



**GARLAND**

**INTERNAL AUDIT**

# Health Inspection and Permit

*March 20, 2018*

*Report 201805*

***City Auditor:***

*Jed Johnson, CIA, CGAP*

***Major Contributor:***

*Dang Nguyen, CPA, CFE*

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## Overall Conclusion

Internal Audit (IA) would like to acknowledge the hard work of the Environmental Health (EH) staff. The multitude of service EH provides is critical to the health and safety of Garland's residents. EH's cash handling controls are effective as cash is deposited daily, secured, and reconciled. The processes and procedures EH has in place along with the technical knowledge and experience of the Environmental Health Specialists (EHS) helps to mitigate the risks of noncompliance with state and local regulatory with regards to food inspection and permitting. As part our audit, we observed EHS conduct various food inspections and found their professionalism, knowledge in their craft, and attention to details to be exceptional.

The following areas for improvements were identified through IA's testing:

- Approximately 11% of inspections were not performed in a timely manner. Considering the sheer number of inspections and follow ups EH is responsible for, an 89% on time rate is not considered a significant operational deficiency, however there is rooms for improvement.
- Food establishments inspected by State regulatory agencies are not periodically monitored by EH to determine if permitting and inspection is required.
- The template or source used for food inspection reports should be made to align closer with the Texas Food Establishment Rules (TFER), however no significant gaps were identified.
- Voided citations are not submitted to Courts for tracking purposes. In addition, citation issued are not properly tracked.
- Under current operating procedures, EH does not assess late fees to establishments whose permit renewal fees are overdue. 2 out of 20 permit renewals (10%) examined by IA were late payments.
- Under current operating procedures, establishment managers are not required to sign or acknowledge completed follow up inspections resulting in full compliance.
- Data integrity issues within information database that may affect the accuracy of certain generated reports.

Management was also provided with additional opportunities for improvement to enhance internal controls. These were not considered significant to the objectives of the audit, but warrant the attention of Management. Consequently, they do not appear in this report.

## Authorization

We have conducted an audit of the Health Inspection and Permit. This audit was conducted under the authority of Article VII, Section 5 of the Garland City Charter and in accordance with the Annual Audit Plan approved by the Garland City Council. This audit was requested by the Director of Health.

## Objective(s)

The objectives of this audit are to:

- A. Determine if permits are issued in accordance with State Law and City Ordinance.
- B. Verify if Environmental Health (EH) conducts routine inspections and as frequently as required by EH's rules and regulations.

## Scope and Methodology

IA conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The scope of this audit is from October 1, 2016 to October 31, 2017. Besides issuing food permits and conducting food inspections, EH conducts and issues other inspections and permits, respectively such as public/semi-public pools, child care centers, underground storage tanks (USTs), and liquid waste haulers. However, the scope of this audit will mainly focus on processes relating to food permits and inspections.

To adequately address the audit objectives and to describe the scope of our work on internal controls, IA performed the following:

- Conducted a surprise cash count. (Obj A&B)
- Obtained copies of applicable City Ordinances and Directives, State, and Federal law, and determined if EH is in compliance. (Obj A&B)
- Conducted walkthroughs and determine efficiency and effectiveness of operational processes. (Obj A&B)
- Obtained and reviewed documentations surrounding inspection scheduling, inspection reports issued, permit tracking, citations tracking, training certificates, and service requests (external complaints). (Obj A&B)
- Compared information in the Envision system with other records and other available sources to ensure information is entered appropriately. (Obj A&B)
- Examined the process for issuing and tracking permits, inspection reports, and citations. (Obj A)
- Examined the permit renewal processes including the notifications given to establishments prior to renewal. (Obj A)

- Compared active permits with active food establishments within Garland identified through various sources (i.e. yellow book, online, Planning Department, Texas Department of State Health records, etc.). (Obj A)
- Confirmed inspection reports are public information and are available to the public upon request. (Obj B)
- Traced citations through the court system to determine correctness, completeness, and timeliness of citation process. (Obj B)
- Examined the timeliness and frequency of food inspections performed. (Obj B)
- Obtained external confirmation inspections were performed on documented date. (Obj B)
- Obtained and reviewed variances granted and determine if they are in compliance with Texas Food Establishment Rules (TFER) guidelines. (Obj B)
- Examined the effectiveness and compliance of internal policies with regards to enforcement methods such as citations and closure. (Obj B)
- Observed and evaluate food inspections to determine if they are aligned with TFER guidelines. (Obj B)
- Examined the timeliness and adequacy of a sample of inspection follow ups (Obj B)
- Tested the accuracy of food temperature measuring devices used during food inspection to determine if they are within TFER guidelines. (Obj B)

