



Office of the Auditor General / Bureau du vérificateur général

AUDIT OF THE FOOD SAFETY PROGRAM

2007

Chapter 2

VÉRIFICATION DU PROGRAMME

DE SALUBRITÉ DES ALIMENTS

2007

Chapitre 2

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EXECUTIVE SUMMARY

Introduction

The audit of the Food Safety Program was included as part of the 2007 Audit Plan of the Office of the Auditor General, first presented to Council as part of the 2005 Annual Report.

Background

The Food Safety Program exists as part of the Environmental & Health Protection Division (EHP) of the Public Health Branch of the Community & Protective Services Department of the City of Ottawa. The Program's budget represents about 30% of EHP's overall budget. In 2006, the Food Safety Program had a budget of \$2.4 million with actual expenditures of \$2.1 million (approximately \$300,000 or about 13% under budget). Provincial funding now covers 75% of this budget, which has grown by about \$800,000 since 2004. Currently, a total of 36.5 Public Health Inspector (PHI) positions deliver the various Environmental Health services for which the Division has responsibility. Of these, 21.5 PHIs deliver Food Safety services.

According to a University of Guelph food safety expert, 11-13 million Canadians (approximately 1/3 of our population) fall ill each year from food and water consumption problems. The most common problems that put the public at serious risk are inadequate food holding temperatures, contamination, poor sanitation and inadequate hand-washing. These are dangerous food safety issues that cause bacteria growth and the development of toxins.¹ The City's PHIs monitor conditions in food establishments to protect the public from these potential health hazards. As the second largest city in Ontario and as the Nation's Capital, the Food Safety Program makes an important contribution to safeguarding the many tourists and local patrons who enjoy the City's growing number of food establishments and the multitude of festivals and special events hosted by Ottawa each year.

Audit Objectives and Scope

The purpose of this audit was to provide an independent and objective assessment of the Food Safety Program's performance in terms of compliance with legislative and regulatory requirements; the appropriateness of the management framework to facilitate the delivery of effective and efficient services; and the adequacy of financial management practices. We also reviewed progress made since the previous audit in 1992; however, we did not review all of the 1992 recommendations in detail.

¹ Based on an excerpt of an interview conducted by CBC with Ben Chapman, a University of Guelph food safety expert. The interview was aired on February 21, 2007 as part of CBC's Marketplace program, and can be viewed at http://www.cbc.ca/marketplace/2007/02/coffee_shops.html.

Summary of Key Findings

The Health Protection and Promotion Act (HPPA), 1990, defines the role and responsibility of all Boards of Health in Ontario. Ottawa's Board of Health is City Council. Under the Act, the Executive Director of the Board of Health is the Medical Officer of Health (MOH). The MOH has legislated responsibility for community health protection and the control of communicable diseases in the City. Food premises are inspected under the HPPA and the Food Premises Regulation 562.

The Provincial Mandatory Guidelines for Food Safety are not being met by the City of Ottawa. Completion rates of annual inspections are significantly below prescribed levels. In a random file audit sample of 100 premises, in 2006:

- 63% of high-risk establishments were inspected at the prescribed frequency or higher (i.e., three inspections per year);
- 87% of medium-risk establishments were inspected at the prescribed frequency or higher (i.e., two inspections per year); and
- 79% of low-risk establishments were inspected at the prescribed frequency or higher (i.e., one inspection per year).

EHP management closely monitors compliance rates on an ongoing basis and maintains statistical reports. Concerns regarding compliance have been previously reported by management to City Council during budget deliberations in previous years and to the Province via annual reporting to the Ministry.

From the outset of this audit, management expressed concern that the group was not able to meet Provincial Food Safety requirements. Management has, over the years, endeavoured to improve the performance of the Program. In recent years, steps have been taken to begin to address systems problems and management has brought attention to the shortage of qualified PHIs. However, despite an increase in the annual budget for Food Safety of approximately 50% from 2004 to 2006, the program has been unable to meet legislative requirements while the budgets over these three years was under spent by a total of \$894,000.

There is a need to consider the performance and needs of this Division more comprehensively and proactively. That has been difficult to do without an information system that facilitates this sort of analysis. The analysis of in-field results and compliance trends has been limited by an antiquated system and tools. Disclosure of inspection results through manual means has caused delays for the public and media, and further inefficiencies for EHP staff.

A recent market survey by Employee Services has concluded that PHI salaries in Ottawa are in the 23rd percentile compared to other Health Departments. Recruitment efforts have been met with frustration given non-competitive salaries and out-of-date equipment.

Despite these challenges, overall, staff interviewed during the audit demonstrated that they are dedicated to promoting safe food handling practices and protecting the public from food-borne illness. There is at this time a need for a more in-depth discussion with Council, as the Board of Health, regarding the current situation and the implications on compliance to legislation. There is a need to develop and propose to Council a comprehensive proactive strategy to address current limitations and better utilize available resources.

Based on industry practices research undertaken as part of this audit as well as consultation with the Ministry of Health & Long-Term Care (MOHLTC), five key components are required for the City to more effectively and efficiently deliver the Food Safety Program:

- An Environmental Health Information System (EHIS) with a module designed specifically for Food Safety inspections is a fundamental tool for management and Public Health Inspectors to enhance efficiency and effectiveness. Better management information will help drive decision-making and is essential to managing resources effectively and efficiently. An EHIS will also act as an enabler for other key components such as quality assurance. Enhanced information technology geared specifically to the needs of municipal environmental health programs has become far more readily available and affordable in the last few years. Other Ontario cities have forged the way and have developed a new industry standard in this regard. Environmental Health Information Systems now used in many other jurisdictions in Ontario include modules to support various programs including food safety, rabies, drinking water, swimming pools, etc.
- Online Disclosure of inspection results, via an EHIS, provides a much more responsive, user-friendly, and efficient approach to providing public access to information. It also has been found to act as an effective enforcement tool in that operators tend to correct any reported deficiencies quickly in order to ensure positive reports are posted on the system.
- Mandatory Food Handler Training and Certification is a proactive strategy for promoting effective food handling practices; it has been shown to increase compliance rates and reduces the need for re-inspections. The City of Toronto created a by-law in 2006 and many other cities in Ontario are in the process of doing the same.
- Quality Assurance (QA) strategies are critical given the dangers posed by food-borne illness and the fact that PHIs work so independently in the field. Inspection information management systems such as those implemented in Peel, York, Niagara, and Toronto have QA features built into the system. Other important QA measures include file audits, accompanied in-field visits, periodic training on policies, procedures and consistency issues, and PHI rotation.

