

Environmental Health Career Plan Update

Frequently Asked Questions (FAQs)

EH Specialist 4A, EH Specialist Sr 4B and Other Required Credential Questions

1. Why isn't VDH willing to pay a bonus to those who obtain the OSE license?

The OSE license is required to perform the duties of an EHS working independently in the Onsite Sewage Program. State law requires anyone who performs a site evaluation or designs an onsite sewage disposal system to be licensed as an Onsite Soil Evaluator or a Professional Engineer. Obtaining the requisite license or certification to perform independently is reflected in the pay raise that accompanies the reclassification of the individual from the 4A position to the 4B position. The OSE/AOSE can be used with other businesses and work in the private sector after ending employment with VDH.

The agency does not pay individuals for the cost of obtaining the licensure or certification necessary to perform the duties of the job. For example, the cost of obtaining a nursing license is not reimbursed by the agency. A nursing position could not be filled by a person who is not already licensed. The licenses and certifications required for environmental health work typically cannot be obtained by persons without experience in the work. Therefore, the career plan allows the agency to fill EH positions with applicants who are not fully qualified and move them up one step when the necessary qualifications are obtained. It should be noted that the agency is willing to pay an initial bonus and renewal bonus to those licensed as an OSE when they satisfactorily complete the Registered Environmental Health Specialist (REHS) exam. This exam does have components related to wastewater disposal as well as other environmental health subject matter areas that lend themselves to all EH.

2. Are EH managers and supervisors required to have the same the credentials as the EHS Seniors?

This depends on the specific position description, but as a rule the mere fact that the person supervises or manages a program does not require the person to be credentialed in that program. On the other hand, if the manager or supervisor is routinely expected to conduct food inspections or evaluate sites and design sewage disposal systems, then the person must have the appropriate credential. In other words, the credentials are required to perform specific field-level tasks.

Since most of our environmental health supervisor and manager vacancies are filled from within the agency, most will have at least one of the required credentials. Supervisors and managers are encouraged to obtain and maintain one or more of the credentials required for the positions that they supervise.

3. What inspections or evaluations are specifically referred to in terms of the different staff levels? Would a supervisor/manager be allowed to conduct a follow-up restaurant inspection to verify that an item is corrected within 10 days without being a standardized food EHS?

The inspections and evaluations referred to in the plan are field level inspections and evaluations; for example, restaurant inspections, site evaluations in the onsite program, and dairy inspections. Where a specific credential is required for that activity, the supervisor or manager must have the appropriate credential.

The Food Regulations require that any authorized representative of the commissioner who inspects a restaurant or conducts plan review for compliance with the regulations shall [have] the KSAs to adequately perform the required duties. The agency has determined that standardization in the food program is the determining factor in whether the person is competent.

The “inspections or evaluations” referred to in the policy do NOT include performance evaluations.

4. For any current food staff who have not yet been standardized and have been here longer than 18 months, am I correct that they will have 90 days to become standardized after September 1st?
The career plan provides a 90 “grace period” for current staff before the written notice/improvement plan is required. Essentially, that provides 180 days for the person to become standardized: 90 days for the grace period and another 90 days after the notice of improvement needed is given.
5. If someone at the 4B level does not currently have the credential but is in the 90 days working to get the credential again, can they perform inspections/evaluations independently but have another standardized or COSE do the final review or enforcement action?
DPOR’s regulations allow unlicensed persons to evaluate soils and design systems under the direct supervision of a licensed OSE. The person who is providing that direct supervision must accept responsibility for ensuring that the work done complies with all regulatory standards. The final system design must be signed by a licensed OSE. On the other hand, an OSE license is **not** required to do strictly regulatory tasks, which would include reviewing OSE work and issuing permits for systems designed by private sector OSEs/PEs.

