



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

***March 11, 2014***

**Public Health**  
Seattle & King County



# King County Food Safety Program Review

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### ***Executive Summary***

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

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

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

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

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

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

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

### **Recommendations Summary**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In addition, King County has a separate mission statement:

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

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

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

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

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

### **Recommendations**

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



### ***B. Program Measures***

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

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

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

Selected measures are categorized as:

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

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

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

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

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

### ***Recommendations***

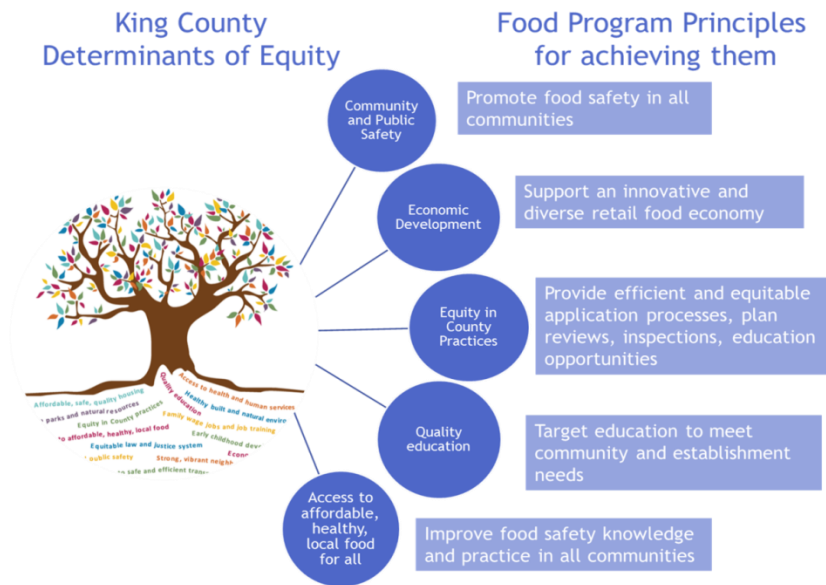
**B1** – The Food Program should adopt a set of program measures for communicating Program results to County policy makers and the public and for managing the Program. Appendix 3 contains measures generated during the Program Review along with measures identified during best practices research among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

### C. Equity and Social Justice

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

#### Procedure and scope of the analysis

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



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

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

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

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

### **Recommendations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### ***Recommendations***

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

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

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

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

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

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



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

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

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

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

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

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

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

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

### **Recommendations**

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

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

### ***F. Process Efficiency***

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

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

Program staff mapped out the current processes for:

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

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

### **Recommendations**

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

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

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

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

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

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

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

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

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

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

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

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

### **Recommendations**

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

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

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

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

**G2** – The Program should implement a dedicated position (PPM) concentrating on community outreach and inter-governmental affairs. This position would project manage program special projects and help the program develop plans and strategies for implementing a culturally competent program. In addition to fulfilling the outreach and project management needs of the program, this position would include acting as an external liaison between the Program and community groups, agencies and elected officials as needed. Due to the high visibility of the Programs' work, a position such as this would help the program staff in developing strategic communications and being more responsive to information and project work requests from elected offices.

***Appendices***

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



### **Appendix 1 – Additional Recommendations**

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

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

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

## Appendix 2 – Proposed Risk Classification Table

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

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

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

**Appendix 3 – Recommended Program Measures**

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

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

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

Appendix 4 – Restaurant Scoring System Reporting Mockup

Restaurant Food Safety Report and window placard – Mockup

King County Public Health  
Restaurant Risk Reporting System



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

Inspection information also  
available inside establishment

Bert's Bean Emporium  
1001 Fifth Avenue  
Seattle, WA 98101  
Phone (206) 555-1938