To assess the reliability of information obtained through the Envision System, IA compared data such as violations, dates, scores, establishment, and inspectors generated from crystal reports to samples of actual inspection reports. In addition, IA validated a sample of information from inspection reports with third parties (related establishment management). As a result of our testing, we determined that the data provided and available was sufficiently reliable for the purpose of this report.

Based on the audit work performed, any deficiencies in internal control that are significant within the context of the audit objectives are stated in the Opportunities for Improvement section on page 7.

## Background

Environmental & Consumer Health's (EH) mission is to protect the health of the general public by minimizing the risk of disease or injury via consumer protection programs such as the inspection of food service establishments, day care centers, and public swimming pools. EH also directly intervenes in disease transmission by investigating all communicable disease cases within the city and by controlling insect and rodent vectors in neighborhoods. The division also protects the environment by minimizing pollution sources through the inspection of industrial and commercial facilities, responding to and mitigating hazardous material spills, and routinely performing chemical analysis of stream water. <sup>(1)</sup>

As of February 21, 2017, EH adopted the 2015 Texas Food Establishment Rules (TFER) into the Garland Code of Ordinance (Sec 22.25). TFER is the standardization and certification retail food inspection training officer's procedures manual that establishes the procedures for the standardization and certification of retail food inspectors in Texas. In addition, EH has made several amendments to TFER which has also been incorporated into Garland Code of Ordinance (Sec 22.26). <sup>(2)</sup> Garland's food safety program, including permitting and food establishment inspections adhere to these established TFER guidelines and related amendments. <sup>(3)</sup>

## **Food Establishment Inspections**

Food Establishment inspections are conducted by Environmental Health Specialists (EHS). Currently EH has 9 EHS, a Field Supervisor, and a Manager. EH has conducted approximately 1,600 unannounced food establishment inspections throughout FY/2017. Each of these inspections are categorized into 12 different food establishment categories (i.e. full service restaurants, fast food restaurants, conveniences stores without snack bars, food processing establishments, etc.). The type and frequency of the inspections depends on the establishment's category. <sup>(3)</sup>

The frequency of inspection is also based on each establishment's potential "risk." The "risk" is based upon the previous inspection score average, number of critical or dangerous violations per inspection, type of food preparation and volume of customers. Unannounced scoring inspections are conducted from one to four times per year based on the calculated "risk" of the establishment. <sup>(4)</sup>

EH uses a 100-point scoring system during each unannounced routine inspection. Every violation noted is debited using a weighted scale (1 - 5) based on severity. <sup>(4)</sup> The average food establishment inspection score for FY17 is 81 (scale of 100) with an average critical violations per inspection around 2. <sup>(1)</sup> Inspection scores are posted and updated on a monthly basis on Garland's Health Department website. A follow up inspection is required for any unannounced inspection that has a violation identified. EHSs are expected to continue scheduling additional follow up inspections until the establishment is in full compliance. <sup>(3)</sup>

## **Permit Issuance**

In addition to routine inspections, EH also requires food establishments to maintain proper food permits to continue operating within Garland. Food establishments are responsible for renewing their permit on an annual basis. EH is responsible for tracking and issuing these permits. Current EH policy does not require or issue permits to food manufacturers that are routinely inspected by the Texas Department of State Health Services (DSHS). Any increase to permit fees must be approved by City Council. <sup>(3)</sup> *See exhibit B for schedule of permit fees.*

## **Complaints Investigations**

EH is also responsible for investigating all complaints made by third parties (i.e. patrons of establishment). Complaints are categorized into 15 different categories with varying response time requirement. *See exhibit D for "Response Time to Service Request" details.* Complaints are received by the Department Representative and are then assigned to an EHS for investigation. A complaint ID is generated for each complaint and is tracked within EH's food inspection system. Once an investigation has been completed the assigned EHS fills out the complaint investigation form and contact the complainant to discuss the investigation findings as well as any applicable remediation. There were a total of 254 complaints received by EHS during the scope of the audit period. <sup>(3)</sup>