- A comprehensive human resource strategy to implement a more competitive salary level for PHIs, improve recruitment of new PHIs and ensure retention of existing resources.

Recommendations and Management Responses

Compliance

Recommendation 1

That management formally report to Council outside of the budget process on the various factors effecting non-compliance with Provincial requirements and reduced food safety standards and present to Council a comprehensive strategy to achieve compliance, incorporating the key components outlined under Recommendation 3 below.

Management Response

Management agrees with the Auditor's recommendation.

The Environment and Health Protection (E&HP) division will report annually, starting in Q3 2008, to the CPS Committee and Council (as the Board of Health) on food safety statistics and issues including but not limited to: numbers of inspections and re-inspections; closures; Provincial Offence Notices issued; food handlers certified; staffing levels; progress on the Environmental Health Information System (EHIS); food borne illness reports and disclosure requests. This process will ensure that when staffing or resource issues are identified they are raised with Council. This was the case in 2004, 2005 and 2006 when the food safety budget was under spent due to the inability to staff and fill Public Health Inspector (PHI) positions. Recruitment and retention of PHI are the primary issues, which affect the ability of the E&HP division to attain compliance with Provincial requirements.

The E&HP division will also be presenting a comprehensive Strategic Food Safety Report to Council at the end Q2 2008, following the release of the audit. This report will include long term strategies to be undertaken by management in order to address staffing needs, technology enhancements and a Quality Assurance Program.

Recommendation 2

That management inform the Province of non-compliance concerns and planned corrective action.

Management Response

Management disagrees with the Auditor's recommendation.

The Ministry of Health and Long Term Care (MOHLTC) determines the reporting requirements of health units across the Province through the Provincial Mandatory Core Service guidelines. The E&HP division has been reporting to the MOHLTC annually (as mandated through the Provincial Mandatory Core Services Guidelines)

regarding compliance in the Food Safety Program, and has done so diligently since the reporting requirement came into effect over 15 years ago. This is not a new requirement from the Province and the E&HP division is already meeting this requirement.

Included in the annual report are compliance factors indicating number of premises and number of inspections and re-inspections, Hazard Analysis and Critical Control Points audits completed at high risk premises, number of food handlers trained and on duty at time of inspection, and number of inspections resulting from investigation of food borne illness, food outbreaks, consumer complaints and food recalls. Of the 36 health departments across Ontario only three are meeting 100% of the mandatory core requirements for high-risk premises.

Management does not agree with the auditor's recommendation to report on planned corrective action, as the MOHLTC does not require health departments to describe planned corrective action, under the local authority, and the information would not be utilized by the Ministry. The MOHLTC is aware that all health departments are managing with the resources available to them at the present time. Consequently, it is not necessary, nor is it mandated, to report to the MOHLTC any actions being taken by individual health departments regarding corrective actions.

In the 2005 MOHLTC Food Safety Audit, the conclusions indicate the following: "Several operational factors will continue to affect the percentage completion rate and reported food safety data at the local health unit level." A few of the factors are:

- Number of FTEs (PHIs) assigned to the Food Safety Program
- Number of re-inspections performed
- Number of inspections performed for investigation of food borne illnesses and food borne outbreaks, consumer complaints and food recalls
- Time required for seasonal, new and closed premises

A significant challenge affecting Ottawa Public Health (OPH) is the number of inspections required for special events (i.e.: Winterlude, Ottawa Ex, Tulip Festival, Hope Volleyball, FIFA games) where the food premises inspections completed are not factored into the Ministry's statistics as the food vendors are not considered to be "fixed" premises. OPH still completes inspection of these premises as a means of ensuring the safety of residents, even though it puts a greater strain on already limited resources.

Since 2005, with the addition of eight PHI positions, the E&HP division has increased productivity by 34% (3900 inspections) with a staffing increase of only 26%. This increase in inspection rate can be attributed not only to the additional FTEs, but also to more efficient work practices in the Food Safety Program, which allowed the average number of inspections completed per inspector to increase. In order to be able to ensure 100% compliance, OPH requires seven additional/new FTEs to be assigned to the Food Safety Program. The utilization of these new resources, if they

are obtained, will be part of the comprehensive Strategic Food Safety report to be presented to Council at the end of Q2 2008.

Performance

Recommendation 3

That management develop a comprehensive strategy to improve the performance of the Food Safety Program and achieve Provincial requirements, including the following components:

- a) **An Environmental Health Information System, beginning with a Food Safety Module designed and geared specifically for public health inspections;**
- b) **Online Disclosure;**
- c) **Quality Assurance; including:**
 - **EHIS management reports,**
 - **Sample file audits,**
 - **Accompanied in-field visits,**
 - **Periodic re- training for PHIs on policies, procedures and consistency issues, and**
 - **PHI rotation; and,**
- d) **Mandatory Food Handler Training.**

Management Response

Management agrees with the Auditor's recommendations.

a & b) Management had been notified by the MOHLTC (Food Safety Audit 2005) that the Ministry was in the process of developing a food safety Environmental Health Information System (EHIS) for all of Ontario. In early 2007 the Ministry elected not to commit to developing and supporting a province-wide system. Consequently, the E&HP division began an exploration into a new EHIS system. The development of an EHIS that will allow online disclosure and real time reporting will require a number of supporting factors including new hardware and software.

In Q2 2008 Ottawa Public Health will develop a business case in accordance with the corporate information technology value assessment process to develop an RFP to secure a company to provide the hardware and software required to facilitate an EHIS system installation. A budget will then be determined and monies requested in order to proceed with this recommendation. The costs will include such expenses as hardware, software, annual licensing, repair and updating/upkeep of technology. E&HP has estimated that the annual ongoing maintenance cost of such a program would be \$250,000.00. This does not include the initial costs associated with hardware and technology, which cannot be determined until a provider is chosen. The capital and operating costs will be identified as part of the 2009 budget process.

