the information gathered will allow us to:

- Identify process improvements and reduce “waste” – reduce time to process permits, thereby reducing cost
- Develop clearer metrics that will provide benchmarks and targets for:
  - training,
  - performance expectations, and
  - consistency and accuracy parameters (thereby reducing cost)

#### **Proviso Item B.1. Copy of Auditor's Report**

A copy of the auditor's letter on implementation of the recommendations is attached:

- Recommendation #5 has been highlighted.

## Proviso Item B.2. Operational Action Plan for Food Permit Cost Reduction

*"An action plan for improving the operational infrastructure of environmental health services in order to lower permit costs and encourage vendor participation while maintaining food safety; Development of the action plan shall be informed, at a minimum, by the recommendations from the 2013 county auditor performance audit of environmental health services and the action plan submitted in response to proviso P1 of this section regarding environmental health services.*

*The proposed action plan shall include recommended actions and timelines for achieving cost savings that are projected to result in no food program rate increases through the end of 2017 while building rate reserves during that timeframe. The plan shall show at a minimum the operational costs, workloads, and staffing assumptions that are the basis for achieving the target."*

The Food Program has conducted extensive data analysis and stakeholder conversations to develop each of the following strategies. We prioritized these strategies by three major criteria:

1. the amount of impact the strategy would have on meeting customer needs, and
2. the importance of maintaining responsible food safety practice guidelines through the strategies – mandated by Federal, State and Local legislation
3. the capacity of the program to develop and implement the strategy with current staffing levels



In EH Response to Budget Proviso 1, submitted in December 2014, the Food Program defined the principles used for development and future assessment of mitigation strategies:

- Food safety standards are maintained;
- Services and associated fees are equitably distributed; and
- A rate and fee structure that allows for full operational cost recovery is maintained.

The Food Program also identified near-term actions for the 2015 permit cycle with a timeline for implementation. Actions were identified as mitigation strategies, including those specifically marked as service reductions to reduce staff time and cost. The program indicated the near and long-term nature of these efforts, and included long-term actions that required research, analysis and development in 2015 to be applied to the 2016 permit cycle.

## Cost Mitigation Strategies:

Table 1: Mitigation strategies to lower program fees

Mitigation Strategy	Permit types affected	Near/mid/long term	Estimated Customer (Cost)/Savings	Estimated EH (Cost)/Savings	Public Health Impact	Equity impact
1. Reallocate Indirect costs of foodborne illness and complaint Investigations	All	Near term (2015)	Reduces hourly rate by \$4 *	No change	No change	Improves equity
2. Reallocate indirect costs of wineries and require permit	All	Near = hourly rate (2015) Mid-term = permit (2016)	Reduces hourly rate \$1 *	Estimated revenue \$48,000	Improves public health	Improves equity
3. Maintain 2014 fees for the 2015 permit year	farmers markets/temporary event vendors and coordinators	Near (2015)	One year saving on fees ranging from 42-130%	(Creates \$500k gap in EH budget)	No change	Inequitable to all, variance for only these permit types
4. Restructure staffing model	All	Long term (2016-2017)	No Change	Increase in efficiency through improved allocation of time to priority public health risks**	No Change	No Change

\*The overall hourly rate is reduced, thereby reducing costs for all permit categories. Costs for this work are applied directly to the respective permits.

\*\* The Program is currently analyzing systems to better distribute staffing and duties, and to better deploy staff to address health risks as they arise.

This report describes the development of these mitigation strategies 1-4 and additional proposed service reduction strategies A, B and C (those that improve equity and pose low or medium public health risk).

## Mitigation Strategies and Service Reductions in 2015 permits

- Mitigation Strategy 1: Reallocate indirect costs of foodborne illness and complaint investigations**

The Food Program reallocated foodborne illness and complaint investigation time from indirect support services costs to direct service time, distributed proportionately to permit types as a direct service cost to 'brick and mortar' permits categories. This action reduced the hourly rate by \$4.

*Permits are like insurance... They cover preventative care services, such as plan reviews, educational visits and inspections. Permits also cover unexpected critical care in the form of foodborne illness investigations, health alerts and emergency preparedness.*

### Outcomes: Mitigation Strategy 1

<b>Permits affected</b>	All	The hourly rate reduction affects all permits. "Brick and mortar" eating establishments receive and pay for this service.
<b>Timeline</b>	Accomplished	Implemented April 1, 2015 with regular permit renewal schedule
<b>EH Cost to develop and implement</b>	Est. 50 person-hrs (~\$10,700)	Analysis of data, financial modeling, stakeholder feedback collection, meetings with Prevention Division, policy approval
		IT changes, administrative training, financial monitoring
<b>Financial impact</b>	Hourly rate decreased by \$4	The redistribution of costs include \$250,000 to PHSKC Communicable Disease Prevention – Epidemiology, and Food Program staff time for foodborne illness and complaint investigations averaging 600 hours and 900 hours respectively in the 2013 - 2014 permit year.
<b>Public Health Impact</b>	No Change	
<b>Equity Impact</b>	Improved equity	creates a more equitable distribution of the cost of critical public health services in food-borne illness across businesses

- Mitigation strategy 2: Reallocate indirect costs of wineries and require permit**

The WA Retail Food Code requires businesses that provide food or beverages to the public to obtain a food establishment permit from the local health department, with very limited exceptions. From 2012 to 2015, Public Health created a pilot program that extended an opportunity for wineries to apply for an exemption from the requirement to obtain an annual operating permit. The program is still responsible for overseeing compliance with the food code. The pilot was developed in partnership with industry, and involved extensive education and notification.

Results of the pilot showed that the compliance rate with the expectations of this exemption opportunity was still only 50%. Limited fees paid by wineries did not cover the cost of indirect services (1000 hours) provided to these businesses going through the exemption process, nor the follow up services for compliance with the food code.

This Mitigation strategy 2 removes the opportunity to apply for an exemption to obtain a permit. The action aligns with guidance from the Washington State Department of Health encouraging local health jurisdictions to work toward greater consistency in tasting room permitting and operations under applicable provisions of the Food Code.

*Food Programs in many local health departments throughout the state issue permits for wineries and tasting rooms as general food establishments, including Yakima, Benton/Franklin and Walla Walla – those counties with the highest density of wineries.*

## Outcomes: Mitigation Strategy 2

<b>Permits affected</b>	All experience reduction in rate	Wineries and beverage related businesses specifically, of which there are ~ 150 wineries and an unknown number of tap rooms and distilleries are affected in the following manner: <ul style="list-style-type: none"> <li>• Businesses that are <b>currently permitted (~ 32)</b> will experience <b>no change</b> in requirements, and will go through the usual annual permit renewal process on April 1<sup>st</sup>, 2016.</li> <li>• Businesses that have an approved code variance from the pilot (~ 52) will need to apply for and obtain a permit by April 1<sup>st</sup>, 2016. The terms of the variance will be honored.</li> <li>• Businesses that have neither a) nor b) (~ 66 currently known) must complete the plan review process and obtain a permit by April 1<sup>st</sup>, 2016. To be able to achieve compliance by this time, submission of full application for plan review is required by December 31st, 2015.</li> </ul>
<b>Timeline</b>	Change in hourly rate – Accomplished.  2015 pilot  2016 requirement	Wine and beverage businesses will be permitted in the permit cycle starting on April 1, 2016.  The Food Program is conducting two information sessions with beverage businesses scheduled for September 22 <sup>nd</sup> and 28 <sup>th</sup> . Meeting announcements have been sent to all beverage related businesses and related associations. <b>see Table 2 below</b>
<b>EH Cost to develop and implement</b>	Est. 80 person-hrs (~ \$17,200)	Multi-agency meetings, updating web content, developing mass emails, scheduling and hosting stakeholder meetings, analysis of data, financial modeling, policy approval, IT billing system changes, administrative training, financial monitoring
<b>Financial impact</b>	Reduced hourly rate by \$1	This mitigation strategy is estimated to generate \$48,000 in revenue to support direct services that are currently under-funded.  Wineries would pay fees according to the standard food permit type appropriate for their operation: could range from \$385 – \$1,158, though estimated at the lower end for most.
<b>Public Health Impact</b>	Improves public health	This strategy creates a process for establishments currently operating outside of the permitting system to receive mandated food safety oversight.  Policy Changes: The process of bringing wineries into compliance with the Food Code is identifying multi-agency collaboration needs regarding multi-agency code non-compliance by some of these businesses.  The Food Program is working with the Environmental Health Onsite

		Septic System Program, King County Department of Permitting and Environmental Review, local jurisdiction land use departments, and Washington State Department of Health Water Program.
<b>Equity Impact</b>	Improves equity	Distributes costs more equitably across all permit types.

**Table 2: Impact of mitigation strategy 2 for permitting wineries**

	2012-2015 pilot system		Permit requirements for April 1, 2016	
	Plan review	Permit	Plan review	Permit
<b>Permitted = 32</b>	Yes	Yes	n/a	Yes
<b>Variance = 52</b>	No	No	No	Yes (between \$380 - \$1,158 depending on operation)
<b>Currently unaddressed ~66</b>	No	No	Yes (avg. \$860 + any required modifications)	Yes

**Table 3: EH Food and Facilities Section: Rate Reduction Impact of mitigation strategies 1 & 2**

2014 Rate	Initial proposed 2015 rate	Proposed rate including 2015-2016 Adopted Budget Assumptions	Savings on program rate from mitigation strategy 1	Savings on program rate from mitigation strategy 2	Final 2015-2016 Program Rate
\$201	\$225	\$220	\$4	\$1	\$215

- Mitigation Strategy 3: Maintain 2014 fees for the 2015 permit year for farmers markets and temporary events**

The Food Program reduced fees for farmers markets and temporary events for the 2015 permit year by applying a one-time action of using the 2014 fee structure for the 2015 permit cycle.

The intent is to work with stakeholders in 2015 to develop a new structure that reduces permit fees and reduces service costs.

### Outcomes: Mitigation Strategy 3

<b>Permits affected</b>	Farmers market and temporary event coordinators and vendors	This created a one year savings of fees ranging from 42-131% for permit holders – the difference between 2014 fees and proposed 2015 fees.
<b>Timeline</b>	Accomplished	Implemented with the usual permit renewal cycle.
<b>EH Cost to develop and implement</b>	Est. 100 person-hrs (~ \$21,500)	Stakeholder meetings, workgroup meetings, analysis of data, financial modeling, policy approval, IT changes, administrative training, financial monitoring
<b>Financial impact</b>	(\$500,000)	This strategy creates a gap in Environmental Health between budgeted revenue and actual revenue collections. This gap was addressed with funding drawn from the Environmental Health Reserve Fund.
<b>Public Health Impact</b>	No Change	Service level remains the same; no public health impact has occurred

<b>Equity Impact</b>	Reduces equity	This strategy kept only these affected permit types at a lower cost for a year, while general food permit fees had an increase for the same permit period.
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- **Mitigation strategy 4: Restructure staffing model**

The Food Program is working with the Labor Union (PTE Local 17), Human Resources, and the Office of Labor Relations to bargain changes to the staffing model. Components of the staffing model under review include:

- weekend coverage,
- supervisory oversight during weekends,
- quality assurance systems to improve inspection consistency,
- analyzing and updating data on workloads,
- overtime use analysis, and
- supervisor to employee span of control.

The program is acting upon recommendations from the 2014 Food Program review, and 2013 Performance Audit recommendations. The program is also undergoing a current research study with Stanford University on quality assurance methods.

- Strategica Consulting performed a Food Program Review in 2013. The review recommended reducing span of control of supervisor to employees to a ratio of 1:10. The program currently operates at a rate of 1:15-18. The increase in field staff positions to meet increased program workload in 2015 will increase the span of control to 1:17-20 (consultant report attached. KC Food Program Review, Section G).
- Currently workloads for food program staff are estimated at an average of 870 inspections per inspector per year. The next highest workload for similar programs in other WA counties is 678 inspections, with a 6 county average of 522. These numbers also do not include return inspections for establishments with poor performance. Benchmarking shows that other food inspection programs have staff workloads with significantly fewer inspections per year per FTE (King County Auditor's Office: Performance Audit of Environmental Health Services report attached, page 17). Other jurisdictions used for comparison were Tacoma-Pierce and Portland-Multnomah.
- In response to stakeholder interest, the Program is currently working on a project to make restaurant inspection results more available for the public (in window placards and online). Oversight of inspection consistency across 11,000 restaurants therefore becomes increasingly critical . The program is engaging in a research study in collaboration with Stanford University to evaluate a peer based method for improving inspection consistency. The project is showing statistically significant improvement in consistency, staff training models and employee morale.

Implementation of these methods into standard practice for the program is estimated to increase the amount of time the program spends on quality assurance measures from 7% of annual staff time to 9% of annual staff time.

### **Program overtime costs analysis:**

Upon initial review of program costs we identified a high rate of overtime spending. We initially communicated that this might be an area where staffing allocation methodology could align workloads with FTEs to find efficiencies.

As our analyses have progressed, the picture looks more complicated and needs further in-depth modeling. Many reasons have emerged for overtime use, and more understanding of the multiple variables in program operations that drive these costs:

- Foodborne illness investigation requires surges of effort for technical inspections and sampling. These outbreaks are not predictable in number or scope of complexity.
- Seasonal increases in work need to be balanced with time and funding investments required for staff training - costs for hiring seasonal employees are high. It is possible that overtime is more efficient.
- Overtime data analysis requires more definition. Current payroll systems do not consistently track the pattern and reason for overtime hours.

### **Outcomes: Mitigation Strategy 4**

Permits affected	All	
Timeline	2016-2017	
EH Cost to develop and implement	To Date: Est. 80 person-hrs ~ (\$17,200)	Analysis of data, financial modeling, multiple meetings with HR and Labor, policy approvals, IT assistance, training, financial monitoring
Financial impact	TBD	
Public Health Impact	TBD	Anticipated improvement in addressing oversight
Equity Impact	TBD	Anticipated improvement in balancing public health needs with staffing allocations



### **Service Reduction Strategies:**

Table 4: Service Reduction and Fee Reduction Strategy 1: Restructure mobile and commissary permits

Service Reduction	Permit types affected	Near/long term	Estimated cost reduction for customer	Estimated time/cost reduction for inspector	Public Health Impact	Equity impact
A. Restructure mobile and commissary permits	Mobile food trucks	Near term	20% permit cost savings ~\$200	Est. \$200	Low risk	Improves equity

**Service Reduction Strategy A:** The Food Program proposes a reduction in service and permit fees by restructuring two permits into one. This strategy reduces administrative costs and reduces the number of inspections while maintaining food safety oversight. Mobile Food vendors are required to utilize a commissary facility where food preparation is done off the mobile vehicle. Previously, the Mobile Food vendor was required to have a separate permit for the use of the commissary, which increased operating costs for this type of food business. Now, mobile vendors require only one permit that covers food safety oversight of both the commissary facility and the food truck.

### Outcomes: Service Reduction Strategy A

Permits affected	Mobile food vendors	Currently ~ 470
Timeline	Accomplished	Analysis and development conducted between 2013 and 2015
EH Cost to develop and implement	Est. 100 person-hrs ~(21,500)	Analysis of data, financial modeling, stakeholder feedback collection, policy approval, IT changes, administrative training, financial monitoring
Financial impact	20% reduction in permit fees (~\$200 fee reduction per permit )	Evaluation of implementation after the close of the 2015-2016 permit year will be required to assess actual time spent on the permits, and set permit fees for future years.
Public Health Impact	Low risk	New strategy and structure - requires evaluation annually  Food Program staff worked to create a new permit structure that creates efficiency while maintaining appropriate food safety oversight for the overall operation for mobile units. Evaluation of implementation will be required to assess the health implications after the close of the 2015-2016 permit year.
Equity Impact	Improves equity	restructuring mobile and commissary permits created a more affordable option for permit holders.

Table 5: Service Reduction Strategies for implementation in 2016 -2017: Strategies B and C

Service Reduction	Permit types affected	Near/long term	Estimated Cost/time Savings	Public Health Impact	Equity impact
B. Create new permit structure	Farmers market and temporary event coordinators	Long term	Analysis needed	Low risk	Improves equity
C. Create new permit structure	Farmers market and temporary event vendors	Long term	Analysis needed	Medium risk	Improves equity

## **Service and Fee Reduction Strategy B:**

### **Create new permit structure for market and event vendors and coordinators**

In March 2015 the Board of Health approved most food program fees. However, they held Farmers Market & Temporary Event fees at 2014 levels. EHS was instructed to redesign the permit structure. The re-design:

- Developed fees based on the 2014 Rate Study report
- Addressed feedback from stakeholders and the Board of Health that requested to
  - Incentivize good performance
  - Provide more education
  - Foster access to healthy food
  - Create flexibility for different kinds of events
  - Support vendors with multiple events

The new permit model provides options that

- allow vendors to attend more events at a lower cost,
- incentivize good performance, and
- focus program resources on areas necessitating greater food safety oversight.