## **Compliance Enforcement**

To help promote clean and safe environment throughout Garland's food establishments, EH has several enforcement tools and reward programs at their disposal. EH has the ability to enforce compliance through the use of citations and or establishment closure. Citations can be issued at the discretion of the inspecting EHS for any violations identified, however they are usually reserved for repeat offenses or critical infractions. *See exhibit C for disposition breakdown of citations issued during the period October 1, 2016 through October 31, 2017.* Closures are normally last step measures and are enforced if the establishment poses an immediate safety threat to the general public. <sup>(3)</sup> In addition to enforcement tools mentioned, EH also has a Food Excellence Award Program which rewards the top 5% food establishments (inspection scores) a waiver for their annual permit fee for the year and an award certificate which can be display at their establishment. <sup>(4)</sup>

## **Revenue and Operating Expenses**

For FY17/18, Public Safety expenditures accounts for 50.2 % (\$87.2 million) of the total General Fund. Of these approximately \$3 million (3.4%) is used to fund public health related services such as inspections of food establishments, environmental investigations, and Animal Shelter operations. The breakdown of these expenditures according to the City Of Garland 2017-2018 Annual Operating Budget is shown below <sup>(1)</sup>:

**General Fund****HEALTH**

<b>DEPARTMENT EXPENDITURES</b>	<b>2015-16 ACTUAL</b>	<b>2016-17 APPROVED</b>	<b>2016-17 REVISED</b>	<b>2017-18 APPROVED</b>
<b>BY CATEGORY:</b>				
Personnel	\$2,488,094	\$2,550,607	\$2,550,607	\$2,604,740
Operations	403,834	399,668	385,770	384,893
Charge-Outs	0	(30,957)	(30,957)	(31,717)
Capital	0	0	0	32,493
<b>TOTAL EXPENDITURES</b>	<b>\$2,891,928</b>	<b>\$2,919,318</b>	<b>\$2,905,420</b>	<b>\$2,990,409</b>
<b>BY OPERATIONAL AREA:</b>				
Administration	\$494,071	\$502,160	\$501,558	\$515,388
Environmental Health	731,286	748,311	749,123	824,326
Animal Services	1,666,571	1,668,847	1,654,739	1,650,695

EH also collects revenue from its operation through various fees charged (see exhibit B for fee details). For the period FY17, EH's food program collected approximately \$421,700 in revenue. This operational revenue is used to help offset food program related expenses. <sup>(3)</sup>

(1) City of Garland 2017-2018 Annual Operating Budget

(2) City of Garland Code of Ordinances

(3) Interviews with EH Management

(4) Health Department Website:

<https://www.garlandtx.gov/hk/health/services/scores.asp>

## Management Accomplishments\*

Health Department Management requested this audit for the purpose of performance improvement. This audit validated many effective department operations while providing suggestions for improvement in other areas. Audit recommendations will be used to improve department programs, functions and accountability.

\*Please note that "Management Accomplishments" are written by the audited entity and that Internal Audit did not audit or verify its accuracy.

## Opportunities for Improvement

During our audit we identified certain areas for improvement. Our audit was not designed or intended to be a detailed study of every relevant system, procedure, and transaction. Accordingly, the Opportunities for Improvement section presented in this report may not be all-inclusive of areas where improvement might be needed.