Viewer can link to google maps



2013



2012



How to interpret this data

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

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

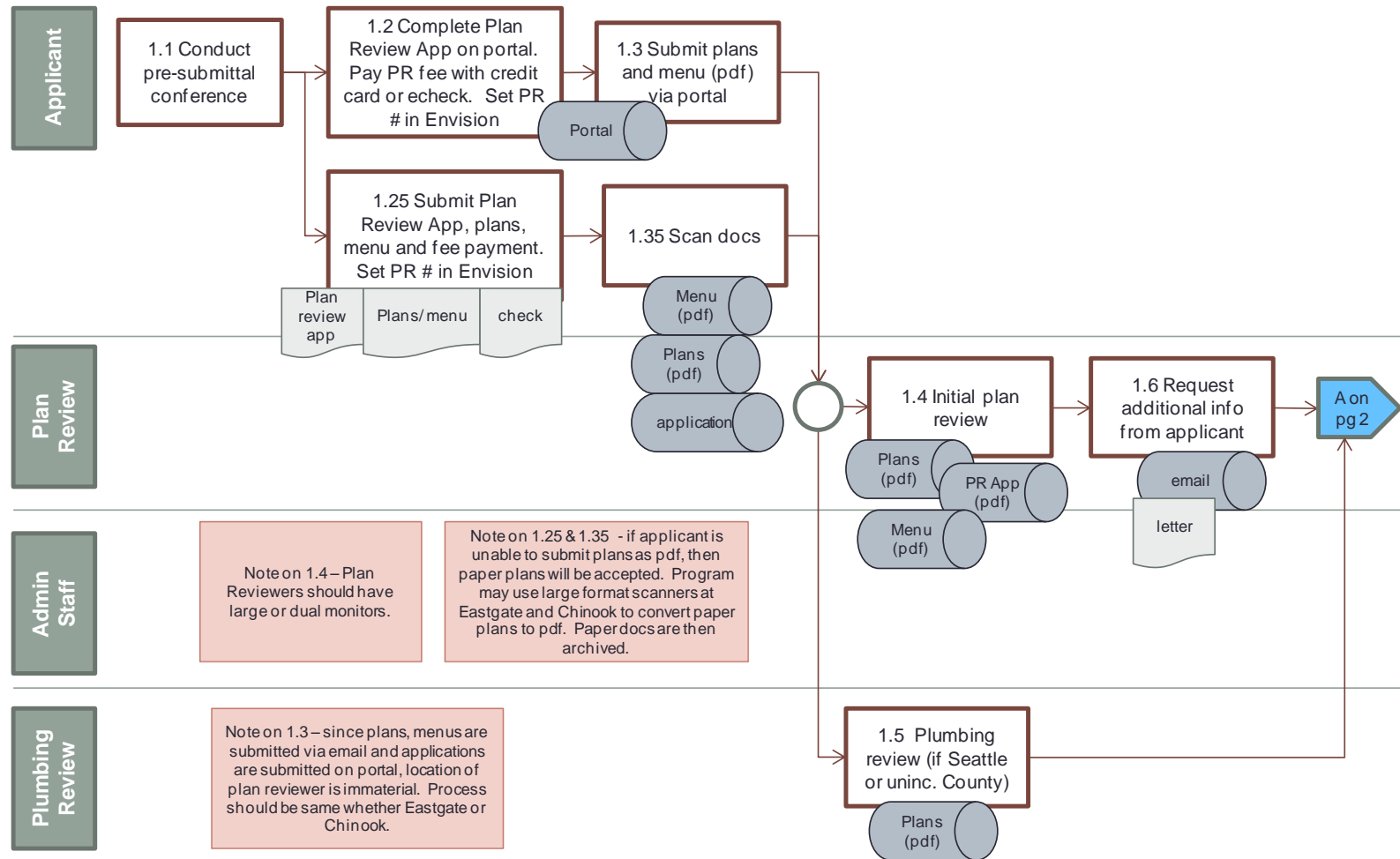


Date	Description	Severity
7/13/13	Routine inspection	65
7/13/13	Improper hot holding	25
7/13/13	Food stored at room temp	25
7/13/13	Inadequate hand washing	15
4/20/13	Routine inspection	0
4/20/13	No violations	0
12/8/12	Return inspection	45
12/8/12	Bare hand contact with food	15
12/8/12	Improper cooling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