The Food Program's proposed model creates a multiple event permit structure that enables vendors to attend multiple temporary events for a lower price.

Under the 2014 permit structure, temporary food vendors are currently required to get a permit for each event they attend (see attachment showing current permit structure). Vendors who attend farmers markets obtain a seasonal permit for each farmers' market location they participate in (not each market day).

In late 2014 and early 2015, the Food Program consulted with neighboring county health departments and national public health colleagues to gather best practices for structuring and enforcing food safety compliance under temporary event permits. The Food Program began this process by meeting with neighboring counties, many of which indicated they also were working on redesigning how farmers market and temporary event vendors are regulated (See attachment of permit redesign timeline).

The Food Program created a workgroup to redesign the permit structure for farmers markets and temporary events.

Work group members included PHSKC program staff and members of food programs from Pierce, Snohomish, Spokane and Thurston counties, as well as the Washington State Department of Health.

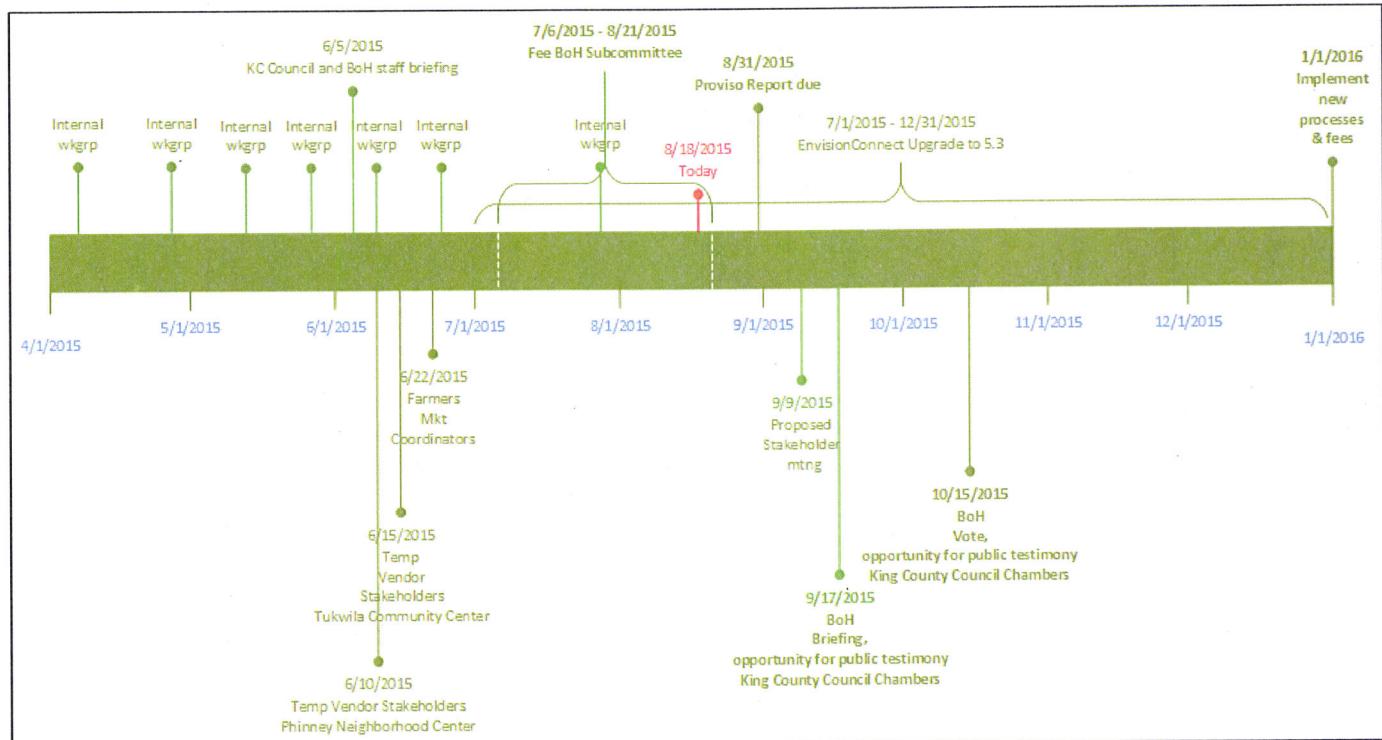
## Workgroup Goal:

Redesign the permit structure for farmers markets and temporary events to enable food businesses and vendors to operate safely, provide appropriate oversight to ensure that they do, and cover the cost of the service.

## Workgroup Redesign Guiding Principles:

- Maintain food safety
- Increase efficiency
- Reduce costs

**Figure 2: Timeline of farmers market and temporary event redesign**



The work group developed a draft permit structure and presented it to stakeholders and food program staff for feedback. The program held three community stakeholder meetings that had interactive sessions for attendees to inform the new permit structure. Two meetings focused on temporary events and had 28 attendees made up of vendors, event coordinators, non-profits, community organizations, festivals and elected officials. One focused on farmers markets and had 27 attendees. With feedback from the community and input from staff, the State Department of Health, and food programs from other counties, the program has a newly designed permit structure. The workgroup is completing the final steps of mapping out education and enforcement components of the new permit structure.

Figure 3: Description of current permit structure

## Current Temp Event & Farmers Market Permit Categories

Opportunity for efficiency and cost savings

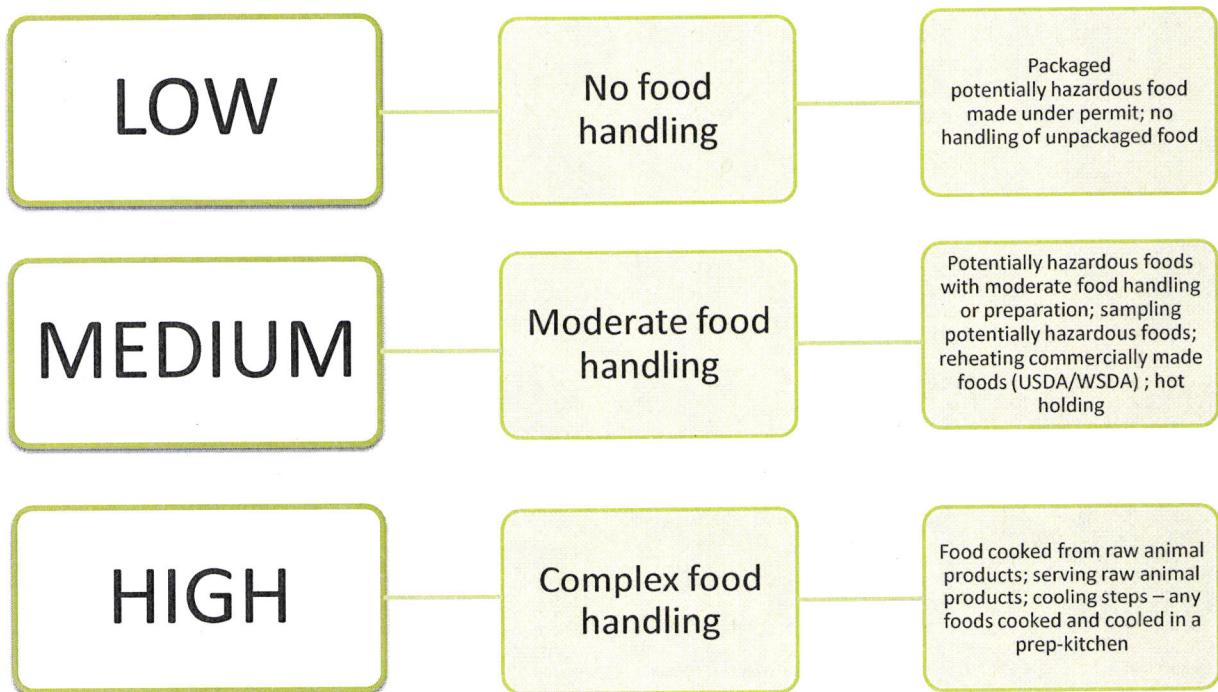
Food Permit Category Temporary Events	Current Fee	When permit is required	Office plan review	Inspection	Enforcement
Temporary Food (1,345 permits)	\$281	For each event	For each event	For each event	a) Not allowed to operate until standards met b) If operating, operation closed until violations corrected
Temporary Food – Limited types of food (1,474 permits)	\$55			Spot check – only inspected if violations observed	
Farmers Markets	Current Fee	When permit is required	Office plan review	Inspection	Enforcement
FM Vendors – Temporary Food	\$281	*Permit per market location per season			
FM Vendors – Limited	\$55		*Once per season market location per season	*2 x per market season	
FM Farmers selling/sampling produce	No Fee	*No permit required; must comply with hand washing			Subject to closure, may obtain permit for future event
				*Farmers Market Coordinator plays a role in food safety oversight allowing for fewer inspections	

Stakeholder and Board of Health feedback requested that the redesign address support for:

- vendors selling healthy foods at farmers markets and temporary events
- overseeing food safety concerns
- incentives for history of good food safety practice
- lowering costs of permits, especially for vendors at multiple temporary events

Figure 4: Risk Categories for farmers market and temporary event permits

## Proposed Change 1: Defining categories by Food Processing



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Similar to the current permit model;

Farmers who sell and sample produce ARE NOT REQUIRED to get a food permit.

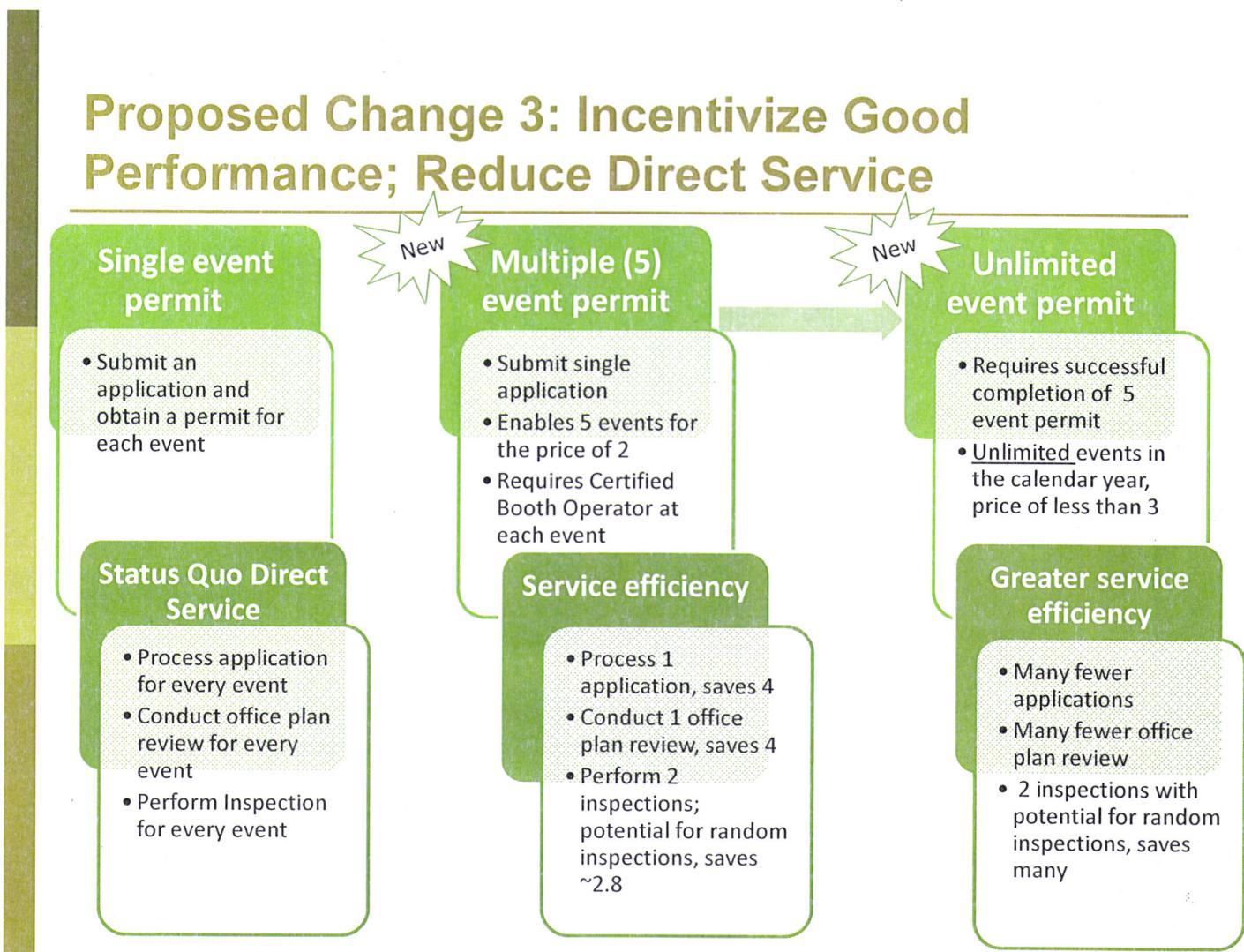
## **Proposed Change 2: Create food safety educational requirements for farmers market and temporary event vendors**

The multi-county workgroup proposes the establishment of a Certified Booth Operator permit for those vendors who have multiple events. This ensures a basic level of formal education around structural requirements such as access to hand washing equipment, and food safety handling practice.

### Certified Booth Operator Class

- Strong stakeholder support for an educational requirement.
- Vendors must have certified booth operator in each booth in order to earn multiple & unlimited permit packages (see next figure 5)
- Certification classes to be held monthly
- Based on successful model in Pierce County

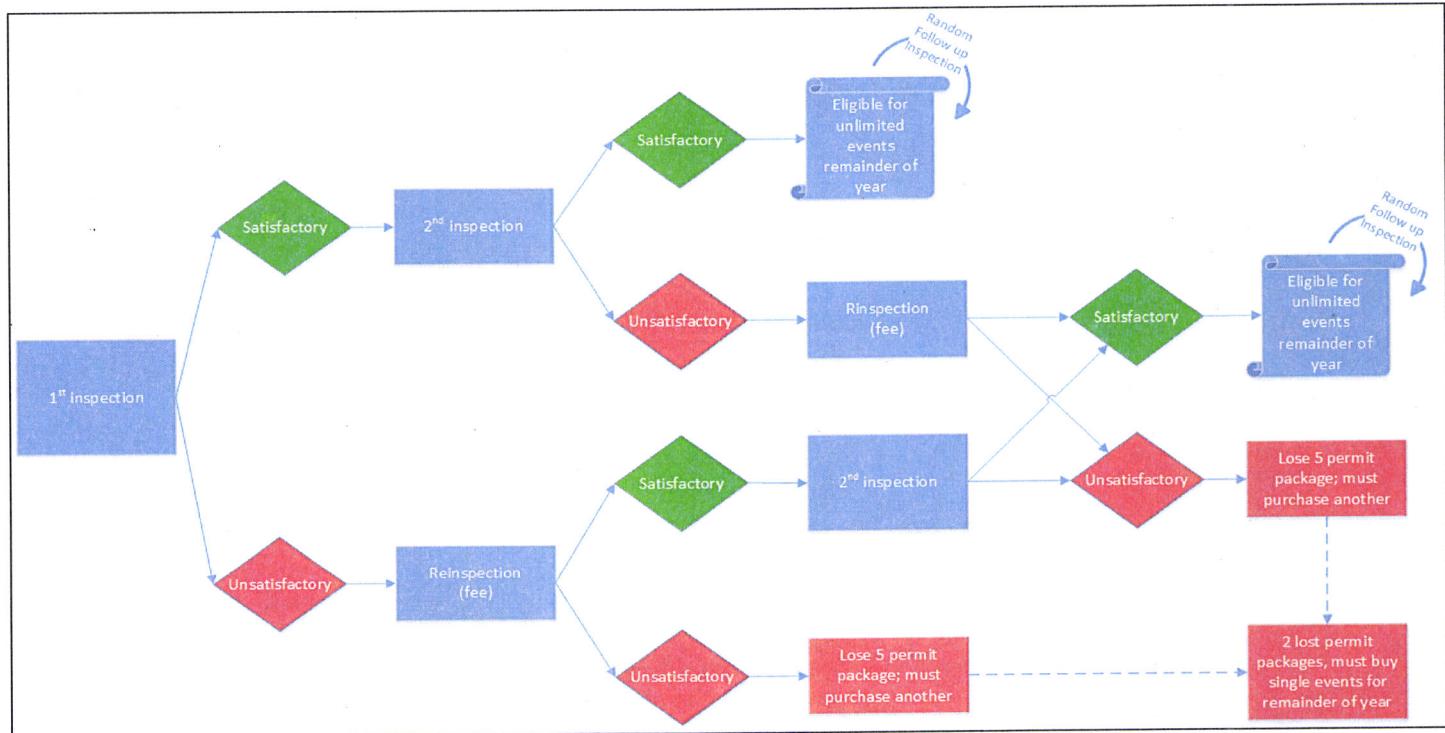
**Figure 5: Proposed Change 3 - Structure savings for multiple event operations**



**Proposed Change 4:** Create performance thresholds and enforcement process that incentivizes good food safety practices.