<b>FINDING # ISS.1 - Frequency and Timeliness of Inspections (Obj. B)</b>	
<b>CONDITION (THE WAY IT IS)</b>	<p>Internal Audit reviewed schedules of completed food inspections for FY/2017. IA noted 175 out of approximately 1,600 unannounced inspections were not performed frequently as intended by the department. The majority of these were related to establishments that require inspection on a semi-annual or quarterly basis (i.e. food processing and high risk establishments). Also, the majority of these pertain to fast food restaurants (44% of all non-timely inspections) and full service restaurants (24% of all non-timely inspections).</p>
<b>CRITERIA (THE WAY IT SHOULD BE)</b>	<p>Section 228.249 (a-b) of TFER notes <i>“the regulatory authority shall inspect each food establishment at least once every 6 months”</i>; however, <i>“if the regulatory authority cannot meet this inspection frequency, frequency shall be prioritized and uniformly applied throughout the jurisdiction based upon assessment of a food establishment’s history of compliance with these rules and the potential for causing foodborne illness”</i></p> <p>Based on the TFER framework mentioned above, EH established the following procedures with regards to the frequency of food inspections:</p> <ul style="list-style-type: none"> <li>• Food establishments that that does not prepare food (i.e. food storage and/or retail only) are to be inspected at a minimum of once a year (annual). <i>For the purpose of IA’s testing 370 days between inspections is considered infrequent.</i></li> <li>• Food preparing establishments are to be inspected at a minimum of twice a year (semi-annual). <i>For the purpose of IA’s testing 273 days between inspections is considered infrequent.</i></li> <li>• High risk establishments are to be inspected the following quarter after the previous inspection. Establishments are deemed high risk if they score below a 70 on their previous inspection. Once they are categorized as high risk</li> </ul>

	<p>an unannounced inspection must be performed the following quarter. As a result these high risk establishment may potentially have up to 4 unannounced inspection within a year (not including rechecks). <i>For the purpose of IA's testing 139 days since last failed inspection is considered infrequent.</i></p>
<p><b>CAUSE (DIFFERENCE BETWEEN CONDITION &amp; CRITERIA)</b></p>	<p>A combination of various factors are responsible for inspection delays, however the most significant underlying factors are:</p> <ul style="list-style-type: none"> <li>• Lack of resources to perform planned unannounced audits while at the same time keep up with follow ups of prior inspections.</li> <li>• Scheduling unannounced audits based on quarterly deadline instead of on days since prior inspection.</li> </ul>
<p><b>EFFECT (SO WHAT?)</b></p>	<p>Delays in routine food inspection exposes Garland residents to safety and health risks if they are patrons of the impacted establishments.</p>
<p><b>RECOMMENDATION</b></p>	<p>Management should monitor and schedule unannounced inspections based on the date when the establishment was last inspected instead of the quarter.</p>
<p><b>MANAGEMENT RESPONSE</b></p>	<p>Concur</p>
<p><b>ACTION PLAN</b></p>	<p>The Envision inspection software can be used to prompt inspections based on dates selected by management. Management will simply modify procedures to prompt inspection frequency based on the number of days since the last inspection rather than on a quarterly basis.</p>
<p><b>IMPLEMENTATION DATE</b></p>	<p>April 1, 2018</p>

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**FINDING # ISS.2 – Tracking of Establishment Requiring Permits (Obj. A)**

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**CONDITION  
(THE WAY IT IS)**

Examination of inspection records from the Department of State Health Services (DSHS) as well as EH permitting/inspection records revealed 9 food establishments that:

- were not frequently inspected by DSHS (has not been inspected over three years); or
- showed no records of prior DSHS inspections;

and is currently not:

- permitted by EH; and
- inspected by EH.

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**CRITERIA  
(THE WAY IT SHOULD  
BE)**

City of Garland has adopted the Texas Food Establishment Rules as of 2/21/2017. *City Ordinance 22.25.*

Under *TFER 228.247 (a) Permit Requirement, Prerequisite for Operation* as amended by Garland:

*"No person shall sell, offer to sell, convey food, or otherwise operate a food establishment within the City without having first obtained a permit issued by the regulatory authority".*

In addition, *TFER section 228.249 (d) Inspection Frequency* as amended by Garland:

*"The regulatory authority shall inspect each food establishment located in the City or its police jurisdiction, and shall make as many inspections and reinspection as are necessary for the enforcement of this article".*

According to EH policies and procedures, an exception can be made to the rules above if the food establishment(s) are frequently inspected by State regulators (DSHS).

