

## President's Message

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# The Problem of Invisibility—Fees Edition

**U**nder the rubric of the “invisible-profession” issue that I have been taking as my theme in these columns, the subject of finances and fees may not at first appear to be pertinent. The connection is that, as I aimed to establish in my first few columns, the general public and elected officials are often unaware of environmental health programs in general and consequently may be unaware of their funding status. Politicians and the public may assume that protections are in place and are fully funded when, in this time of general financial belt tightening, some of those programs may actually be endangered. So I thought it would be worth examining this subject area.

Environmental health at the local level has often been funded in a manner that I liken to a three-legged stool:

1. funding from county or city taxes—because of the community benefits that result from preventing immediate and long-term environmental hazards;
2. funding provided by state agencies to local agencies to conduct state-mandated programs; and
3. funding from a fee-for-service system (sometimes supplemented with grant funding as seed money for new initiatives).

During the late 1970s and the 1980s, local decision makers in many communities decided to collect fees from the consumers of environmental health services. In the 1970s we also saw federal environmental protection activities split from environmental health with the formation of the U.S. Environmental Protection Agency. This split was repeated in many states with the formation

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of state environmental protection agencies. With the advent of fully fee-funded programs, there has been a further separation of local environmental health and public health departments in some areas of the country. I have often heard from local environmental health practitioners that their division is the “red-headed stepchild” within a local public health agency when it comes to resource allocation. Indeed, many resist raising fees when new revenues are put into a general fund or displaced in a shell game to meet other public health needs.

Advocates of fully fee-funded programs have, however, found a new freedom to use revenues to meet the costs of running an environmental health program. This development has also allowed what has been termed a “separation” or “divorce” of the environmental health section from the public health agency. Other decision drivers may have affected these separations as well.

In recent years in local, state, and national politics, there has been taxpayer pushback against new or raised taxes, so the current climate is one of holding budgets level or making cuts. For many environmental health programs those cuts can mean personnel impacts because personnel costs are the predominant fraction of most budgets. In periods of budget cuts, the training line is often one of the first to be considered as expendable, which again leads to more staff stress.

In my past positions at local and state public health agencies, much of my time as an administrator was spent protecting the base, or traditional, environmental health programs and looking for opportunities to enhance those programs. But revenues from each of the three-legged-stool sources also allowed more flexible spending to start initiatives in new program areas that were difficult to support by fees alone.

- Such new program areas could include
- community environmental health assessment and prioritization using a process such as the Protocol for Assessing Community Excellence in Environmental Health (PACE EH);

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- involvement in built-environment issues, including planning, zoning, and development; and
- indoor air quality issues such as mold and radon.

New initiatives such as these can aid in slowing the rotating employee exit door because employees are able to use their science-based skills not just to provide mandated inspection services, but also to meet community-driven environmental health needs.

National-performance-standards efforts are under way within the fields of public health and environmental health. These standards, which are likely to be linked with a national accreditation process of either a voluntary or a mandatory nature, address the need for environmental health to have well-rounded programs that provide the 10 essential environmental public health services. A mandated inspection program that is exclusively fee funded is likely to mainly emphasize Essential Service 6 (Enforce Laws and Regulations That Protect Environmental Health and Ensure Safety). In my opinion, an environmental health unit with a spread of revenues from various sources will be more likely to have a well-rounded program that can meet the performance standards and the linked accreditation process.

In DeKalb County, Georgia, we chose a three-year cycle for our fees-for-service review so that we were not constantly asking the boards of health and the commissioners for unpopular fee increases. Some other metro Atlanta communities chose to go more frequently (e.g., every year); others went less frequently (i.e., at intervals of more than three years) and often had to request very steep fee hikes to restore lost ground.

Proposals to raise fees to a very high level to cover all program costs can cause political fallout and backlash. This result is often counterproductive to any benefits gained from positive marketing of the environmental health program. Other negative consequences of fee collections are connected to enforcement for nonpayment of fees: The inspector sometimes feels that his or her job has been reduced to that of invoice creator and bill collector. When the fees are tied to yearly permits, however, collections can provide an opportunity to correct longstanding environmental health issues as well as benefit from the administrative aspects of the fees.

Environmental health has to compete in local budgets with areas such as police, fire, traffic engineering, and public works, whose efforts are sometimes more glamorous and obvious and where a lack of effort causes immediate symptoms. A decreased or inadequate environmental health budget, by contrast, is far more insidious; the damaging effects may not be apparent for years or even generations. Still, with adequate marketing of a program to the appropriate boards, personnel issues can be addressed when funding is available. In DeKalb County, we were able to successfully argue for the creation of a career ladder, special pay for late-night and weekend work (temporaries and nightclubs), and recognition of successful completion of the Registered Environmental Health Specialist examination.

In rapidly growing areas, it is particularly important for environmental health administrators to plan for the future. Without such planning, fee revenues will fund increasing demands without adequate staff to meet those increasing demands and challenges. If staff levels stay stagnant during these surges in building and population growth, stresses

will be placed on the employees, and the symptom will be turnover.

Environmental health is preventive in nature, and work done in the present—when properly executed—can prevent large community expenditures in the future. Without ongoing marketing of the benefits of environmental health programs, however, it will be hard to persuade local decision makers to part with an increased share of the public coffers, both for traditional programs and for new environmental health initiatives.

Marketing of new fees is also important if backlash from the constituents paying the tab is to be averted. If business owners who pay the fees also understand the benefits of the program and feel they are getting good service or value for the money, they are much more likely to support (or at least not resist) new fees and program initiatives. In fact, when the business community feels connected to the program and their issues are being heard and addressed, business owners are more likely to speak supportively at approval hearings for those fees and new programs. 🐼

*Acknowledgement:* My thinking on the issue of fees has been influenced by the work of Larry Gordon, particularly his 1961 paper "Fees for Service: Pros and Cons," which can be found on the Web at [http://hsc.unm.edu/library/spc/Gordon/papers/Fees\\_for\\_Service-Pros\\_and\\_Cons.pdf](http://hsc.unm.edu/library/spc/Gordon/papers/Fees_for_Service-Pros_and_Cons.pdf).

*Disclaimer:* This article was written by Rob Blake in his private capacity. No official support or endorsement by the Centers for Disease Control and Prevention is intended or should be inferred.

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