



7/8/2024

Position Allocation Cover Letter – Rationale for a Second Senior EHS in Consumer Protection

Background

The Consumer Protection Program is responsible for providing the following services to Humboldt County, through State, Local, and Federal mandate:

Funded Mandates (Fee for Service, Grant-funded)

- Retail Food inspection and permitting
- Body Art Facility inspection and permitting
- Public Pool and Spa inspection and permitting
- Correctional Facility inspection
- Organized Camp inspection and oversight.
- Beach Water Quality Sampling and Advisory Posting

Unfunded Mandates (Grant/Realignment)

- Harmful Algal Bloom Response and Advisory Posting
- Mussel Sampling and Advisory Posting
- Wild/Domestic Animal Bite Investigation & Response (rabies)
- Vector investigation & surveillance (mosquitoes, birds & rodents)
- Foodborne Illness Investigation
- Administrative Tasks (PHAB, etc.)
- Complaint response; local Code Enforcement assistance

Of these listed services, the Retail Food program consists of more than 80% of the workload for actively permitted facilities (Figure 1) and incoming applications/service requests (Figure 2). CP program staffing allocation consists of a Supervisor, a Senior, and six inspectors. Currently, two inspector positions are vacant.

The CP Program Senior acts as the technical expert in all CP programs, and as such is responsible for inspector training, assignment of work, review of work, performance of highly technical inspections (e.g. correctional facilities), and program improvement in response to changing legislation and program needs. As the work is primarily in-office, the senior is largely responsible for fielding phone calls from the public and engaging with people at the front counter.



Figure 1: Active Permits & Registrations

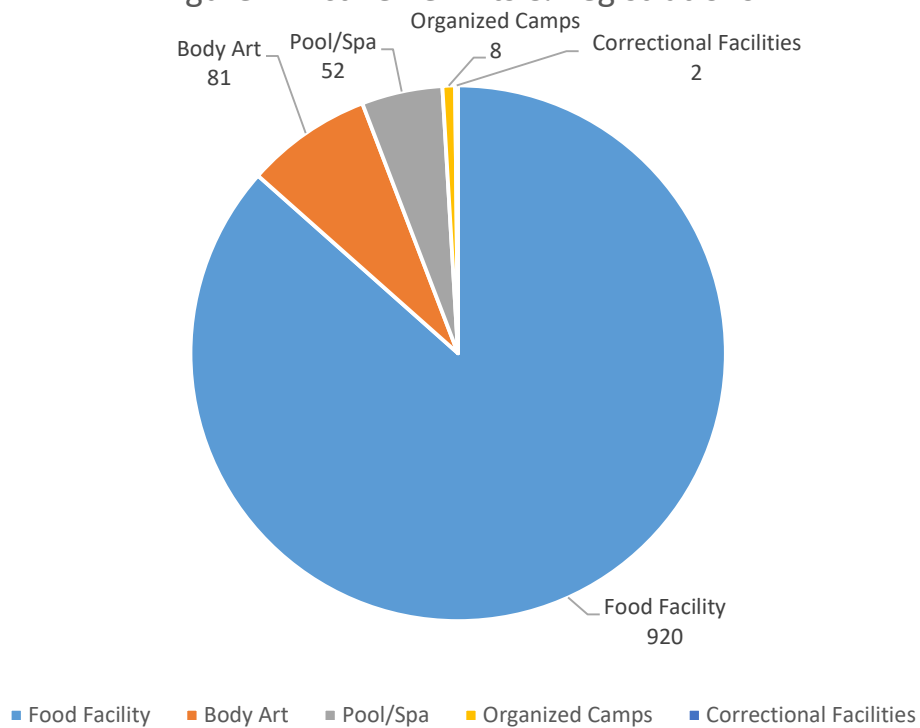
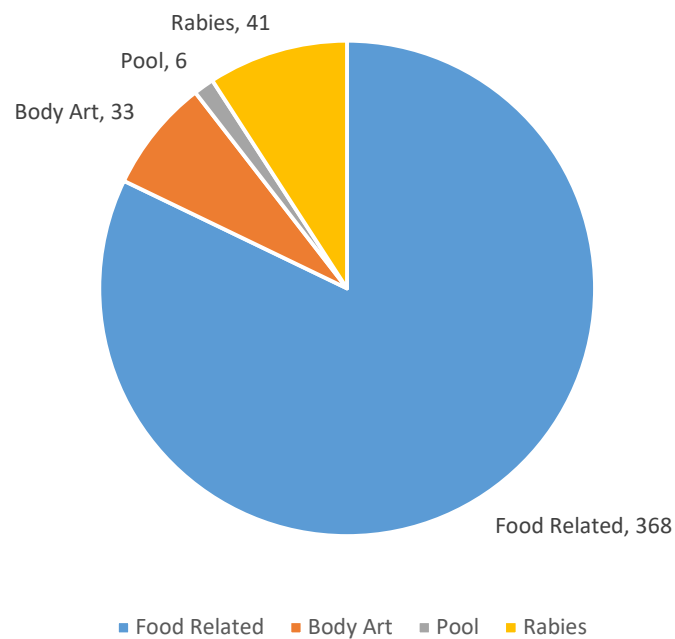


Figure 2: Applications Received 2023 (Includes Rabies Testing Authorizations)