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**CAUSE  
(DIFFERENCE  
BETWEEN CONDITION  
& CRITERIA)**

Under the current business process, food establishments that are periodically inspected by State regulatory agency does not require permitting and or periodic inspection from EH. However, the process to monitor State regulatory

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	agency's inspection activities currently does not exist. As a result, certain establishments that are not frequently inspected nor had their inspection suspended by State regulatory agency are not reassessed by EH for potential inspection and permitting requirements.
<b>EFFECT (SO WHAT?)</b>	Food establishments may operate in Garland without proper permits and/or inspections, which may expose Garland residents to certain safety and health risks.
<b>RECOMMENDATION</b>	Management should: <ul style="list-style-type: none"> <li>• Further investigate the 9 food establishments identified by IA to determine if permitting and inspection is required.</li> <li>• Periodically review food establishments that are inspected by State regulatory agencies to determine if permitting and inspection by EH is required.</li> </ul>
<b>MANAGEMENT RESPONSE</b>	Concur
<b>ACTION PLAN</b>	Staff investigated the 9 DSHS permitted establishments identified by this audit and none met the threshold of a COG permit. Staff will implement a procedure to review DSHS permitted facilities on an annual basis to determine if COG permits are necessary for any DSHS permitted establishment.
<b>IMPLEMENTATION DATE</b>	January 26, 2018

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**FINDING # ISS.3 – TFER Compliance (Obj. A & B)**

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<b>CONDITION (THE WAY IT IS)</b>	EH utilizes system application to generate inspection report results. The system maintains a database of all possible violations that can be found during an inspection and assigns a code to each violation. These violations are all tied and referenced to the Texas Food Establishment Rule (TFER). After an inspection, the EHS would generate an inspection report by selecting all the applicable violation codes within the system. Internal Audit compared the violations stored within the system with violations documented within TFER as well as the Amendments to TFER to identify any significant gaps and/or inconsistency. This comparison resulted in a number of identified gaps and inconsistency between TFER and existing violations maintained in Envision.
<b>CRITERIA (THE WAY IT SHOULD BE)</b>	Garland EH's food inspection program adheres to TFER. These rules provides a set of guidelines on how a food inspection should be conducted. Certain aspects of TFER can be amended and has been amended in the past to align with Garland's Health Environment goals and objective. These amendments are incorporated within the City's code of ordinances and are expected to be followed for all food inspections.
<b>CAUSE (DIFFERENCE BETWEEN CONDITION &amp; CRITERIA)</b>	EH does not have a periodic review process to reconcile the violations coded into Envision with TFER and the amendments made to TFER.
<b>EFFECT (SO WHAT?)</b>	Certain violations identified by TFER may go unnoticed during an inspection.
<b>RECOMMENDATION</b>	Management should periodically reconcile existing violations with TFER guidelines to identify and update any significant gaps and inconsistency.
<b>MANAGEMENT RESPONSE</b>	Concur
<b>ACTION PLAN</b>	GHD staff will review gaps/inconsistencies identified by the audit and reconcile gaps in the Envision inspection report as necessary. GHD only recently began using the TFER as ordinance by reference. As written, COG ordinance automatically adopts TFER changes. GHD staff has always,

	and will continue, to monitor TFER changes at the state level to assess local impact.
<b>IMPLEMENTATION DATE</b>	July 1, 2018 to reconcile gaps noted by IA (if necessary) Staff will continuously monitor TFER changes

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**FINDING # ISS.4 – Citations (Obj. B)**

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<b>CONDITION (THE WAY IT IS)</b>	<p>1. Internal Audit (IA) examined all citations issued by EHS for the period October 1, 2016 through October 31, 2017 and noted all voided citations by EH were not being submitted to Courts for tracking purposes.</p> <p>2. Using EH's citation tracking records, IA performed a gap analysis of all citations issued during the scope of the audit to identify unaccounted citation tickets. The gap analysis identified 22 citation tickets that were not recorded in EH's citation tracking records. With the help of EH, IA was able to research and account for all these citation tickets and verified they were submitted to Courts (if issued). However, all citations issued should be continuously monitored and tracked to prevent the misuse of citation tickets.</p>
<b>CRITERIA (THE WAY IT SHOULD BE)</b>	<p>1. Voided citations should be clearly marked with a reason for the void. The voided citation should be sent to Court along with completed citations for tracking purposes. This is a best practice followed by several City departments including the Police Department and Code Compliance.</p> <p>2. Citations should be issued in sequential order and tracked to account for any missing citations that was not issued.</p>
<b>CAUSE (DIFFERENCE BETWEEN CONDITION &amp; CRITERIA)</b>	<p>The process for tracking citations issued is a manual process involving manually entering citations issued into an excel spreadsheet. As a result, this may lead to human error when updating the tracking spreadsheet, such as forgetting to add a citation issued, keying in wrong citation #, and/or duplicating a citation issued.</p>
<b>EFFECT (SO WHAT?)</b>	<p>Ineffective controls surrounding the tracking and monitoring of citation ticket inventories may prevent the detection of stolen or misused citation tickets.</p>
<b>RECOMMENDATION</b>	<p>Management should:</p> <p>1. Record a reason for all voided citations and submit them to Courts for input into the Court system and tracking purposes.</p> <p>2. Periodically, perform an inventory and reconciliation of citations to identify any unaccounted citations not tracked.</p>

