



**PUBLIC HEALTH SERVICES  
ENVIRONMENTAL HEALTH DIVISION**

**DATE:** April 14, 2022

**TO:** Lilly Simmering, Deputy County Executive Officer

**FROM:** Christine Lane, REHS, Director of Environmental Health 

**SUBJECT: Performance Audit of the Environmental Health Food Safety Program**

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Attached you will find the Environmental Health Division's responses to the recommendations from the performance audit of the Environmental Health (EH) Food Safety Program by EHA Consulting Group, Inc. on their report dated February 18, 2022.

We appreciate the comments made in the report especially concluding that the Orange County Environmental Health Food Safety Program "has one of, if not the best operated Food Safety program in the country."

Please contact me if you have any questions.

CL

cc: Dr. Clayton Chau, MD, PHD, MASL, Agency Director  
Dr. Bredehoft, DrPH, Chief of Public Health Services/County Public Health  
Director Lala Oca Ragen, CEO Performance Management and Policy Director  
Liz Guillen-Merchant, CEO Performance Management and Policy Director

## Performance Audit of EH Food Safety Program Responses to Recommendations

### I. Purpose Achievement

#### **Recommendation:**

*Food Safety should consider developing its own vision, mission, and core values as part of a strategic plan based on the recommendations in this audit and with input from the Board of Supervisors and ensure that there is an evaluation plan for continuous monitoring/adjustment.*

#### **Response: Environmental Health (EH) partially concurs with the recommendation.**

In lieu of a Vision, Mission and Values statement specifically for the Food Safety Program, EH as a Division has a Vision, Mission and Values statement (attached) covering all programs. Since many of our business operators are in multiple EH programs (e.g. gas station operators have programs in food safety, hazardous materials and water quality at one location), a Division-wide Vision, Mission and Values statement is better suited to cover all EH programs.

### II. Food Industry Engagement

#### **Recommendations:**

*(1) Review all documents and forms on the website and ensure that they are written in a way that is plain and easy to understand for an individual that doesn't have a background in governmental public health/food safety. Measure them against Culturally and Linguistically Appropriate Services.*

*(2) Utilize the Voluntary National Retail Food Program Standards to regularly assess Food Safety performance and maintain a written evaluation plan against the standards.*

#### **Response: EH concurs with the recommendations.**

(1) EH is currently in the process of updating outreach material in Orange County's 6 major threshold languages to ensure they are easy to understand and will continue to review the Culturally and Linguistically Appropriate Services. Additionally, bilingual staff will attend meetings where information is presented to businesses or the public. For example, at Temporary Food Facility event meetings EH staff members will attend to present information in the identified language (e.g., Vietnamese for Tet Festival event).

- (2) EH will review the Voluntary National Retail Food Program Standards to determine which standards are applicable to the Food Safety Program.

### III. **Compliance, Quantity & Efficiency**

#### **Recommendations:**

- (1) Food Safety should develop its own annual report and highlight its accomplishments and outline future quality improvement initiatives.*
- (2) Initiate a program to canvas the county for unpermitted food establishments and require that they be permitted.*
- (3) Establish a program to recruit Registered Sanitarians (current college students as well as currently employed) to work for Orange County in order to bring staffing numbers up to the required amount.*
- (4) Establish an employee retention program that focuses on workforce development and promoting from within.*

#### **Response: EH concurs with the recommendations.**

- (1) EH currently provides much of this information to HCA annually; however, EH will explore ways that our new database system provides the capacity to generate annual information.
- (2) EH inspectors do find unapproved food operations during normal field activities., More time can be allocated toward surveillance to detect unpermitted facilities; however, additional staff would be required. In addition, EH is currently developing a proposal for a new program specifically related to unlawful (unpermitted) street vending, but the program is not yet established; the unlawful street vending program proposal is forthcoming.
- (3) EH has established a collaborative strategy with Cal State University Fullerton's Public Health Department, Environmental Health program to hire interns on a routine basis. This collaboration is targeted to begin this year and will continue year-round.
- (4) EH agrees that a retention program is helpful to develop our workforce and to promote from within when staff are eligible and qualified. The CEO's office is aware of this challenge and has begun dialogue with EH to address the issue.

#### IV. Quality

**Recommendation:**

*Food Safety should implement a systematic process for assessing customer satisfaction. Results and actions taken based on customer feedback should be documented (perhaps in the previously recommended annual report).*

**Response: EH concurs with the recommendation**

EH agrees that a customer satisfaction process can be implemented post-inspection and will work with IT to develop strategies and procedures for a survey. Survey results will be shared with HCA leadership, as well as the CEO and BOS as necessary.