In order to ensure the effectiveness of the system a pilot project would be undertaken (10 users to start) at a cost of approximately \$150,000.00.

c) Three (3) PHI Supervisory positions were created and staffed in the summer of 2007 to facilitate and ensure Quality Assurance within the Food Safety Program. The supervisors are solely dedicated to overseeing PHIs in the Food Safety Program and monitoring their reports and inspection forms for accuracy and consistency; accompanying staff on inspections in the field when required; trouble shooting and liaising with staff for consistent information sharing and distribution of new policies and procedures. An Educational Committee was also established (August 2007) to ensure semi-annual training sessions are offered to staff to keep them updated on new relevant information and policies. Finally, PHI rotation will be formally initiated by Q2 2008 to allow staff opportunities to work in different areas of the City, in both rural and urban settings. It is the intent of OPH to rotate staff in the Food Safety Program every 18-24 months.

d) Currently the provincial mandate is limited to providing or making available food handler training. The initiation and implementation of a mandatory food handler training bylaw will require an additional three FTEs for the E&HP division for the management and delivery of the training, and the creation of a City bylaw by City Council.

Management will support the establishment of a City of Ottawa bylaw and E&HP will bring forward a proposed bylaw in Q3 2009 to Committee and Council. At this time there is only one Health department in the province that has successfully initiated a bylaw for mandatory food handler training and that is the City of Toronto.

It should be noted that in the MOHLTC 2005 Food Safety Audit report released in June 2007, identified that Ottawa Public Health has trained the second highest number of food handlers (1848) in the province, after the City of Toronto.

Recommendation 4

That management assess funding requirements to implement this strategy, both for the short and long-term, including:

- a) **Phasing in key components, beginning with new information technology as the first step;**
- b) **Implementing the new information system on a pilot basis (i.e., starting with one district in the City in year one) to phase in design and equipment costs as well as staff training and associated operational adjustments;**
- c) **Technical/systems and other specialist position requirements (e.g., QA, training, administration) to support implementation and ongoing maintenance stages;**
- d) **Projecting PHI staff numbers required, drawing on industry research (conducted as part of this audit) to develop PHI staff-to-premise ratios for high, medium and low-risk premises and factoring in other workload;**
- e) **Contingency plans to provide surge capacity to deal with a large-scale outbreak or other emergency; and,**
- f) **Investigating cost-sharing arrangements with the Province regarding improved Environmental Health information technology.**

Management Response

Management agrees with the Auditor's recommendations.

New funding requirements will be identified as part of the 2009 budget process for both short and long term solutions.

a) Management will continue to explore funding requirements and conduct feasibility studies in relation to initiating and implementing an EHIS to determine short and long-term costs as identified in the management response to Recommendation 3 a & b.

b) Management will continue to engage the IT Services for assistance in the establishment of an EHIS work plan 2008 and to create an RFP.

c) Management will determine the requirements of a specialist/QA support position, seek funding and create a job description by Q3 2008.

d) Management will continue to work with Employee Services to assess staffing levels and to determine comparators across the province by Q2 2008. The best practice determinant is the number of PHIs per 100,000 residents. OPH is currently staffed below the Provincial average. (Provincial average is 6.14 PHIs per 100,000 and Ottawa has 4.29 PHIs per 100,000.)

e) Management will explore options and possibilities to be included in the establishment of a contingency plan that would address surge capacity in the event of a large-scale emergency or outbreak. This may include Memorandums of Understanding with adjacent health departments to provide support if required.

It should be noted that currently there is a shortage of certified PHIs across the country, which is problematic in establishing a surge capacity contingency plan, but management will make a best effort to complete contingency planning by 2009.

f) Management will continue to liaise with the MOHLTC to explore cost sharing opportunities for an EHIS. Currently the Ministry is NOT cost sharing with any of the Ontario health departments that have an EHIS in place. The Ministry committed (2005 Food Safety Audit) to producing an EHIS for all Provincial Health departments, but that commitment was withdrawn in early 2007. Consequently health departments are individually establishing and funding EHIS systems.

Recommendation 5

That management liaise with By-Law Services to ensure adequate coordination of the business licensing process for Food Premises with EHP as follows:

- a) Include EHP in the distribution of all food premise license applications;**
- b) Consider the feasibility of on-line access by EHP to the status of food premise applications to facilitate tracking and follow-through;**
- c) Ensure that all parties responsible for sign-off prior to licensing have a coordinated response with operators (i.e., Zoning, Building Services, Licensing, EHP); and,**

d) Do not issue business licenses for food premises without EHP approval.

Management Response

Management agrees with this recommendation.

a) Schedule 7 to Licensing By-law 2002-189 requires approval from E&HP as a condition for the issuance of a food premise license. E&HP is therefore included in the distribution of all food premise license applications as part of a standard approval process. By-law and Regulatory Services branch staff will continue this practice.

b) E&HP staff is currently working with Information Technology Services to determine the required and appropriate level of access to MAP given the needs of the business unit and other relevant considerations, which would provide for on-line access to food premise license applications.

c) Schedule 7 to Licensing By-law 2002-189 requires that a food premise license shall not be issued until the conditions for issuance have been met; that is, all required approvals, including that of E&HP, have been obtained accordingly. A process is currently in place to ensure that all relevant parties provide to By-law and Regulatory Services said approval either electronically or manually. Staff of the various approval branches will continue to work cooperatively to provide a coordinated response to operators.

d) Schedule 7 to Licensing By-law 2002-189 requires that a food premise license shall not be issued until approval from E&HP has been obtained. By-law and Regulatory Services staff has, in conjunction with E&HP, developed a process to facilitate approval. Staff of both branches will work cooperatively to continue this practice.

Recommendation 6

That management review and realign the respective roles and responsibilities of the Program Manager and Supervisor positions within the broader context of strategic plans for the Food Safety Program as well as other Environmental Health programs, including:

- a) Creating and staffing any new positions only after the rationale has been completely formulated and incorporated into the EHP Division's comprehensive strategy;**
- b) The introduction of new technology;**
- c) The implications of any other planned changes (i.e., on-line Disclosure and Mandatory Food Handler Training);**
- d) Implementing a Quality Assurance Program; and,**
- e) Revising and clarifying policies and procedures.**

Management Response

Management agrees with the Auditor's recommendation.

The comprehensive Strategic Food Safety Report to be delivered annually to Council described in recommendation 1 will include a discussion of the respective roles and responsibilities of the program manager and supervisor positions within the unit where new positions are identified.

The need for supervisory positions was identified and evaluated in mid 2006, and in early 2007 the positions were posted and filled. Management believes that the benefits of staffing the positions immediately were the start of a rigorous QA Food Safety Program as well as continuing to increase efficiencies made over the previous two years.