The following diagram illustrates a flow chart of food safety practice performance and resulting opportunities.

**Figure 6: Performance thresholds and enforcement process**



In year 1 of the new permit structure, vendors who have multiple events can apply for a certified booth operator permit, and permits for single events, or permits for packages of events.

- A satisfactory inspection result and continued safe food handling practice leads to eligibility for a lower cost permit for multiple events.
- An unsatisfactory inspection results in an additional fee for the mandatory re-inspection.
- There is a path to become eligible for the lower permit fees, if you have an unsatisfactory inspection
- Repeated unsatisfactory inspections result in longer thresholds of good practice to become eligible for the lower permit fee

**Proposed Change 5:** Create a "blanket permit" for unique, one-time events

Stakeholders requested an option where one organization can take the responsibility for all the vendors at one event. For example, can the organizer of the Bite of Seattle apply for plan review and permits for all vendors and pay for the staffing costs necessary to review the plan and inspect all the food vendors at the event?

- This is a permit option billed at the hourly rate of \$215 per staff person required for all services provided.
- This option enables a single organization to assume the costs for an event, regardless of the structure and number of vendors.
- This option received strong stakeholder support, particularly from community and non-profit organizations
- This is similar to a model used in Pierce County

**Proposed Change 6:** Farmers Market Coordinator Fee - Scaling Fees

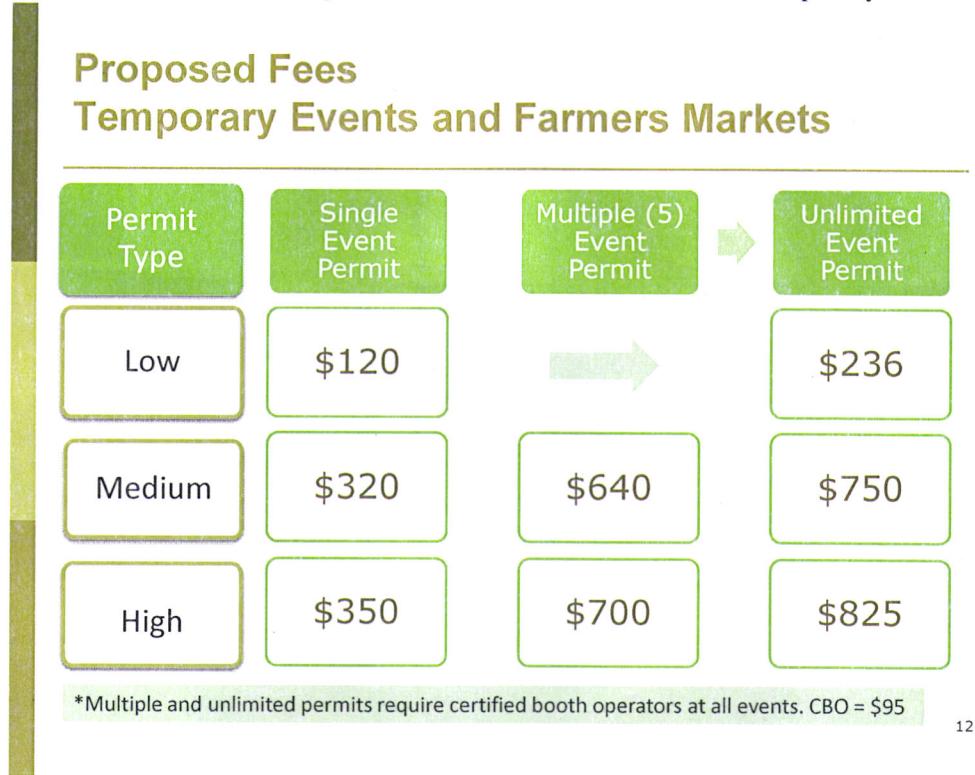
This design is in development, in collaboration with farmers market coordinators.

**Outcomes: Service Reduction Strategy B**

<b>Permits affected</b>	Farmers markets and temporary event vendors	Currently oversee ~ 2,700 temporary event permits and 220 farmers market vendor permits annually. In the proposed model, single businesses are able to attend multiple events. Therefore the total number of unique businesses affected by this change is expected to be less than 2,920, the sum of permits indicated above.
<b>Timeline</b>	Proposed redesign is being reviewed by BOH. To be implemented in Jan, 2016.	Between now and January, food program staff will project the cost of the new permits, along with estimating savings, assuming vendors attend the same number of events from previous years under the current permit structure.
<b>EH Cost to develop and implement</b>	Est. 250 person-hrs to date ~(\$53,750)	Analysis of data, financial modeling, stakeholder feedback collection, policy approval, IT changes, administrative training, financial monitoring
<b>Financial impact</b>	See tables 6 and 7 below	The redesigned permit structure captures efficiencies for the program and cost savings for permit holders. <ul style="list-style-type: none"><li>• The new 'multi-event' permit options reduce the administrative steps by requiring only 1 permit processing for 5 events.</li><li>• It also reduces the number of inspections, providing random inspections with targeted re-inspections based on performance.</li></ul>

		Evaluation of implementation after the end of 2016 will be required to assess time spent on the permits, the financial implications to business owners, and the permit fee for future years.
<b>Public Health Impact</b>	Medium risk (to be determined after evaluation)	<p>Temporary events and farmers markets differ from general food establishments in that they occur in changing facilities, often without permanent sanitation facilities (plumbing for hand washing, produce washing, restroom access, etc.).</p> <p>The proposed permit structure incentivizes good food safety practice.</p> <p>Evaluation of implementation after the end of 2016 will be required to assess the food safety implications of the new permit structure</p>
<b>Equity Impact</b>	Improves equity	<p>The new permit structure creates more equity by addressing concerns expressed by stakeholders, including the following:</p> <ul style="list-style-type: none"> <li>• Temporary event and farmers markets fees for events that operate only a few days a year are more equitable with brick and mortar food establishments.</li> <li>• Lower permit fees open opportunity for community organizations' fundraisers and community gatherings.</li> <li>• Lower permit fees support small business' ability to participate in the market place.</li> <li>• The new multiple event permit options may encourage vendors to attend more markets and events than they do currently.</li> </ul> <p>The new permit structure requires EH to address additional education language access and equity development strategies for small businesses. Ideas are in initial stages of creation.</p>

**Figure 7:** Proposed Fees for Farmers Markets and Temporary Events



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**Table 6: Proposed Temporary Event/Farmers Market Detailed Permit Schedule**

Temporary Food and Farmers Markets Fee Schedule	2014 Fees Single Permit	Previously Proposed Fee Single	New Proposed Fee 2016 Single	New Proposed Fee 2016 *Multiple (up to 5)	New Proposed Fee 2016 *Unlimited	2013 Permit Count
Farmer's Markets Temporary Food – Limited (Type-Low)	\$55	\$195	\$120	N/A	\$236	317
Farmer's Markets Temporary Food (Type -Medium)	\$281	\$390	\$320	\$640		**225
Farmer's Markets Temporary Food (Type -High)	\$281	\$390	\$350	\$700		**
Other Temporary Food – Limited (Type - Low)	\$55	\$195	\$120	N/A	\$236	1,474
Other Temporary Food – Limited (Type - Medium)	\$281	\$390	\$320	\$640	\$750	**1,345
Other Temporary Food – Limited (Type - High)	\$281	\$390	\$350	\$700	\$825	**
*Certified Booth Operator (CBO) good for 2 years	N/A	N/A	\$95			
First Re-inspection Fee	N/A	N/A	\$160			
Additional Re-inspection Fee	1/2 permit		\$160			
Hourly Rate	201/ hr	\$215/hr				-

\*Multiple and Unlimited permit is approved only w/meeting requirements including "certified booth operator" (CBO).

\*\* Medium and High Categories were combined in prior years. Since this is a new permit category we have no historical data for numbers of permits. Preliminary estimates are 60-65% Medium and 35-40% for high.

**Table 7: Estimated vendor savings with new permit model - detailed schedule**

Temporary Event or Market	2015	2016 Proposed Medium Risk	net change	2016 Proposed High Risk	net change
had 1 event	\$ 281	\$ 320	\$ 39	\$ 350	\$ 69
had 3 events	\$ 843	\$ 640	\$ (203)	\$ 700	\$ (143)
had 4 events	\$ 1,124	\$ 640	\$ (484)	\$ 700	\$ (424)
had 5 events	\$ 1,405	\$ 640	\$ (765)	\$ 700	\$ (705)
had 10 events	\$ 2,810	\$ 1,280	\$ (1,530)	\$ 1,400	\$ (1,410)
had 20 events	\$ 5,620	\$ 1,390	\$ (4,230)	\$ 1,525	\$ (4,095)
<b>Year 2:</b>		<b>2017</b>			
had 10 events	\$ 2,810	\$ 750	\$ (2,060)	\$ 825	\$ (1,985)
had 20 events	\$ 5,620	\$ 750	\$ (4,870)	\$ 825	\$ (4,795)

**Figure 8: Examples of cost changes for vendors with multiple events**

Example costs for a vendor – 3 events, high risk/complex food handling		Example costs for a vendor – 9 events, high/complex food handling	
2014 rates	Original proposed 2015	2014 rates	Original proposed 2015
<ul style="list-style-type: none"> <li>• 3 events * \$281</li> <li>• Total: \$843</li> </ul>	<ul style="list-style-type: none"> <li>• 3 events * \$390</li> <li>• Total: \$1170</li> </ul>	<p><b>2016 Proposed rates</b></p> <ul style="list-style-type: none"> <li>• 1 Multiple event permit * \$700</li> <li>• Can go to 5 events</li> <li>• 1 Certified Booth Operator * \$95</li> <li>• Total: \$795</li> <li>• Savings for 3 events: \$375</li> </ul>	<p><b>2016 Proposed rates</b></p> <ul style="list-style-type: none"> <li>• Single event cost = \$281</li> <li>• 9 events * \$281</li> <li>• Total: \$2529</li> <li>• Single event cost = \$390</li> <li>• 9 events * \$390</li> <li>• Total: \$3,510</li> <li>• 1 Multiple event permit * \$700</li> <li>• 1 Certified Booth Operator * \$95</li> <li>• 1 Unlimited event permit * \$825</li> <li>• Can go to unlimited events</li> <li>• Total: \$1,615</li> <li>• Savings for 9 events: \$1,895</li> </ul>

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## Additional Service Reduction Strategies Considered and Not Recommended:

Table 8: Service reductions not recommended for implementation

Service Reduction	Permit types affected	Near/long term	Estimated Cost/time Savings	Public Health Impact	Equity impact
D. Eliminate educational visit	All	Long term	Reduction of ~ 9,700 educational visits, increase of ~7600 inspections	High risk	Inequitable
E. Eliminate risk-based model	All	Long term	Reduction of ~ 5,500 inspections	High risk	Inequitable

Service Reduction strategies D and E are inequitable to small businesses and pose high public health risk. They are not being undertaken by the program.

**Service Reduction D:** Elimination of the educational visit would have a disproportionately negative impact on small businesses and non-English speaking business owners who value educational visits as part of their annual staff training.

In program surveys, a variety of stakeholders and program staff report that educational visits and inspection presence in establishments improves food safety practices.

**Service Reduction E:** Eliminating the risk-based model would make permit fees the same for all businesses, regardless of size or type of operation. It would decrease food safety oversight for those who may need more assistance to manage high risk activities, and increase it for those who don't.

The risk-based model is designed to enable local health jurisdictions to allocate resources according to risk. Eliminating the risk-based model would mean that all establishments, regardless of complexity of operation and risk of food type, would receive the same amount of oversight. Low risk permit holders who currently receive one inspection and a corresponding lower fee would receive an additional inspection with this strategy. Conversely, high risk establishments who currently receive three inspections per year will receive one less. This is anticipated to create high risk for foodborne illness. Extensive evaluation of implementation is required to assess the public health implications.

In an article published in the American Journal of Public Health<sup>1</sup>, University of Washington researchers found a correlation between spending resources by local health jurisdictions on food safety oversight and rates of foodborne illness.

There are significant associations between jurisdictions with higher investment in food safety oversight and lower incidence of foodborne illness.

*"This study shows how important it is to collect good data that link public health expenditures and outcomes," said senior author, Dr. Tao Sheng Kwan-Gett, Director of the UW Northwest Center for Public Health Practice, and "investing in public health yields a good return on investment."*

<sup>1</sup> Betty Bekemeier, Michelle Pui-Yan Yip, Matthew D. Dunbar, Greg Whitman, and Tao Kwan-Gett. Local Health Department Food Safety and Sanitation Expenditures and Reductions in Enteric Disease, 2000–2010. American Journal of Public Health: April 2015, Vol. 105, No. S2, pp. S345-S352. doi: 10.2105/AJPH.2015.302555

## **Recommended timeline and Action items**

Timelines and next steps include internal and external factors. The program has scheduled quarterly stakeholder meetings for updates, will schedule stakeholder-specific meetings for wineries and beverage related businesses, and farmers markets and temporary events meetings as needed. We are updating website content, staff trainings, and program data bases to manage these new changes. The program hopes for the Board of Health vote on remaining farmers market and temporary event permit fees in the 4th quarter of this year to be ready for implementation January 1, 2016.

**Table 9: Timeline for next steps for 2015**

Action items	Q1 – 2015	Q2 – 2015	Q3 – 2015	Q4 – 2015
Integrate near-term mitigation strategies				
Board of Health adopts 2015 fees				
Work with staff and labor regarding staffing plans				
Conduct outreach with other counties				
Identify best practices for farmers markets and temporary events				
Develop new permit structure for farmers markets and temporary events				
Conduct stakeholder outreach				
Board of Health adopts fees for temporary events and farmers markets				

The following pages have a table that summarizes the proposed action plan on recommended actions described in Mitigation Strategies 1-4, and Service Reduction Strategies A-C. The table addresses:

- Proposed start dates for the action
- Projected operational costs
- Projected operational savings
- Estimated impact on workloads and staffing
- Impacts on rate increases

Underlying all these recommendations, Environmental Health assumes the same projections for building and maintaining the Environmental Health Reserve Fund as proposed in the Board of Health adoption of the rate in March 2015. Mitigation strategy 3, as noted, decreases the Reserve Fund by approximately \$500K in 2015, and therefore EH will continue to collect reserve fund charges until the Reserve Fund policy target is met (60 days in operating costs).

Attachments:

- Auditor's report letter July 31, 2015
- 2014 Food Program Review

Mitigation Strategy or Service Reduction projections on workload and cost						
Action	workload levels (net increase or decrease to implement action) and staffing change assumptions	2015 incremental operation cost/(savings) of action	2015 One time Implementation Costs	2015 Revenue Impact	2016 incremental operation cost/(saving) of action	2016 One time Implementation Costs
Mitigation S1 -food-borne illness investigations	4/1/2015	no net increase	None - reallocation only	None	None	None - reallocation only
Mitigation S2-Wineries			1000 indirect hours absorbed in 2014. Program development in 2015 approx \$11,000 (updating content, mass emails, multi-agency meetings, stakeholder meetings)			There is an estimated \$5,000 cost to administrative, IT and training costs for implementation
Mitigation S3-Maintain 2014 fees for temps & markets	4/1/2015	no net increase	None	\$ (450,000)	None	N/A
						Loss of revenue is difference between original 2015 proposed fee using \$215/hour and keeping fees at 2014 level.