<b>MANAGEMENT RESPONSE</b>	Concur
<b>ACTION PLAN</b>	A spreadsheet has been created to capture all necessary information and will be updated weekly.
<b>IMPLEMENTATION DATE</b>	January 26, 2018

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**FINDING # ISS.5 – Permit Renewal Late Fees (Obj. A)**

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<b>CONDITION (THE WAY IT IS)</b>	Current renewal process does not charge establishments a late fee for renewing expired permits. In 2 of 20 (10%) permit renewal (Exhibit A) examined payments were received at most 2 weeks after permit had expired.
<b>CRITERIA (THE WAY IT SHOULD BE)</b>	Best collection practice followed by several City departments such as Customer Service and City Library assess late fees for overdue payment to incentivize on time payment.
<b>CAUSE (DIFFERENCE BETWEEN CONDITION &amp; CRITERIA)</b>	EH may not assess a late fee for permit renewal unless it has been approved by City Council and added to City Ordinances.
<b>EFFECT (SO WHAT?)</b>	The inability to assess a late fee may result in delayed late renewal fees and higher number of expired permits outstanding.
<b>RECOMMENDATION</b>	Management should propose a late fee for permit renewals to City Council to be added to the City Ordinances.
<b>MANAGEMENT RESPONSE</b>	Concur
<b>ACTION PLAN</b>	GHD management proposed a \$50 fee for late permit payments during the 17/18 budget cycle and the fee was endorsed by City Management. An oversight during the budget process resulted in the proposed late fee being excluded from the budget related ordinance fee update. Because the projected revenue from a late fee is minimal, management made the decision to resubmit the permit late fee proposal during the 18/19 budget process.
<b>IMPLEMENTATION DATE</b>	October 1, 2018

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**FINDING # ISS.6 - Inspection Follow Ups (Obj. B)**

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<b>CONDITION (THE WAY IT IS)</b>	<p>1. Under current operation process, after an unannounced inspection is conducted the manager of the establishment is required to sign the inspection report acknowledging an inspection was performed on that date. If any violations were identified during the initial unannounced inspection then a follow up audit is conducted and the manager of the establishment is required to sign and acknowledge any unresolved violations found during the follow up. However, the Manager of an establishment is not required or asked to sign or acknowledge a follow up inspection was conducted if the inspection resulted in full compliance (no violations).</p> <p>2. Internal Audit reviewed 10 of the 55 follow ups (Exhibit A) that were performed 10 days after the initial inspection to determine if appropriate justifications was documented on the inspection report as required by policies and procedures. In 5 out of the 10 follow ups examined, EH did not document reason for extending compliance deadline and as such is not in compliance with internal protocols.</p>
<b>CRITERIA (THE WAY IT SHOULD BE)</b>	<p>1. For services rendered to a third party it is considered best practice to request a signature from the third party acknowledging that the service was rendered on that specific date as to avoid future disputes.</p> <p>2. Follow up Inspection policies and procedures states that "compliance deadlines for non-priority or core violations shall be no more than ten days from the date of the initial inspection. However, EHSs are empowered to provide longer compliance deadlines when reasonable. If the compliance deadline is greater than ten days, EHSs shall note on the food inspection report the rationale for the longer compliance deadline."</p>
<b>CAUSE (DIFFERENCE BETWEEN CONDITION &amp; CRITERIA)</b>	<p>1. During the development of the current food inspection policies and procedures, the process of obtaining management's signature as acknowledgment a follow up inspection had occurred and found to be in full compliance was never considered and implemented.</p> <p>2. EHS did not follow the protocol requiring documentation for reason for extending compliance deadlines.</p>