Scroll for more data

## Appendix 5 – Proposed Process maps

### Proposed New Permanent Establishment Permitting Process Map



Proposed FP New Permanent Establishment Permits

Created: 11/06/13

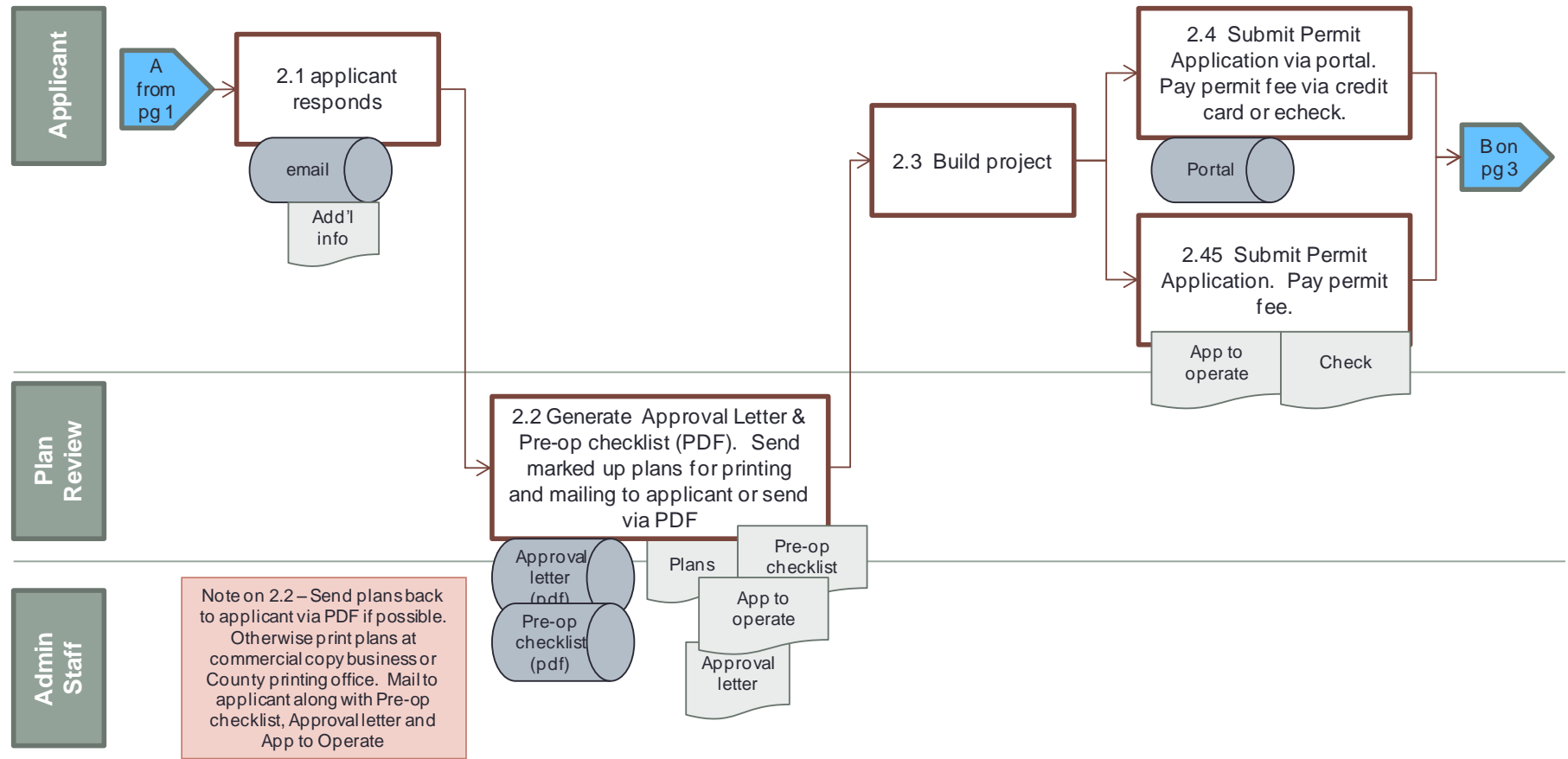
Modified: 11/13/13

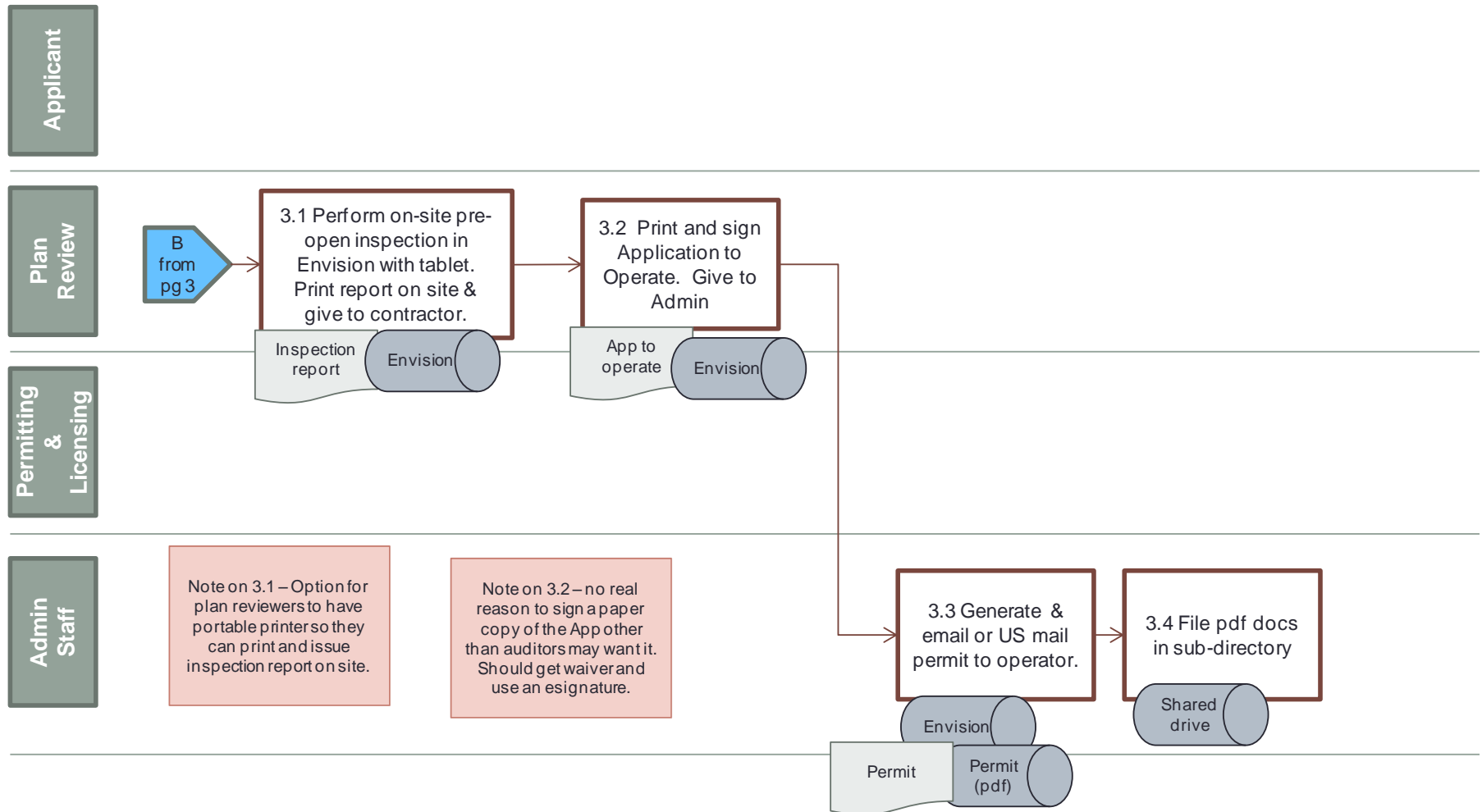
Page 1 of 3





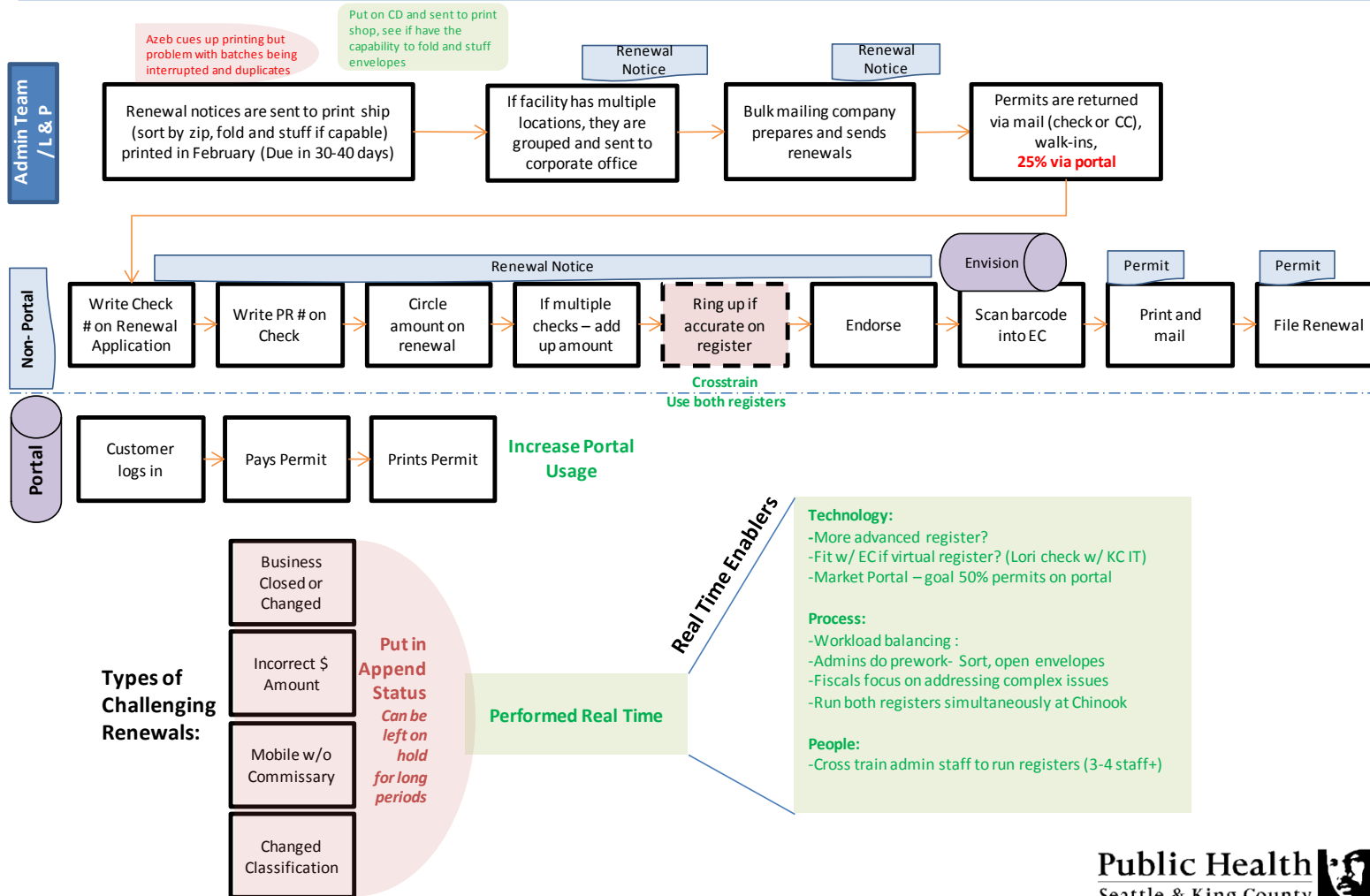
## King County Food Protection Program Review