Service & Fee Reduction A - restructure mobiles & commissary permits	4/1/2015	Approx. 360 separate commissary permits no longer needed. Admin savings 35-40 hours. Decreases inspection time (470 mobile permits)-	Indirect hours absorbed in 2013-2014. Program development in 2015 approx \$16,000 in administrative changes and training costs	None redistributes workload	Neutral - slight increase \$8000	Neutral
Service & Fee Reduction B&C 1 - create new permit structure for market and events - Multiples, Unlimited permits	1/1/2016	This will save admin & inspection time for multiple and annual permits.	None redistributes workload	None (starts 2016)	Revenue Decrease-tbd depends on how many "multiple" and "unlimited" permits are purchased	Revenue Decrease- especially as more vendors qualify for annual pass. This will be offset by reduced inspection time in this permit category.
Service & Fee Reduction B&C 2 -create new permit structure for market and events. Certified Booth Operator - (CBO)	1/1/2016	Increase admin time to issue new card, plus educational staff time to run the classes	Included above	None (starts 2016)	\$95 per CBO	The certified booth operator card will cost \$95 for 2 years and will be required for vendors prior to purchasing multiple or unlimited permits.
Service & Fee Reduction B&C 3 - create new permit structure for market and events -First Re-inspection Fee \$150	1/1/2016	None re-inspections are already done	Included above	None (starts 2016)	\$150 per re-inspection, this will cover the staffing costs \$1500 - \$5000	Estimated that up to 10% of event & market vendors may need a re-inspection due to violations (220 market & 2700 temp permits; many of these are the same vendor)

## Environmental Health Division Food Program ESTIMATED BUDGET on new permit models

	2015 Operating Budget	2016 Operating Budget	2017 Estimated Budget	Notes
<b>Revenues:</b>				
Total Revenues	\$ 10,026,020	\$ 10,136,020	\$ 10,440,101	Based on database showing estimated billings, not actual revenue
Expenses				
Total Expenses	\$ 9,037,308	\$ 9,624,727.00	\$ 9,913,469	Does not include anticipated retirement payouts
Net Difference	\$ 988,712	\$ 511,293	\$ 526,632	This difference is used for unbudgeted "surge costs" for unpredicted foodborne illness outbreaks and increases in complaint investigations. Net amount builds the EH Reserve Fund.

# King County Auditor's Office

Kymber Waltmunson, King County Auditor



King County

DATE: July 31, 2015

TO: Metropolitan King County Councilmembers  
FROM: Kymber Waltmunson, King County Auditor  
SUBJECT: Second follow-up on the 2013 Performance Audit of Environmental Health Services

The Environmental Health Services Division (EHS) has implemented a rigorous staffing methodology for the entire division. The division's improved staffing approach incorporates best practices and enables a staff allocation process based on workload analysis and performance standards. This memo serves as the auditor's report that EHS has fully implemented Recommendation #5 (see full text in the implementation table below) of our 2013 performance audit of the division, as required by the Council-adopted Ordinance 17941 (Section 98, P2).

In addition, EHS has re-evaluated the policy of having a unified rate and received a recommendation from the Board of Health to adopt two separate rates. This addresses the fee equity and efficiency concerns we raised in our 2013 audit and satisfies the intent of Recommendation #2 (see full text in the implementation table below).

We will follow up on the remaining three outstanding recommendations in 2016 based on their expected implementation schedule.

Of the two audit recommendations we reviewed on this follow-up:

<b>DONE</b>	2	Recommendations have been fully implemented Auditor will no longer monitor
<b>PROGRESS</b>	0	Recommendations are in progress or partially implemented Auditor will continue to monitor
<b>OPEN</b>	0	Recommendations remain unresolved Auditor will continue to monitor

Please see below for details on the implementation status of these recommendations.

### Implementation Status as of July 2015

#	Quick Status	Recommendation	Status Detail
2	<b>DONE</b>	EHS should re-evaluate the policy of having a unified rate and make recommendations to the Board of Health for modifications needed to address fee equity and efficiency.	EHS conducted a re-evaluation of the unified rate based on a consultant's rate study. The rate study provided program-specific cost and time study analyses and reviewed fee equity and efficiency for different rate structures. Based on findings from the rate study and recommendations from EHS, the Board of Health decided to establish two separate rates for the division. The two rates designate two operational sections: Food and Facilities Section and Community Environmental Health Section. This modification improves EHS's ability to charge fees equitably and efficiently for programs with significant differences in operating costs, code enforcement requirements, and management structure.
5	<b>DONE</b>	EHS should implement a rigorous approach to staff allocations addressing the four best practice factors we identified which include a defined staffing methodology with staffing standards and performance measures related to caseloads and workloads.	<p>EHS has incorporated best practices in implementing a rigorous staff allocation process. Since our review in 2014, EHS has applied findings from the rate study and Food Program Review to develop a guidance document for making staffing decisions. The guidance document provides key questions and criteria for assessing and justifying staffing needs. In addition, EHS has revised human resources processes, developed new tools, and adopted new policies and procedures for position requests based on workload definition and consideration of alternatives. EHS also conducted additional program reviews to identify tasks, document processes, and develop standard metrics for workloads.</p> <p>EHS has indicated a commitment to continuous improvement that will be necessary to ensure that the division attains a mature and sustainable staffing methodology for the long-term.</p>

**Metropolitan King County Councilmembers**

July 31, 2015

Page 3 of 3

Chelsea Lei, Management Auditor, and Elise Garvey, Management Auditor, conducted this review. Please contact Chelsea Lei at 477-6523, or me at 477-1043 if you have any questions about the issues discussed in this letter.

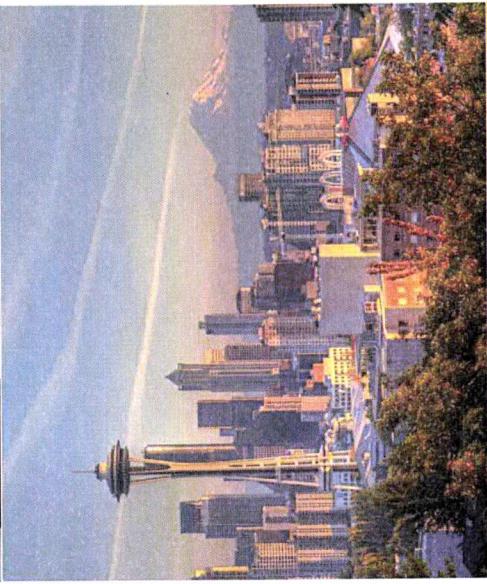
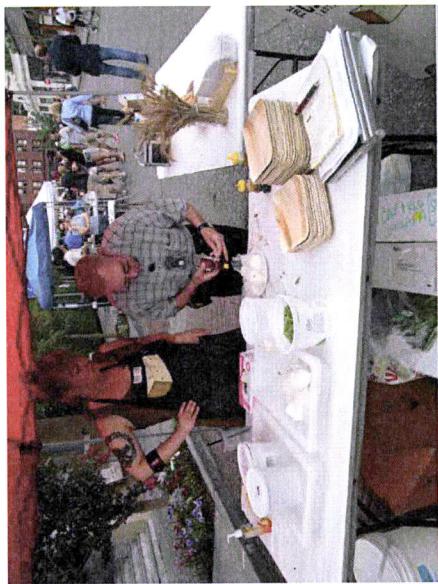
cc: Dow Constantine, King County Executive  
Fred Jarrett, Deputy County Executive  
Rhonda Berry, Assistant Deputy County Executive  
Dwight Dively, Director, Office of Performance, Strategy & Budget (PSB)  
Eunjoo Greenhouse, Interim Deputy Director, Department of Executive Services, Finance & Business Operations Division  
Jonathan Swift, Deputy Director, PSB  
Patty Hayes, Director, Department of Public Health – Seattle & King County (DPH)  
Michael Gedeon, Chief Administrative Officer, DPH – Finance and Administrative Services Division  
Ngozi Oleru, Division Director, DPH - Environmental Health Services Division (EHD)  
Stella Chao, Deputy Director, DPH/EHD – Environmental Health General Administration  
Anne Noris, Clerk of the Council  
Shelley Harrison, Administrative Staff Assistant, King County Executive Office



# *King County Food Protection*

## *Program Review*

*Final Report*  
*March 14, 2014*



## **King County Food Safety Program Review**

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## **Executive Summary**

The King County Food Program is the largest public health program in Washington State. The Program permits, educates and inspects over 11,000 permanent food businesses, 3,000 temporary food businesses and issues over 50,000 worker cards annually. The 55 employees of the Program are dedicated to their mission of public protection, educating industry on the details of the public health codes, and educating the public about safe food handling and preparation practices.

The Program performs well in its core mandate of public protection and operates efficiently with no general tax support. The staff of the Program are driven by a desire to improve the policy, administrative and operational aspects of the program in the spirit of continuous improvement. In 2013, the Program staff undertook this Review to realize this goal. Specific elements of the Review included:

1. Evaluate the efficiency of the permitting process for permanent food establishments.
2. Evaluate program outcomes against Equity and Social Justice (ESJ) ordinance goals. Identify ways for maximizing ESJ goals within the context of regulatory goals and mandates.
3. Identify strategies and policies for optimizing program outcomes while addressing innovations and new business models in the food service industry. Assess how the Program's risk-based inspection model can be modified to safeguard the public while accommodating industry trends and to direct staff time to areas and establishments of greater risk.
4. Identify ways that the Program can inform the public re: permit status and risks of various food establishments in efficient and meaningful ways.
5. Evaluate the pros and cons of educational vs. punitive models for enforcing food safety codes. Suggest policies and methods for gaining high levels of compliance within industry.

6. Identify appropriate performance measures for the Program including outcome measures that can demonstrate the ability of the program to prevent food-borne illnesses and can measure inspection quality.
7. Evaluate the permit year cycle and how various workflows and seasonality impact the ability to optimize staff resources.

In addition, the work scope initially included an evaluation of workloads and staffing levels. Due to the comprehensive nature of the program review, the program decided to conduct a rate and time study with an additional consultant to examine the areas more closely. This work will be conducted during winter of 2014.

The recommendations in this report should be used as a springboard to accomplish the self-improvement that the program desires to become a world class public health agency. The Program should create task forces or workgroups to refine these recommendations in the coming months and beyond using the principles of continuous improvement and Lean management. These principles should include internal communication and feedback mechanisms so that the staff is aware of and engaged in this continuous improvement. In addition, an ongoing quality control program should be implemented to increase operational consistency and quality in inspections.

The Program Review recommendations are briefly listed below and described in more detail in the following pages. Appendices are provided with additional detail on how these recommendations could be implemented.

### **Recommendations Summary**

**A1 –** The Food Program should adopt the recommended mission statement for the Food Safety Program.

## **King County Food Protection Program Review**

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### **Final Report**

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**B1** – The Food Program should adopt a set of program measures for communicating Program results to County policy makers and the public and for managing the Program.

**C1** – Create a Food Program Equity and Social Justice task force to systematically revisit Food Program policies to identify any inequities contrary to ESJ goals.

**C2** – Build knowledge and understanding among Food Program staff of ESJ goals and policies and methods to increase achieving those goals.

**C3** – Increase access to translation and interpreter services and improve mechanism whereby staff can request and obtain these services when in the field.

**C4** – Incorporate plan review or field plan review for additional equipment that may be needed in an establishment if a trend of violations is detected for a specific food preparation practice.

**C5** – Create and facilitate stakeholder groups, advisory boards, and community groups to identify and address community needs regarding food safety practices and the retail food industry.

**C6** – Use a range of engagement methods and mediums for providing education to Program staff, the public and food establishment operators on ways to enhance ESJ goals.

**D1** – The Food Program should expand risk categories to accommodate food establishments that:

1. Pose little risk to the public and could be inspected less than once a year,
2. Conduct catering services or process food products using smoking for preservation, curing or sous vide cooking techniques or other techniques that are not in strict compliance with the Food Code.
3. Food service establishments that have an adverse record of compliance with the food code.

**D2** –Evaluate the value and efficacy of educational visits. Consider using stricter criteria of when to provide educational visits, providing targeted education that will be of the most value to the establishment and in protecting public health. Provide educational visits to businesses that need help in how to prepare safe food.

**D3** – The Food Program should amend the baseline inclusion criteria for risk classes 1, 2 and 3 to adjust for food preparation processes or food products that are currently not commensurate with their current classification.

**E1** – Implement a restaurant reporting system that is transparent, credible and intuitive to the public, and fair to food establishments.

**F1** – Implement process improvements for new permanent establishment permits

**F2** – Implement process improvements for permit renewals

**F3** – Implement process improvements for change of ownership and classification changes

**G1** – Upon completion of rate and time studies, the Program should restructure the organization to incorporate a reduced span of control for the inspection units and to facilitate implementation of other Program Review recommendations.

**G2** – The Program should implement a dedicated position (PPM) concentrating on community outreach and inter-governmental affairs. This would include acting as a liaison between the Program and policy makers at the Board, County Council and City Council level.

#### **A. Program Mission**

A mission statement should be the foundation of an organization's strategy, performance measurement system, work processes and policy structure. The Food Protection Program operates within the hierarchy of Public Health Seattle-King County (PHSKC) and the Environmental Health Division of PHSKC. These two entities operate under the following two mission statements:

PHSKC: Identify and promote the conditions under which all people can live within healthy communities and can achieve optimum health.

Environmental Health Division: Ensuring all residents of King County have safer, healthier places to live, learn, work and play.

In addition, King County has a separate mission statement:

King County government provides fiscally responsible, quality-driven local and regional services for healthy, safe, and vibrant communities.

Within this context, the Food Protection Program worked to develop their own mission statement. It would describe what value the organization provides and identify on whom the organization is imparting that value. The mission statement can also describe how the organization is uniquely positioned to impart that value. A mission statement should not delve into the tactics or details of how that value is imparted as that may change over time. Mission statements are designed to be valid and relevant for long periods of time. Mission statements should also be short and sweet: no longer than 10 or 12 words.

The staff of the Food Protection Program debated several alternative mission statements keeping in mind the criteria described above. After several rounds of debate and word smithing the staff recommended the following as the Program's new mission statement:

*We promote healthy communities by reducing risk and advancing food safety*

**Recommendations**

A1 – The Food Program should adopt the recommended mission statement for the Food Safety Program.

## **B. Program Measures**

Program measures are quantitative indicators of performance. They should be linked to, and describe the degree of attainment of, program mission and key strategic goals. Currently, the Program uses productivity measures tied to number of inspections performed each year and the extent that assigned inspection quotas are completed. Other operational measures examine average inspection scores and number of red item violations. Division and Program management have expressed the need to communicate program results to demonstrate to the public, the media and policy makers in the Board of Health, the County and constituent cities that the Program is achieving its mission of minimizing risk to the public and advancing food safety.

### ***Procedure and scope of the analysis***

Program staff identified desired program outcomes based on statutory requirements, the needs of Program stakeholders such as the Board of Health and outcomes suggested by the new mission statement. Staff then identified the extent that the Program can actually control these outcomes. For those where the Program can exercise a measure of control, the staff identified potential measures for each outcome. These measures were refined using criteria to ensure that the measures were practical, credible and easy to administer. Additional measures were identified by contacting peer food safety programs in Arizona and California to round out the roster of measures.

Selected measures are categorized as:

Risk minimization – these measures are demonstrate the program's ability to attain the key mission of minimizing risk to the public.

Quality assurance – these measures will be useful to Program management in ensuring that staff conduct inspections according to standards for quality, fairness, consistency and adherence to the Food Code.

Community engagement – these measures will demonstrate how well the Program is engaging constituents and various community groups in Food Program activities, reducing risk and advancing food safety.

Food Safety – this measure will serve as a proxy for how well the Program attains the second part of its mission of advancing food safety knowledge among the broader King County community.

Customer Satisfaction – this measure will provide feedback from permitted food establishments regarding their satisfaction with how the Program conducts inspections and educates permittees on food safety requirements.

### ***Recommendations***

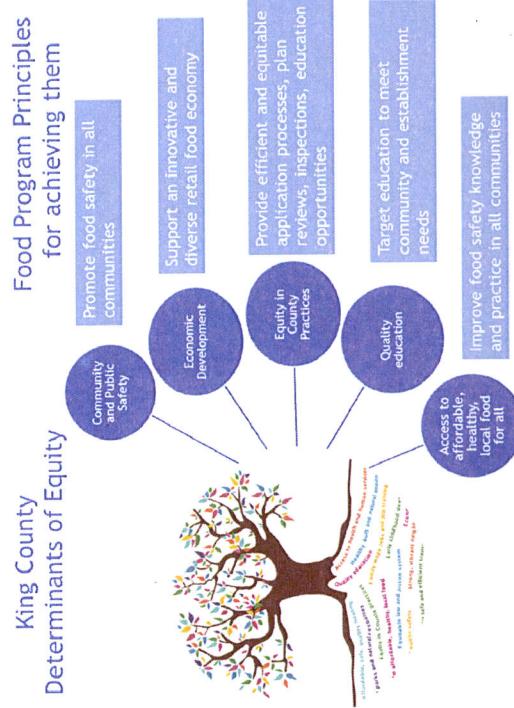
B1 – The Food Program should adopt a set of program measures for communicating Program results to County policy makers and the public and for managing the Program. Appendix 3 contains measures generated during the Program Review along with measures identified during best practices research among peer food safety programs. Baseline performance data should be researched and compiled for each selected measure. Additionally, the Program should determine desired performance targets. Performance should be monitored and reported on at least an annual basis. The Program should continue refining this set of measures by discussing them with stakeholders, Division management and County and City policymakers.