<p><b>EFFECT (SO WHAT?)</b></p>	<p>1. Insufficient supporting documents or evidence with regards to third party verifications and acknowledgment may result in greater exposure to risk of fraudulent reporting, since controls to detect them are not in place.</p> <p>2. Delay in follow up inspections without appropriate documented reasoning exposes Garland residents to known safety and health risks if they are patrons of the associated establishments.</p>
<p><b>RECOMMENDATION</b></p>	<p>1. Management should implement a policy in place to require signatures from establishment management after all follow up inspections.</p> <p>2. Management should review with staff the policy that requires documentation noting the reason for compliance deadline extensions.</p>
<p><b>MANAGEMENT RESPONSE</b></p>	<p>Concur</p>
<p><b>ACTION PLAN</b></p>	<p>Signatures from establishment management for rechecks have been implemented and management will review the policy requiring documentation for compliance deadline extensions during the January 30<sup>th</sup> staff meeting.</p>
<p><b>IMPLEMENTATION DATE</b></p>	<p>January 31, 2018</p>

<b>FINDING # ISS.7 - Data Integrity, Duplicate Violation Descriptions (Obj. A &amp; B)</b>	
<b>CONDITION (THE WAY IT IS)</b>	IA noted there were duplicate violation descriptions for 27 violation codes out of a total of 123 existing different violation codes. Each violation is assigned a specific code within Envision System used for generating inspection report (one to one relationship). IA noted there were 27 violation codes that had multiple violation descriptions of the same type (i.e. duplicated description).
<b>CRITERIA (THE WAY IT SHOULD BE)</b>	To ensure proper data integrity, violation codes and violation description should have a one to one relationship. This means for each violation code there should only be one description associated to the code. For example, violation code "1606" should only have one description, "Proper Labeling: Honestly Presented/Proper Date Marking" and no other variation.
<b>CAUSE (DIFFERENCE BETWEEN CONDITION &amp; CRITERIA)</b>	When updates to violation descriptions were made within Envision, the new violation description was added to the violation code instead of modifying existing description which resulted in multiple (duplicate) violation descriptions for a single code.
<b>EFFECT (SO WHAT?)</b>	Data integrity helps in insuring the consistency and accuracy of the data stored and presented. Duplicate violation descriptions for a single violation code may result in EHS selecting different existing violation descriptions for similar description when generating their report. As a result, this would lead to inaccurate reporting when the report is summarizing data based on different types of violations.
<b>RECOMMENDATION</b>	Management should work with IT to consolidate the duplicating violation descriptions and going forward updates to violation code descriptions should replace existing ones.
<b>MANAGEMENT RESPONSE</b>	Concur
<b>ACTION PLAN</b>	GHD management will request IT support to implement the recommendation

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<b>IMPLEMENTATION DATE</b>	The request for IT assistance has been made. The implementation date will be dependent on IT's ability to fulfill the request.
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## Exhibit A – Sampling Methodologies

### Finding 5 –Permit Renewals Late Fees

IA obtained the lists of establishments that requires a permit from EH (population 1073). IA then randomly selected a sample of 20 establishments from a population of 68 whose permits had expired as of 11/01/17 (date of testing) or is set to expire within the current year for testing. This criteria was used in order to test whether application to renew was submitted, payment was received timely, and/or notification to establishment to renew permit was sent out to establishment in a timely manner. The results can be projected to the entire population.

### Finding 6 – Inspection Follow Ups

A Crystal report was ran from EH's food inspection system for all inspections (including follow ups, complaints and complaints investigations) for the period October 1, 2016 through October 31, 2017. IA then calculated the number of workdays between an unannounced inspection and the respective follow up inspections. IA then selected a sample of 10 follow up inspections from a population of 55 follow ups that occurred 15 workdays after the initial unannounced inspection. The results can be projected to the entire population.