Current Challenges

Over the last five years, the CP program has lost four experienced inspectors as well as a supervisor with ten years of experience in the program. As a rural county Humboldt has limited options for recruitment of REHS. As such, many recruits onboard at the trainee level. After achieving registration staff frequently pursue the higher wages offered by urban counties. Humboldt County acts as an ad hoc training academy and experiences frequent turn-over of staff. The perpetual onboarding of new staff, requiring training/oversight, coupled with the day-to-day duties of the Senior position has resulted in the following impacts to the CP Program:

- Delays in training and releasing new inspectors to independent field work.
- Inability to timely process and manage complaints.
- Delays in review of applications, inspections, and staff work products; and associated frustrations of applicants and operators.
- Lack of capacity to train staff in non-food-related tasks – staff lack sufficient training in Body Art and Pool/Spa inspections, rabies response, and vector investigation. Currently over 78% of these facilities are past due for routine inspection.
- Limited capacity for program improvements.
- Lack of capacity to manage and implement FDA Standardized Training program and associated annual grant funding opportunities.
- Diminished morale and job satisfaction of the CP team and overwhelmed Senior EHS in the position.

In summary, the amount of senior level work in the Consumer Protection program exceeds the capacity of a single position.

Second Senior – Division of Responsibility

The request to allocate a second Senior position in the CP Program is intended to address the challenges listed above by having one Senior position dedicated solely to the Retail Food program and another covering all other program functions. Specifically, division of work would be as follows:

Retail Food Program Senior

Food subprograms: Mobiles, Compact Mobiles, Cottage Food, Event Booths, Permanent Facilities, Special Event Coordinator Training.

- Assign and distribute food facility plan reviews, applications, complaints, and consultations to inspectors.
- Review inspector communications, as needed, including inspection reports, correspondence, plan reviews, etc.
- Review all new food facility permits and provide final permit approval of Mobile, Cottage, Compact Mobile, Permanent, and Event Coordinators permit applications
- Inspections, plan review, consultations, correspondences, for open districts, overflow work, inspector request, etc.
- Process Building and Planning referrals for county and cities.
- Process business license application review routings.
- Review ABC license application referrals and assign/process as needed.
- Administer inspector training program for new and current inspectors.
- Oversee FDA Retail Food Program Standards grant program.
- Technical assistance to inspectors on plans, inspections, consults, and inquiries



- Support relationship with Edible Food Recovery Program Manager and ensure consistent implementation of program
- Complete review of complaint investigation to approve resolution
- Advise on and implement escalated enforcement when necessary
- Program development- develop forms, processes, procedures, informational handouts, etc. and lead teams on program improvements.
- Attend MFF development TAC and Northern CA Food TAC
- Apply for and manage applicable grant funding
- Manage appropriately sized district including all programs: Retail Food, Body Art, Rec Health

General Programs Senior

- Body Art
 - Yearly facility inspections
 - Practitioner registration reviews new and yearly updates
 - Facility plan reviews
 - Inspector training as needed.
 - Attend TAC
 - Program development
- Pools/Spas
 - Facility inspections 2X or 1X for seasonal
 - Plan review for new facilities and remodels, plumbing changes, updates, cover changes, etc.
 - Inspector training as needed.
 - Attend Pool TAC
 - Program development
- Vector
 - Mosquito complaints and surveillance
 - Rodent complaints
 - Cockroach and bedbug complaints
 - Rabies program administration that includes bite response, wild animals, quarantine, and other mandated program functions
 - West Nile Monitoring Program: collection/testing of birds
- Recreational Waters
 - Beach grant program QA/QC and administration/mandated functions
 - Freshwater bathing beaches
- Toxin Program
 - Paralytic Shellfish Poisoning- Mussel sampling, quarantine and postings
 - HAB monitoring, signage and public education
 - Coordinate with Shellfish Program of CDPH and recommendations on Vibrio Control and Humboldt Bay Area Plan
- Organized Camps
 - Yearly inspections
 - Plan review as needed.
 - Program development



- Calcode Water Systems
 - Inspections
 - Monitoring of results and boil water notices
 - Program development
- Detention Facilities
 - Yearly Inspections of 4 facilities- Includes housing, general health and safety, and food.
 - Coordination with Health Officer and PHN/HES
 - Complete review of complaint investigation to approve resolution.
 - Advise on and implement escalated enforcement when necessary.
 - Program development- develop forms, processes, procedures, informational handouts, etc. and lead teams on program improvements.
 - Apply for and manage applicable grant funding.
 - Manage appropriately sized district including all programs: Retail Food, Body Art, Rec Health.

Position Funding & Budget Considerations

CP program staff positions are funded primarily by permit fees and fee-for-service activities, supplemented by realignment for unfunded statutory mandated activities. A Senior EHS position costs \$110,145 per year. An EHS I/II (inspector) costs \$93,100 per year.

The intent is to deallocate one EHS I/II and allocate one Senior EHS for a program cost increase of \$17,045/year. The program cost will be mitigated by a 3% fee increase for CP Program services (calculated by DHHS Fiscal), as well as an increase in the number of regulated facilities through program expansion into a newly regulated jurisdiction (18 additional food facilities), implementation of Commissary permits, and implementation of Edible Food Recovery inspections.