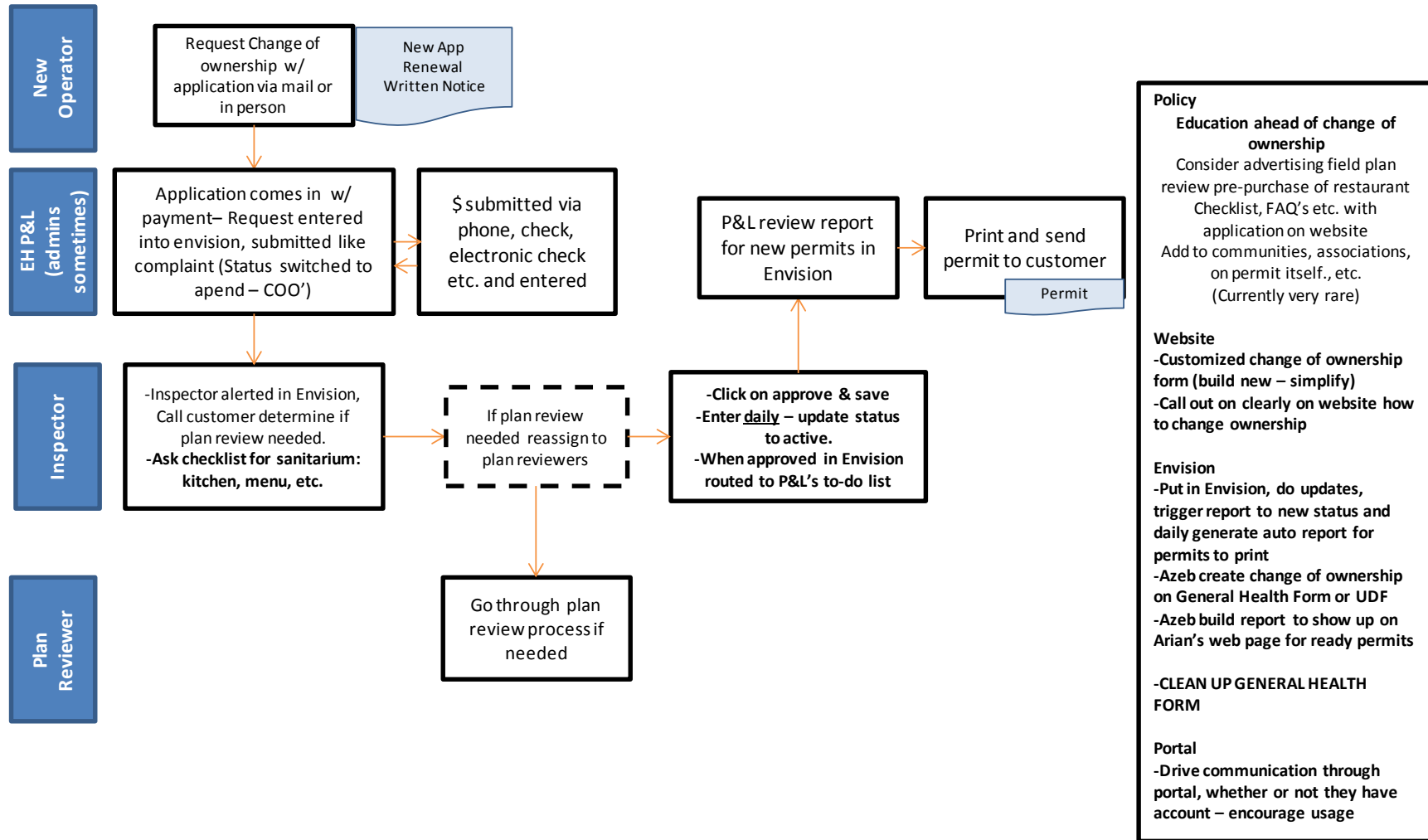
## Proposed Permit Renewals Process Map

### Renewals - "To-Be"



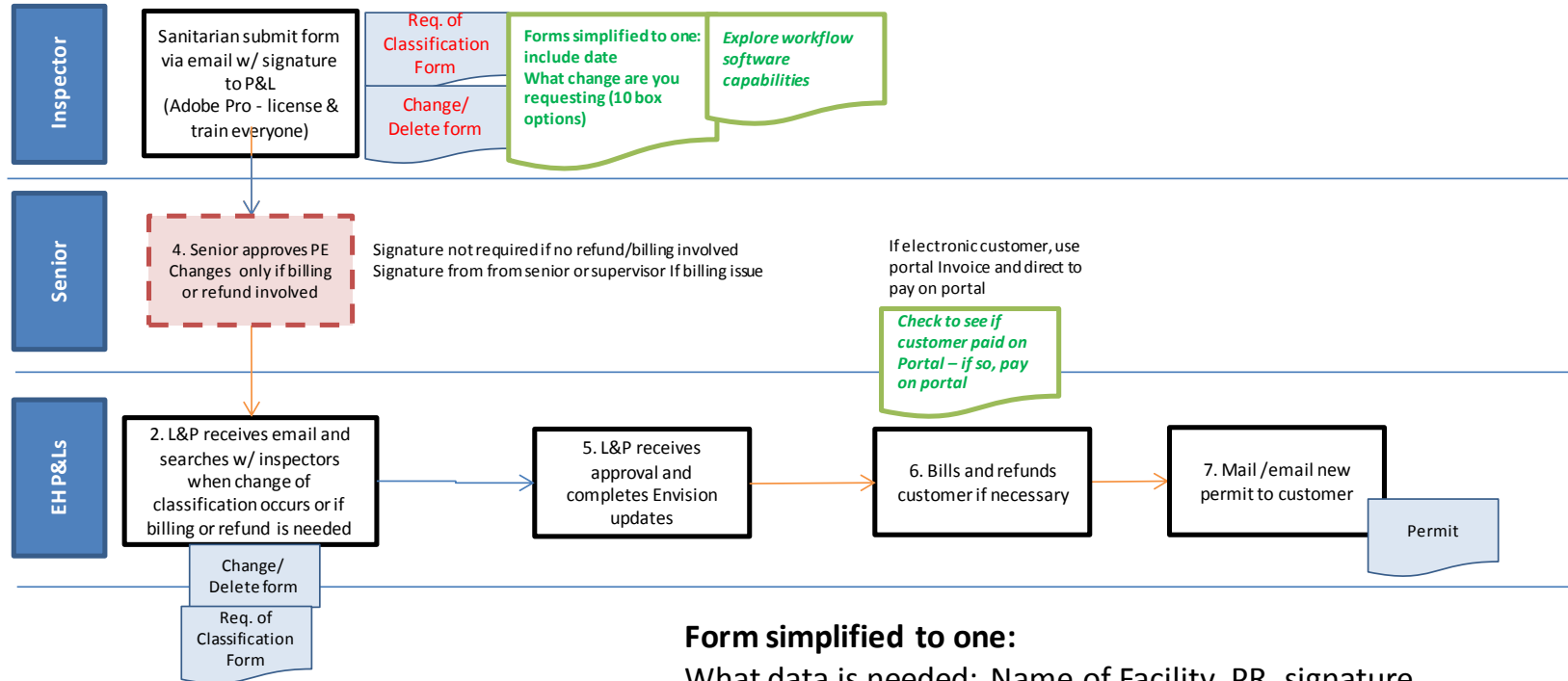
Proposed Change of Ownership Process Map

# New Change of Ownership Process



Proposed Classification (P/E) Change Process Map

## Classification P/E Changes



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

### Form simplified to one:

What data is needed: Name of Facility, PR, signature of inspector, what changed

**Boxes:** Address (site and mailing), name, PE

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

## **Appendix 6 – Lean Sub-Project Specifications**

### **Sub-projects for New Permanent Establishment Permits (including plan review)**

<b>Project 1: Streamline Envision data entry</b>
<b>Description:</b> Transfer responsibility for Envision data entry from the Permit & Licensing (P&L) unit to Plan Review (PR). The PR number would be assigned in Envision by Plan Review staff at the time of submittal of the Plan Review application rather than after the Application to Operate form is submitted.
<b>Technical/Legal changes:</b> None.
<b>Expected benefits:</b> Moving responsibility and the timing of assigning the PR # would eliminate two handoffs between Admin, Plan Review and P&L staff. It would also eliminate a historical bottleneck to conducting pre-open inspections.
<b>Start implementation:</b> 2015, 1 <sup>st</sup> Qtr
<b>Duration of implementation:</b> 6 months
<b>Process map reference:</b> Steps 1.2 and 1.25