In the food program, VDH policy is that only standardized persons may initiate enforcement action or condemn food. An EHS who is not standardized but has completed training for temporary food service establishments may continue to inspect temporary establishments. VDH policy also allows an EHS who has been trained in the food program to conduct up to five inspections per year without being standardized.

6. If you have a 4B position that requires a food person to maintain standardization or an onsite person to maintain their DPOR license and that person fails to do so for either one and there is no extenuating circumstances that caused that person not to maintain their credentialing is that person then demoted and reclassified to a 4A until they regain the credentialing within the 90 days?
No. A person who is currently at the 4B level but fails to maintain the required credential will be provided a written notice of improvement needed that includes an improvement plan allowing up to 90 days to obtain the credential. If the employee fails to complete the improvement plan, including obtaining the credential, and there are no extenuating circumstances, the employee will be released from employment with the agency.
7. I have an employee who started midway through the onsite training module and her degree is not one of the preferred DPOR degrees. How does this affect her?
Since the person has already been hired, this might be considered an “extenuating circumstance” for which an exception to the requirements may be granted. Some allowances may be required, in the interest of fairness, during a transition period.
8. We advertised and finished interviewing for an EHS Sr. position that would run the rabies and environmental complaints programs. This is the way the job was posted in the RMS and how it was interviewed. We have checked references and made an offer. Will this position now have to go through the Food Standardization process over 18 months thus impacting their ability to run those two programs for 18 months?
On the face, this position appears to be at the EH Associate (3A) level. Because the person is already employed, the district may wish to request an exception to the policy or to redefine the requirements of the position to include food inspections and make obtaining standardization in the food program a condition of employment.

Both the existing and the revised career plans include descriptions of and requirements for the Environmental Health Associate (3A) position for paraprofessional staff who are assigned work that includes routine swimming pool inspections, routine investigations of animal bites, monitoring confined animals, and other routine inspections of low technical complexity. Districts are encouraged to use this classification when it meets a

business need; doing so is one way to hire and develop employees who do not yet have the background required for the 4A or higher level positions.

9. We have a 4A on have consumer side that was just hired to do pool inspections and environmental complaints. There was and is not intention for this person to do food establishment inspections. Is this an exception that needs to go to OHR and Bob Hicks to approve and what would be the process?

Yes. See also the response to question 8.

10. We are in the process of hiring a 4A for Onsite. So as I understand it, they have 18 months to become licensed or may be terminated if after giving them a development plan for 90 days to complete this task. Do we have a general list of what would be extenuating circumstances? Is inability to get the courses one needs fit that condition? Again this was advertised differently so we may benefit from changing the RMS ad although interviews are already set up.

A person hired as an EHS in the onsite sewage program should be provided 18 months to complete training and obtain the OSE license. If the employee is not able to do so, the person should be released from employment with the agency.

Exceptions to the policy will be considered on a case-by-case basis. We don't have a list of "extenuating circumstances".

11. Staff has a 90 day grace period after 9/1/2014 to get their license if they are in the 4B position before we give them a substandard notice and development plan? I think that is what was said on the polycom although it is not in the documents (I think) for career path.

That is correct. On 9/1/14 there is a 90 day grace period. If the employee does not have the credential at the end of 90 days (essentially the end of November, 2014) the employee should be given a notice and a developmental plan allowing up to 90 days to obtain the credential. Although not specifically stated in the written plan, that is effectively the implementation plan.

12. Does this make 4B exempt positions like it does for nursing? Impacts how we can utilize staff.

Nothing in this career plan changes the status of employees under the FLSA.

13. Why is it that when an EHS progresses from the 4A position to the 4B position that the salary increase is not negotiable up to 10%.

Our current policy 3.05 [Pay Practices](#) has the 4A to 4B as non-competitive and is considered an In-Band Adjustment. We received approval to consider the 4B to 4C as a **competitive** action type which allows for the up to 10% increase.

