



CLALLAM COUNTY BOARD OF HEALTH

AGENDA of March 19, 2024 @ 1:30 – 3:30 pm

Clallam County Courthouse

Board of Commissioners Meeting Room 160

223 E. 4th Street

Port Angeles, WA 98362

Board of Health meeting will also be available virtually at:

If you would like to participate in the meeting via Zoom audio only, call 253-215-8782 and join with Meeting ID: 935 7343 5754 and Passcode: 095863

If you would like to participate in the meeting via Zoom video conference, visit <https://zoom.us/j/93573435754> join with Meeting ID: 935 7343 5754 and Passcode: 095863

This meeting can be viewed on a live stream at this link: <http://www.clallam.net/features/meetings.html>

Public comment and questions can be directed to the Clerk of the Board at 360-417-2276 or nan.furford@clallamcountywa.gov

- Call to Order
- Roll Call
- Request for Modifications/Approval of Agenda
- Approval of Draft Meeting Minutes for February 20, 2024
- Action Items: None
- Public Comment for Agenda Items – *Please limit comments to three minutes*
- Health Officer: Infectious Disease Update
- Discussion Items: Review of the proposed draft Environmental Health Division Fee Schedule
- Board of Health Public Hearings: None
- Board of Health Presentations:
- Old Business and Information Items: None
- Environmental Health Director
- HHS Director
- Future meeting agenda items:
 1. Vaccination Rates
 2. Air Quality and Noise Ordinance
 3. Climate Change
 4. Update on Behavioral Health Organization (BHO)
 5. Olympic Peninsula Healthy Communities Coalition

- Public Comment – *Please limit comments to three minutes*
- Adjournment

NEXT MEETING – April 16, 2024

INSTRUCTIONS FOR SPEAKING AT A BOARD OF HEALTH MEETING:

- Members of the public wishing to address the Board on general items may do so during the designated times on the agenda.
- Members of the public wishing to comment at the public hearing are asked to sign in on the sheet provided giving their name and place of residence.
- The Chair may limit the comment period to 3 minutes for each speaker subject to Board concurrence.
- Speakers, generally, will be heard in the order they signed up. All comments must be made from the speaker's rostrum and any individual making comments shall first state their name and address for the official record.
- General comments, applause, booing from members of the audience are inappropriate and may result in removal.

These guidelines are intended to promote an orderly system for conducting a public meeting/hearing so that each person has an opportunity to be heard and to ensure that exercising their right of free speech embarrasses no one.

Note: Written testimony presented by members of the public during the Board meeting is considered a public document and must be submitted to the Clerk of the Board. Copies of public documents from Board meetings are available by contacting the Public Records Department.

Members:

Chair, Mike French; Vice-Chair, Shahida Shahrir; Dr. Gerald Stephanz; Helen Kenoyer; Tia Skerbeck;
Paul Cunningham; Jeff Gingell; Mark Ozias and Randy Johnson

Health and Human Services Staff:

Dr. Allison Berry, Health Official; Kevin LoPiccolo, Director; Jenny Oppelt, Deputy Director;
Jennifer Garcelon, Environmental Health Director; Nan Furford, Clerk of the Board

FEBRUARY 20, 2024
DRAFT MINUTES



CLALLAM COUNTY BOARD OF HEALTH

MINUTES of February 20, 2024 @ 1:30 pm – 3:30 pm

Clallam County Courthouse

Board of Commissioners Meeting Room 160

223 E. 4th Street Port Angeles, WA 98362

Meeting was held via Zoom (Video conference)

REGULAR MEETING OF THE CLALLAM COUNTY BOARD OF HEALTH

Call to Order: The meeting was called to order at 1:30 p.m.

Roll Call: Members present were Chair, Mike French; Commissioner Mark Ozias; Commissioner Randy Johnson; Vice-Chair, Shahida Shahrir; Community Stakeholder, Dr. Gerald Stephanz; Jamestown S'Klallam Tribe, Paul Cunningham; Lower Elwha Klallam Tribe, Tia Skerbeck; Consumer of Public Health, Helen Kenoyer; Health Officer, Dr. Allison Berry; HHS Director, Kevin LoPiccolo; HHS Deputy Director, Jennifer Oppelt; Environmental Health Director, Jennifer Garcelon

Members excused: City Council Member Representative, Jeff Gingell

Request for Modifications/Approval of Agenda

Commissioner Ozias made a motion to approve the agenda, Commissioner Johnson seconded. Agenda approved.

ACTION TAKEN: The Board had unanimous consent to approve the agenda.

Approval of Draft Meeting Minutes for January 16, 2024

Commissioner Mark Ozias made a motion to approve the meeting minutes; Dr. Stephanz seconded. Minutes approved.

Action Items:

None.

Public Comment for Agenda Items:

None.

Health Officer – Infectious Disease Update – Dr. Berry

Dr. Berry reported that we are still in respiratory season. Covid activity remains elevated, RSV activity is down trending, and we should be out of RSV season in Spring. With flu, we are getting a small second wave of infections and is still in the community. We will likely see Covid-19 through November to April for years to come. If you test positive, recommend isolate at home for 5 days, and wear a mask for at least 10 days as you are still contagious. Dr. Berry announced that there was one new death due to Covid-19, a resident in their 60's that was unvaccinated. Covid-19 remains serious and severe. It is still three times more deadly than the flu. Discussion followed.

Discussion Items: Environmental Health Budget, Programing and Proposed Fee Schedule

Jennifer Garcelon presented on Rules, Regulations and Policies that the Environmental Health Division is required to adhere to. After highlighting the requirements, Jen Garcelon provided an overview of the current fee structure and indicated to the Board of Health that the Department will be requesting that the fees be reviewed and increased since the current fees do not cover the cost of doing business. Discussion followed. New fee schedule recommendations and options were requested for review at the next meeting.

Board of Health Hearings:

None.

Board of Health Presentations:

None.

Old Business and Information Items:

None.

Environmental Health Director - Jennifer Garcelon

In the House budget there is a proviso for a septage study. Currently, all the pumpers take their wastewater to the treatment plant, so what happens when the treatment plant won't allow anyone to come in to discharge or if they shut down for maintenance. Discussion followed.

HHS Director- Kevin LoPiccolo

Last month Commissioner French, Dr. Berry, and about half of our staff went up to Clallam Bay Fire District 5 to discuss possibilities of bringing harm reduction services to Clallam Bay. HHS Staff have been working on pursuing a lease to offer harm reduction services with a local property management company out of Forks. Discussion followed.

Public Comment

None.

Adjournment

Meeting was adjourned at 2:00 p.m.

Next Meeting – March 19, 2024

PASSED AND ADOPTED this _____ day of _____, 2024

CLALLAM COUNTY BOARD OF HEALTH

Mike French, Chair

Allison Berry, MD, MPH, Health Officer

ATTEST:

Nan Furford, Clerk of the Board

MARCH 19, 2024
STAFF MEMO AND
ATTACHMENTS



Clallam County Department of Health and Human Services

Environmental Health Services ♦ 111 East 3rd Street ♦ Port Angeles, WA 98362-3018
Tele: 360-417-2258 ♦ FAX: 360-457-9795

TO: Clallam County Board of Health
FROM: Clallam County Environmental Health Services
SUBJECT: Environmental Health Fee Schedule
DATE: March 15, 2024

Background

During the 2024 Clallam County budget process, the Board of County Commissioners and Chief Financial Officer requested the fees be reviewed. Deputy Chief Financial Officer, Rebecca Turner offered to assist Environmental Health in reviewing the fee schedule. The last fee schedule update was in 2018.

At the February 20, 2024, Board of Health meeting, Jennifer Garcelon, Environmental Health Director, provided an extensive overview of the Environmental Health budget and a review of the planned fee update process. The fee review process included:

- Review of other jurisdictions hourly rate.
- Confirmation of the average time it takes to conduct fee activities.
- Review of revenues and expenditures by Environmental Health Program.
- Coordination with Finance Office for updated fee schedule.

Methods and Findings

As part of this report, an informational report has been prepared to demonstrate how proposed fees were calculated. The Finance Office will provide an overview of the fee calculation methodology that was prepared.

Recognizing that different programs/fees may require different calculations, below is an overview of the various options considered in this process:

1. Hourly charge – based on the internal costs (direct costs, indirect costs, capital assets, and general overhead) for that program. Changes in FTE levels, demand for services, and other influencing factors can cause the hourly rate to greatly vary from one year to the next. Some fees, however, are simply based on the amount of time spent performing the service, and an hourly rate provides an easy way to cover costs. This type of calculation can be reviewed annually or periodically and is easier to apply either a CPI % factor to or adjust for overall costs.
2. Per activity charge – based on the internal costs (direct costs, indirect costs, capital assets, and general overhead) to run the program, and is based on the average time spent per activity. This type of calculation splits costs out to each activity in a more direct method than the hourly charge method. However, it is based off prior historical statistics, which can greatly change at any point in time. Also, if efficiencies are gained in the repetition of

one of the services/tests, the calculation will ill-proportionally shift fee amounts to the other services/tests.

3. Combination of hourly charge & per quantity charge – proportionately breaks out the wages & benefits according to how many activities performed within a year, with supplies & services evenly distributed across all types & quantities of tests/services, no matter the length of time to complete. As this method is based off prior historical statistics as well, a CPI % factor should be applied.

These calculation options consider all 4 of the applicable cost components that should be used when establishing fees:

1. Direct Costs – means all applicable operational costs including, but not restricted to, salaries, wages, fringe benefits, supplies, and services, incurred by the department to impose the regulation, perform the service, or provide the product for which the fee or charge is being levied.
2. Indirect Costs – means all applicable costs incurred by the department in the provision of managerial, administrative, and general support of those imposing the regulation, performing the service, or providing the product for which the fee or charge is being levied. Because the current programmatic funding of Environmental Health includes Foundational Public Health Services Funding (FPHS), this exercise did not contemplate any Department/Program Overhead rate, but if those costs should, in the future, exceed any FPHS or other applicable funding source(s), it should be revisited.
3. Capital Assets - means the annual depreciation expense of those capital assets used by the department to impose the regulation, perform the service, or provide the product for which the fee or charge is being levied.
4. General Overhead - means the expenses not otherwise included in the categories of direct costs, indirect costs, and capital assets but that are incurred by the County to impose the regulation, perform the service, or provide the product for which the fee or charge is being levied. General overhead includes those expenses incurred by central service departments, which provide managerial, administrative, and general support, that are not otherwise charged to the operating departments (Information Technology, Human Resources, Payroll, Accounts Payable, Facilities, etc.).