<b>Project 2: Scanning and printing building plans</b>
<b>Description:</b> Use large format scanners to scan building plans and menus immediately after submittal. Plans and menus would then be stored on a server in pdf form and accessed, viewed and notated by staff using Adobe software. Plans would also be printed using a large format printers and sent to the applicant or emailed as pdf docs depending on the technical capabilities of the applicant. Depending on volume, the program could either purchase their own large format printers or outsource the printing to the County print shop or a private printing business.
<b>Technical/Legal changes:</b> Program would have to purchase one or two large format scanners, large format printers. Some Plan Reviewers may benefit from dual monitors. The Program may have to upgrade their license for Adobe Acrobat to facilitate posting

comments in pdf documents.
<b>Expected benefits:</b> Some applicants would benefit by not having to print building plans and delivering paper docs to FP offices. Plans submitted on paper can be scanned using a wide-format scanner and the paper originals can be immediately archived. Digital submission of plans would also allow digital transmission of plans between Eastgate and Chinook, between FP and plumbing review staff and between King County and review staff in incorporated cities. Plans can be marked up using Adobe software which is more efficient, facilitates archiving and eliminates the need to mark up duplicate sets of plans. Plans can also be returned to applicants in digital form which expedites transferring documents and eliminates the need for applicants to pick up plans. Digital submission, management and transmission of building plans will facilitate a “virtual office” concept whereby the distinctions between Eastgate and Chinook will dissipate. The two offices can also allocate workload more efficiently and collaborate more effectively.
<b>Start implementation:</b> Pilot test the concept starting in 2016 1 <sup>st</sup> Qtr
<b>Duration of implementation:</b> Pilot test for six months. Six months for full rollout once concept is tested and modified.
<b>Process map reference:</b> Steps 1.3, 1.35, 1.4, 1.5, 2.2, 3.4

<b>Project 3: Use portal for new permit applications</b>
<b>Description:</b> Modify the FP portal to allow online applications and fee payment for plan review and application to operate.
<b>Technical/Legal changes:</b> Portal will have to be modified to include data input for plan review and operating permit. Portal already has existing functionality for acceptance of fee payment using echeck or credit card.
<b>Expected benefits:</b> Gives applicants the convenience of applying and paying fees online rather than downloading paper forms, handwriting or typing forms and preparing a paper check. Eliminates the need to send in paper forms or driving to a FP office to submit applications. Along with project #2 (digital submission of building plans and menus) this project allows complete online, digital submission and transmission of all documents

associated with new food permits. FP staff will not have to manage paper forms, paper checks or the need to archive paper documents. FP can significantly reduce the number of NSF checks and realize quicker cash receipts.

**Start implementation:** Pilot test the concept starting in 2015, 1<sup>st</sup> Qtr

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

**Process map reference:** Steps 1.2 and 2.4

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

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

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

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

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

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

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



**Project 5: Digital archiving**

**Description:** Food program staff will archive all documents associated with new permits and plan review using a document management protocol or system.

**Technical/Legal changes:** The Program will have to fully implement MS-Sharepoint, a document management system or MS-Explorer to serve as a digital archive. The County most likely has a document management standard that can be employed.

**Expected benefits:** FP staff will not have to manage paper forms or the need to archive paper documents.

**Start implementation:** Summer 2016

**Duration of implementation:** six months

**Process map reference:** 3.4

### Sub-projects for Permit Renewals

#### Project 1: Increase portal use

**Description:** In 2011, payment of yearly Food Establishment Permit was enabled via web site. Approximately, 25 % of annual renewals are completed through the portal.

**Technical/Legal changes:** Reevaluate portal site and make it easier to use. Enable portal to make all changes like change of ownership or classification changes. Will need to do research to find out ways to increase portal use, i.e. discussing it at educational visits, media campaign, flyers, etc.

**Expected benefits:** Increase portal use will reduce staff hours and resources spending on turnaround of permits processing. Applicant would pay via portal and be able to print own permit. Renewal reminders can also be sent via email which would save on mailing/paper costs. This would reduce wait times for applicant receiving permit.

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

**Duration of implementation:** Ongoing

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

#### Project 2: Integrate Envision Connect into accounting processes

**Description:** Currently, there are 2 separate processes for intake of permit renewals received via mail or walk ins. First, checks or credit card information must be “rung in” via cash register and then processed into Envision Connect. The permit is then mailed and filed. This project involves modifying Envision Connect to include a cash receipts function so that the cash register steps can be eliminated.

**Technical/Legal changes:** Would need to contact Decade Software to find out if current Envision Connect can incorporate some kind of cash receipting function for checks and credit cards. Also, will need to check with fiscal to make sure that processed items can be documented for audit purposes.

**Expected benefits:** Would eliminate additional step of “ringing in” checks and credit cards

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

### Project 3: Increase seasonal staffing

<b>Description:</b> Only staff within Permits and Licensing (2 FTE’s) have the ability to process applications within Envision Connect and some staff have limited duty responsibilities within current job classification. This sub-project will augment staffing during the heavy renewal season.
<b>Technical/Legal changes:</b> Additional duties for staff will have to be approved or added to current job classification via labor contract approval. Training on Envision Connect will have to be implemented. Additional staffing may be needed in Permits and Licensing or workload balancing must be addressed.
<b>Expected benefits:</b> Additional staffing with training will accommodate the heavy burden of permit renewals during renewal time. Thus, reducing turnaround time for applicant receiving permit. Regular Permits and Licensing staff would be available to handle complex and immediate application issues that may arise during permit renewal time.
<b>Start implementation:</b> Start of 2014 permit renewals
<b>Duration of implementation:</b> 12 months.
<b>Process map reference:</b> Permit’s Renewals- “To Be”

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

#### Project 1: Integrate Envision Connect into accounting processes

**Description:** Currently, there are 2 separate processes for intake of permit renewals received via mail or walk ins. First, checks or credit card information must be “rung in” via cash register and then processed into Envision Connect. The permit is then mailed and filed. This project involves modifying Envision Connect to include a cash receipts function so that the cash register steps can be eliminated.

**Technical/Legal changes:** Would need to contact Decade Software to find out if current Envision Connect can incorporate some kind of cash receipting function for checks and credit cards. Also, will need to check with fiscal to make sure that processed items can be documented for audit purposes.

**Expected benefits:** Would eliminate additional step of “ringing in” checks and credit cards separately, thus eliminating process times for providing permits to applicants.

