



**Missoula City-County Health Department**

**ENVIRONMENTAL HEALTH**

301 West Alder Street | Missoula MT 59802-4123  
www.missoulacounty.us/HealthDept

Phone | 406.258.4755

Fax | 406.258.4781

TO: Economic Affairs Interim Committee  
FROM: Shannon Therriault, R.S., Environmental Health Manager  
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I apologize for the lateness of these comments. The Missoula City-County Health Department is concerned about how current accounting and budgeting practices affect licensing fees for small boards like the Board of Sanitarians.

The Board of Sanitarians plays an important role in ensuring a competent and educated environmental public health workforce. Sanitarians work at the intersection of science and public policy, and routinely make measured decisions in the gray area of regulation interpretation. To do this, we have to have the education, knowledge and experience to determine whether public health will be protected in a given circumstance. Our communities, the public and regulated businesses are better served by having a Board confirm that we are qualified to serve in this capacity. (An official from DPHHS once told me that a monkey could fill out a restaurant inspection report, which, while stunningly offensive, may be true if you treat the inspection as a simple checklist of violations. But it takes a person with a good microbiological background to perform risk-based inspections, impart legitimate public health reasons for the rules, apply scientific principles accurately in unique situations, and investigate food borne illness complaints and outbreaks.)

There are only about 185 licensed sanitarians in the state (compared to over 20,000 nurses.) Having such a small pool of licensees makes it difficult to pay all of DLI's direct and indirect costs of operating the board. To save money, the Board of Sanitarians meets infrequently. In recent years, we had difficulty getting new sanitarians-in-training approved in a timely fashion because meetings, even those held over the phone, cost too much money. Emails and phone calls went unanswered.

Last year our fees increased by 50%. DLI staff and Board responsiveness improved significantly. Yet, last year's fee increase apparently did not provide the financial stability that the Board predicted. It seems that the costs attributed to and charged to the Board are not within the Board's control. The current framework does not kindle innovations or improvement, because to meet or change regulations means that license fees have to increase even more.

We don't know what the answer is, but appreciate that the Economic Affairs Interim Committee is looking into this issue. There definitely needs to be some basic support for small boards, especially those that are focused on maintaining public health and safety.

Thank you for the opportunity to comment.