Quality Assurance practices are in place, with random audits from Supervisors of facilities that were recently inspected by staff. An auditing form is used; deficiencies will trigger training, and Coaching and Feedback will be provided if deficiencies persist. Staff also receive feedback during annual performance evaluations. The queue management system in reception issues a customer service survey when the visit is complete, allowing for rating and feedback of the experience.

#### V. Readiness – No Recommendation Offered

#### VI. Information Technology

**Recommendations:**

*The following components should be part of a new data management system: Optimized routing for inspectors*

- *Customized dashboards for inspectors to monitor productivity*
- *Routing of tasks between users in the system*
- *Allowing an inspector to conduct a consolidated inspection at an establishment with multiple permits, and issue a combined report (rather than launching each permit as a separate inspection)*
- *Allowing a client to schedule an appointment with an inspector/staff member online*
- *Allowing a client to make edits to their own information by field type*
- *Preventing dual data entry of applications received online and storing as a record*
- *Geocoding and address validation of online submissions*
- *Versioning of documents and integration of comments with respect to plan markups*

**Response: EH concurs with the recommendations.**

The items listed are either planned to be incorporated later in the implementation process or are on the “wish list” for future integration. The client facing portal will be integrated in a multi-phased approach when other services/options are added. For example, clients will be able to create an account when HealthSpace is live, but may not be able to access all features, such as reprinting a health permit, until later in the implementation schedule. A contract modification and additional cost may be needed if the wish list is approved for implementation.

The priority with HealthSpace implementation is inspections, investigations and basic Environmental Health functions.

**VII. Inspectional Evaluations**

**Recommendations:**

- (1) To address inspectional gaps observed during field observations, Department-wide training is recommended to highlight the two areas identified. This should be accomplished via presentation and practical demonstration with equipment to maximize the training session. **NOTE: Above-described training was performed by EHA Consulting Group, Inc. on February 2, 2022.***
- (2) The plan review process was evaluated, including a final site inspection. Initial reviews operate under a mandate of 20 business days for completion. If not approved, a mandate timeline does not exist for review of the revised plans. For continuity of review and understanding of history, typically the same plan reviewer examines the plans to completion. The primary objective of the plan review department is to comply with the initial review mandate which is met. This requires a substantial amount of departmental resources prolonging revision reviews and final inspections. To adequately handle and process the current volume of initial and revised plan reviews, additional staff is necessary to meet the needs of Orange County residents.*
- (3) The foodservice establishment closure process was directly observed during the project. Based on interviews with inspectors, re-opening inspections commonly fail due to lack of compliance with re-opening requirements which are clearly communicated in the inspection report. Currently, there is no mandatory minimum time of closure to permit for corrective action. Commonly, foodservice operators do not take the adequate time to address critical operational hazards which are in part, or in whole, responsible for the closure leading to prolonged closures. To promote compliance and success of reopening, a mandatory minimum closure time 24-48 hours should be established to permit for adequate corrective action by the foodservice operator.*

**Response: EH concurs with the recommendations.**

- (1) Training is provided for ice machines and food processing equipment, following the California Retail Food Code requirements, including Clean-In-Place processes. As noted in the audit, supplementary training was provided to address this recommendation. The training was recorded and has been made accessible on the Eureka training platform.
- (2) EH agrees that additional staff members are needed to address the increasing plan review workload and approval time frame, and EH leadership has presented analysis regarding workload and staff resources, including potential staffing scenarios. With four additional staff dedicated to the Plan Check section, the threshold of 20 business days could be reduced to 10-15 business days. Another option for consideration is to add a fee for an expedited review of five business days, if there are staff members available. EH and the CEO's office is already working to address the recruitment strategy for EH to help it meet its targets.
- (3) EH agrees there should be a mandatory closure period for facilities and language has been drafted to update the existing (outdated) county ordinance for Environmental Health.



**Vision:**

To serve the public by partnering with our businesses and community to promote a safe environment.

**Mission:**

Protect public health and the environment through our commitment to educate and serve Orange County residents, visitors, and businesses.

# **Environmental Health Values**

## ***Teamwork***

*Builds relationships, unity, and aligns us towards our mission.*

## ***Service***

*Service is the heart of what we do daily.*

## ***Integrity***

*Upholding a commitment to ethical and professional standards everyday.*

## ***Respect***

*Valuing everyone's contributions.*