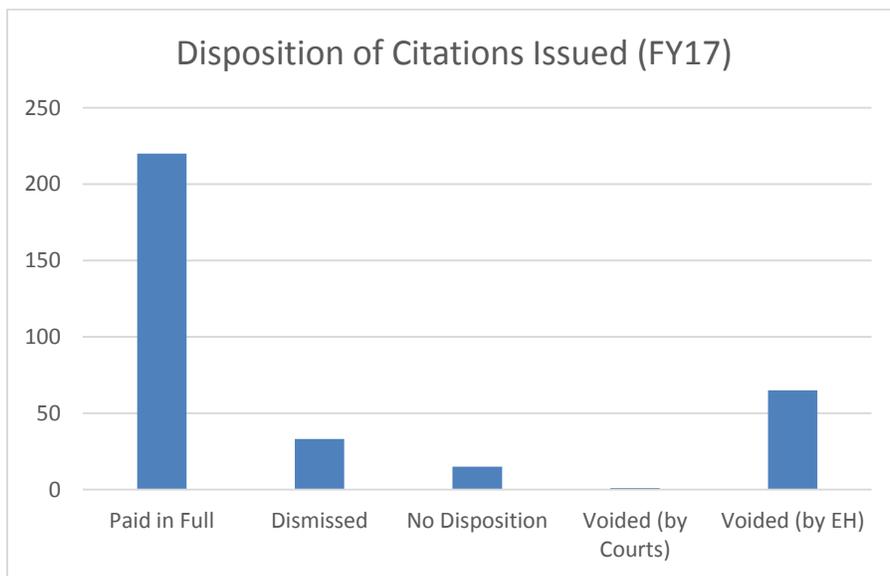
## Exhibit B – Environmental Health Fees

TYPE OF SERVICE/FEE	Class	CURRENT FEE
Full Service	1	\$450.00
Fast Food	2	\$450.00
Sandwich/Ice Cream	3	\$350.00
Convenience Store	4	\$250.00
Supermarket	5	\$350.00
Food Processor	6	\$350.00
Daycare	7	\$350.00
School	8	\$350.00
Warehouse	9	\$250.00
Hot Truck	10	\$450.00
Assisted Living Facility	11	\$350.00
Hospitals & Nursing Homes	12	\$450.00
Catering Trucks		\$200.00
Concession Stands		\$25.00
Environmental Site Assessment		\$80.00
Liquid Waste Hauler		\$200.00
Registered Manager		\$30.00
Registered Pool Operator Permit		\$10.00
Registered Pool Operator Class		\$20.00
Pool Permit		\$200.00
Pool Re-Check Fee		\$25.00
Temporary Food Permit		\$50.00
Underground Storage Tank Installation/Removal		\$100.00
Underground Storage Tank Permit		\$200.00
Re-print Fee		\$5.00

*Source: Obtained current fees schedule from the Health Director.*

## Exhibit C – Citations Disposition (Oct 1, 2016 – Oct 31, 2017)

Disposition	# of Citations	% of Total Citations
Paid in Full	220	65.87%
Dismissed	33	9.88%
No Disposition	15	4.49%
Voided (by Courts)	1	0.30%
Voided (by EH)	65	19.46%
<b>Grand Total</b>	<b>334</b>	<b>100.00%</b>



*Source: Obtained citation records from Environmental Health Manager and Crystal Report pulled from the Court Citations. Records pulled are for all Health related citations issued during the period October 1, 2016 through October 31, 2017.*

## Exhibit D – Response Time to Service Requests

The following response times must be met by Environmental Health staff:

Service Request	Response Time
Alleged Food Borne Illness ( <i>Multiple Groups</i> )	Immediately
Alleged Food Borne Illness ( <i>Single Group</i> )	24 hrs
Unsanitary Food Service Establishment	48 hrs.
Unsanitary Child Care Center	48 hrs.
Swimming Pool Complaint ( <i>Fence or Safety Hazard</i> )	Immediately
Swimming Pool Complaint ( <i>Non-Hazard</i> )	24 hrs.
Epidemiological Investigation	24 hrs.
Air Pollution or Nuisance Dust Evaluation	48 hrs.
Stationary Noise Source Evaluation	48 hrs.
Review of Plans	24 hrs.
Certificate of Occupancy Inspection	48 hrs.
Foster Home Inspection	72 hrs.
Rodent or Mosquito Complaint	48 hrs.
Illegal Discharge Complaint	Immediately
Other Non-Specific Nuisances	48 hrs.

**Response time is to be considered real clock time, excluding Saturdays and Sundays.**

*Source: Policy was obtained from the Director of Health*