In addition, it is essential to have a supervisory level in place prior to the introduction of new technology and on-line disclosure, as the Supervisors will be instrumental in ensuring consistency in data collected and downloaded into the new EHIS system.

Supervisors are currently revising and clarifying policies and procedures with input from management and staff, which will result in increased and facilitated communication between staff and management, and clear direction to enable the QA Program. The results of this discussion and any changes or realignment of the existing Supervisor positions will be addressed in the 2008 comprehensive Strategic Food Safety Report.

Recommendation 7

That management implement a comprehensive recruitment strategy to attract and retain qualified PHIs, including:

- a) Requesting that Employee Services proceed with market value research on PHI salary levels; and,
- b) Resurrecting the Trainee program to assist in recruiting students, offering tuition and certification in exchange for a job term commitment.

Management Response

Management agrees with the Auditor's recommendation.

Meetings with the Employee Services were held in October 2007 to address recruitment and retention issues. Management will continue to attend career fairs at the four universities across the Country in an attempt to recruit new graduates to OPH. Employee Services will work with E&HP to develop promotional materials and;

- a) Employee Services will be conducting market value research pending current data collection at the end of October 2007. Eight comparator municipalities will be polled by Employee Services and the results of this research will inform the recruitment strategy for PHIs.
- b) Costs associated with the resurrection of a Trainee Program are being investigated and will be compiled by January 2008 in conjunction with Employee Services. These

will include the costs of books and tuition for the four year Environmental Health Degree Program. The strategy of a Trainee Program is to encourage local high school students to pursue a career in Public Health Inspection with the expectation that they will return to Ottawa once they have completed their training and schooling. The original Trainee Program was discontinued in 1996 due to budgetary pressures. It should be noted that many of the current PHIs employed by Ottawa Public Health were graduates of the Trainee Program. Management will present a report to Council in Q3 2008 outlining the business case for the reinstatement of the Trainee Program.

Financial Management

Recommendation 8

That management prepare annual budgets for the Environmental & Health Protection Division based on clear strategic objectives and priorities for the Food Safety Program and other Environmental Health programs (i.e., develop the comprehensive strategy for the Food Safety Program as a first step).

Management Response

Management agrees with the Auditor's recommendations.

The comprehensive Strategic Food Safety Report discussed in recommendation 1 will be a fundamental first step. The E&HP Management team does prepare annual budgets for the division, including strategic objectives and priorities for the Food Safety Program and all other E&HP programs. In 2004, 2005 and 2006 the food safety budget was under spent due to the inability to staff and fill Public Health Inspector (PHI) positions. Recruitment and retention of Public Health Inspectors are the primary issues, which affect the ability of the E&HP division to attain compliance with provincial requirements. With an aggressive recruitment program the expectation is that all existing PHI positions will be filled by 2009.

Recommendation 9

That management, before requesting any additional resources as part of the 2009 budget submissions, explore options for funding from any surplus Food Safety budget, from within the Public Health Branch budget and from within the Community & Protective Services Department budget.

Management Response

Management agrees to the Auditor's recommendations.

Management will explore all funding opportunities within their authority as part of the 2009 budget submission.

Recommendation 10

That management, once a more strategic approach to managing the Food Safety Program has been established, pursue the feasibility of inspection fees or especially a

surcharge for repeat offenders (i.e., charge for extra visits required to ensure compliance, beyond the Provincially-mandated annual inspection frequency).

Management Response

Management does not agree with the Auditor's recommendation regarding inspection fees, as it is not industry best practice.

Of the 36 health departments in Ontario, only one charges a fee for inspection (Hamilton) and they are in the midst of repealing their bylaw. Under the HPPA, OPH is required to inspect and investigate all reports of food borne illness and cannot refuse to perform an inspection, because the premise will not pay an inspection fee.

Management agrees with the Auditor's recommendation regarding repeat offenders.

Historically it has been demonstrated that there are identified food premises operators that repeatedly fail to comply with the Food Premises Regulation. These operators consume an inordinate amount of a PHI's time with re-inspections and complaint investigations. A surcharge fee structure would have to be incorporated into a bylaw and passed by Council. Management will present a draft bylaw to Council in Q1 2009.

Recommendation 11

That management examine the potential cost/benefits of increasing fees for the delivery of Food Handler Training, comparing Ottawa rates to other cities in Ontario.

Management Response

Management agrees with the Auditor's recommendation.

A comparator survey of all Ontario Health Department's training fees will be conducted in January 2008 and at that time the fee structure will be reviewed and revamped if necessary. It should be noted that with the possible advent of mandatory food handler training the fees will have to be 'reasonable' reflecting a cost recovery structure.

Recommendation 12

That management ensure the appropriate segregation of duties associated with the collection and processing of all revenues.

Management Response

Management agrees with the Auditor's recommendation.

As of June 2007 the food handler training course registration is done via the City's "CLASS" system, which facilitates on line registration and eliminates the need to directly handle cash or cheques. The E&HP division ensures appropriate processing of all revenues through consultation with the Financial Support Unit (FSU) as per current practice.

Recommendation 13

That management request that Financial Services review revenue collection procedures within the EHP Division.

Management Response

Management agrees with the Auditor's recommendation.

E&HP management currently consults on an ad hoc basis with the FSU, and will establish a regular meeting schedule to review collection procedures in Q1 2008.

Progress Since 1992**Recommendation 14**

That management improve communications within and between districts by:

- a) **Clarifying expectations/standards and priorities regarding inspection frequencies for the interim until Provincial requirements can be met;**
- b) **Establishing consistent practices between districts;**
- c) **Establishing regular section meetings for each working group (i.e., west, central and east districts) to review plans, standards and guidelines, work progress, strategies, access to information, tools/materials, and in-field security measures;**
- d) **Refocusing Division-wide meetings to deal with broader educational issues of legislation, professional practice and legal considerations;**
- e) **Restructuring 'Info-Share' sessions to ensure they provide a productive opportunity for the exchange of ideas; and,**
- f) **Addressing any individual performance issues with staff members one-on-one as required.**

Management Response

Management agrees with the Auditor's recommendations.

a, b & c) Consistent practices and sharing of standardized information between areas and districts is being facilitated by the implementation of the supervisory positions, additional PHI meetings and continued info-share meetings. In 2005, a sub-office was established in Orleans at the Centrum location where 10 PHIs were relocated to facilitate customer service to residents in the east end of Ottawa. The transition to the sub-office initially led to a few communication challenges, but over time the transition smoothed and the flow of information between the two offices increased substantially.

d & e) Monthly PHI meetings will continue to facilitate sharing of educational issues, professional practice and legal considerations. "Info-share" meetings will be reinstated on a quarterly basis to ensure productive opportunities for the exchange of ideas commencing in Q1 2008.

f) All CUPE staff and their program managers have participated in the PDP pilot project. Individual performance issues have been addressed through this process, which will continue to be utilized after 2007 on an annual basis.