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

**Duration of implementation:** 6 months.

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

#### Project 2: Integrate workflow into Envision Connect for transmission of change of ownership/classification applications

**Description:** Currently, change of ownership/change of classification (PE) request is received via mail or in person; all applications are then scanned and forwarded to designated plan reviewer. After plan reviewer has determined that application is not under a plan review, the application (in pdf) is forwarded via email to the designated inspector for approval. After email is received, the application is printed and signed and then scanned again and forwarded to Permits and Licensing. This sub-project involves using workflow technology to move applications (in pdf) around the agency to the appropriate staff without the need for re-scanning, printing or applying ink signatures.

**Technical/Legal changes:** Will need to verify that Envision Connect has ability to

## King County Food Protection Program Review

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

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

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

**Duration of implementation:** 3 months

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

### Sample screen shot- “to do list”

The screenshot displays the EnvisionConnect web application interface. The top navigation bar includes 'File', 'Tools', and 'Help'. The main content area is titled 'My home page' and contains a 'Report: Dashboard' section. This section features two gauges: one for '2013 is 88.2% over.' and another for 'Toward Target Food-Pool'. Below the gauges are two tables comparing 'Annual Target' and 'Completed Inspections'.

Annual Target	Completed Inspections	Annual Target	Completed Inspections
560	432	272	255
% of Target Complete: 77.1%		% of Target Complete: 93.8%	

Below the tables, a section titled 'These open complaints (food & pools) are assigned to me:' contains a table with columns: Record ID, Status, Assigned Date, Name, Address, City, and Zip.

At the bottom, a section titled 'Routine inspections in past 30 days with 35 or more Red Critical Points, requiring return inspection/letter:' contains a table with columns: Record ID, Date of, Name, SITE ADDRESS, CITY, ZIP, Activity #, Score, and Rep.

The bottom status bar shows 'Connected', 'User: SHINJ', 'Database: EnvisionConnect', and 'Server: PHEHAPP01'.

### Project 3: Allow portal access for change of ownership and change of classification

**Description:** Modify the portal to allow change of ownership and reclass requests.

**Technical/Legal changes:** Can the changes to ownership and classifications be controlled without tampering of accounts? How can this information be verified and would this lead to an increase amount of refunds or charges due to operator error?

**Expected benefits:** Would reduce staff time and resources to process change in application.

**Start implementation:** 2015, 1<sup>st</sup> Qtr

**Duration of implementation:** 6 months

**Process map reference:** New change of ownership process

### Project 4: Form reduction and simplification for mobile units

**Description:** Mobiles currently need to complete 5-7 forms depending on the changes to the commissary and foods being prepared. Simplify the process and administrative burden by consolidating forms and data being collected. Eliminate signed restroom agreements since code only states to have approval restroom access but does not specifically require written documentation. Area businesses will not sign forms seen as legal document but will allow restroom access for mobile food vendors.

Include these changes with new business plan review process.

**Technical/Legal changes:** Need to create new form to collect needed data and re-write policies.

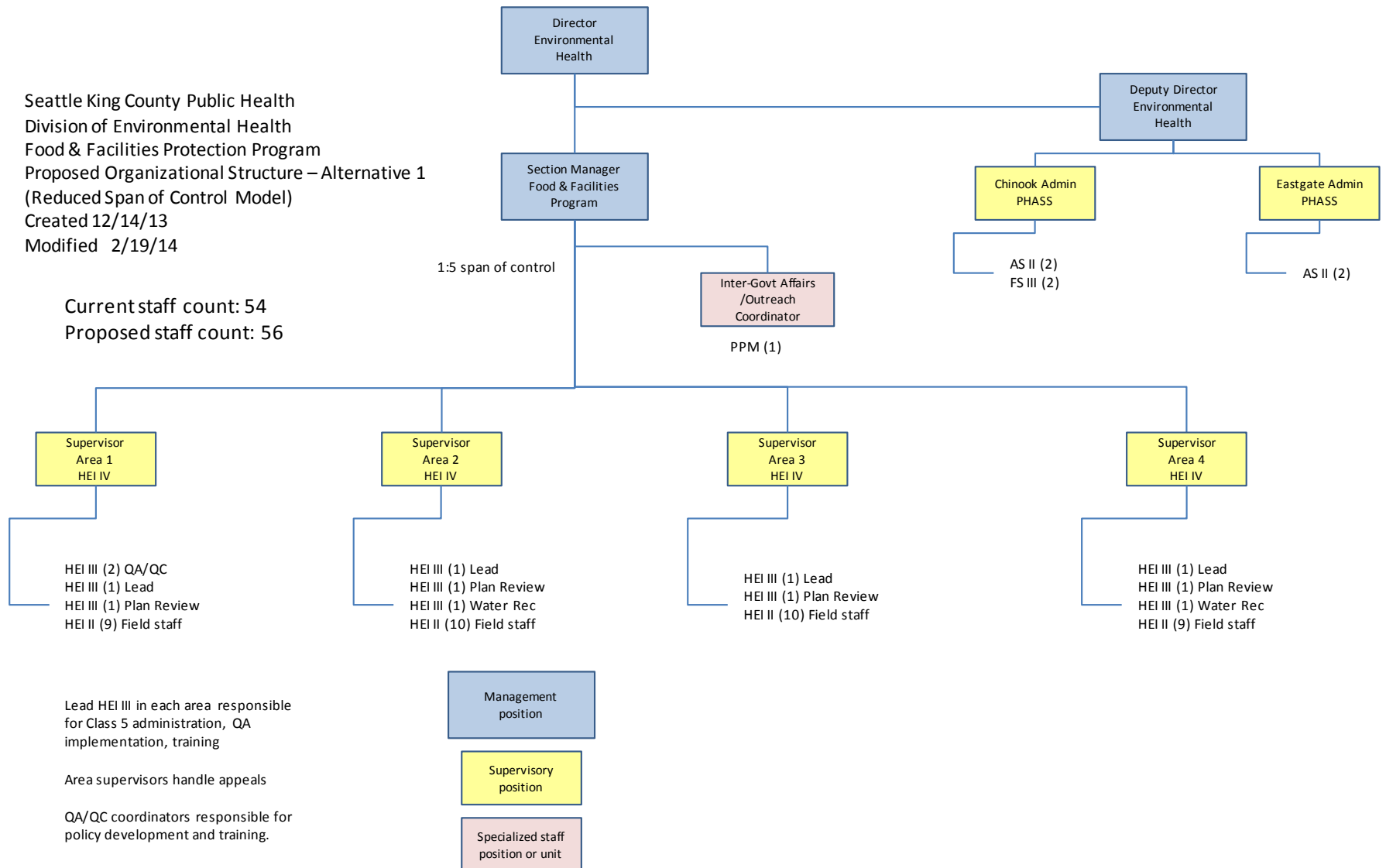
**Expected benefits:** Less confusion and paper work for a business operator seeking to obtain a permit. Less staff time for verifying the currently required forms. Mobiles have more freedom to move within King County since restrooms can be used/shared without