- In-Band Adjustments: A non-competitive pay practice which allows agency flexibility to provide salary growth and career progression within the same pay band for any of the four reasons described below.
 - Duty changes: If the assigned duties cause the position to be evaluated at one benchmark level higher (e.g., from level 4A to 4B or 4B to 4C), District and Office Directors are authorized to approve a 4% salary increase.
- Voluntary Transfers – Competitive: This practice applies to the movement of an employee from one position to a different position within the same pay band, in the same role or in a different role, at a higher, lower or equal responsibility benchmark level, through a competitive selection process.
 - All Other Positions: District and Office Directors are authorized to approve negotiated rates from the minimum of the pay band up to 10% above the current salary, within the advertised salary range. Requests for pay rates more than 10% above current salary and within the advertised salary range require the approval of the appropriate Deputy Commissioner.

14. Will VDH be providing more training to satisfy the OSE CPE requirements?

Ultimately, it is the responsibility of the individual to assure that they meet the necessary requirements to retain any required credential and it is the EH manager's responsibility to assure that each employee has any credential for the assigned work. VDH will continue to actively pursue and promote training opportunities based on agency business needs, but cannot guarantee that each individual will be able to satisfy all continuing education needs through agency provided training.

15. The plan gives the perception that there is a high degree of specialization in regard to the food, onsite sewage and dairy programs with little specialization or work in the many other EH programs, which are typically covered by staff working in the food or onsite programs. Will the EWP's reflect these other duties specific to one "side" or the other or will that be left to district discretion?

The career plan is not intended to imply that staff may only work in specific programs. Districts should assign duties to EH staff based on district need, keeping in mind that credentials are required to carry out certain specific tasks in some programs. Currently, some EHS Seniors have more than one credential and are assigned work in multiple programs; for example, we have staff assigned work in both the food and onsite programs and so are standardized in the food program and have the OSE license.

EH Technical Specialist 4C Questions

16. Will an additional certification be required for the Onsite Sewage 4C position?

Yes. The 4C position in the onsite sewage program will be requiring certification by OEHS. Training will be provided and successful completion of the training will be required for current as well as future Onsite Sewage Technical Specialists. Although the training has not been fully designed, we expect that the training will focus on the agency business need for staff at the district level to review alternative onsite sewage system plans. All persons employed at the 4C level will be expected to maintain the requirements for the specific position, including the DPOR AOSE/COSE.

17. When a 4C is reassigned to a 4B position due to inability or unwillingness to maintain the required credentials, is the 4C position reclassified to a 4B position or is the staff member reassigned to a vacant 4B position? If the position is reclassified, how does the district retain or get back a 4C position? If the position is not reclassified, what if there are no vacant 4B positions?

Ideally the downward movement would occur and the position working title would be changed at the same time via HR5 and HR9. If there is another vacant EH position, a working title change would be submitted for the 4C EH Tech Spec. If there is not another vacant EH position, it would be reviewed on a case by case basis.

18. How should districts handle periods of turnover relative to the 4C position? If the food or onsite 4C position is vacant, who would be allowed to perform that work until the position is filled?

Any person with the required KSA's, as demonstrated by the appropriate certification, could fill in. It's important to keep in mind that only a Certified Standardization Officer can conduct standardization activities in the food program.

19. Do we anticipate any support for helping our 4C staff who were limited to a 4% pay increase upon promotion, based on former practice?

No, the In-band adjustment for change in duties (4%) increase was designated in the original 2003 plan.

20. Another FAQ stresses the importance of addressing advancement with staff. Is this indicating that Districts should promote multiple individuals to a 4C position? What is the expectation of Districts? In the past the 4C technical position was typically reserved for one sometimes two individuals in a single program area only.

4C positions must be approved by the Central Office. Approval is based on the district demonstrating a business need. There is nothing in the plan requiring that a district have a 4C position or limiting the number of positions

at that level. However, because the district needs to demonstrate need, promotion to 4C should not be considered simply a means to reward employees and promotion is not automatic after completing the required training.