### **C. Equity and Social Justice**

This section covers strategies for implementing the County's Equity and Social Justice (ESJ) ordinance. These strategies are specific to the Food Safety Program and will support goals for enhancing a vibrant and diverse retail food industry, provide opportunities for economic development and govern County actions in such a way that they support ESJ goals.

#### **Procedure and scope of the analysis**

Program staff identified the determinants of equity that are directly impacted by or are related to Food Program activities. These include: community and public safety; equity in County practices; economic development; and access to affordable, healthy and safe food. The graphic below illustrates these determinants, how they are derived from the broader King County determinants of equity, and Food Program principles for achieving the determinants:



These determinants were refined into specific concepts relevant to the Food Program and the factors that the Program can control within its jurisdiction. These concepts include:

- Food safety is public safety
- Food and culture go together
- ESJ is not a subsidy or a free pass from compliance
- Equitable access to Food Program resources, information and support services improves food safety and a diverse retail food industry.

The concepts were further refined into three goals that would be supported by specific actions:

1. Build the cultural competency skills of Food Program staff, growing ability to identify food safety solutions that are science based and culturally appropriate
2. Provide targeted education to meet the needs of the intended audience
3. Work with partner organizations, stakeholder groups, and community members to promote food safety best practices in all communities

### **Recommendations**

**C1 – Create a Food Program Equity and Social Justice task force to work on the following:**

- Systematically revisit Food Program policies to identify any inequities contrary to ESJ goals. This should include strategies, tactics and policies to ensure that a new risk classification scheme and restaurant reporting are done in such a way that is culturally sensitive with methods for assisting small businesses and establishments operated by non-english speakers.

**C2 – Build knowledge and understanding among Food Program staff by:**

- Encouraging staff to share real world experiences and case studies at each staff meeting that would help inform decision making in the field supportive of ESJ goals.

These case studies would also include success stories on food establishments that achieved Food Code compliance while also supporting ESJ goals.

- Inviting food establishment operators to present at staff meetings on food preparation techniques and ingredients that are culturally specific and to brainstorm on how to support culturally-specific food preparation in a manner that is consistent with the Food Code.
- Conducting activities at staff meetings to explore and check biases among inspection staff.

- Including ESJ components in hiring and new employee training.

**C3 – Increase access to translation and interpreter services and improve mechanism whereby staff can request and obtain these services when in the field.**

- Include a question on permit applications and a field in Envision to capture establishment need for interpreter services for onsite visits.
- Identify and train a core contingent of interpreters to be used in field situations who are knowledgeable about food safety.
- Engage staff members who are multilingual to assess their interest and availability to serve as a language resource within the program and throughout Environmental Health.
- Work with WA Department of Health to have inspection form translated into other languages.

**C4 – Incorporate plan review or field plan review for additional equipment that may be needed in an establishment if a trend of violations is detected for a specific food preparation practice (E.g., installing a walk in cooler for cooling large quantities of food, adding a food prep sink.)**

**C5** - Create and facilitate stakeholder groups, advisory boards, and community groups to identify and address community needs regarding food safety practices and the retail food industry.

- Explore system for providing compensation for participation in groups and advisory board (may be part of broader division-wide effort across Environmental Health)

**C6** – Use a range of engagement methods and mediums for providing education.

- Develop technical assistance videos for staff to use in the field.
- Provide in-person food worker card classes in multiple languages.
- Make use of audience response devices with staff and public.
- Create food safety outreach materials for holidays/cultural events with specific food safety needs.

#### **D. Risk Classification**

Risk classifications are assigned to operators based on their relative risk to the public. Risks are currently assigned in three categories: 1, 2 and 3 in order of increased potential risk. Two additional categories encompasses low- and high-risk temporary event operators such as street fairs and farmers market operators and vendors. Risk classifications correspond to annual permit fees and to the number of field visits performed by the Program. Currently, class 1 establishments receive one inspection, class 2 receive two inspections and so on. The U.S. Food and Drug Administration (FDA) publishes a model risk classification scheme that can be adopted by counties. Counties have the discretion to modify this scheme as long as they adopt a risk-based program. The King County classification scheme largely adheres to the FDA model.

#### ***Procedure and scope of the analysis***

Program staff examined the current risk classification in order to better align Program resources and tactics with potential risks. The staff identified various types of risk posed by food establishments and conditions that tended to impede compliance with the food code. The staff then identified tactics that could be deployed to mitigate those risks or conditions. Staff then identified risk classifications that aligned with the most common or potentially adverse types of risks posed. Tactics were proposed that could potentially have the greatest beneficial impact on reducing the identified risks. In addition, staff proposed potential changes to the current risk classifications (1-3) to address specific food products or preparation processes where the current risk classification was not appropriate.

## **Recommendations**

**D1** – The Food Program should consider adopting a new risk classification scheme that would incorporate new classifications for:

1. Food establishments that pose little risk and could be inspected less than once a year.
2. Food service establishments that conduct catering services or process food products using smoking for preservation, curing or sous vide cooking techniques.
3. Food service establishments that have an adverse record of compliance with the food code. Inclusion criteria into this class could include:
  - a. Mean of last 4 scored inspects that exceed a certain threshold, or
  - b. A suspension or closure (other than a self-closure) in the last year that is performance based (e.g., not for non-payment of permit fees).

Strategies should be created (in conjunction with the ESJ Task Force) to assist small businesses and establishments operated by non-english speakers in complying with the Food Code so they are not unfairly represented in any high-risk classification.

An example of a new risk classification system is included in Appendix 2. Operators that fall within the criteria for reassignment based on the new inclusion criteria should be reassigned upon expiration of their current permit. Reassignment should be determined by the area inspector, plan reviewer and a Senior based on their knowledge of the operator.

**D2** – Evaluate the value and efficacy of educational visits. Consider using stricter criteria of when to provide educational visits, providing targeted education that will be of the most value to the establishment and in protecting public health. Provide educational visits to businesses that need help in how to prepare safe food.

**D3** – The Food Program should consider changing their baseline inclusion criteria for risk classes 1, 2 and 3 as described in Appendix 2.

### ***E. Public Information and Restaurant Reporting***

Inspections and compliance activities can only go so far in achieving the mission of reducing risk and advancing food safety in the broader community. The community itself has a role in ensuring the safety of the food supply. Consumers can protect themselves from unsafe food and preparation practices through understanding the precepts of safe food handling. Consumers can also reduce their risk exposure to unsafe food by having knowledge about the relative risk of food establishments. Since understanding risk requires some technical knowledge, the County can help by educating consumers by providing information via the internet, community outreach activities and by requiring food establishments to self-report their inspection results to the dining public. This can also promote Food Code compliance by incentivizing food establishments to seek better inspection results (which will result in better results reported to the public). Jurisdictions across the country and around the world are experimenting with the most efficient, credible and fair method of collecting and reporting inspection results.

Currently the Program operates a webpage (under the umbrella of the King County website) that provides inspection history for all permitted food establishments. The data can be accessed with a search engine whereby a consumer can find a food establishment by address, name, inspection date or by the number of points incurred during an inspection. The Program also provides email and social media posts and alerts on restaurant closures.

This section deals with new strategies for the County to improve on the information they currently provide to the public on inspection data and risk.

### ***Procedure and scope of the analysis***

Program staff identified the desired outcomes of a public information and restaurant reporting system. These outcomes included:

- A fully informed dining public,
- Citizens more aware of how they can improve food safety at home,
- Encouraging food establishments to improve compliance with the food code,
- Supporting County ESI goals and reducing risk to the public.

The staff then identified the types of information that would result in the desired outcomes. Regarding a restaurant reporting system, the staff created and refined reporting templates and determined the tactics and policies that would be necessary for implementation of a reporting system including what should be displayed at a food establishment, how restaurant reports should be updated, methods for accessing restaurant inspection scores and how to interpret the data.

### **Recommendations**

**E1** – The Food Program should implement a restaurant reporting system that is transparent, credible and intuitive to the public, and fair to food establishments. Appendix 4 contains a template for a reporting system. The Program can initiate this recommendation by:

- Conducting further research into window placard systems, scoring methodologies, web reporting and stakeholder engagement methods used in other jurisdictions.
- Implementing a stakeholder engagement strategy ensure a smooth roll-out.

**F. Process Efficiency**

This section covers administrative processes within the Food Safety Program including processes for applying for new food establishment permits, changes in ownership, changes in classification and permit renewals. These processes were analyzed using Lean process improvement techniques with the objectives of improving customer service, reducing cycle times, reducing paperwork and staff time.

**Procedure and scope of the analysis**

Program staff mapped out the current processes for:

- Temporary event permits
- New permanent establishments (plan review and permitting)
- Change of ownership for mobiles
- Change of ownership for permanent establishments
- Change in classification
- Permit renewals

Lean techniques were then applied to the current processes and proposed process maps were prepared. Based on the proposed maps, sub-projects were defined and documented. These sub-projects present small, bite-size implementation projects that can be prioritized based on ease of implementation, immediacy of benefit, cost, etc. These Sub-projects are found in Appendix 6. The Program should follow up with cost-benefit analysis and selective pilot testing on these recommendations prior to full implementation.

## Recommendations

**Recommendation F1** – Implement process improvements for new permanent establishment permits including the following sub-projects:

- Streamline Envision data entry
- Implement scanning and printing of building plans
- Use the portal for new permit applications
- Implement digital preparation and transmission of plan review and inspection reports
- Implement digital archiving

The proposed process map can be found in Appendix 5. Descriptions of individual sub-projects can be found in Appendix 6.

**Recommendation F2** – Implement process improvements for permit renewals including the following sub-projects:

- Increase use of the portal for renewals
- Modify Envision Connect to include a cash receipting function allowing elimination of the cash register
- Increase seasonal staffing

The proposed process map can be found in Appendix 5. Descriptions of individual sub-projects can be found in Appendix 6.

**Recommendation F3** – Implement process improvements for change of ownership and classification changes including the following sub-projects:

- Modify Envision Connect to include a cash receipting function allowing elimination of the cash register
- Use workflow technology in Envision Connect to expedite the transmission, review and approval of change of ownership/reclass applications

- Allow portal access for change of ownership and change of classification
- Form reduction and simplification for mobile changes in ownership

The proposed process map can be found in Appendix 5. Descriptions of individual sub-projects can be found in Appendix 6.

## ***G. Program Structure***

This section addresses organizational structure and span of control issues within the Program. Currently the Program is divided into three inspection units, each headed by a Supervisor (HEI IV) assisted by one or two Seniors (HEI IIIs). Two of these inspection units are based out of the Chinook Building and one is based out of the Eastgate Public Health Center in Bellevue. Administrative staff (which are technically not part of the Food Program) are split between the two offices and handle the public counters. Currently, Supervisors have spans of control (supervisor to inspector) as high as 1 to 15. This may be too broad to allow for adequate supervision. In addition, as the Program evolves and shifts from implementing other Program Review recommendations, it will have to make adjustments to the organizational structure in order to facilitate these other recommendations. More information will be needed from time and rate studies (to be conducted in 2014) before the Program can make these organizational adjustments but it will most certainly include changes in staffing levels, staffing ratios per Supervisor and spans of control. Based on additional work performed to determine the number of staff needed to address workloads, the Program should address spans of control and implement any restructuring needed to reduce it to an optimum level.

## ***Recommendations***

**G1** – Upon completion of rate and time studies, the Program should restructure the organization to incorporate a reduced span of control for the inspection units and to facilitate implementation of other Program Review recommendations. A span of control of 1 to 10 would be more appropriate given the work content and experience of inspection staff. Criteria for evaluating potential structures could include:

1. Does the Program have adequate supervisorial/ managerial personnel to implement the structure?

2. Are spans of control appropriate?
3. Are the number of management layers appropriate?
4. Will the Board of Health endorse the structure?
5. Is the structure relatively easy to implement?
6. Does the structure promote efficient administrative processes?
7. Is the structure consistent with HR and union rules?
8. Does the structure adequately balance centralized and decentralized functions?
9. Is the structure cost efficient to implement and operate?

Two potential organizational models are included in Appendix 7 for future consideration once the time, workload and rate studies are completed later in 2014.

**G2**—The Program should implement a dedicated position (PPM) concentrating on community outreach and inter-governmental affairs. This would include acting as a liaison between the Program and policy makers at the Board, County Council and City Council level.

**Appendices**

- 1 – Additional Recommendations
- 2 – Risk Classification Specifications
- 3 – Program Measures Specifications
- 4 – Restaurant Reporting Specifications
- 5 – Proposed Process Maps
- 6 – Lean Sub-Project Specifications
- 7 – Potential Organizational Models
- 8 – Acronym Key

**Appendix 1 – Additional Recommendations**

The following recommendations were discussed in workshop settings during the Program Review but it was determined that they bear more study and consideration before implementation.

1. Conduct a baseline study (based on FDA-provided specifications for sample selections, data collection) to establish County-wide risk factors using existing data from Envision. Use the results of the baseline to identify risk factors most relevant for the County. Develop intervention strategies to mitigate the identified risk factors. After 5 years of implementing the risk control strategies, perform a second baseline study to determine the efficacy of the risk control strategies.
2. Implement a quality assurance program using the FDA Standard 4 (Uniform Inspection Program) as a starting point for a County standard.
3. Adopt a policy whereby a food establishment can apply to drop to a lower risk classification (with lower permit fee and fewer inspections) based on less-risky food processes, menu items, investment in equipment. Conversely, the Program should change an establishment to a higher risk classification (with higher permit fee and more frequent inspections) based on more risky food prep processes, menu items, equipment issues. AKA test-in/test-out scheme.
4. Adopt a policy whereby consumer advisories should be posted on menus for all non-compliant foods and/or food prep processes.
5. Work with corporate or chain operators to create and manage an internal food safety program
6. Modify the policy for processing Change of Ownerships so that a material change of ownership (e.g., not a corporate transfer from one holding company to another) would trigger an educational inspection and a plan review inspection (could be the same visit). This would obligate some ownership changes to meet the minimum requirements of the Food Code thus providing an upgrade of older establishments.
7. Explore the feasibility of alternative work hour systems for:
  - a. Weekend coverage for class 3, 4 and 5 permittees
    - i. One annual inspection conducted either Friday PM or Saturday PM
  - b. Special Event/Farmers Market and Temporary Event programs.
    - i. Shifting schedule to Wednesday through Sunday with evening work hours when required.
    - ii. Explore the feasibility of a pay differential for staff working the alternative hour program
8. Replace late fees (on permit renewals) with a reinstatement fee. Permit would expire one month after renewal date. Thereafter, permit would be in revoked status. Operator can reinstate up to one month after expiration of grace period, otherwise establishment is closed. Thereafter, operator must apply for a new permit and submit to a plan review (and pay plan review fee).

9. The Program should modify the policy and Envision so that return and complaint inspections are counted as a full or half inspection for quota purposes.
10. Stagger renewals to four times a year to eliminate pro-rating of fees. New permits would be assigned the renewal date after the date the permit is issued (e.g., a permit issued on May 15, 2014 would be assigned a renewal date of June 30, 2015).
11. Issue GPS transmitters to mobile operators. Mobile team inspectors would use GPS trackers to locate hard-to-find mobile units. Trackers could also be used to determine when mobile units visit their assigned commissaries.
12. Investigate the use of lock box services from the County's bank for automating the receipt, deposit and accounting of permit renewals.