Fee calculations based on the cost per activity are much more time intensive and complex for the hourly charge calculations. Per activity charge calculations require someone to detail out specific quantities of specific supplies to quantify the cost of supplies used to perform each activity. The cost of services used throughout the year are either activity-specific or are aggregated and then divided by the expected number of activities in the prior year (or the estimated number for the upcoming year). This method is preferred over the hourly charge method for programs that have consistent and repetitive tasks to perform throughout the year.

Summary

Health and Human Services Department recognizes the need to address the current fee structure that has not been updated since 2018. The methodology that was used in preparing the proposed fees is an accurate assessment of the time that it takes to process respective review and process of applications. Although the methodology is a correct measurement, Health and Human Services Staff would like to discuss with the Board of Health the necessity of applying an overhead cost to a division that is funded by the County General Fund. It is the Department's understanding that this will be the first time that an indirect cost will be applied to a General Fund Division. It is the Department's position that such cost will only hinder and further restrict services to the public. The Environmental Health Division currently has two deferred positions. It is certainly the intention of increasing fee revenue to allow the Environmental Division to hire an additional employee to work in the onsite septic program, but ultimately the growth and opportunity will stop there. Any surplus that is generated by fee collection will become part of the General Fund balance, not reinvested into the necessary programs that are intended to provide a community benefit.

Recommendation

Staff is recommending that the Board of Health review the three options found in the Informational Report and have a discussion on each option. As outlined, each option projects a surplus, but the overall dependence on County General Fund is a negative and will continue to be so moving forward. Staff would like to discuss the self-imposed cost.

If the Board of Health decides to support one of the three options presented, Staff will prepare an Ordinance and schedule a public hearing.



An Informational Report to the Clallam County Board of Health

Environmental Health Department Fees for Services

Board of Health Board Members

Mike French, Chair
Shahida Shahrir, Vice Chair
Paul Cunningham, MD
Jeff Gingell
Randy Johnson
Helen Kenoyer
Mark Ozias
Tia Skerbeck
Gerald Stephanz, MD

Health & Human Services Staff:

Kevin LoPiccolo, **Health & Human Services Director**
Jennifer Oppelt, **Health & Human Services Deputy Director,**
Allison Berry, MD, MPH, **Health & Human Services Health Officer**

Prepared/Submitted by:

Jennifer Garcelon, **Environmental Health Director**
Rebecca Turner, **Deputy Chief Financial Officer**

During the October 2023 Health & Human Services (HHS) Board of County Commissioners (BOCC) budget meeting, a desire to see an evaluation of the fees HHS Environmental Health (EH) charges was expressed since fees had not been updated since 2018. Discussion led to the decision that an updated fee schedule should be prepared, presented, and adopted early 2024.

Jennifer Garcelon, HHS Environmental Health Director, and Rebecca Turner, Deputy Chief Financial Officer, met in November 2023 to discuss the process by which this evaluation would take place. It was decided that EH employees would be asked to quantify the average amount of time spent on each non-hourly fee type on the current EH Fee Schedule, and that information would be provided to Finance by mid-December 2023. Analysis was done for each program within HHS Environmental Health to determine whether an updated hourly rate or a cost-based calculation would be best applied to each program's fees. New fee schedule options were calculated and discussed with HHS management and are now presented to the Board of Health on March 19, 2024, for discussion, with the goal of adoption at the April BOH meeting.

Accordingly, this report was produced to provide explanatory information. EH fees and specific circumstances are discussed throughout the report, though much of the information is applicable to all County fees.

This report is organized as follows:

- Chapter 1: Background info on the budget, staffing, and functions of EH
- Chapter 2: The RCWs and WACs that govern inspections and fees
- Chapter 3: Fee amounts and resulting program revenue
- Chapter 4: Determining the average number of hours needed to perform an inspection
- Chapter 5: An overview of the fee calculation methodology
- Chapter 6: Discussion of each component part used in the fee calculation
- Chapter 7: Summary

Chapter 1 - Background Info about Environmental Health

Environmental Health, a department within HHS (but is a General Fund department), is tasked with promoting and enforcing state regulations pertaining to:

- Public drinking water systems
- Public pools and spas
- Restaurants and food trucks
- On-Site Septic systems

In 2023, the Environmental Health department's programs had the following Revenue & Expenditures:

- Drinking Water Quality
 - Program Fees/FPHS/Other Revenues: \$129,854.43
 - Expenditures: \$177,414.94
 - Surplus/(Deficit): (\$47,560.51)
- Solid & Hazardous Waste
 - Program Fees/FPHS/Other Revenues: \$123,044.52
 - Expenditures: \$98,964.29
 - Surplus/(Deficit): \$24,080.23

- On Site Septic
 - Program Fees/FPHS/Other Revenues: \$545,951.85
 - Expenditures: \$608,512.23
 - Surplus/(Deficit): (\$62,560.38)
- Food
 - Program Fees/FPHS/Other Revenues: \$185,822.21
 - FPHS Funding: 160,000 (estimated)
 - Expenditures: \$431,205.97
 - Surplus/(Deficit): (\$85,383.76)
- Other Environmental Health
 - Program Fees/Other Revenues: \$18,784.85
 - FPHS Funding: 279,855.44 (estimated)
 - Expenditures: \$302,292.95
 - Surplus/(Deficit): (\$3,652.66)
- Environmental Water Quality
 - Program Fees/FPHS/Other Revenues: \$206,199.06
 - Expenditures: \$136,260.34
 - Surplus/(Deficit): \$69,858.72
- 2023 HHS EH Department Overall Surplus/(Deficit): (\$105,218.36)

The County structure is becoming ever more increasingly difficult to rely on property taxes and sales taxes to fund all expenditures, with revenues growing year over year at a lesser rate than expenditures. During the preparation of the 2024 budget, facing a large General Fund deficit due to this inherent nature of the revenues & expenditures growth, the BOCC, the Administrator, and Finance staff worked diligently to think in creative ways to reduce the deficit. Even with measures taken, we knew that labor negotiations for represented employees would begin & take effect in 2024, so the full extent of the deficit wouldn't be known at the time of the budget process. One of the decisions made in reducing the budget deficit for the General Fund was to look at General Fund FTE positions that were vacant at that time and recommend some for deferral. County policy requires all approved FTE positions to be fully funded (budgeted) for the entire year, even though we know that won't ever be the case (employee turnover, retirements, etc.). An exception exists that positions may be funded for a portion of the year if specifically designated by the Board of County Commissioners. There was no desire to lay off any current employees, so only vacant positions were considered in this process. HHS EH had 2 vacant positions that were deferred: 1 Environmental Health Specialist & 1 Customer Service Specialist, both within the On Site Septic program.

In 2024 the Environmental Health department had an adopted budget of approximately \$1.6 million. Personnel costs account for about 80% of the budget with the remaining 20% being for supplies & services costs.

The department's total FTE count is 12.28 FTE, which consists of:

- 1 Manager
- 2 Customer Service Specialists
- 7.48 Environmental Health Specialists
- .8 Database Technician
- 1 Water Quality Specialist

The EH department is divided into the following 6 main programs:

- Food – The Clallam County Environmental Health Food Safety and Living Environment Program is responsible for working with the public, local and state organizations, businesses, community partners, food service establishments (FSE's), food service workers and owners or operators of water recreation facilities to protect public health. EH works to prevent the spread of communicable diseases, including foodborne and waterborne illnesses through education, inspection, plan review and permitting responsibilities.

The chart below provides the number of permits & food handler cards issued, inspections completed, and complaints prior to and during the pandemic, as well as a yearly average back to 2013 (or as far back as the statistics have been tracked if after 2013).

Food Program Statistics						
	2019	2020	2021	2022	2023	2013-2023 Average
Food Service Permits Issued (Permanent)	360	334	351	357	395	407
Food Service Permits (Temporary)	219	26	55	152	191	157
Food Service Inspections (permanent and temp)	435	165	119	117	248	455
Food Handler Cards Issued (both in class and on-line)	3,904	2,486	3,055	3,726	3,888	3,454
Food Service Plan Reviews	48	23	29	47	34	29
Food Service Complaints Investigated	51	15	23	32	55	37
Food Service Change in Service or Owner	13	7	14	13	18	14
Foodborne Illnesses/Outbreaks Reported to DOH	0	0	0	0	14/1	1
Fee Waivers Issued for Food	80	37	26	47	77	54

Data Source: Clallam County Environmental Health

Of the 7.48 Environmental Health Specialists' time, 3 FTE are assigned to Food, along with 1 FTE Customer Service Specialist.

- Drinking Water Quality – The Drinking Water Program includes an accredited drinking water lab for nitrate and bacteria testing maintained by an Environmental Health Specialist who also provides well siting and proof of potable water reviews, and water system surveys.

The Clallam County Environmental Health Drinking Water and Laboratory Program is responsible for the regulation of drinking water sources in Clallam County through sanitary surveys, technical assistance, and complaint investigation. The program also operates and manages the County's accredited environmental health water laboratory to provide routine and investigative water testing for public and private water systems in Clallam County. The drinking water program operates under the authority from WAC 246-290, WAC 246-291, WAC 173-50, and RCW 19.27.097.

The chart below provides the number of water availability requests processed and water samples processed by type prior to and during the pandemic.

Drinking Water Quality Program Statistics						
	2019	2020	2021	2022	2023	2013-2023 Average
Water Availability Requests Processed	229	222	261	275	287	209
Water Samples Processed (bact)	1,671	1,541	1,645	1,844	2,965	1,858
Water Samples Processed (nitrate)	171	142	211	284	500	221
Water Samples Processed (fecal)	530	610	779	602	512	773
Water Samples Processed (enterolert)	782	318	192	298	935	730

Data Source: Clallam County Environmental Health

Of the 7.48 Environmental Health Specialists' time, 1 FTE is assigned to Drinking Water.