21. Currently our District does not have a 4C position in all programs. It appears to me the career plan addresses the importance and the need to have a 4C in all program areas. Am I correct that if no 4C position exists in perhaps the onsite program that a District should be supporting and advancing someone to this role?
Each district should consider the role of the 4C technical specialist and the utility of that position in meeting program needs. If establishing a 4C position will improve the efficiency and effectiveness of the district program, this is a good way to provide some upward mobility to staff.
22. Are districts going to be required to have a 4C Onsite Technical Specialist on staff like the 4C Food Technical Specialist? Currently, our supervisor serves in that capacity as an EH Supervisor.
Districts are not required to have 4C Onsite Technical Specialist. The circumstances, including workload in each program, vary between districts. The decision to request a 4C position in any of the programs should be based on business need. Demonstration of a business need is required before approval for the position will be granted.
23. In our district, we have not moved/progressed 4Bs to 4C position. The 4C is posted and applicants apply. We currently are in the selection stages of an open position. In the updated plan:
- A) Does promoted employee remain at his/her 4B salary level until the 4C training and credentials have been attained?
Yes
- B) How long does the employee have to complete the 4C training and credentials?
Please see page 15 of the [2014 VDH Procedures for Certification and Standardization of Retail Food Inspection Staff](#):
- NOTE:*
1. *All of the initial certification requirements are to be completed during a total of 8 joint inspections with the SSO, within a period of 12 months, but not to exceed the 18 month initial training period.*
- C) If the employee fails to complete, must they always be returned to the 4B? What if there is not 4B position available and the district only needs a 4C?
There are multiple factors to consider, if they have any current SOC or Notice of Substandard Performance, they could be separated. What if they were excellent as an EH Sr but could not maintain credentials. If they could not perform the duties then the Performance Management route would be the way to go. Think maybe this would be a case by case also.

Bonus Questions

24. What is the justification for providing a bonus for the NEHA REHS and CP-FS credentials?
The REHS and CP-FS credentials are nationally recognized as indicating that the holder has a high degree of professional knowledge. As an agency, we want to encourage and recognize the degree of professional knowledge shown by persons who obtain those credentials. Since the credentials are not required to perform the basic duties of the position, we are able to offer a financial incentive to employees who obtain and maintain those credentials.
25. Will new hires that already have the REHS or CP-FS when hired receive the bonus at the time they are hired?
New hires and re-hires that have the REHS or CP-FS are not eligible for the initial bonus; however they will be eligible for the renewal bonus.

26. Will current employees who already hold the CP-FS receive the \$1,000 bonus on September 1, 2014?
You can give a bonus to current eligible staff with CP-FS on 9/1/2014; however if they renew the certification within the upcoming fiscal year, they will not be eligible for the renewal bonus.
27. Can you clarify a little more on how the REHS “renewal” bonus will impact current staff holding this credential? Is it if they renew anytime after September 1st or anytime during a specific fiscal year? What if already renewed prior to September 1st?
Anyone who renews the REHS or CP-FS credential after the policy becomes effective (i.e., September 1, 2014) 1, should receive the bonus. Note that the applicable date is the NEHA renewal date; a person whose credential expires at the end of September may already have paid to renew their registration. That person would still be eligible for the bonus after September 1 if they produce the required documentation. If the credential expired and was renewed prior to September 1, the bonus is not applicable.
28. How does this affect overall staff pay, aside from the potential bonuses? Will the plan result in position up-grades and pay increases?
Aside from the bonuses and the potential loss of pay upon demotion or separation (depending on classification) due to failing to maintain required credentials, the plan does not affect EHS pay. The plan does not include reclassification of the EHS positions.
29. How do I ensure that an employee who renews a credential is eligible for the bonus?
The employee should produce evidence in the form of a certificate, transcript or license that indicates the current status of the credential. In the case of the NEHA credentials, the holder can download a transcript from the NEHA website. DPOR has a license look-up function on their website. The food and dairy certifications can be confirmed by OEHS staff.
30. By offering a bonus for the NEHA CP-FS credential, aren't we suggesting that the VDH standardization program is inadequate?
No, the CP-FS is not a “higher” version of standardization. Standardization focuses on the KSAs required for ensuring regulatory compliance. The CP-FS encompasses a broader and more general knowledge of food safety.
31. The plan authorizes in-band bonuses. Does the district have the option to not award the bonus?
Districts should award the bonus to any employee who presents evidence of having obtained or renewed the credential and who, in the last performance review cycle, had no active Written Notices and/or Notices of Improvement Needed and had a performance rating of Contributor or better.