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#### Appendix 2 – Proposed Risk Classification Table

Class	Baseline criteria	Inclusion criteria	Inspect frequency	Special tactics
1	• Self-serve groceries, wine tasting rooms	N/A	Every other year	<ul style="list-style-type: none"> <li>• Training as needed</li> <li>• Community outreach</li> <li>• Return inspections</li> </ul>
2	• Current parameters based on food served and prepped	N/A	1x year	<ul style="list-style-type: none"> <li>• Training as needed</li> <li>• RCPs as needed</li> <li>• Community outreach</li> <li>• Office conferences</li> <li>• Return inspections</li> </ul>
3	• Current parameters based on food served and prepped with exceptions for low-risk food and prep	N/A	2x year	<ul style="list-style-type: none"> <li>• Training as needed</li> <li>• RCPs as needed</li> <li>• Community outreach</li> <li>• Office conferences</li> <li>• Return inspections</li> </ul>
4	• Current parameters based on food served and prepped with exceptions for low-risk food and prep	N/A	3x year	<ul style="list-style-type: none"> <li>• Training as needed</li> <li>• RCPs as needed</li> <li>• Community outreach</li> <li>• Office conferences</li> <li>• Return inspections</li> </ul>
5	• General food service establishment that provides catering and would normally be in class 3, or • Facilities that use special processes (i.e., sous vide, curing, smoking for preservation), or • Discretionary as condition of a variance	N/A	3x year – plus additional inspection to observe special process or catering op	<ul style="list-style-type: none"> <li>• Training as needed</li> <li>• RCPs as needed</li> <li>• Community outreach</li> <li>• Office conferences</li> <li>• Return inspections</li> </ul>
6	• Mean of last 4 scored inspects >35, or • Inadequate facility/equipment for food items/ prep processes, or • 3+ substantiated complaints, or • Suspension or closure in last year		Multiple inspections (at least 3 annual scored)	<ul style="list-style-type: none"> <li>• Class 6 permit assigned to area inspector</li> <li>• Two inspectors per visit</li> <li>• CAP and/or agreements with operators</li> <li>• Agreed upon investment in equipment, Risk control plans, SOPs, Mgmt or certified food safety manager training, menu restrictions</li> <li>• Plan review (if facility or equipment issues)</li> </ul>
Temp/ farmers	• Temp event operators, farmers markets	• N/A	1x for temp events 2x for markets	<ul style="list-style-type: none"> <li>• Recurring event permits</li> <li>• Temp event coordinator training and plan review</li> <li>• Coordination between temp event and mobile unit inspectors re: doing cross-inspections</li> </ul>

## Appendix 2 - Proposed Changes to Risk Categorizations (1-3)

Item #	Current Risk Type	Proposed Risk Type	Food Process Description	Rationale for change
1	2	1	Toasting and serving bagel or bread product without application of condiments or spreads (e.g., espresso store). Commercially prepared and packaged cream cheese or spreads are allowed as risk 1.	Toasting has been considered cooking – however the risk is very limited. Not to include sandwich making or sandwich toasting (risk 2)
2	2	1	Grocery with commercially prepackaged raw meat, poultry or fish with no cutting on site	No handling of product occurs and minimal risk of cross-contamination
3	2	1	Waffle cones	Making waffle cones presents little more risk than scooping ice cream
4	2	1	Reheating individually commercially prepackaged foods like burritos for immediate service	Limited time in the danger zone. No handling of food.
5	1	2	Grocery stores that sell packaged products that require a Consumer Advisory (e.g., raw milk, sushi)	Minimal risk of cross contamination.
6	1	2	Preparation of any produce for ready-to-eat service or sale (e.g., sectioning melons, making salad, smoothie stores)	Potentially hazardous food and higher risk to the consumer.
7	3	2	Cooking of pizza that only contains commercially pre-cooked ingredients such as pepperoni	These are ready-to-eat foods and may be potentially hazardous. Subject to contamination and temperature abuse.
8	3	2	Reheating and hot holding of commercially pre-cooked foods (no cooling). , (e.g., sandwich shop that serves soup or chili, store that sells pre-cooked hot dogs).	No risk of cross contamination or under cooking.

**Appendix 3 – Recommended Program Measures**

Measure	Type
1. Mean aggregate red item scores	Risk
2. Deviation from inspection standard	QA
3. Annual community contacts	Community engagement
4. Community engagement comprehension score	Community Engagement
5. Food safety website page visits	Food safety
6. Mean # of onsite corrections per inspection	QA
7. #of zero score visits	Risk
8. Number of establishments that score > 35 points	Risk
9. # of effective interventions for high scoring establishments	QA/Risk
10. Aggregate customer scores	Customer satisfaction
11. Percent of all food establishments that receive the required number of inspections annually	QA
12. Percent of full inspections (type 128) completed for all permits	QA
13. Annual program expenditures per permit	Cost/Efficiency
14. Percent of plan reviews completed within 30 days	Efficiency

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Measure	Type
15. Number of inspections performed per inspector (annually)	Efficiency

Note: Measures 11-15 were identified during peer agency benchmarking and not by the Program Review workgroup.

**Appendix 4 – Restaurant Scoring System Reporting Mockup**

**Restaurant Food Safety Report and window placard – Mockup**

King County Public Health  
Restaurant Risk Reporting System



To view quick report, log into [www.kingcorestaurantwatch.com](http://www.kingcorestaurantwatch.com)  
Type in permit # A78012. Or text  
permit # to 206.555.3038

Inspection information also  
available inside establishment

Bert's Bean Emporium      Viewer can link to google maps  
1001 Fifth Avenue  
Seattle, WA 98101  
Phone (206) 555-1938



Click through to recent inspections and violations  
(all types). Also closures and suspensions. Web  
viewer can click through on description field to get  
detailed info on nature of violation.



Date	Description	Severity
7/13/13	Routine inspection	65
7/13/13	Improper hot holding	25
7/13/13	Food stored at room temp	25
7/13/13	Inadequate handwashing	15
4/20/13	Routine inspection	0
4/20/13	No violations	0
12/8/12	Return inspection	45
12/8/12	Bare hand contact with food	15
12/8/12	Improper cooling	30

Scroll for more data

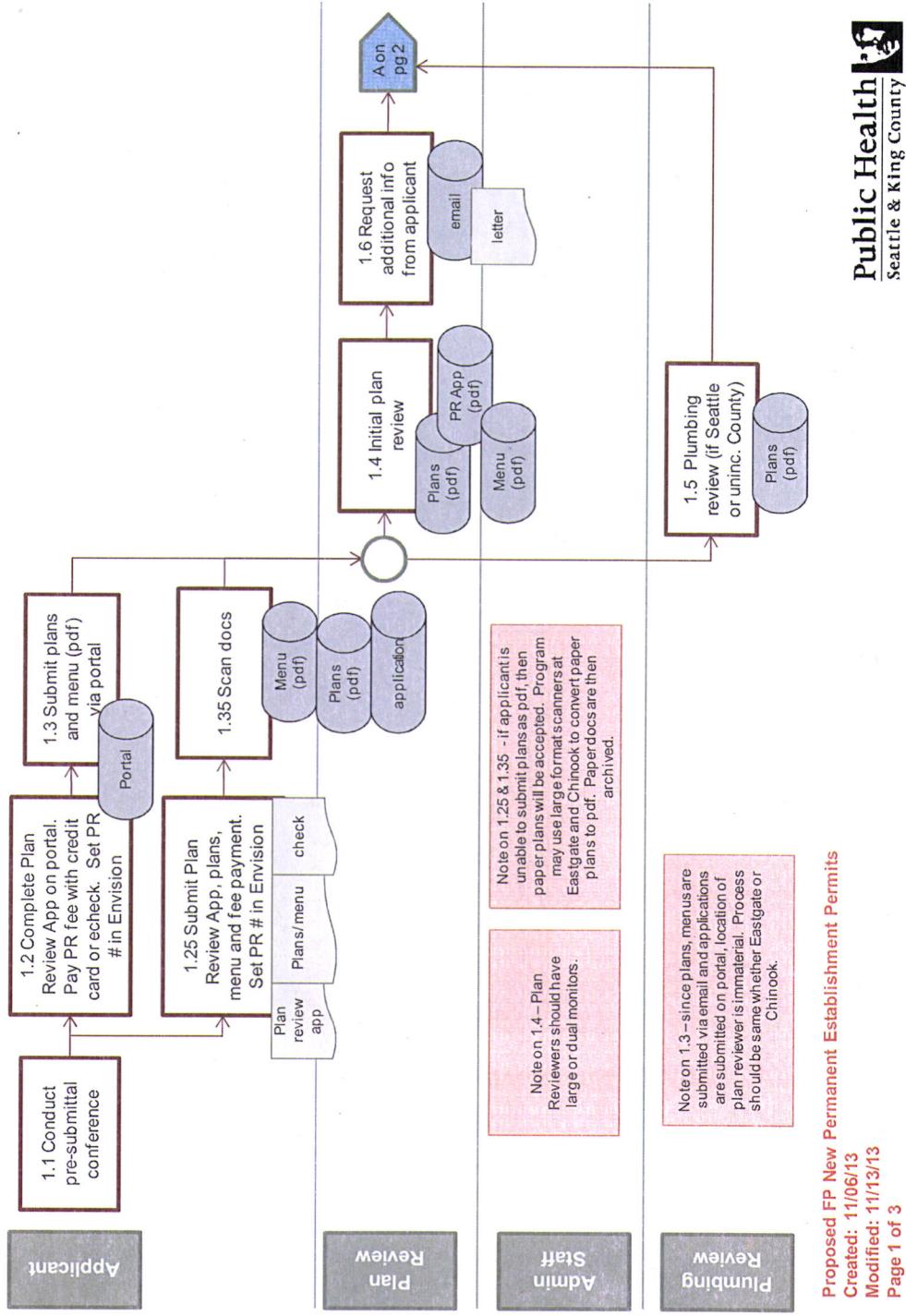
**How to interpret this data**

Inspection scores are based on regulations to  
eliminate risk factors.....

Page 29

## Appendix 5 – Proposed Process maps

### Proposed New Permanent Establishment Permitting Process Map

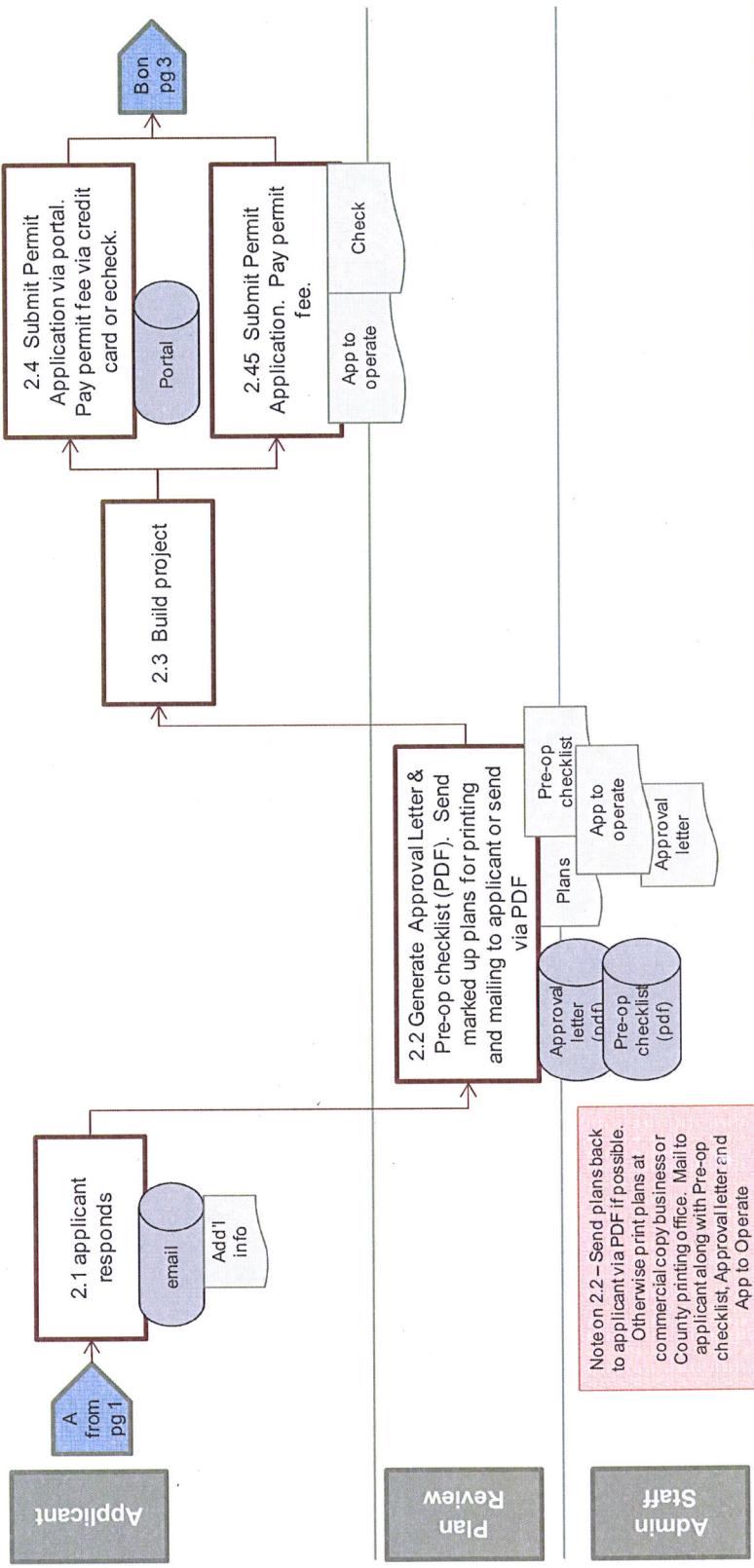


**Proposed FP New Permanent Establishment Permits**

Created: 11/06/13  
Modified: 11/13/13  
Page 1 of 3

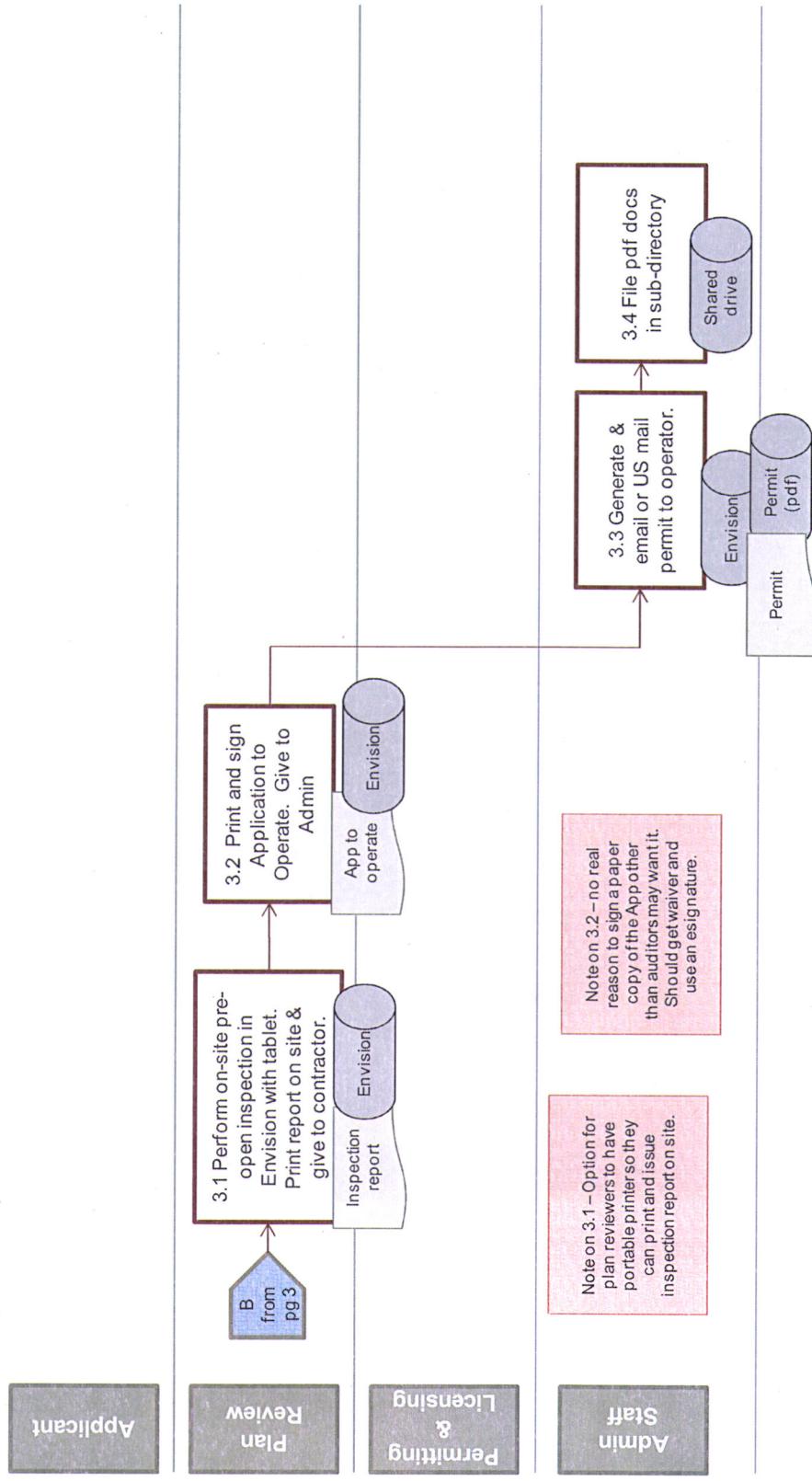
## King County Food Protection Program Review

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## King County Food Protection Program Review