- **Solid & Hazardous Waste** – The Clallam County Environmental Solid and Hazardous Waste Program is responsible for assisting with, and responding to, solid and hazardous waste issues within Clallam County. There are 13 permitted solid waste facilities in Clallam County. EH enforces solid waste codes with authority by WAC 173-304, WAC 173-350, WAC 173-351, and CCC 41.11.

Routine program activities include, but are not limited to; business assistance, resident assistance, facility inspections, complaint investigations, complaint enforcement, issuance of permits, review of permits, review of new facilities or modification of existing facilities, updating the County website, public outreach and education, working in partnership with Code Enforcement, working in partnership with the septic team, working in partnership with the Sheriff's Department, working in partnership with the Cities of Sequim and Forks, contributing to the Solid Waste Advisory Committee and the development of the Clallam County Solid Waste Management Plan.

Solid & Hazardous Waste Program Statistics						
	2019	2020	2021	2022	2023	2013-2023 Average
Solid Waste Permits Issued- Renewed/Reviewed	13	13	13	13	13	13
Solid Waste Inspections	38	40	39	33	37	51
Solid Waste Complaints Investigated	71	54	50	60	89	56
Complaints Closed					46	
Cases at max fine referred to PAO/HE				2	0	

Data Source: Clallam County Environmental Health

Of the 7.48 Environmental Health Specialists' time, 1 FTE is assigned to Solid & Hazardous Waste.

- **On Site Septic** – The Clallam County Environmental Health Onsite Septic Operation & Maintenance (O&M) Program is responsible for preventing premature failures by normalizing

regular inspections, tracking O&M activity including failures and assisting with various grant tasks. The O&M inspection program is required by WAC 246-272A-0270 and CCC 41.20.170. Each septic system must be inspected annually or every three years, depending on the system.

The Clallam County Environmental Health Onsite Septic Permitting Program is responsible for assuring that septic systems are designed, installed, and maintained in ways that meet State and local standards. Staff receive permits at the EH counter, perform data entry of all permits, soil reports, waivers, complaints from professionals and the public. EH enforces Washington State Administrative Code (WAC) 246-272A and Clallam County Chapter 41.20 onsite septic codes by conducting soil evaluations in the field and reviewing and approving septic permit designs. EH also investigates complaints of sewage surfacing and will send correspondence regarding failures and onsite permitting requirements.

The table below provides the number of permits by type, site registrations by type, complaints investigated, referrals to the Prosecuting Attorney's Office, as well as land divisions/BLA/CUP processed.

On Site Septic Program Statistics						
	2019	2020	2021	2022	2023	2013-2023 Average
On-site Permits	331	323	431	295	301	312
New	215	223	322	192	223	231
Repair	93	90	93	91	61	88
Other	23	10	16	12	17	30
Site Registrations	277	300	374	274	236	249
New SIR	203	228	284	182	180	210
Repair SIR	71	60	65	61	56	64
LDV	2	9	23	30	0	11
On-site Complaints Investigated	61	57	63	31	26	40
OSS Referrals to PAO			3	1	1	2
Land Divisions, BLA, CUP Processed	60	53	75	122	73	69

Data Source: Clallam County Environmental Health

Of the 7.48 Environmental Health Specialists' time, 2.48 FTE are assigned to On Site Septic, as well as the .8 FTE Database Technician.

- Environmental Water Quality – The Clallam County Water Quality Program is responsible for managing reporting and deliverables for several grants, coordinating current work and future steps for the Clallam County PIC program, and for responding to public inquiries and providing guidance related to local water quality concerns, primarily due to pollution.

The Water Quality Specialist 1 FTE is assigned to the Environmental Water Quality program.

- Other Environmental Health – The Environmental Health Administration Program oversees the Environmental Health staffing and program activities. The Environmental Health Director coordinates EH staff and programs. Other Environmental Health programs include emergency preparedness, foundational public health services (FPHS), and vector surveillance.

The 1 FTE Manager and 1 FTE Customer Service Specialist are assigned to the Other Environmental Health program.

Chapter 2: Washington Administrative Codes (WAC's) Clallam County Code (CCC) that Govern Inspections and Fees

The following table details the various Washington Administrative Codes (WAC's) and Clallam County Code (CCC) that pertain to Environmental Health.

Environmental Health Regulations		
Drinking Water	WAC 246-290	Group A Public Water Supplies
	WAC 246-291	Group B Public Water Supplies
Food Safety	WAC 246-215	Food Service
	WAC 246-217	Food Worker Cards
	CCC 41.40	Rules and Regulations Governing Food Service Establishments
On-Site Septic	WAC 246-272A	On-Site Sewage Systems
	CCC 41.20	On-Site Sewage System
Schools	WAC 246-366/366A	EH and Safety Standards for Primary and Secondary Schools
Solid Waste	WAC 173-304	Minimum Functional Standards for Solid Waste Handling
	WAC 173-350	Solid Waste Handling Standards
	WAC 173-351	Criteria for Municipal Solid Waste Landfills
	CCC 41.11	Solid Waste Regulation
Water Recreation	WAC 246-260	Water Recreation Facilities

Data Source: Clallam County Environmental Health

Chapter 3: Fee Amounts and Resulting Program Revenue

RCW 70.05.060 grants each local Board of Health (BOH) supervision over all matters pertaining to the life and health of the people within its jurisdiction, as well as the authority to establish fee schedules for issuing or renewing licenses or permits for such other services as are authorized by the law and the rules of the state board of health, provided that such fees for services shall not exceed the actual cost of providing any such services.

The following table provides a comparison of hourly rates charged for Technical Assistance and other hourly tasks in select comparable counties.

Hourly Rates across select WA Counties		
County	Hourly Rate	Last Updated
Clallam	\$ 93.00	2018
Jefferson	\$ 109.20	2023
Kitsap	\$ 150.00	2023
Skagit	\$ 95.00	2023
Whatcom	\$ 138.00	2023
Mason	\$ 95.00	2023
Pacific	\$ 80.00	2022
Grays Harbor	\$ 105.00	2023
Lewis	\$ 100.00	2023
Cowlitz	\$ 150.00	2022

Data Source: Clallam County Environmental Health

Because each local BOH has the authority to set rates for their jurisdiction, it isn't surprising that hourly rates across counties vary substantially. A standard calculation that utilizes actual staffing standards and costs should be developed to determine the hourly rate(s) to be used. This hourly rate will then be used for any services charged out by the hour and will also be a component of flat-fee charges.

Clallam County has developed a calculation intended to recoup all costs (direct, indirect, capital assets, and general overhead) incurred in providing a service. Failure to include all associated costs in any given methodology will result in a lower fee, as those costs will be absorbed elsewhere in an organization's budget. As will be discussed in chapters 5 and 6, Clallam County's methodology is thorough insofar as it captures all costs associated with a program's operations.

Clallam County staff also perform work for grant-funded projects and other non-fee work, which are reimbursed based on actual costs. Time spent on grant-funded projects and other non-fee work should be taken into account when determining the amount of productive time spent in each program to minimize the chance that a specific program fee will attempt to collect more than the actual cost of providing the service.

Chapter 4: Determining the Number of hours to perform a service

For some programs, fee amounts are partially/fully determined based upon the amount of time it takes to perform the service for which the fee is being charged. Logically, if it takes 2 hours to provide a service, the cost will be more than if it takes 1 hour. Time studies and/or other reviews should be periodically conducted to determine the average time it takes to perform a service.

Conducting a time study involves having staff record the amount of time it takes to perform a task during a pre-determined, limited amount of time. For example, each inspector may record the time it takes to complete each inspection during a week. This data is then used to determine the average amount of time it takes to complete each type of inspection.

To expedite the time collection efforts to fit within the desired timeframe for implementing new fee amounts, Clallam County EH staff reviewed the current fee schedule and compiled a listing of the average amount of time spent on each non-hourly fee item. Theoretically, the 'average time' of each type of service multiplied by the corresponding number of inspections completed during the year should approximately equate to the number of employees multiplied by the 'billable hours' (i.e., the average number of hours an inspector is available to perform inspections).

When we performed this calculation for one of the programs using 2023 statistics, the results indicated that all fee-based work should have been able to be completed within 815 staff hours for all the tests performed for the year, yet the program supports 1 full time employee at 2,080 hours. This is not an unexpected result.

Time studies rarely show 100% of time paid/worked as billable time. Logically, staff taking time off work due to vacation/sick/jury/etc. reduces the number of billable hours available to be worked by staff. Also, in a department such as Environmental Health, employees are skilled in areas other than just their program and may spend time assisting customers at the front counter, compiling Public Records Requests, or assisting other programs in non-billable ways. While the estimates of the average time to complete each service were provided by the employees doing the work, individual services may vary greatly in the amount of time that it takes to perform.

Some work performed by employees is not billable, even within their program. For example, EH receives complaints from the public that must be investigated, but has no revenue associated, unless fines are assessed. Time spent answering general questions and providing information to the public, which is also not billable. And again, as mentioned above, though program fees are the primary activity of the EH department, some productive time is spent on grant-funded and other non-fee work.

Chapter 5: Overview of the Fee Calculation Methodology

Recognizing that different programs/fees may require different calculations, here is an overview of the various options considered in this process:

1. Hourly charge – based on the internal costs (direct costs, indirect costs, capital assets, and general overhead) for that program. Changes in FTE levels, demand for services, and other influencing factors can cause the hourly rate to greatly vary from one year to the next. Some fees, however, are simply based on the amount of time spent performing the service, and an hourly rate provides an easy way to cover costs. This type of calculation can be reviewed annually or periodically and is easier to apply either a CPI % factor to or adjust for overall costs.
2. Per activity charge – based on the internal costs (direct costs, indirect costs, capital assets, and general overhead) to run the program, and is based on the average time spent per activity. This type of calculation splits costs out to each activity in a more direct method than the hourly charge method. However, it is based off prior historical statistics, which can greatly change at any point in time. Also, if efficiencies are gained in the repetition of one of the services/tests, the calculation will ill-proportionally shift fee amounts to the other services/tests.
3. Combination of hourly charge & per quantity charge – proportionately breaks out the wages & benefits according to how many activities performed within a year, with supplies & services evenly distributed across all types & quantities of tests/services, no matter the length of time to complete. As this method is based off prior historical statistics as well, a CPI % factor should be applied.