Recruitment, Transactions and EWP Questions

32. How will employees know that they will have opportunities for advancement?
EH managers are expected to inform current employees of the career plan. Mention of the plan should be part of the recruitment process, especially during the salary negotiation process; the plan is a requirement that may affect a candidate's decision to accept a position with VDH. Ideally, all current employees and new hires should be provided a copy of the career plan.
33. Can we advertise in RMS that a Bachelor's Degree is required for EH Specialists due to the DPOR licensing requirements?
No. There are other combinations of education, training and experience that meet the requirements for the DPOR licensure; therefore the educational requirements of a specific Bachelor Degree are not true requirements.

Use the following language: “Must be able to obtain licensure from the Department of Professional and Occupational Regulation (DPOR) in Alternative Onsite Soil Evaluator (AOSE) or Conventional Onsite Soil Evaluator (COSE) within 18 months.”

34. Based on these changes will any new verbiage be required to be placed for recruitment advertising?
Please use only the applicable program for the advertisement.

Must be able to complete training in the VDH Soils program, VDH Food program or VDH Shellfish program and be able to obtain credentials in one of the following within 18 months: VDH Standardized in Food, DPOR Conventional Onsite Soil Evaluator (COSE), DPOR Alternative Onsite Soil Evaluator (AOSE), National Shellfish Sanitation Program (NSSP) State Standardized Inspector

35. How will the career plan requirements affect recruitment from outside of the agency? Can we use “equivalent experience credits” to enhance the pool of applicants or would we always be expected to hire new staff at the entry level regardless of work experience outside of VDH?

The amount of experience is not the factor that determines which level a candidate may fill. In order to be a 4B or 4C, the appropriate credentials mentioned in the career plan are required. A candidate for an onsite sewage position who already possesses a valid OSE license may be hired at the 4B level. On the other hand, a candidate for the position who has 10 years of experience but no license would be hired at the 4A level and would be upgraded to a 4B position when the license is obtained. It may be reasonable to expect that a candidate with no license but with significant relevant experience could obtain the license in less than the 18 months allowed.

Both the licensure or certification and relevant experience must be considered along with other qualifications when filling a vacant position.

36. DPOR requires from one to four years of experience before an EHS can sit for the OSE licensing exam. How will VDH be able to fill vacant positions in the onsite sewage program when there is no mechanism for licensure without VDH experience?

There are several combinations of education, training, and experience that allow one to obtain the OSE credential. A summary document is attached.

Note that a person with one of the “approved” bachelor degrees who completes the required VDH onsite sewage training qualifies to sit for the OSE exam with one year of experience. The required experience does not have to be as a VDH employee.

37. It was mentioned that 4C positions must be competitive. Does this mean advertised internally or externally?
It can be recruited as agency only, state employee only or general public. Agency only does require senior management approval but is the preferred recruitment option.

38. In doing our review of our current positions/EWPs/duties assigned and the career descriptions we received, we feel we have a current EHS Senior (4B) functioning at the Tech (4C) level. He has the required licensure for the 4C position (AOSE). Do we go ahead and sign him up for the Onsite Sewage System Technical Specialist training as soon as it’s offered and then submit the request to the 4C with negotiated increase up to 10% once we have proof it was completed successfully? I know the new plan says recruit, but with what FTE?