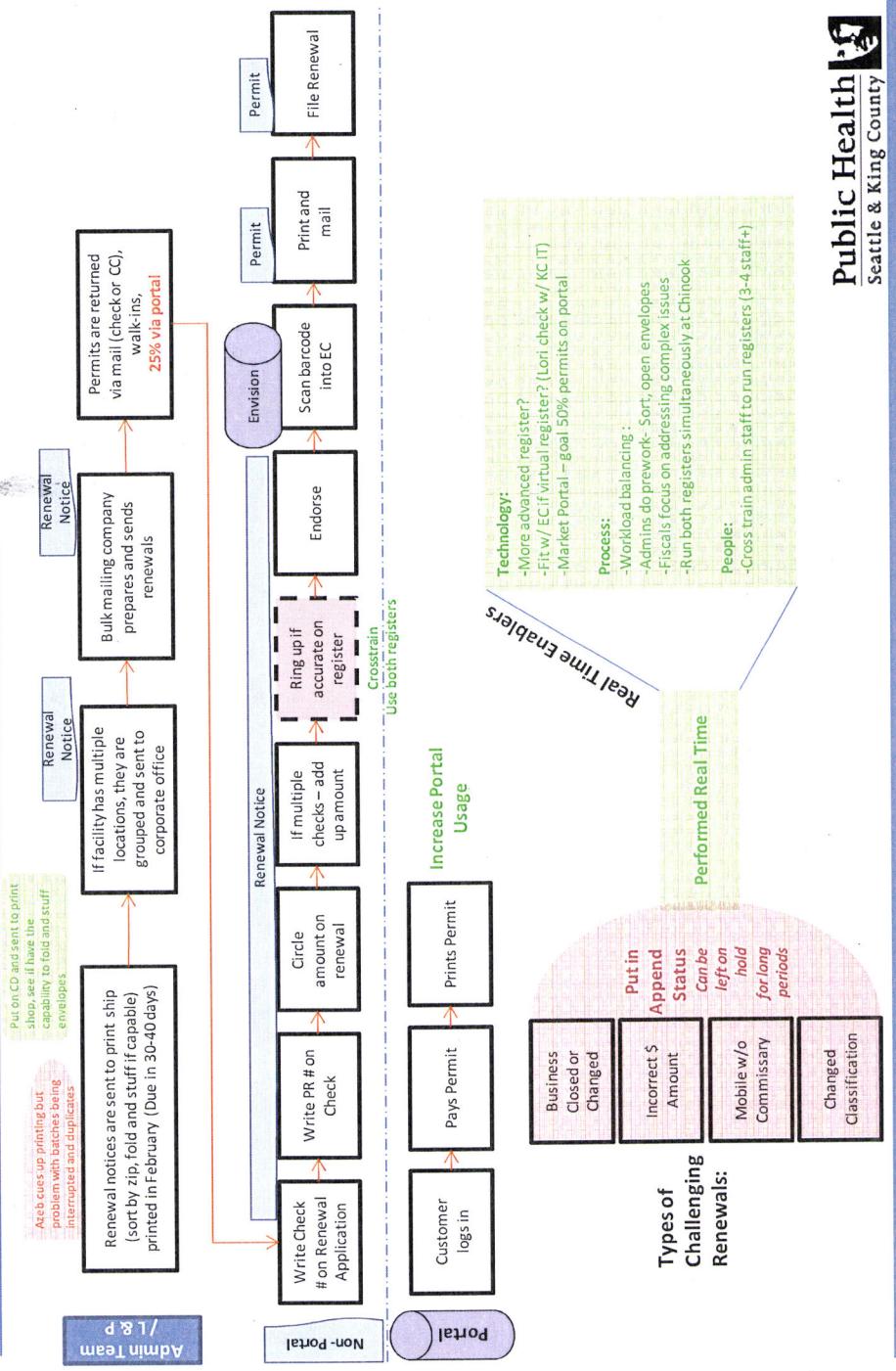
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Current FP New Permanent Establishment Permits  
Page 3 of 3

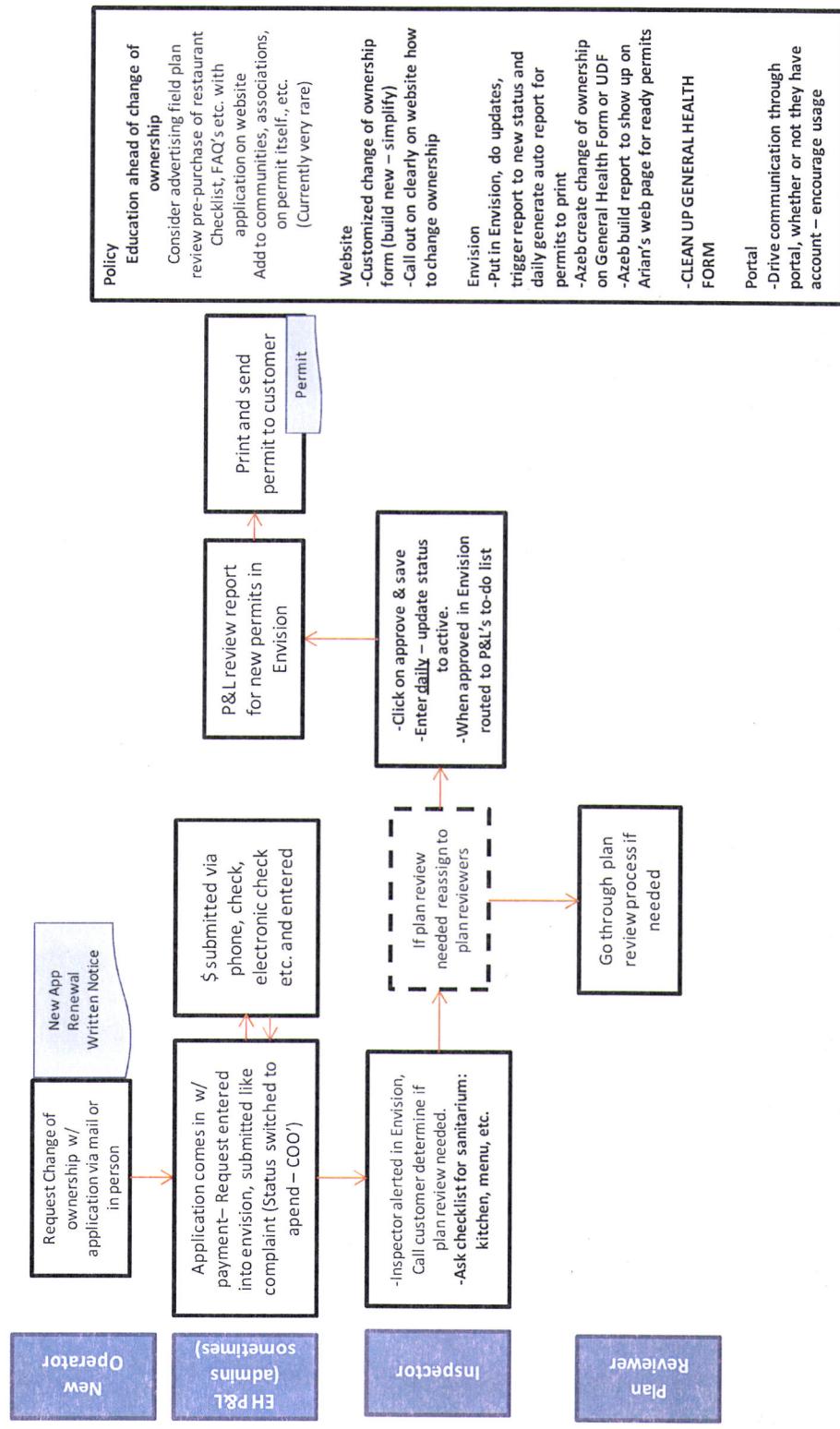
## Proposed Permit Renewals Process Map

## Renewals - “To-Be”



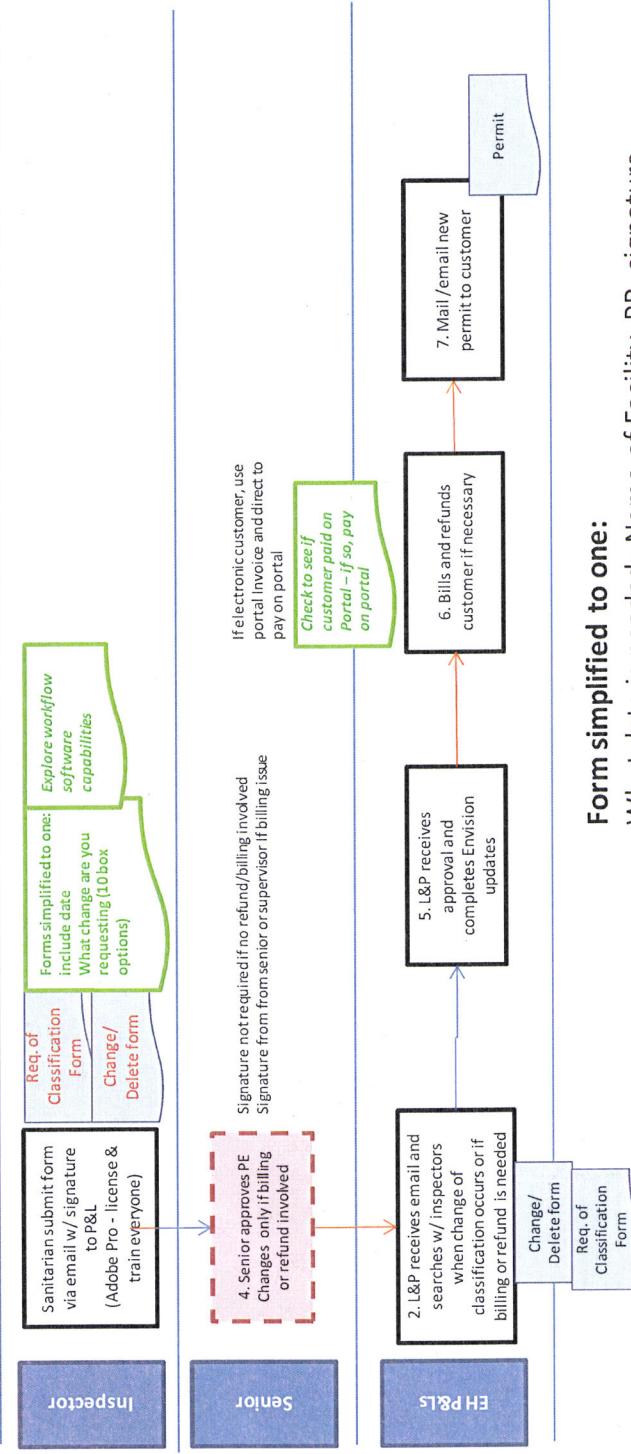
## Proposed Change of Ownership Process Map

# New Change of Ownership Process



## Proposed Classification (P/E) Change Process Map

# Classification P/E Changes



### Form simplified to one:

What data is needed: Name of Facility, PR, signature of inspector, what changed  
**Boxes:** Address (site and mailing), name, PE

Modify P/E Changes form  
Remove part where senior signs  
If additional billing, write on form vs. billing memo

- Small fee for change of ownership – the route of plan review (plan reviewers & inspectors as needed).
- Small fee allows for priority setting for inspector
- If need plan review (phone)



**Appendix 6 – Lean Sub-Project Specifications****Sub-projects for New Permanent Establishment Permits (including plan review)**

<b>Project 1: Streamline Envision data entry</b>
<b>Description:</b> Transfer responsibility for Envision data entry from the Permit & Licensing (P&L) unit to Plan Review (PR). The PR number would be assigned in Envision by Plan Review staff at the time of submittal of the Plan Review application rather than after the Application to Operate form is submitted.
<b>Technical/Legal changes:</b> None.
<b>Expected benefits:</b> Moving responsibility and the timing of assigning the PR # would eliminate two handoffs between Admin, Plan Review and P&L staff. It would also eliminate a historical bottleneck to conducting pre-open inspections.
<b>Start implementation:</b> 2015, 1 <sup>st</sup> Qtr
<b>Duration of implementation:</b> 6 months
<b>Process map reference:</b> Steps 1.2 and 1.25
<b>Project 2: Scanning and printing building plans</b>
<b>Description:</b> Use large format scanners to scan building plans and menus immediately after submittal. Plans and menus would then be stored on a server in pdf form and accessed, viewed and notated by staff using Adobe software. Plans would also be printed using a large format printers and sent to the applicant or emailed as pdf docs depending on the technical capabilities of the applicant. Depending on volume, the program could either purchase their own large format printers or outsource the printing to the County print shop or a private printing business.
<b>Technical/Legal changes:</b> Program would have to purchase one or two large format scanners, large format printers. Some Plan Reviewers may benefit from dual monitors. The Program may have to upgrade their license for Adobe Acrobat to facilitate posting

comments in pdf documents.	<p><b>Expected benefits:</b> Some applicants would benefit by not having to print building plans and delivering paper docs to FP offices. Plans submitted on paper can be scanned using a wide-format scanner and the paper originals can be immediately archived. Digital submission of plans would also allow digital transmission of plans between Eastgate and Chinook, between FP and plumbing review staff and between King County and review staff in incorporated cities. Plans can be marked up using Adobe software which is more efficient, facilitates archiving and eliminates the need to mark up duplicate sets of plans. Plans can also be returned to applicants in digital form which expedites transferring documents and eliminates the need for applicants to pick up plans. Digital submission, management and transmission of building plans will facilitate a “virtual office” concept whereby the distinctions between Eastgate and Chinook will dissipate. The two offices can also allocate workload more efficiently and collaborate more effectively.</p>	<p><b>Start implementation:</b> Pilot test the concept starting in 2016 1<sup>st</sup> Qtr</p> <p><b>Duration of implementation:</b> Pilot test for six months. Six months for full rollout once concept is tested and modified.</p> <p><b>Process map reference:</b> Steps 1.3, 1.35, 1.4, 1.5, 2.2, 3.4</p>	<p><b>Project 3: Use portal for new permit applications</b></p> <p><b>Description:</b> Modify the FP portal to allow online applications and fee payment for plan review and application to operate.</p> <p><b>Technical/Legal changes:</b> Portal will have to be modified to include data input for plan review and operating permit. Portal already has existing functionality for acceptance of fee payment using echeck or credit card.</p> <p><b>Expected benefits:</b> Gives applicants the convenience of applying and paying fees online rather than downloading paper forms, handwriting or typing forms and preparing a paper check. Eliminates the need to send in paper forms or driving to a FP office to submit applications. Along with project #2 (digital submission of building plans and menus) this project allows complete online, digital submission and transmission of all documents</p>
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associated with new food permits. FP staff will not have to manage paper forms, paper checks or the need to archive paper documents. FP can significantly reduce the number of NSF checks and realize quicker cash receipts.
<b>Start implementation:</b> Pilot test the concept starting in 2015, 1 <sup>st</sup> Qtr
<b>Duration of implementation:</b> Pilot test for six months. Six months for full rollout once concept is tested and modified.
<b>Process map reference:</b> Steps 1.2 and 2.4

#### Project 4: Digital preparation and transmission of plan review and inspection reports

**Description:** Plan Review staff will prepare the Approval Letter, the Pre-Opening Checklist and the Pre-Opening Inspection Report in MS-Word converted to pdf and transmit these documents to the applicant via email. Plan Reviewers would also have the option print the Pre-Op Inspection Report on-site using a portable printer and submitting the report to the applicant, architect or contractor at time of inspection. The FP should also get a waiver from the County Auditor to replace a handwritten signature (of the applicant and FP staff) on the Application to Operate with an esignature. Operating permits can also be transmitted to operators via email.

**Technical/Legal changes:** MS-Word templates should be created for the Approval Letter, the Pre-Opening Checklist and the Pre-Opening Inspection Report. Purchase of one or two portable printers for on-site printing of the Pre-Opening Report. Secure a waiver from the County Auditor to replace handwritten signatures on the Application to Operate with esigs.

**Expected benefits:** Expedites the preparation and transmission of documents sent to applicants. FP staff will not have to manage paper forms or the need to archive paper documents.

**Start implementation:** Pilot test the concept starting in 2016 1<sup>st</sup> Qtr

**Duration of implementation:** Pilot test for six months. Six months for full rollout once concept is tested and modified.