These calculation options consider all 4 of the applicable cost components that should be used when establishing fees:

1. Direct Costs – means all applicable operational costs including, but not restricted to, salaries, wages, fringe benefits, supplies, and services, incurred by the department to impose the regulation, perform the service, or provide the product for which the fee or charge is being levied.
2. Indirect Costs – means all applicable costs incurred by the department in the provision of managerial, administrative, and general support of those imposing the regulation, performing the service, or providing the product for which the fee or charge is being levied. Because the current programmatic funding of EH includes FPHS funding, this exercise did not contemplate any Department/Program Overhead rate, but if those costs should, in the future, exceed any FPHS or other applicable funding source(s), it should be revisited.
3. Capital Assets - means the annual depreciation expense of those capital assets used by the department to impose the regulation, perform the service, or provide the product for which the fee or charge is being levied.
4. General Overhead - means the expenses not otherwise included in the categories of direct costs, indirect costs, and capital assets but that are incurred by the County to impose the regulation, perform the service, or provide the product for which the fee or charge is being levied. General overhead includes those expenses incurred by central service departments, which provide managerial, administrative, and general support, that are not otherwise charged to the operating departments (Information Technology, Human Resources, Payroll, Accounts Payable, Facilities, etc.).

Fee calculations based on the cost per activity are much more time intensive and complex for the hourly charge calculations. Per activity charge calculations require someone to detail out specific quantities of specific supplies to quantify the cost of supplies used to perform each activity. The cost of services used throughout the year are either activity-specific or are aggregated and then divided by the expected number of activities in the prior year (or the estimated number for the upcoming year). This method is preferred over the hourly charge method for programs that have consistent and repetitive tasks to perform throughout the year.

The following is a very generic, but easy to follow, formula to calculate the cost of providing 1 unit of service (hourly charge). The formula is:

$$\begin{array}{r}
 \text{Cost of 1 'billable' hour of time to perform a service} \\
 + \\
 \text{Cost of direct materials \& services used in 1 hour} \\
 + \\
 \text{1 hour of depreciation of capital assets} \\
 \times \\
 \text{Department/Program Overhead rate (if applicable)} \\
 \times \\
 \text{County Overhead rate} \\
 \times \\
 \text{Number of hours to perform a service} \\
 = \\
 \text{Cost of Providing 1 Unit of Service}
 \end{array}$$

Fee calculations can be performed annually/periodically. However, there are challenges and nuances that impact each component of the fee methodology calculation and can therefore impact the resulting fee amount. These challenges and nuances will be discussed in the next chapter.

Chapter 6: Discussion of the Component Parts

Calculating the cost of 1 'billable' hour of time to perform the service:

At the time the calculation is performed, a Schedule A that shows the loaded payroll cost data (pay and benefits) of all employees who were in the applicable position at the start of the following year is used to calculate the average hourly cost of Program FTE(s). However, because there is expected to be more hours paid to employees than 'billable' hours, the Program needs to estimate how many 'billable' hours per FTE are expected or are expected for the Program as a whole. This involves subtracting holidays and estimating how many hours will be spent on vacation and sick time, in meetings and training, and other work attributable to the service throughout the year. Alternatively, a review of the prior year's statistics or a time study could be utilized to determine the number of billable hours in that period and assume it will remain consistent until the next review is performed.

In the earlier case, if it is expected that an FTE will produce 815 billable hours, the per 'billable' hour cost is 2,080 hours paid divided by 815 billable hours multiplied by the hourly FTE loaded payroll cost. In this example, the multiplier is 2.55 times the hourly FTE loaded payroll cost ($2,080/815=2.56$).

Several things present challenges in accurately calculating the future cost of 1 FTE. They include:

1. If the cost-of-living adjustments (COLA) that will go into effect at the start of the next year is not known at the time the calculation is performed, then a COLA is not factored into the payroll cost.
2. If a new collective bargaining agreement (CBA) is to be implemented in the next year, the impact of the hourly FTE cost may not be yet known.
3. If turnover occurs during the year, it is likely that the exiting employee will be replaced by an employee at a lower step. Because of the unknowns of turnover and recruitment, the potential impact cannot be included in the calculation.
4. Time worked beyond an employee's normal schedule (e.g., overtime) is not included in the average pay since it is budgeted for the BARS section as a whole vs. the employee(s) who work it. Rather than call out specific programs with only 1 FTE that also have overtime budgeted, as opposed to programs with multiple FTE, to remain consistent across programs, overtime is not included.
5. Time spent on yet unknown, future grant-funded and other non-hourly fee work can have an impact on the number of billable hours for an FTE/the FTEs in an entire program.

Calculating the cost of direct supplies & services used in 1 hour:

To perform this part of the calculation, a program must first distinguish between its direct and indirect costs. Direct costs (program-specific costs of supplies & services) are applicable to this portion of the rate. Indirect costs (department-wide costs that aren't attributable to a single program) are recouped through the overhead rate, which is discussed later in this report.

Depending on when the calculation is performed, if actual costs are to be used, the costs are most likely 1 or 2 years old. As a result, cost data should be increased for a one-year CPI change to help make it a more accurate reflection of current & future costs. For example, if the 2024 fees schedule were to be

implemented as of January 1, 2024, calendar year 2022 data would have been the most recent complete year to pull actual data from. In this review of fees, because it will be implemented mid-year, the 2024 budgeted figures have been used.

The CPI adjusted direct costs is divided by the number of direct FTE and then by the 'billable' hours per FTE to calculate the direct materials and services costs used to provide 1 hour of service. Alternatively, if a program estimated 'billable' hours for the entire program, the CPI adjusted direct costs is divided by the overall 'billable' hours to calculate the direct materials and services costs used to provide 1 hour of service.

Calculating the cost of 1 hour of depreciation of capital assets:

The hourly rate is calculated by taking the annual depreciation per program and dividing it by the program's 'billable' hours. The annual depreciation of any capital assets comes from the most recent Fixed Asset Listing prepared by the Auditor's Office. As discussed in relation to calculating direct costs, to implement a new fee at the start of the year, the fee calculation is performed prior to the release of the new Fixed Asset Listing to be presented (for January 1, 2024, the 2023 Fixed Asset Listing wouldn't be released yet). Therefore, the 2022 Fixed Asset Listing data was used when calculating fees to be charged in 2024.

Depreciation is factored into the hourly cost per service to 'even out' the effect of purchasing capital assets over the useful life of the assets, rather than only including them in the year of purchase. Some costs are clearly useful only in the year of expenditure, but assets which are purchased once and used over several years should have their impact on fees spread out over the years that the assets are used for that program.

Calculating the department/program administrative and overhead rate:

The calculation of the overhead rate depends on how a department has set up their accounting structure. There are 3 general methods used within the County General Fund departments, and there are slight variances within each of the 3 general methods that are used by these departments.

The 3 methods are:

1. Department utilizes an administration business unit(s) to record all indirect costs and these costs are not allocated out to the programs within the department,
2. Department utilizes an administration business unit(s) to record all indirect costs and these costs are allocated out to the program within the department, or
3. Department does not utilize an administration business unit and all costs associated with a program are recorded to that program.

EH uses option 1 detailed above. The Other Environmental Services program contains management and other costs that will need to be allocated among the other EH programs if its sources of revenues don't adequately cover these costs. These costs include costs associated with administrative staff (e.g., EH Manager), general administration materials and services (e.g., paper). EH utilizes a separate program and BARS account section to capture these costs. For this review, there is sufficient FPHS revenue covering the unfunded costs of this program, so no Department/Program Administrative and Overhead is being calculated. If in the future there are unfunded costs within this program, these costs will then be allocated to each of the other programs for the purpose of calculating the fee schedule fees.

The overhead calculation for EH is:

$$\begin{array}{c} \text{EH Other Environmental Health unfunded costs} \\ / \\ \text{Remaining Program costs (estimated direct costs)} \\ = \\ \text{Overhead Rate} \end{array}$$

County Cost Allocation rate:

The intent of this rate is to allocate costs incurred at the County-wide level in imposing regulations, performing services, and providing products when those costs are not directly paid for by a department, but are paid for through another County General Fund Department. This rate is calculated by the Auditor's Office each year.

Like the capital asset rate, these costs are not recorded within the program charging the fee for service and revenue is not transferred back to the central service department providing the central service. Recognizing that the costs of running the programs of the EH department go beyond the costs incorporated in their budget, it is important to keep in mind that if EH programs overall were to charge program fees that fully support all programmatic & central service costs, the department's budget would show a surplus each year. This does not mean that EH would be charging more than it costs to perform that service, as again, the department budget would not show the central service expenditures.

Once fees for individual services were calculated, a comparison of the new calculations to the pre-existing fees was made. Some fee items had decreased in price, which wasn't in line with the intent of this process but is shown in the 'Option A' & 'Option B' sets of fees. For the 'Option C' set of fees, if a fee was calculated to decrease, the original fee was used. For instance, the Administrative Hearing fee cost of \$331 was calculated to \$203 under the Hourly Charge calculation. Rather than decreasing the cost of that fee, it was left at \$331 under 'Option C'.

Some of the fee items had increased substantially in price, which could be a shock to that program's customers. If a fee was calculated to increase, an increase factor of 50% or 75% of the original fee was applied to limit how much the fee could increase. For instance, the Public or Private Water Availability fee cost of \$70 was calculated to \$161 under the Hourly Charge calculation. Rather than increasing the fee by 130%, a 50% increase factor was applied to limit the increase to no more than 50% of the existing fee (a \$35 increase) and shows as \$105 under 'Option C'.

As future fee schedules are evaluated and updated, these variances should be required less and less and the process should become more and more objective, rather than subjective.

Chapter 7: Summary

This report sets out to explain how the County determines what dollar amount to assign to the different fees for services and how this process can result in fee amounts changing from one year to the next beyond an amount that can be explained by inflation.

Labor and materials/services costs, the depreciation of capital assets, and overhead costs are all included in the fee calculation methodology. The cost of these expenses is calculated on a 'billable' hourly rate and then multiplied based on the number of hours required to provide the specific service. Then, increased by the overhead rates.

Changes from one year to the next can occur for multiple reasons. Generally, changes in labor costs and the relationship between direct and indirect costs are the primary reasons. Employee turnover can cause a reduction in labor costs when more tenured employees leave employment and are replaced by individuals at entry level pay rates. Conversely, labor rates can rise as employees move up the pay scale.