Recommendation 15

That management monitor and report regularly to the Council on:

- a) **Proposed strategies to improve Program performance (now and in the future);**
- b) **Progress in implementing improvements; and,**
- c) **Meaningful trends or indicators of the Program's success and the results achieved, working toward reporting on the evolution of community compliance rates (i.e., with legislated safe Food Handling practices).**

Management Response

Management agrees with the Auditor's recommendation (as agreed to in recommendation #1).

The E&HP division will report annually to CPS Committee and Council starting in Q2 in 2008. Included in the annual Strategic Food Safety Report will be statistics as well as proposed strategies to improve performance and progress to date.

Recommendation 16

That management implement procedural enhancements and ensure consistent practices across the Division as appropriate on an ongoing basis, including:

- a) **The application of enforcement policies and procedures;**
- b) **Documentation of HACCP assessments; and,**
- c) **Updates/upgrades to the inspection form.**

Management Response

Management agrees with the Auditor's recommendations.

An educational committee has been established in the E&HP division to address issues of updating staff on new procedures, policies, Ministry protocols and orientation. This committee will also address procedural challenges including any changes to existing inspection forms and documentation (including HACCP assessments). The Committee meets every 2 months and information is shared with staff during regularly scheduled PHI meetings.

Recommendation 17

That management establish a formal Orientation Program for new and rotating inspection staff.

Management Response

Management agrees with the Auditor's recommendation.

A newly established education committee (August 2007) will ensure a formal orientation program for new staff, and will develop semi-annual training sessions for all PHIs. Staff training will be held in Q1 and Q3 of 2008.

Conclusion

The City currently is not in compliance with provincially mandated inspection standards. Under the direction of the current management group attempts have been made to address some of the underlying issues regarding technology and human resources, however, these issues remain unresolved. A comprehensive strategy, as outlined in this report, is necessary to address current issues in a more proactive and complete manner. Specifically, information technology tools need to be enhanced to allow for more efficient and effective use of resources and a better approach is required to enable more effective recruitment and retention of qualified and skilled PHIs. Such a strategy should be formally reported to Council clearly outlining the factors affecting compliance and what is proposed to address the issue.

It is felt that by implementing the recommendations contained in this report, the EHP Division will be able to significantly improve the performance of the Food Safety Program, comply with Provincial legislative requirements, and more effectively protect the Ottawa community from food-borne illness.

Acknowledgement

We wish to express our appreciation for the cooperation and assistance afforded the audit team by management and staff.

RÉSUMÉ

Introduction

La vérification du Programme de salubrité des aliments était prévue dans le Plan de vérification de 2007 du Bureau du vérificateur général, qui a été soumis au Conseil municipal dans le rapport annuel 2005.

Contexte

Le Programme de salubrité des aliments relève de la Division de la protection de la santé et de l'environnement, une composante de la Direction de la santé publique qui, elle-même, fait partie de Services communautaires et de protection à la Ville d'Ottawa. Le budget du Programme représente environ 30 p. 100 du budget global de la Division. En 2006, un budget de 2,4 millions de dollars était consacré au Programme de salubrité des aliments et les dépenses réellement engagées à ce titre se sont élevées à 2,1 millions de dollars (à peu près 300 000 \$ ou 13 p. 100 de moins que le budget prévu). Les fonds que la Province alloue aujourd'hui à ce Programme permettent de financer 75 p. 100 du budget qui y est consacré, lequel a augmenté d'environ 800 000 \$ depuis 2004. À l'heure actuelle, la Division compte l'équivalent de 36,5 postes d'inspecteur de la santé publique (ISP), dont les titulaires assurent les divers services découlant des responsabilités que la Division doit assumer. De ce nombre, 21,5 sont affectés aux services liés à la salubrité des aliments.

Selon un expert en salubrité des aliments de l'Université de Guelph, entre 11 et 13 millions de Canadiens et de Canadiennes (à peu près le tiers de la population) souffrent chaque année d'une intoxication provoquée par la consommation d'eau ou d'aliments. Les problèmes de salubrité les plus courants et qui présentent le plus de risques pour la population sont attribuables à la contamination ainsi qu'à de mauvaises pratiques au chapitre des températures de maintien de la nourriture, de la stérilisation et des techniques de lavage des mains. Les pratiques inadéquates sont dangereuses et entraînent la prolifération de bactéries et la production de toxines². Les inspecteurs de la santé publique de la Ville surveillent la salubrité des établissements qui servent de la nourriture, afin de protéger la santé des clients. Le Programme de salubrité des aliments de la Ville contribue grandement à préserver la santé d'une multitude de gens : en effet, étant donné qu'Ottawa figure au second rang des grandes villes de l'Ontario et qu'elle est la capitale du Canada, de nombreux touristes et résidents de la région prennent part à la variété de festivals et d'événements spéciaux qui s'y tiennent chaque année et fréquentent les restaurants qui s'y multiplient.

² D'après l'extrait d'une entrevue avec Ben Chapman, expert en salubrité des aliments de l'Université de Guelph, réalisée par la CBC, dans le cadre de l'émission *Marketplace*, diffusé le 21 février 2007. Il est possible de visionner l'entrevue à www.cbc.ca/marketplace/2007/02/coffee_shops.html.

Objectifs et portée de la vérification

La vérification avait pour objectif d'évaluer de façon indépendante et objective le Programme de salubrité des aliments, plus particulièrement sa conformité avec les exigences législatives et réglementaires, la pertinence du cadre de gestion pour ce qui est de faciliter la prestation de services efficaces et efficients, et le bien-fondé des pratiques en matière de gestion financière. Les progrès réalisés depuis la dernière vérification du Programme, en 1992, ont également été analysés; toutefois, les recommandations formulées en 1992 n'ont pas toutes fait l'objet d'un examen approfondi.