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

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

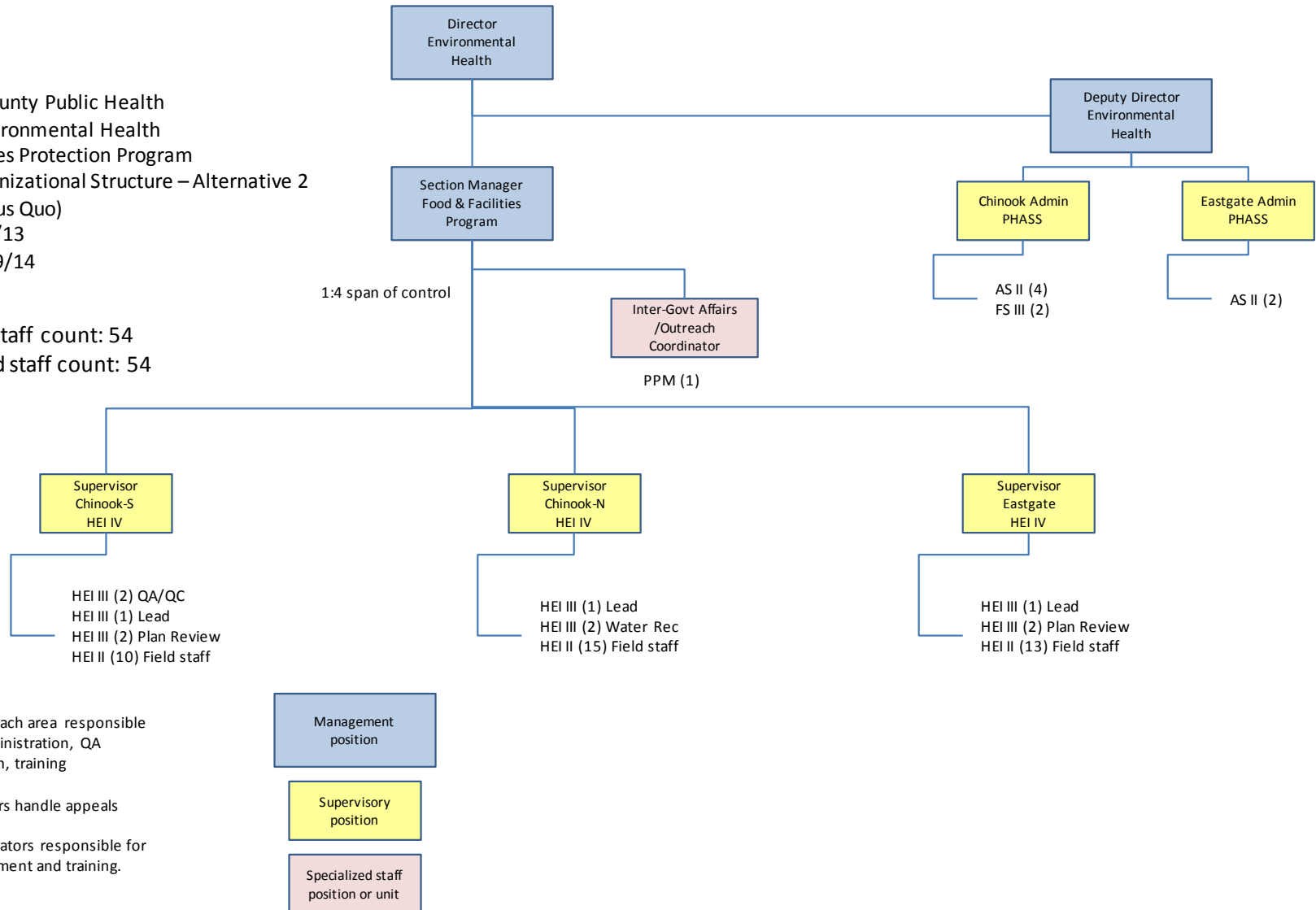




**Appendix 7 – Potential Organizational Models – Alternative 2 (Modified Status Quo Model)**

Seattle King County Public Health  
Division of Environmental Health  
Food & Facilities Protection Program  
Proposed Organizational Structure – Alternative 2  
(Modified Status Quo)  
Created 12/16/13  
Modified 2/19/14

Current staff count: 54  
Proposed staff count: 54



**Appendix 8 – Acronym Key**

CAP – Corrective Action Plan

ESJ – Equity and Social Justice

ESL – English as a second language

FBI – Food borne illness

FDA – U.S. Food and Drug Administration

FTE – Full time equivalent

HEI – Health & Environmental Investigator

PE – Program element

PPM – Program/Project Manager

PR – Plan review

QA – Quality Assurance

QR – Quick response

RCP – Risk Control Plan

SOP – Standard Operating Procedure