Lastly, the number of hours determined to be necessary to perform the service and the ratio of hours spent in direct service vs. indirect activities impacts the results of the fee calculation.

Please see the attached HHS Environmental Health Fee Schedule comparison page that shows: the currently adopted 2024 fee schedule, 'Option A' Simple Hourly-based Charge fees, 'Option B' Hourly Charge fees, and 'Option C' Combo fees. Also attached is a comparison of the 2023 actual revenues & expenditures, the currently adopted 2024 budgeted revenues & expenditures, and the annual impact of each of the Options. These two sets of comparisons are meant to be viewed together, to give you both the micro and the macro impacts of each of the suggested Options.

FEE SCHEDULE UPDATE:
IMPACT OF REVENUE
PROJECTIONS

HHS Environmental Health Fee Schedule Update: Annual Impact of Revenue Projections

	Drinking Water Quality	Solid & Hazardous Waste	On Site Services	Food	Other Environmental Health	Environmental Water Quality	Total
2023 Actuals:							
Total Revenue	\$ 129,854	\$ 123,045	\$ 545,952	\$ 345,822	\$ 298,640	\$ 206,119	\$ 1,649,432
Expenditures	\$ 177,415	\$ 98,964	\$ 608,512	\$ 431,206	\$ 302,293	\$ 136,260	\$ 1,754,651
Surplus(Deficit)	\$ (47,561)	\$ 24,080	\$ (62,560)	\$ (85,384)	\$ (3,653)	\$ 69,859	\$ (105,218)

Current 2024 Budget:							
Program Revenue	\$ 100,000	\$ 28,500	\$ 606,400	\$ 196,000	\$ -	\$ -	\$ 930,900
FPHS Revenue	\$ 24,886	\$ 5,379	\$ 3,342	\$ 165,325	\$ 158,937	\$ 265	\$ 358,134
Non-Fee Revenue	\$ 1	\$ 132,000	\$ 30,000	\$ 5,000	\$ 50,978	\$ 61,500	\$ 279,479
Total Revenue	\$ 124,887	\$ 165,879	\$ 639,742	\$ 366,325	\$ 209,915	\$ 61,765	\$ 1,568,513
Expenditures	\$ 182,338	\$ 133,849	\$ 512,465	\$ 435,788	\$ 204,474	\$ 130,793	\$ 1,599,707
Surplus(Deficit)	\$ (57,451)	\$ 32,030	\$ 127,276	\$ (69,463)	\$ 5,441	\$ (69,027)	\$ (31,194)

2024 Budget with Option A:							
Additional Program Revenue	\$ 86,595	\$ 8,172	\$ (24,736)	\$ 36,293	\$ -	\$ -	\$ 106,324
Program Revenue	\$ 100,000	\$ 28,500	\$ 606,400	\$ 196,000	\$ -	\$ -	\$ 930,900
FPHS Revenue	\$ 24,886	\$ 5,379	\$ 3,342	\$ 165,325	\$ 158,937	\$ 265	\$ 358,134
Non-Fee Revenue	\$ 1	\$ 132,000	\$ 30,000	\$ 5,000	\$ 50,978	\$ 61,500	\$ 279,479
Total Revenue	\$ 211,482	\$ 174,051	\$ 615,006	\$ 402,618	\$ 209,915	\$ 61,765	\$ 1,674,837
Expenditures	\$ 182,338	\$ 133,849	\$ 512,465	\$ 435,788	\$ 204,474	\$ 130,793	\$ 1,599,707
Surplus(Deficit)	\$ 29,144	\$ 40,202	\$ 102,540	\$ (33,170)	\$ 5,441	\$ (69,027)	\$ 75,130

2024 Budget with Option B:							
Additional Program Revenue	\$ 124,864	\$ 5,608	\$ (71,576)	\$ 167,763	\$ -	\$ -	\$ 226,659
Program Revenue	\$ 100,000	\$ 28,500	\$ 606,400	\$ 196,000	\$ -	\$ -	\$ 930,900
FPHS Revenue	\$ 24,886	\$ 5,379	\$ 3,342	\$ 165,325	\$ 158,937	\$ 265	\$ 358,134
Non-Fee Revenue	\$ 1	\$ 132,000	\$ 30,000	\$ 5,000	\$ 50,978	\$ 61,500	\$ 279,479
Total Revenue	\$ 249,751	\$ 171,487	\$ 568,166	\$ 534,088	\$ 209,915	\$ 61,765	\$ 1,795,172
Expenditures	\$ 182,338	\$ 133,849	\$ 512,465	\$ 435,788	\$ 204,474	\$ 130,793	\$ 1,599,707
Surplus(Deficit)	\$ 67,413	\$ 37,638	\$ 55,700	\$ 98,300	\$ 5,441	\$ (69,027)	\$ 195,465

2024 Budget with Option C:							
Additional Program Revenue	\$ 102,143	\$ 5,127	\$ -	\$ 78,282	\$ -	\$ -	\$ 185,552
Program Revenue	\$ 100,000	\$ 28,500	\$ 606,400	\$ 196,000	\$ -	\$ -	\$ 930,900
FPHS Revenue	\$ 24,886	\$ 5,379	\$ 3,342	\$ 165,325	\$ 158,937	\$ 265	\$ 358,134
Non-Fee Revenue	\$ 1	\$ 132,000	\$ 30,000	\$ 5,000	\$ 50,978	\$ 61,500	\$ 279,479
Total Revenue	\$ 227,030	\$ 171,006	\$ 639,742	\$ 444,607	\$ 209,915	\$ 61,765	\$ 1,754,065
Expenditures	\$ 182,338	\$ 133,849	\$ 512,465	\$ 435,788	\$ 204,474	\$ 130,793	\$ 1,599,707
Surplus(Deficit)	\$ 44,692	\$ 37,157	\$ 127,276	\$ 8,819	\$ 5,441	\$ (69,027)	\$ 154,358

2024 Budget with Option C (+ Deferred EH Spec Position):							
Additional Program Revenue	\$ 102,143	\$ 5,127	\$ -	\$ 78,282	\$ -	\$ -	\$ 185,552
Program Revenue	\$ 100,000	\$ 28,500	\$ 606,400	\$ 196,000	\$ -	\$ -	\$ 930,900
FPHS Revenue	\$ 24,886	\$ 5,379	\$ 3,342	\$ 165,325	\$ 158,937	\$ 265	\$ 358,134
Non-Fee Revenue	\$ 1	\$ 132,000	\$ 30,000	\$ 5,000	\$ 50,978	\$ 61,500	\$ 279,479
Total Revenue	\$ 227,030	\$ 171,006	\$ 639,742	\$ 444,607	\$ 209,915	\$ 61,765	\$ 1,754,065
Expenditures	\$ 182,338	\$ 133,849	\$ 612,666	\$ 435,788	\$ 204,474	\$ 130,793	\$ 1,699,908
Surplus(Deficit)	\$ 44,692	\$ 37,157	\$ 27,075	\$ 8,819	\$ 5,441	\$ (69,027)	\$ 54,157

<i>County Indirect Costs (Building rent, Utilities, IT support staff, HR support staff, Accounts Payable, Finance, etc.):</i>	\$ 49,961	\$ 36,675	\$ 167,871	\$ 119,406	\$ 56,026	\$ 35,837	\$ 465,775
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County General Fund Dependence:	\$ 5,268	\$ (482)	\$ 140,795	\$ 110,587	\$ 50,585	\$ 104,864	\$ 411,618
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FEE SCHUDULE OPTIONS

HHS Environmental Health Fee Schedule Options:

HHS Environmental Health Fee Schedule Options:		Option A		Option B		Option C	
		Simple Hourly-based Increase		Hourly Charge Per Option Program		Combo Option (with 50 & 75% increase limits)	
Current Fee Schedule	\$ 93		\$ 107				
		Difference		Difference		75% inc limit	Difference
General Environmental Health							
Technical Assistance	\$ 93	\$ 107	\$14	\$ 68	(\$25)	\$ 107	\$14
Waiver Request							
Local Code Only	\$ 125	\$ 268	\$143	\$ 169	\$44	\$ 169	\$44
State Code	\$ 185	\$ 321	\$136	\$ 203	\$18	\$ 203	\$18
Appeals to the Board of Health for Determination	\$ 265	\$ 535	\$270	\$ 339	\$74	\$ 339	\$74
Administrative Conference	\$ 199	\$ 321	\$122	\$ 203	\$4	\$ 203	\$4
Administrative Hearing	\$ 331	\$ 321	(\$10)	\$ 203	(\$128)	\$ 331	\$0
Environmental Health Land Use Proposal Fees							
		Difference		Difference		75% inc limit	Difference
Site Evaluations	\$ 397	\$ 428	\$31	\$ 352	(\$45)	\$ 397	\$0
Administrative Fee	\$ 93	\$ 107	\$14	\$ 88	(\$5)	\$ 107	\$14
Land Use Technical Review Fee	\$ 132	\$ 214	\$82	\$ 176	\$44	\$ 214	\$82
Land Division Seasonal Water Table Observation	\$ 465	\$ 535	\$70	\$ 440	(\$25)	\$ 535	\$70
Final Plan Review for Signature	\$ 159	\$ 214	\$55	\$ 176	\$17	\$ 176	\$17
On-Site Septic Program							
		Difference		Difference		75% inc limit	Difference
Site Registration	\$ 397	\$ 428	\$31	\$ 352	(\$45)	\$ 397	\$0
Construction Permit							
Individual							
Conventional	\$ 424	\$ 482	\$58	\$ 396	(\$28)	\$ 424	\$0
Alternative	\$ 503	\$ 535	\$32	\$ 440	(\$63)	\$ 503	\$0
Owner Installed	\$ 569	\$ 642	\$73	\$ 528	(\$41)	\$ 569	\$0
Commercial	\$ 569	\$ 642	\$73	\$ 528	(\$41)	\$ 569	\$0
Community	\$ 569	\$ 642	\$73	\$ 528	(\$41)	\$ 569	\$0
Repair Permit							
Individual - Conventional or Alternative System	\$ 239	\$ 321	\$82	\$ 264	\$25	\$ 264	\$25
Commercial	\$ 569	\$ 321	(\$248)	\$ 264	(\$305)	\$ 569	\$0
Community	\$ 569	\$ 321	(\$248)	\$ 264	(\$305)	\$ 569	\$0
Tank Placement Only	\$ 239	\$ 214	(\$25)	\$ 176	(\$63)	\$ 239	\$0
Expansion of Existing System	\$ 384	\$ 428	\$44	\$ 352	(\$32)	\$ 384	\$0
Vault Toilet or Waterless System	\$ 239	\$ 321	\$82	\$ 264	\$25	\$ 264	\$25
Re-inspection Fee	\$ 186	\$ 321	\$135	\$ 264	\$78	\$ 264	\$78
Services							
Operation & Maintenance							
Annual O&M Fee	\$ 13	\$ 13	\$0	\$ 13	\$0	\$ 13	\$0
System Status Report Review Fees							
Electronic Submission-Gov't Action	\$ 46	\$ 214	\$168	\$ 176	\$130	\$ 81	\$35
Paper Submission-Gov't Action	\$ 56	\$ 214	\$158	\$ 176	\$120	\$ 98	\$42
Return Fee for Incomplete Report	\$ 43	\$ 214	\$171	\$ 176	\$133	\$ 75	\$32
Seasonal Water Table Observations	\$ 465	\$ 535	\$70	\$ 440	(\$25)	\$ 535	\$70
Permit Re-design	\$ 132	\$ 214	\$82	\$ 176	\$44	\$ 176	\$44
On-site Sanitary Surveys	\$ 185	\$ -	(\$185)	\$ -	(\$185)	\$ 185	\$0
Septic System Decommissioning Certification	\$ 93	\$ 214	\$121	\$ 176	\$83	\$ 163	\$70
Sewage Installers Certification							
Sewage System Installer Annual Fee	\$ 317	\$ 535	\$218	\$ 440	\$123	\$ 440	\$123
Site Installer Annual Fee	\$ 159	\$ 535	\$376	\$ 440	\$281	\$ 278	\$119
Septic Tank Pumpers Certification							
Septic Pumper Annual Fee	\$ 317	\$ 642	\$325	\$ 528	\$211	\$ 528	\$211
Operation & Maintenance Specialists Certification							
Examination	\$ 199						
O&M Specialists Fee	\$ 317	\$ 642	\$325	\$ 528	\$211	\$ 528	\$211