First, a EH Tech Spec (4C) level must be approved. It must be a competitive recruitment and the position must be advertised. Once the successful candidate is selected then the candidate may be signed up for the Onsite Sewage System Technical Specialist training. You will have to work with CHS on reassignment of FTEs or manage it within your District.

39. What HR forms must be submitted and how do I access them?

HR5 and HR9 (if applicable) actions designated in the plan are to be submitted via Web HR F&A with appropriate documentation attached.

- Bonuses: Submit HR5 In-Band Bonus for New Knowledge, Skills & Abilities
- EH Spec 4A to EH Spec Sr 4B: Submit HR9 for working title, band/level change and link HR5 for non-competitive in-band adjustment for change in duties
- EH Spec Sr 4B to EH Tech Spec 4C: Submit HR5 for Competitive Voluntary Transfer
- EH Tech Spec 4C to EH Spec Sr 4B: Submit HR9 for working title, band/level changes and link HR5 for non-competitive in-band adjustment downward for reduced duties.

40. Will HR be releasing a canned comment to add to EWP's to reflect the needs for maintaining licensure and standardization? We have that in our EWP's already, but thought there may be a desire to standardize that language across the state.

Yes the benchmarks have been updated on the HR6CList and the HR8A templates. The additional language regarding the "maintenance of credentials" will need to be added to each EWP individually.

41. How should districts budget for this foreseeable expense of renewal bonuses?

Business managers should survey their district to identify staff that currently possesses either an REHS or CP-FS credential. The date of renewal will be specified on the credential. If the date of renewal falls in the fiscal year, it should be included in the 'Salaries' tab of the budget workbook on the row designated Bonuses and Incentives. For FY15, this row is shaded in green and black font, but per the Office of Financial Management, it can be hard-coded in and will be rolled up into the total.

Basic paths to OSE licensure from 18VAC160-20-96. Qualifications for Licensure - Onsite Soil Evaluators.

Education/Related license	Experience under licensed COSE or AOSE (years)*	License
Virginia Licensed Professional Soil Scientist (LPSS)	1	COSE
Bachelor's degree with major in soil science, biology, chemistry, engineering, environmental science, geology, agronomy, earth science, or environmental health	2	COSE
Associate's degree with major in waterworks, wastewater works, environmental science, or engineering technology	3	COSE
Completed VDH Basic Onsite Sewage training with no degree or with unrelated degree	4	COSE
No degree or related credential	8	COSE
=====	=====	=====
COSE or interim OSE	2 in the last 4 years	AOSE
COSE, interim OSE and employee of VDH or local government reviewing plans	2	AOSE
Authorized Onsite Soil Evaluator (pre-2009) + design of 36 onsite sewage systems (12 of which were alternative)	3	AOSE
Authorized Onsite Soil Evaluator prior to 2009, COSE, or Interim OSE, employee of VDH in onsite sewage design prior to 2009	4	AOSE

COSE – Licensed Conventional Onsite Soil Evaluator

AOSE – Licensed Alternative Onsite Soil Evaluator

* Each individual applying for a conventional or an alternative onsite soil evaluator license **may receive credit for up to half of the experience required by this section for:**

1. Satisfactory completion of postsecondary courses in wastewater, biology, chemistry, geology, hydraulics, hydrogeology, or soil science at the rate of one month per semester hour or two-thirds of a month per quarter hour; or

2. Satisfactory completion of board-approved onsite soil evaluator training courses at the rate of one month for each training credit earned. Up to one training credit is awarded for each 10 hours of classroom contact time or for each 20 hours of laboratory exercise and field trip contact time. No credit towards training credits is granted for breaks, meals, receptions, and time other than classroom, laboratory and field trip contact time. [Emphasis added]

Most common paths to licensure for new VDH employees