Sommaire des principales constatations

La *Loi sur la protection et la promotion de la santé*, L.R.O. 1990, définit le rôle et les responsabilités de tous les conseils de santé de l'Ontario. Le Conseil municipal d'Ottawa agit à titre de conseil de santé. Conformément à la *Loi*, le président du conseil de santé est le médecin-hygiéniste en chef (ou médecin chef en santé publique), qui est chargé de protéger la santé de la collectivité et de prévenir les maladies transmissibles dans la ville. Les établissements qui servent de la nourriture sont inspectés en vertu de la *Loi sur la protection et la promotion de la santé* et du Règlement n° 562 sur les dépôts d'aliments.

La Ville d'Ottawa ne rencontre pas les lignes directrices obligatoires de la Province en matière de surveillance de la salubrité des aliments, en ce sens que le nombre d'inspections réalisées annuellement est nettement inférieur aux niveaux prescrits. En 2006, la vérification d'un échantillon de 100 établissements a révélé ce qui suit :

- 63 p. 100 des établissements à risque élevé ont été inspectés selon la fréquence réglementaire ou plus souvent (c.-à-d. trois inspections par année);
- 87 p. 100 des établissements à risque modéré ont été inspectés selon la fréquence réglementaire ou plus souvent (c.-à-d. deux inspections par année);
- 79 p. 100 des établissements à faible risque ont été inspectés selon la fréquence réglementaire ou plus souvent (c.-à-d. une inspection par année).

La direction de la Division de la protection de la santé et de l'environnement surveille couramment les taux de conformité et produit des rapports statistiques à cet égard. Par les années passées, elle a signalé des préoccupations relatives au respect de ces taux, et ce, tant au Conseil municipal pendant les délibérations budgétaires qu'au gouvernement provincial par l'entremise de rapports annuels soumis au ministère de la Santé et des Soins de longue durée (MSSLD).

Dès le début de la vérification, la direction a dit craindre que le groupe ne soit pas en mesure de satisfaire aux exigences provinciales en matière de surveillance de la salubrité des aliments. Au fil des ans, les gestionnaires se sont efforcés d'améliorer le

rendement du Programme. Ces dernières années, des mesures ont été prises pour éliminer les failles du système et la direction a attiré l'attention sur la pénurie d'inspecteurs de la santé publique qualifiés. Cependant, malgré une hausse entre 2004 et 2006 d'environ 50 p.100 du budget consacré à la salubrité des aliments, le Programme ne répond toujours pas aux exigences réglementaires, bien qu'un excédent cumulé de 894 000 \$ ait été enregistré dans les budgets de 2004, de 2005 et de 2006.

Il faut examiner de manière plus exhaustive et proactive le rendement et les besoins de la Division de la protection de la santé et de l'environnement, ce qui s'est révélé difficile puisque la Division ne dispose pas d'un système d'information facilitant ce type d'analyse. En effet, un système et des outils désuets rendent difficile l'analyse des données recueillies sur le terrain et des tendances relatives au respect des exigences. De plus, le fait de compiler les résultats des inspections à la main retarde la diffusion des renseignements au public et aux médias et nuit à l'efficacité du personnel de la Division de la protection de la santé et de l'environnement.

Une étude de marché menée récemment par Services aux employés révèle que les salaires des inspecteurs de la santé publique à Ottawa se situent au 23^e percentile par rapport à ceux des travailleurs affectés à d'autres services de santé. Les efforts de recrutement demeurent infructueux en raison des salaires non concurrentiels offerts et de l'équipement obsolète avec lequel les candidats retenus devront travailler.

Malgré tout, les membres du personnel interviewés dans le cadre de la vérification ont pour la plupart affirmé qu'ils cherchent diligemment à promouvoir des pratiques de manipulation sécuritaire des aliments et à protéger la population des intoxications alimentaires. Il faudra maintenant discuter plus en profondeur avec le Conseil municipal (à titre de conseil de santé) de la situation actuelle et de ses répercussions sur le respect des dispositions législatives en matière de salubrité des aliments. Il faudra également élaborer et soumettre au Conseil une stratégie globale proactive pour résoudre les difficultés actuelles auxquelles se heurte la Division et utiliser plus judicieusement les ressources disponibles.

Selon les recherches effectuées à propos des pratiques de l'industrie dans le cadre de la vérification et les consultations avec le personnel du MSSLD, la Ville a besoin de cinq éléments clés pour augmenter l'efficacité et l'efficience de son Programme de salubrité des aliments :

- Un système d'information sur l'hygiène du milieu (SIHM) comprenant un module conçu pour les inspections sur la salubrité des aliments constitue pour la direction et les inspecteurs de la santé publique un outil essentiel visant à accroître l'efficacité et l'efficience du Programme de salubrité des aliments. Une meilleure gestion de l'information facilitera le processus décisionnel et la gestion des ressources. De même, un SIHM simplifiera la mise en application d'autres composantes

importantes, notamment le contrôle de la qualité. Depuis quelques années, il est beaucoup plus facile et abordable de recourir à des outils informatiques perfectionnés de gestion de l'information municipale sur l'hygiène du milieu. D'autres villes de l'Ontario ont ouvert la voie à ces outils, établissant ainsi une nouvelle norme dans l'industrie. Les systèmes d'information sur l'hygiène du milieu utilisés ailleurs dans la province comportent des modules qui soutiennent divers volets, y compris la salubrité des aliments, la lutte contre la rage, la protection de l'eau potable, l'entretien des piscines, etc.