HHS Environmental Health Fee Schedule Options:

HHS Environmental Health Fee Schedule Options:			Option A		Option B		Option C				
Current Fee Schedule	\$	93	Simple Hourly-based		Hourly Charge	Per	Combo Option				
			Increase	\$			107	Option	Program	(with 50 & 75% increase limits)	
			Difference		Difference		50% inc limit	Difference			
Solid Waste Program											
Plan Review for New Application	\$	930	\$	1,070	\$140	\$	886	(\$44)	\$	1,070	\$140
Municipal Solid Waste Landfill (MSWLF)											
MSWLF Annual Permit	\$	7,935	\$	8,560	\$625	\$	7,087	(\$848)	\$	7,935	\$0
MSWLF Closure Permit	\$	9,919	\$	10,700	\$781	\$	8,858	(\$1,061)	\$	9,919	\$0
MSWLF Post Closure Permit Annual Fee	\$	3,968	\$	4,280	\$312	\$	3,543	(\$425)	\$	3,968	\$0
Recycling	\$	926	\$	1,070	\$144	\$	886	(\$40)	\$	926	\$0
Composting	\$	1,852	\$	2,140	\$288	\$	1,772	(\$80)	\$	1,852	\$0
Land Application	\$	926	\$	1,070	\$144	\$	886	(\$40)	\$	926	\$0
Anaerobic Digester	\$	926	\$	1,070	\$144	\$	886	(\$40)	\$	926	\$0
Energy Recovery and Incineration	\$	926	\$	1,070	\$144	\$	886	(\$40)	\$	926	\$0
Intermediate Solid Waste Material Recovery Facility											
Intermediate Solid Waste Facility Transfer Station											
TS Handling <5,000 tons/year	\$	926	\$	2,675	\$1,749	\$	2,215	\$1,289	\$	1,389	\$463
TS Handling >5,000 tons/year	\$	3,703	\$	4,280	\$577	\$	3,543	(\$160)	\$	3,703	\$0
Piles Used for Storage or Treatment	\$	463	\$	1,070	\$607	\$	886	\$423	\$	695	\$232
Surface Impoundments and Tanks	\$	463	\$	1,070	\$607	\$	886	\$423	\$	695	\$232
Waste Tire Storage and Transportation	\$	463	\$	1,070	\$607	\$	886	\$423	\$	695	\$232
Moderate Risk Waste Handling Facility	\$	1,852	\$	2,675	\$823	\$	2,215	\$363	\$	2,215	\$363
Satellite Moderate Risk Waste Handling Facility	\$	278	\$	535	\$257	\$	443	\$165	\$	417	\$139
Limited Purpose Landfill											
Limited Purpose Landfill Annual Permit	\$	4,629	\$	5,350	\$721	\$	4,429	(\$200)	\$	4,629	\$0
Limited Purpose Landfill Closure Permit	\$	6,613	\$	7,490	\$877	\$	6,201	(\$412)	\$	6,613	\$0
Limited Purpose Landfill Post Closure Permit	\$	2,777	\$	3,210	\$433	\$	2,658	(\$119)	\$	2,777	\$0
Inert Waste Landfill	\$	2,777	\$	3,210	\$433	\$	2,658	(\$119)	\$	2,777	\$0
Permit Exempt Facilities Which Require Review	\$	370	\$	428	\$58	\$	354	(\$16)	\$	370	\$0
Other Solid Waste Facilities or Activities	\$	93	\$	107	\$14	\$	89	(\$4)	\$	107	\$14
Late Solid Waste Permit Fee											
Penalty Fee											
Secure Medicine Return Program	No longer in effect due to statewide program										
			Difference		Difference		50% inc limit	Difference			
Proposed Food Safety Program											
Annual FSE											
Risk Category 1											
Seating 0-25	\$	278	\$	214	(\$64)	\$	294	\$16	\$	294	\$16
Seating 26-50	\$	343	\$	268	(\$76)	\$	367	\$24	\$	367	\$24
Seating 50+	\$	417	\$	321	(\$96)	\$	441	\$25	\$	441	\$25
Risk Category 2											
Seating 0-25	\$	343	\$	321	(\$22)	\$	441	\$98	\$	441	\$98
Seating 26-50	\$	408	\$	428	\$20	\$	588	\$180	\$	588	\$180
Seating 50+	\$	482	\$	535	\$54	\$	735	\$254	\$	722	\$241
Risk Category 3											
Seating 0-25	\$	432	\$	535	\$103	\$	735	\$303	\$	648	\$216
Seating 26-50	\$	475	\$	642	\$167	\$	881	\$406	\$	713	\$238
Seating 50+	\$	509	\$	749	\$240	\$	1,028	\$519	\$	764	\$255
Catering Stand Alone	\$	185	\$	428	\$243	\$	588	\$403	\$	278	\$93
Catering Added to FSE	\$	278	\$	214	(\$64)	\$	294	\$16	\$	294	\$16
Satellite Kitchens (Schools, etc.)	\$	139	\$	107	(\$32)	\$	147	\$8	\$	147	\$8
Mobile Unit			\$	428	\$428	\$	588	\$588	\$	-	\$0
Temporary Permit											
Temporary Event Low Risk (one event, up to 21 consec	\$	33	\$	80	\$47	\$	110	\$77	\$	50	\$17
Temporary Event High Risk (one event, up to 21 consec	\$	132	\$	161	\$29	\$	220	\$88	\$	198	\$66
Recurring Temporary Event low risk (same menu, up to 6	\$	33	\$	107	\$74	\$	147	\$114	\$	50	\$17
Recurring Temporary Event high risk (same menu, up to 6	\$	132	\$	214	\$82	\$	294	\$162	\$	198	\$66
Temporary Farmers Market/Demonstrators Low Risk	\$	185	\$	107	(\$78)	\$	147	(\$38)	\$	185	\$0
Temporary Farmers Market/Demonstrators High Risk	\$	185	\$	214	\$29	\$	294	\$109	\$	278	\$93

HHS Environmental Health Fee Schedule Options:

		Option A		Option B		Option C	
		Simple Hourly-based Increase		Hourly Charge Option	Per Program	Combo Option (with 50 & 75% increase limits)	
Current Fee Schedule		\$ 93		\$ 107			
Other Food Fees							
Late Annual Fee 1-30 days after date due		\$	- \$0	\$	- \$0	\$	- \$0
Late Annual Fee 31+ days after date due		\$	- \$0	\$	- \$0	\$	- \$0
Temporary Permit Received w/in 10 business days of event		\$	- \$0	\$	- \$0	\$	- \$0
NEW 501©3		\$	- \$0	\$	- \$0	\$	- \$0
Re-inspection Fee		\$	321 \$321	\$	441 \$441	\$	- \$0
Operating without a Permit							
Food Worker Card							
Food Worker Card-Copy							
Plan Review, minimum 6 hrs, billed hrly afterwards		\$	166	\$	881 \$715	\$	249 \$83
		Difference		Difference		50% inc limit	Difference
Current Food Safety Program							
Restaurants							
0-25 Seats		\$	278	\$	159 (\$119)	\$	278 \$0
26-50 Seats		\$	408	\$	478 \$70	\$	478 \$70
51-100 Seats		\$	463	\$	637 \$174	\$	637 \$174
More than 100 Seats		\$	555	\$	796 \$241	\$	796 \$241
Cocktail Lounge		\$	132	\$	- (\$132)	\$	132 \$0
Catering							
Off-site by Restaurant		\$	185	\$	796 \$611	\$	278 \$93
Stand Alone		\$	278	\$	796 \$518	\$	417 \$139
Institutional Facilities							
Schools							
Main Kitchen		\$	185	\$	796 \$611	\$	278 \$93
Satellite Kitchen		\$	93	\$	637 \$544	\$	140 \$47
Jail Kitchen		\$	185	\$	637 \$452	\$	278 \$93
Limited Food Services							
B&B, Taverns, etc.		\$	185	\$	637 \$452	\$	278 \$93
Temporary Special Events							
PHF Foods		\$	132	\$	478 \$346	\$	198 \$66
Non-PHF Foods		\$	33	\$	319 \$286	\$	50 \$17
Late Application Fee							
Farmers' Market Vendor		\$	185	\$	319 \$134	\$	278 \$93
Large Event Permit (4+ vendors)		\$	140	\$	319 \$179	\$	210 \$70
Groceries							
0-3 Check Stands		\$	278	\$	159 (\$119)	\$	278 \$0
4 or More Check Stands		\$	370	\$	159 (\$211)	\$	370 \$0
Grocery with Food							
Meat		\$	93	\$	478 \$385	\$	140 \$47
Bakery		\$	93	\$	478 \$385	\$	140 \$47
Fish		\$	93	\$	478 \$385	\$	140 \$47
Deli		\$	185	\$	637 \$452	\$	278 \$93
Espresso		\$	93	\$	478 \$385	\$	140 \$47
Community Kitchen		\$	93	\$	159 \$66	\$	140 \$47
Penalty Fee							
Re-inspection		\$	186	\$	319 \$133	\$	279 \$93
Late Fees							
1 month delinquent							
2 months delinquent							
Food Handler Cards*							
New		\$	10	\$	10 \$0	\$	10 \$0
Duplicate		\$	5	\$	5 \$0	\$	5 \$0