**Process map reference:** Steps 2.2, 3.1, 3.2, 3.3

<b>Project 5: Digital archiving</b>
<b>Description:</b> Food program staff will archive all documents associated with new permits and plan review using a document management protocol or system.
<b>Technical/Legal changes:</b> The Program will have to fully implement MS-Sharepoint, a document management system or MS-Explorer to serve as a digital archive. The County most likely has a document management standard that can be employed.
<b>Expected benefits:</b> FP staff will not have to manage paper forms or the need to archive paper documents.
<b>Start implementation:</b> Summer 2016
<b>Duration of implementation:</b> six months
<b>Process map reference:</b> 3.4

## **Sub-projects for Permit Renewals**

<b>Project 1: Increase portal use</b>	
<b>Description:</b> In 2011, payment of yearly Food Establishment Permit was enabled via web site. Approximately, 25 % of annual renewals are completed through the portal.	
<b>Technical/Legal changes:</b> Reevaluate portal site and make it easier to use. Enable portal to make all changes like change of ownership or classification changes. Will need to do research to find out ways to increase portal use, i.e. discussing it at educational visits, media campaign, flyers, etc.	
<b>Expected benefits:</b> Increase portal use will reduce staff hours and resources spending on turnaround of permits processing. Applicant would pay via portal and be able to print own permit. Renewal reminders can also be sent via email which would save on mailing/paper costs. This would reduce wait times for applicant receiving permit.	
<b>Start implementation:</b> 2014, 2 <sup>nd</sup> Qtr	
<b>Duration of implementation:</b> Ongoing	
<b>Process map reference:</b> Permit Renewals – “To-Be”	
<b>Project 2: Integrate Envision Connect into accounting processes</b>	
<b>Description:</b> Currently, there are 2 separate processes for intake of permit renewals received via mail or walk ins. First, checks or credit card information must be “run in” via cash register and then processed into Envision Connect. The permit is then mailed and filed. This project involves modifying Envision Connect to include a cash receipts function so that the cash register steps can be eliminated.	
<b>Technical/Legal changes:</b> Would need to contact Decade Software to find out if current Envision Connect can incorporate some kind of cash receipting function for checks and credit cards. Also, will need to check with fiscal to make sure that processed items can be documented for audit purposes.	
<b>Expected benefits:</b> Would eliminate additional step of “ringing in” checks and credit cards	

separately, thus eliminating process times for providing permits to applicants.
<b>Start implementation:</b> Start of 2014 permit renewals
<b>Duration of implementation:</b> 6 months.
<b>Process map reference:</b> Permit Renewals – “To-Be”

**Project 3: Increase seasonal staffing**

**Description:** Only staff within Permits and Licensing (2 FTE's) have the ability to process applications within Envision Connect and some staff have limited duty responsibilities within current job classification. This sub-project will augment staffing during the heavy renewal season.

**Technical/Legal changes:** Additional duties for staff will have to be approved or added to current job classification via labor contract approval. Training on Envision Connect will have to be implemented. Additional staffing may be needed in Permits and Licensing or workload balancing must be addressed.

**Expected benefits:** Additional staffing with training will accommodate the heavy burden of permit renewals during renewal time. Thus, reducing turnaround time for applicant receiving permit. Regular Permits and Licensing staff would be available to handle complex and immediate application issues that may arise during permit renewal time.

**Start implementation:** Start of 2014 permit renewals

**Duration of implementation:** 12 months.

**Process map reference:** Permit's Renewals- “To Be”

**Sub-projects for Change of Ownership and Reclassifications**

<b>Project 1: Integrate Envision Connect into accounting processes</b>	
<b>Description:</b> Currently, there are 2 separate processes for intake of permit renewals received via mail or walk ins. First, checks or credit card information must be “run in” via cash register and then processed into Envision Connect. The permit is then mailed and filed. This project involves modifying Envision Connect to include a cash receipts function so that the cash register steps can be eliminated.	
<b>Technical/Legal changes:</b> Would need to contact Decade Software to find out if current Envision Connect can incorporate some kind of cash receipting function for checks and credit cards. Also, will need to check with fiscal to make sure that processed items can be documented for audit purposes.	
<b>Expected benefits:</b> Would eliminate additional step of “ringing in” checks and credit cards separately, thus eliminating process times for providing permits to applicants.	
<b>Start implementation:</b> Start of 2014 permit renewals	
<b>Duration of implementation:</b> 6 months.	
<b>Process map reference:</b> New Change of Ownership Process	
<b>Project 2: Integrate workflow into Envision Connect for transmission of change of ownership/classification applications</b>	
<b>Description:</b> Currently, change of ownership/change of classification (PE) request is received via mail or in person; all applications are then scanned and forwarded to designated plan reviewer. After plan reviewer has determined that application is not under a plan review, the application (in pdf) is forwarded via email to the designated inspector for approval. After email is received, the application is printed and signed and then scanned again and forwarded to Permits and Licensing. This sub-project involves using workflow technology to move applications (in pdf) around the agency to the appropriate staff without the need for re-scanning, printing or applying ink signatures.	
<b>Technical/Legal changes:</b> Will need to verify that Envision Connect has ability to	

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accommodate a "to do list" (see screen shot of current "to do list") on home page of Envision Connect that will trigger the plans reviewer, inspector, and permits and licensing that a change of ownership/change of classification application is awaiting approval or processing. Envision Connect will need to be modified to accommodate an e-signature (e.g., checkbox, password protection and/or PIN for approving an application). Will need to verify how the original application will be filed for future auditing purposes.

**Expected benefits:** Will reduce the amount of pdf "handoffs", the need to print applications and the need for inked signatures.

**Start implementation:** 2014, 2<sup>nd</sup> Qtr

**Duration of implementation:** 3 months

**Process map reference:** New Change of Ownership Process

### Sample screen shot- "to do list"

The screenshot shows the Envision Connect software interface with the following details:

- Top Bar:** Includes icons for Home, Refresh, Print Reports, Back, Forward, and Logout.
- Title Bar:** Displays "My home page" and the date "Tuesday, November 19, 2013".
- Dashboard Metrics:**
  - A progress bar for "Annual Target" showing 560 completed inspections out of 660, with a note: "2013 is 88.2% over" and "% of Target Complete: 77.1%".
  - A gauge chart titled "Toward Target Food+Pool" showing 272 actual vs 560 target.
  - A pie chart showing activity distribution: Daily time and Activity (11/19/2013 2:29:12 PM), Dispatch Center (400), Maintain daily time and activity (230), and Maintain travel activity (200).
- Activities List:** A table titled "Activities" with columns: Record ID, Click on + sign to view details, Status, Assigned Date, Name, Address, City, and Zip. It lists several items including "2013 is 88.2% over", "Completed Inspections", "Annual Target", and "272 266 % of Target Complete: 93.8%".
- Common Tasks:** A list of tasks including: Change my password, Dispatch Center, Maintain daily time and activity, Maintain travel activity, Productivity, Cameras, Agency Management, Complaint Processing, Financial, Human Resources, Inspection and Survey, Program Management, Reporting, Print reports, Run Report Builder, and Routinely inspections in past 30 days with 35 or more Red Critical Points, requiring return inspection/letter.
- Bottom Status Bar:** Shows "Connected User: SHINI Database: EnvisionConnect Server: PHEHAPP01".

<b>Project 3: Allow portal access for change of ownership and change of classification</b>	
<b>Description:</b>	Modify the portal to allow change of ownership and reclass requests.
<b>Technical/Legal changes:</b>	Can the changes to ownership and classifications be controlled without tampering of accounts? How can this information be verified and would this lead to an increase amount of refunds or charges due to operator error?
<b>Expected benefits:</b>	Would reduce staff time and resources to process change in application.
<b>Start implementation:</b>	2015, 1 <sup>st</sup> Qtr
<b>Duration of implementation:</b>	6 months
<b>Process map reference:</b>	New change of ownership process

<b>Project 4: Form reduction and simplification for mobile units</b>	
<b>Description:</b>	Mobiles currently need to complete 5-7 forms depending on the changes to the commissary and foods being prepared. Simplify the process and administrative burden by consolidating forms and data being collected. Eliminate signed restroom agreements since code only states to have approval restroom access but does not specifically require written documentation. Area businesses will not sign forms seen as legal document but will allow restroom access for mobile food vendors.
<b>Expected benefits:</b>	Include these changes with new business plan review process.
<b>Technical/Legal changes:</b>	Need to create new form to collect needed data and re-write policies.

**Expected benefits:** Less confusion and paper work for a business operator seeking to obtain a permit. Less staff time for verifying the currently required forms. Mobiles have more freedom to move within King County since restrooms can be used/shared without

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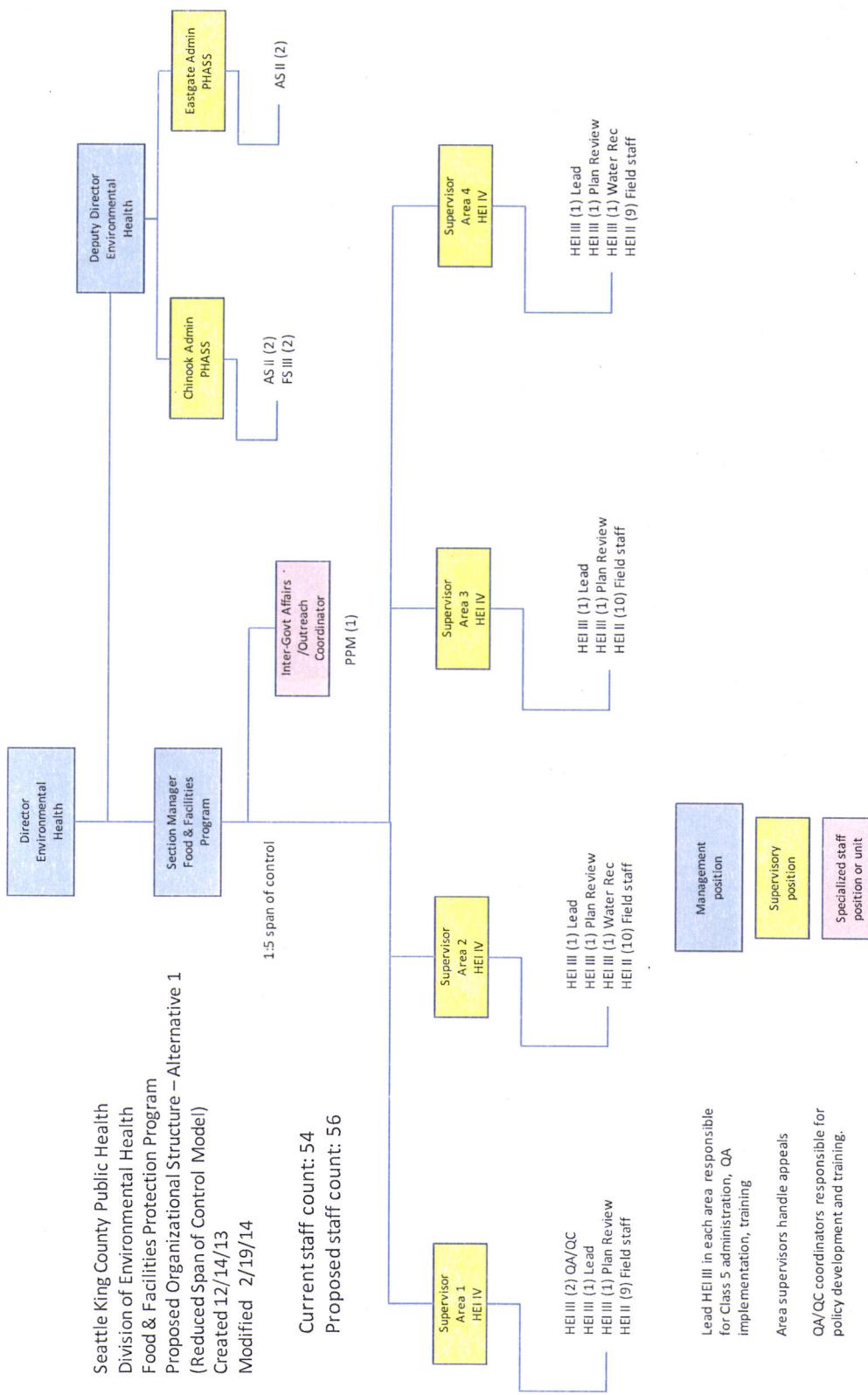
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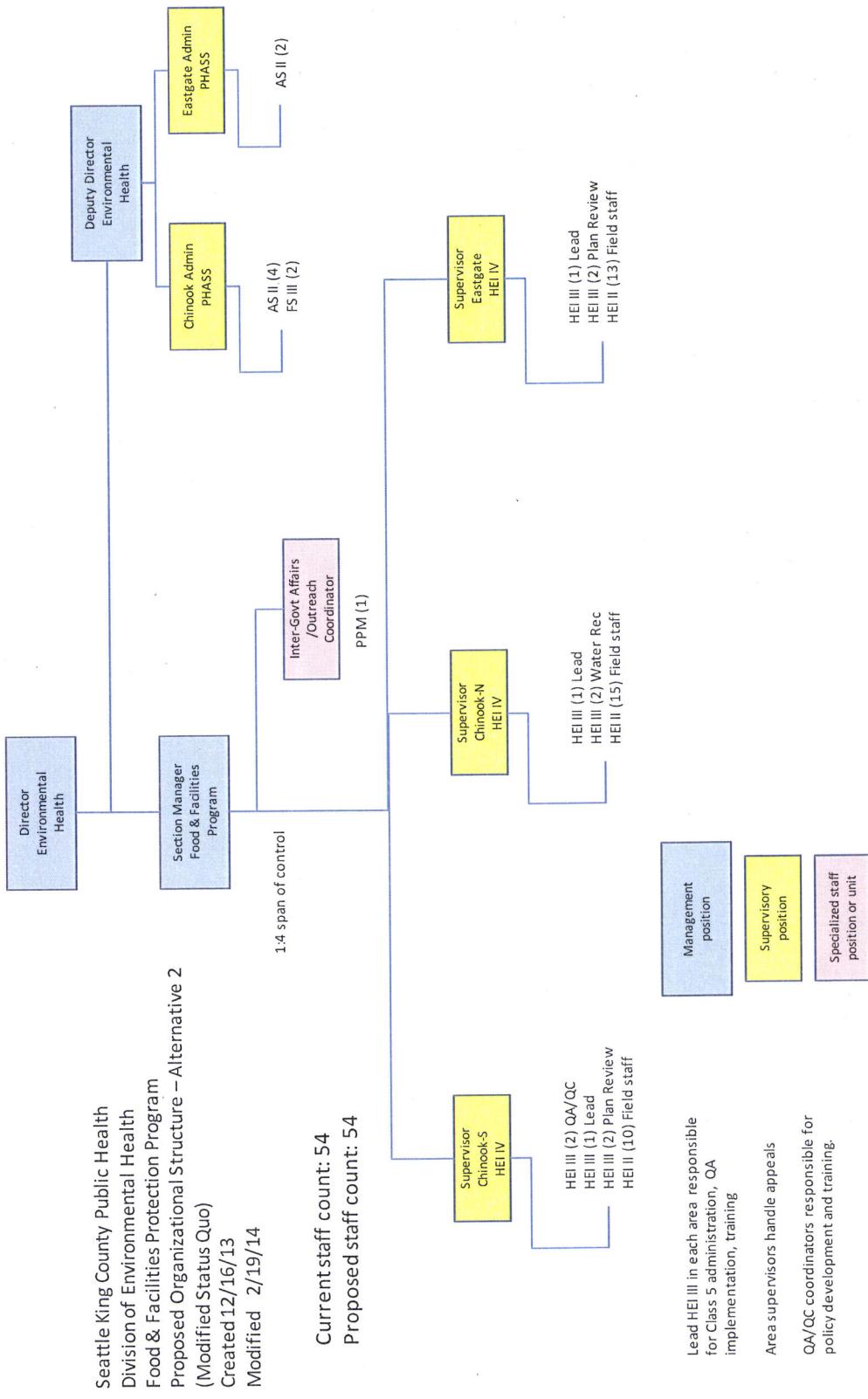
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threat of closure or red violation if not documented in advance.
<b>Start implementation:</b> 2014, 3 <sup>rd</sup> Qtr
<b>Duration of implementation:</b> 6 month
<b>Process map reference:</b> ownership information needed

## Appendix 7 – Potential Organizational Models – Alternative 1 (Reduced Span of Control Model)



**Appendix 7 – Potential Organizational Models – Alternative 2 (Modified Status Quo Model)**



#### **Appendix 8 – Acronym Key**

- CAP – Corrective Action Plan
- ESJ – Equity and Social Justice
- ESL – English as a second language
- FBI – Food borne illness
- FDA – U.S. Food and Drug Administration
- FTE – Full time equivalent
- HEI – Health & Environmental Investigator
- PE – Program element
- PPM – Program/Project Manager
- PR – Plan review
- QA – Quality Assurance
- QR – Quick response
- RCP – Risk Control Plan
- SOP – Standard Operating Procedure