- La divulgation en ligne des résultats des inspections, par l'entremise du SIHM, constitue un moyen convivial pour le public de consulter les renseignements avec facilité et efficacité. De plus, le système s'avère un incitatif efficace en ce sens que les exploitants des établissements pris en défaut tendent à remédier rapidement aux manquements rapportés pour que le système affiche un rapport positif à l'égard de leur établissement.
- La formation et l'accréditation obligatoires en manutention des aliments représentent une stratégie proactive de promotion de la manipulation sécuritaire et efficace des aliments. En effet, il est reconnu que ces mesures contribuent à augmenter les taux de conformité et à réduire les besoins de réinspection. En 2006, la Ville de Toronto a adopté un règlement à cet égard et de nombreuses autres municipalités de l'Ontario s'apprêtent à faire de même.
- Les stratégies de contrôle de la qualité sont cruciales en raison des dangers que présentent les maladies d'origine alimentaire et du fait que les ISP travaillent de manière très indépendante dans l'industrie. Les systèmes de gestion de l'information sur les inspections, tels ceux mis en œuvre dans les municipalités de Peel, de York et de Niagara, ainsi qu'à Toronto, intègrent des fonctions de contrôle de la qualité. Parmi les mesures importantes de contrôle de la qualité figurent les vérifications de dossiers, les visites surveillées des établissements, les cours périodiques de recyclage sur les politiques, les procédures et les questions d'uniformité, et la rotation des ISP.
- Une stratégie générale en matière de ressources humaines est proposée pour offrir aux ISP des salaires plus concurrentiels, favoriser le recrutement des ISP et veiller au maintien des ressources existantes.

Recommandations et réponses de la direction

Conformité

Recommandation 1

Que la direction soumette au Conseil, en dehors du processus budgétaire, un rapport sur les divers facteurs qui entraînent le non-respect des exigences provinciales et l'application de normes peu rigoureuses au chapitre de la salubrité des aliments et

qu'elle lui propose une stratégie générale qui intégrera les éléments clés définis à la recommandation 3 afin d'aider la Ville à satisfaire auxdites exigences provinciales.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

À compter du troisième trimestre de 2008, la Division de la protection de la santé et de l'environnement soumettra au Comité des services communautaires et de protection et au Conseil (à titre de conseil de santé) un rapport annuel qui présentera des statistiques et des questions liées à la salubrité des aliments, y compris, sans toutefois s'y limiter, des données sur le nombre d'inspections et de réinspections effectuées, les fermetures d'établissements décrétées, le nombre d'avis d'infraction provinciale émis, le nombre de manipulateurs d'aliments agréés, les niveaux de dotation, les progrès réalisés au chapitre du système d'information sur l'hygiène du milieu, les cas déclarés de maladie d'origine alimentaire et les demandes de divulgation. Ainsi, le Conseil sera mis au courant des problèmes de dotation ou de ressources à mesure qu'ils se poseront, comme cela s'est produit en 2004, en 2005 et en 2006 lorsque le budget consacré au Programme de salubrité des aliments n'a pas épuisé vu son incapacité à doter les postes d'inspecteur de la santé publique (ISP). Le recrutement d'ISP et leur maintien en fonction figurent parmi les principales préoccupations de Santé publique Ottawa et influent sur la capacité de la Division de la protection de la santé et de l'environnement à se conformer aux normes provinciales.

À la fin du deuxième trimestre de 2008, soit après la diffusion du présent rapport de vérification, la Division de la protection de la santé et de l'environnement soumettra également au Conseil un rapport stratégique exhaustif sur la salubrité des aliments. Ce document proposera à la direction des stratégies à long terme pour répondre aux besoins en dotation, améliorer la technologie utilisée et mettre au point un programme de contrôle de la qualité.

Recommandation 2

Que la direction fasse part à la Province des préoccupations relatives au non-respect des exigences en matière de surveillance de la salubrité des aliments et des mesures correctives que la Ville entend prendre à cet égard.

Réponse de la direction

La direction n'est pas d'accord avec la recommandation du vérificateur.

Dans ses Lignes directrices touchant les programmes et services de santé obligatoires, le ministère de la Santé et des Soins de longue durée (MSSLD) établit les exigences en matière de reddition de comptes que doivent respecter tous les bureaux de santé de l'Ontario. Conformément au document susmentionné, la Division de la protection de la santé et de l'environnement fait rapport chaque année au MSSLD sur la conformité du Programme de salubrité des aliments avec les normes provinciales, et ce, depuis

l'entrée en vigueur de l'exigence en matière de reddition de comptes, il y a plus de 15 ans. Il ne s'agit pas d'une nouvelle exigence de la province et la Division de la protection de la santé et de l'environnement y satisfait déjà.

Le rapport annuel comprend des facteurs de conformité qui indiquent le nombre d'établissements visités et d'inspections et de réinspections réalisées, les vérifications d'analyse des risques et de maîtrise des points critiques (HACCP) effectuées pour des établissements à risque élevé, le nombre de manipulateurs d'aliments ayant reçu la formation nécessaire et qui étaient de service au moment de l'inspection, ainsi que le nombre d'inspections résultant d'enquêtes sur des maladies d'origine alimentaire, des épidémies alimentaires, des plaintes de consommateurs et des rappels d'aliments. Des 36 services de santé publique de l'Ontario, trois seulement satisfont à toutes les exigences relatives aux établissements à risque élevé.

La direction ne souscrit pas à la recommandation du vérificateur selon laquelle la Division doit faire rapport au MSSLD des mesures correctives que la Ville entend prendre, puisque le Ministère ne demande pas aux services de santé publique de décrire les correctifs envisagés par les autorités locales, et que ces renseignements ne seraient pas utiles au Ministère. Celui-ci est conscient que tous les services de santé publique fonctionnent avec les ressources qui sont mises à leur disposition à l'heure actuelle. Par conséquent, il n'est ni nécessaire ni obligatoire pour un service de santé publique de rendre compte au MSSLD de toute mesure corrective qu'il a prise.

Les constatations de la vérification de 2005 par le MSSLD sur la salubrité des aliments révèlent que plusieurs facteurs opérationnels continueront d'influer sur le taux d'inspections réalisées et sur les données sur la salubrité des aliments recueillies par les bureaux de santé locaux. Quelques-uns de ces facteurs sont notamment les suivants :

- le nombre d'ETP (ISP) affectés au Programme de salubrité des aliments;
- le nombre de réinspections effectuées;
- le nombre d'inspections menées dans le cadre d'enquêtes sur des maladies d'origine alimentaire, des épidémies alimentaires, des plaintes de consommateurs et des rappels d'aliments;
- les heures de travail requises pour l'inspection d'établissements saisonniers, nouveaux et fermés.

Santé publique Ottawa (SPO) est aux prises avec un défi de taille : il lui faut procéder à de nombreuses inspections dans le cadre d'événements spéciaux (c.-à-d. Bal de Neige, Super EX, Festival des tulipes, tournoi HOPE de volley-ball de plage, Coupe du monde de la FIFA, etc.) qui se tiennent dans la capitale. Ces inspections ne sont pas prises en compte dans les statistiques du Ministère du fait que les services de restauration offerts à ces événements ne sont pas considérés comme étant assurés par des établissements « fixes ». SPO inspecte néanmoins ces services afin d'assurer la

sécurité des résidents, même si cette façon de faire taxe lourdement ses ressources déjà limitées.