HHS Environmental Health Fee Schedule Options:

		Option A		Option B		Option C	
		Simple Hourly-based Increase		Hourly Charge Option	Per Program	Combo Option (with 50 & 75% increase limits)	
Current Fee Schedule	\$ 93		\$ 107				
Plan Review							
Complex menu	\$ 278	\$ 428	\$150	\$ 637	\$359	\$ 417	\$139
Non-complex menu	\$ 159	\$ 428	\$269	\$ 637	\$478	\$ 239	\$80
PHF limited	\$ 132	\$ 428	\$296	\$ 637	\$505	\$ 198	\$66
Non-PHF limited menu	\$ 93	\$ 428	\$335	\$ 637	\$544	\$ 140	\$47
Change in Ownership		\$ 428	\$428	\$ 637	\$637	\$ -	\$0
		Difference		Difference		50% inc limit	Difference
Laboratory Services and Drinking Water Program							
Water Testing							
Bacteria Presence/Absence	\$ 23	\$ 26	\$3	\$ -	(\$23)		(\$23)
Coliform-Colilert 18	\$ 23	\$ 26	\$3	\$ 47	\$24	\$ 41	\$18
Coliform-Colilert 24	\$ 23	\$ 26	\$3	\$ 11	(\$12)	\$ 21	(\$2)
Total Coliform/E. coli count	\$ 35	\$ 40	\$5	\$ 60	\$25	\$ 49	\$14
E Coli	\$ 35	\$ 40	\$5	\$ 60	\$25	\$ 49	\$14
Enterococcus (Beach)	\$ 40	\$ 46	\$6	\$ 60	\$20	\$ 49	\$9
Bacterial retest	\$ 18	\$ 21	\$3	\$ 47	\$29	\$ 21	\$3
Fecal coliform	\$ 30	\$ 35	\$5	\$ 71	\$41	\$ 55	\$25
Nitrate	\$ 30	\$ 35	\$5	\$ 28	(\$2)	\$ 31	\$1
After Hours/Weekend Surcharge				\$ 429	\$429	\$ 429	\$429
Water Availability (GMA Requirement)							
Public or Private	\$ 70	\$ 80	\$10	\$ 161	\$91	\$ 105	\$35
Alternative Water System Plan Review (Rainwater Catch	\$ 200	\$ 214	\$14	\$ 429	\$229	\$ 300	\$100
Public Water System Plan Review							
Plan Review	\$ 93	\$ 107	\$14	\$ 214	\$121	\$ 107	\$14
Well Site Inspection	\$ 278	\$ 321	\$43	\$ 643	\$365	\$ 417	\$139
Water System Sanitary Survey							
Private Individual Well	\$ 242	\$ 278	\$36	\$ 536	\$294	\$ 363	\$121
Public Water System	\$ 460	\$ 529	\$69	\$ 1,822	\$1,362	\$ 690	\$230
		Difference		Difference		50% inc limit	Difference
Living Environment Program							
Swimming Pools/Spas Permit							
Open All Year	\$ 317	\$ 428	\$111	\$ 267	(\$50)	\$ 317	\$0
Seasonal	\$ 231	\$ 321	\$90	\$ 200	(\$31)	\$ 231	\$0
Each Additional Pool/Spa	\$ 93	\$ 107	\$14	\$ 67	(\$26)	\$ 93	\$0
Plan Review							
Schools							
Plan Review	\$ 93	\$ 321	\$228	\$ 200	\$107	\$ 321	\$228
Safety Inspections	\$ 93	\$ 214	\$121	\$ 133	\$40	\$ 214	\$121
Food Preparation Facilities	\$ 93	\$ 107	\$14	\$ 67	(\$26)	\$ 107	\$14
Drug Lab Clean up							
Sampling for Meth Contamination	\$ 93	\$ 107	\$14	\$ 67	(\$26)	\$ 107	\$14
Meth Cleanup Plan Review	\$ 93	\$ 107	\$14	\$ 67	(\$26)	\$ 107	\$14
Meth Habitation Determination	\$ 93	\$ 107	\$14	\$ 67	(\$26)	\$ 107	\$14

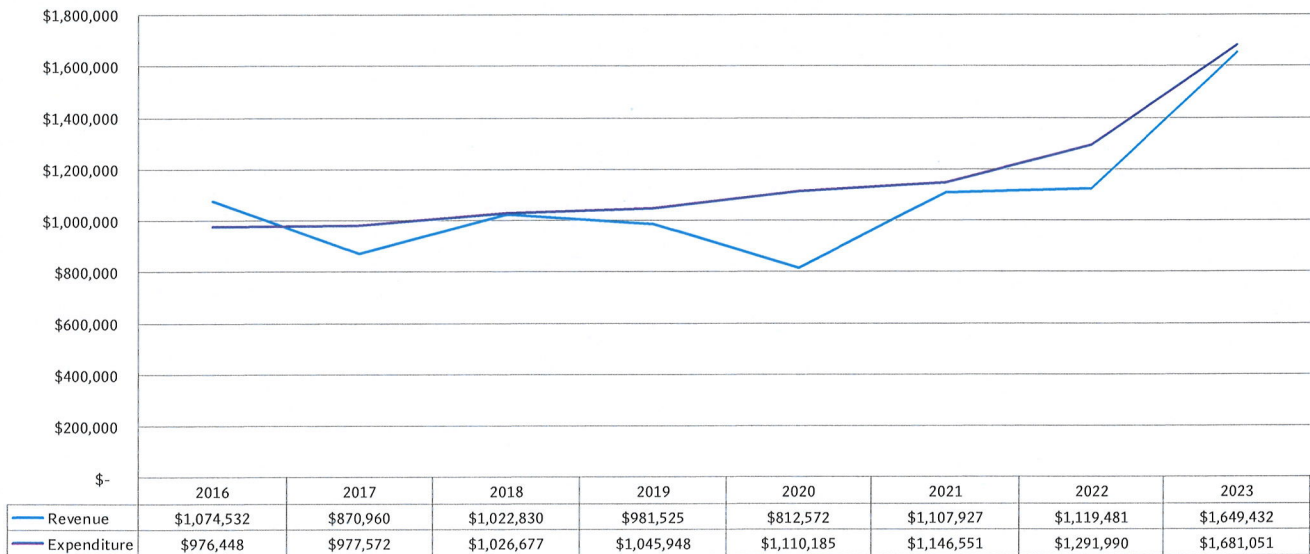
ENVIRONMENTAL HEALTH FEE SCHEDULE REVIEW

Environmental Health Fee Schedule Review

Jen Garcelon, REHS, MPH
Environmental Health Director
February 20, 2024

Background on the Environmental Health Budget

EH Revenue and Expenditure 2016-2023

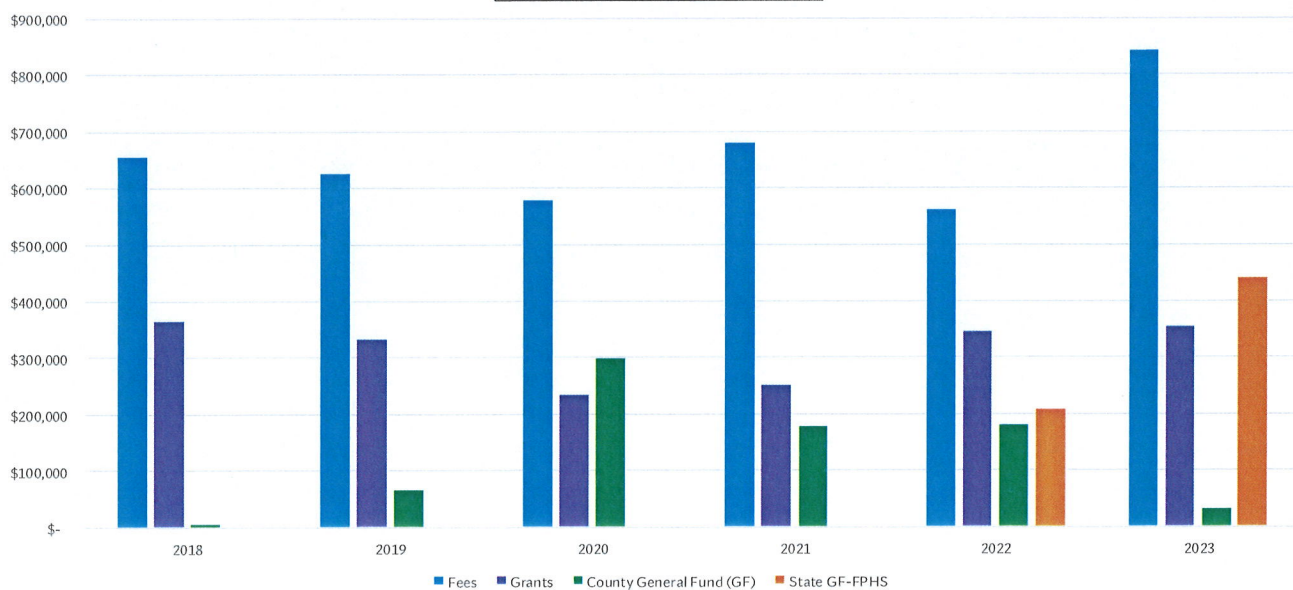


Revenues in this graph include program fees, grants, interdepartmental funds, and fines. Does not include County General Fund.

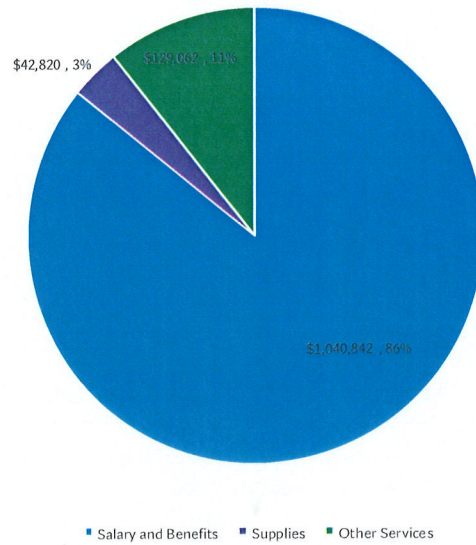
The Environmental Health Budget consists of a few **revenue** sources

- Fees from EH program activities
 - Grants
 - County General Fund
 - State Foundational Public Health Funds (FPHS)-EH started to receive in 2022
 - Other Small Streams-Intergovernmental and Fines
-

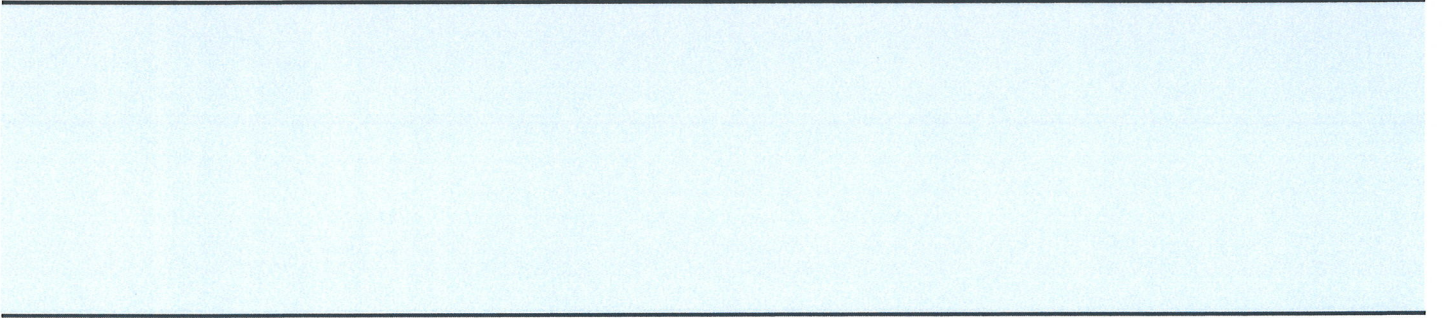
EH Revenue Sources 2018-2023



Average Expenditure 2018-2023



Environmental Health Fee Review



RCW [70.05.060](#)

Powers and duties of local board of health

Each local board of health shall have supervision over all matters pertaining to the preservation of the life and health of the people within its jurisdiction and shall:

- (1) Enforce through the local health officer or the administrative officer appointed under RCW [70.05.040](#), if any, the public health statutes of the state and rules promulgated by the state board of health and the secretary of health;
- (2) Supervise the maintenance of all health and sanitary measures for the protection of the public health within its jurisdiction;
- (3) Enact such local rules and regulations as are necessary in order to preserve, promote and improve the public health and provide for the enforcement thereof;
- (4) Provide for the control and prevention of any dangerous, contagious or infectious disease within the jurisdiction of the local health department;
- (5) Provide for the prevention, control and abatement of nuisances detrimental to the public health;
- (6) Make such reports to the state board of health through the local health officer or the administrative officer as the state board of health may require; and
- (7) Establish fee schedules for issuing or renewing licenses or permits or for such other services as are authorized by the law and the rules of the state board of health: PROVIDED, That such fees for services shall not exceed the actual cost of providing any such services

Timeline to Update EH Fees

1st BOH Meeting

- We are here
- Discuss major changes in latest update
- Overview process

2nd BOH Meeting

- Draft fee schedule presented
- BOH discussion
- Call for public hearing

3rd BOH Meeting

- Public Hearing
 - BOH Discussion
 - Next steps
 - Vote
 - Recommend Changes for next meeting
-

State Mandated EH Programs

Program	Code	Name
Drinking Water	WAC 246-290	Group A Public Water Supplies
	WAC 246-291	Group B Public Water Systems
Food Safety	WAC 246-215	Food Service
	WAC 246-217	Food Worker Cards
	CCC 41.40	Rules and Regulations Governing Food Service Establishments
On-Site Septic	WAC 246-272A	On-Site Sewage Systems
	CCC 41.20	On-Site Sewage System
Schools	WAC 246-366/366A	EH and Safety Standards for Primary and Secondary Schools
Solid Waste	WAC 173-304	Minimum Functional Standards for Solid Waste Handling
	WAC 173-350	Solid Waste Handling Standards
	WAC 173-351	Criteria for Municipal Solid Waste Landfills
	CCC 41.11	Solid Waste Regulations
Water Recreation	WAC 246-260	Water Recreation Facilities

The last major overhaul of the Environmental Health Fee Schedule Ordinance was in 2017. At that time, the hourly rate changed from \$81 to \$93; a 15% increase.

Prior to 2017, the fees were changed in 2011. In 2021, the BOH added the new O&M Fee.

The process to review the fee increases include

- Review of other counties' hourly rate
 - Confirmation of the average time it takes to conduct fee activities
 - Review of revenues and expenditures by EH Program
 - Coordination with CFO's Office
-

Other Local Health Jurisdictions'
Hourly Rates

Small/Medium Sized LHJ	Hourly Rate	Last Update
Clallam	\$93.00	2018
Cowlitz	\$150.00	2022
Grays Harbor	\$105.00	2023
Island	\$113.00	2024
Jefferson	\$116.47	2024
Kitsap	\$150.00	2023
Lewis	\$100.00	2023
Mason	\$95.00	2023
Pacific	\$80.00	2022
Skagit	\$95.00	2023
Whatcom	\$138.00	2023
Large LHJs		
Tacoma-Pierce	\$204.00	2024
Seattle-King	\$230.00	2023
Snohomish	\$205.00	2022
Spokane	\$160.00	2024
Clark	\$136.00	2022
Thurston	\$250.00	2024

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Drinking Water Lab									
Revenue	\$100,163	\$123,437	\$108,522	\$108,034	\$117,139	\$90,648	\$79,031	\$84,347	\$134,637
Expenditure	\$104,866	\$131,939	\$109,163	\$119,509	\$118,845	\$117,068	\$127,868	\$130,381	\$153,390
Difference	\$(4,703)	\$(8,502)	\$(641)	\$(11,475)	\$(1,706)	\$(26,420)	\$(48,837)	\$(46,034)	\$(18,753)
Solid Hazardous Waste									
Revenue	\$129,510	\$80,823	\$76,165	\$76,135	\$99,382	\$73,388	\$75,831	\$80,867	\$123,844
Expenditure	\$118,948	\$74,501	\$66,237	\$58,574	\$71,011	\$71,990	\$77,972	\$79,836	\$98,964
Difference	\$10,562	\$6,322	\$9,928	\$17,561	\$28,371	\$1,398	\$(2,141)	\$1,031	\$24,880
Onsite Services and Water Quality									
Revenue	\$563,305	\$707,270	\$506,333	\$646,093	\$560,980	\$437,485	\$591,910	\$483,091	\$742,071
Expenditure	\$643,605	\$402,862	\$413,420	\$470,976	\$478,605	\$536,024	\$530,841	\$570,910	\$744,773
Difference	\$(80,300)	\$304,408	\$92,913	\$175,117	\$82,375	\$(98,539)	\$61,069	\$(87,819)	\$(2,702)
Food Safety									
Revenue	\$167,743	\$162,989	\$163,597	\$176,944	\$117,839	\$147,181	\$160,250	\$179,337	\$191,039
Expenditure	\$225,009	\$235,605	\$245,179	\$233,676	\$244,082	\$246,660	\$259,644	\$258,187	\$431,206
Difference	\$(57,266)	\$(72,616)	\$(81,582)	\$(56,732)	\$(126,243)	\$(99,479)	\$(99,394)	\$(78,850)	\$(240,167)
EH Admin									
Revenue	\$1,695	\$13	\$16,342	\$15,625	\$26,184	\$63,870	\$28,116	\$16,044	\$17,985
FPHS Revenue								\$207,575	\$439,855
Expenditure	\$154,000	\$131,541	\$143,573	\$143,942	\$133,405	\$138,443	\$150,226	\$233,434	\$252,717
Difference	\$(152,305)	\$(131,528)	\$(127,231)	\$(128,317)	\$(107,221)	\$(74,573)	\$(122,110)	\$(9,815)	\$205,123
Total Budget									
Revenue	\$962,416	\$1,074,532	\$870,960	\$1,022,830	\$981,525	\$812,572	\$1,107,927	\$1,119,481	\$1,649,431
Expenditure	\$1,246,428	\$976,448	\$977,572	\$1,026,677	\$1,045,948	\$1,110,185	\$1,146,551	\$1,272,748	\$1,681,051
	\$(284,012)	\$(98,084)	\$(106,612)	\$(3,847)	\$(64,423)	\$(297,613)	\$(38,624)	\$(153,267)	\$(31,619)

Some suggested changes in the fee schedule

- A new categorization system for food service establishments (FSE), moving to Risk Category 1-4, from a la carte system now; may include tiers for size of FSE
- A two-hour minimum charge for after-hours water sample analysis
- A new fee for food establishments on a septic system at annual permitting time
 - There are 66 number of FSEs on a septic and each year it takes extra time to review the renewal with inspection compliance
 - A lower or no fee if in compliance at X time, otherwise a fee of Y
 - Skagit charges \$100-\$225; Snohomish charges \$215

What is the Boards request for frequency of fee updates?

- Annual, biennial, triennial, or other recommendation
-