Depuis 2005, année où huit postes d'ISP ont été créés, la productivité de la Division de la protection de la santé et de l'environnement s'est accrue de 34 p. 100 (3 900 inspections effectuées) tandis que le niveau de dotation n'a augmenté que de 26 p. 100. Cette hausse du taux d'inspection s'explique non seulement par le nombre accru d'ETP, mais également par l'utilisation de méthodes de travail plus efficaces pour les besoins du Programme de salubrité des aliments, ce qui a donné lieu à une augmentation du nombre moyen d'inspections réalisées par ISP. Afin de pouvoir se conformer à toutes les normes provinciales, SPO demande que sept ETP supplémentaires ou nouveaux soient affectés au Programme de salubrité des aliments. Ces nouvelles ressources, si elles sont obtenues, figureront dans le rapport stratégique exhaustif sur la salubrité des aliments, qui sera soumis au Conseil à la fin du deuxième trimestre de 2008.

Rendement

Recommandation 3

Que, dans le but d'accroître le rendement du Programme de salubrité des aliments et de satisfaire aux exigences provinciales, la direction élabore une stratégie globale qui comprendra les éléments suivants :

- a) **un système d'information sur l'hygiène du milieu reposant avant tout sur un module conçu pour les inspections sur la salubrité des aliments;**
- b) **la divulgation en ligne des résultats des inspections;**
- c) **le contrôle de la qualité, notamment au moyen des outils suivants :**
 - **rapports de la direction sur le SIHM,**
 - **vérifications d'échantillons de dossiers,**
 - **visites surveillées des établissements,**
 - **cours offerts régulièrement aux ISP pour rafraîchir leurs connaissances sur les politiques, les procédures et les questions d'uniformité,**
 - **rotation des ISP;**
- d) **la formation obligatoire sur la manipulation des aliments.**

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

a) et b) Le MSSLD, par l'entremise de son rapport de vérification 2005 sur la salubrité des aliments, a avisé la direction que son personnel travaillait à l'élaboration d'un système d'information sur l'hygiène du milieu pour toutes les villes de l'Ontario. Au début de l'année 2007, le Ministère a toutefois décidé de ne pas respecter son engagement de créer et de soutenir un tel système à l'échelle de la province. La Division de la protection de la santé et de l'environnement a donc entrepris des recherches en vue de mettre en place un nouveau SIHM qui permettra l'affichage de renseignements en ligne et la production de rapports en temps réel, ce

qui exigera un certain nombre d'outils d'appui, y compris l'acquisition de matériel et de logiciels.

Au deuxième trimestre de 2008, Santé publique Ottawa effectuera une analyse de rentabilité conformément au processus d'estimation de la valeur de la technologie de l'information utilisée à la Ville pour créer une demande de propositions en vue de retenir les services d'une entreprise qui fournira le matériel informatique et les logiciels nécessaires à l'installation du SIHM. Un budget sera ensuite attribué au projet et des fonds seront demandés pour donner suite à cette recommandation. Les coûts tiendront compte de dépenses visant notamment le matériel informatique, les logiciels, les concessions de licence annuelles ainsi que les réparations, les mises à niveau et l'entretien des outils. La Division de la protection de la santé et de l'environnement estime à 250 000 \$ par année les coûts d'entretien courant associés à un tel programme, somme qui ne comprend pas les frais initiaux liés au matériel et à la technologie, lesquels seront connus une fois seulement que le fournisseur aura été choisi. Les coûts d'immobilisations et de fonctionnement seront déterminés au cours du processus budgétaire de 2009.

Afin d'assurer l'efficacité du système, un projet pilote serait entrepris (auquel participeraient 10 usagers pour commencer), dont la mise en œuvre coûterait environ 150 000 \$.

c) À l'été 2007, trois postes d'inspecteur en chef de la santé publique ont été créés et dotés pour prendre en charge le volet contrôle de la qualité du Programme de salubrité des aliments. Les inspecteurs en chef ont pour seules tâches de coordonner le travail des ISP affectés au Programme et de vérifier l'exactitude et l'uniformité des rapports et des formulaires d'inspection que ces derniers préparent, d'accompagner au besoin les membres du personnel au cours d'inspections d'établissements, de résoudre les problèmes et d'assurer la liaison avec le personnel pour faciliter l'échange de renseignements et la communication des nouvelles politiques et procédures. En outre, en août 2007, un comité de l'éducation a été mis sur pied pour organiser des séances de perfectionnement semestrielles à l'intention des employés afin de les tenir au fait des nouvelles politiques et des renseignements pertinents. Enfin, la rotation des ISP sera entreprise d'ici au deuxième trimestre de 2008 pour permettre aux employés de travailler dans divers secteurs ruraux et urbains de la ville. SPO entend faire la rotation des ISP affectés au Programme de salubrité des aliments tous les 18 à 24 mois.

d) À l'heure actuelle, le mandat de la Province se limite à donner de la formation sur la manipulation des aliments ou à mettre celle-ci à la disposition des intéressés. L'élaboration et la mise en application d'un règlement sur la formation de manipulateurs d'aliments nécessiteront trois autres ETP à la Division de la protection de la santé et de l'environnement. Les titulaires des postes en question seront responsables de la gestion et de la prestation des cours de formation ainsi que de la formulation d'un règlement municipal au nom du Conseil.

La direction appuiera l'établissement par la Ville d'Ottawa d'un règlement municipal et la Division de la protection de la santé et de l'environnement soumettra au Comité et au Conseil ledit règlement au troisième trimestre de 2009. À l'heure actuelle en Ontario, seul le service de santé publique de Toronto a réussi à mettre en vigueur un règlement rendant obligatoire la formation en manipulation des aliments.

Il importe de noter que selon le rapport de vérification de 2005 du MSSLD sur la salubrité des aliments, diffusé en juin 2007, Santé publique Ottawa figure au deuxième rang des villes ontariennes ayant formé le plus grand nombre de manipulateurs d'aliments (1 848), après la Ville de Toronto.

Recommandation 4

Que la direction évalue les exigences de financement liées à la mise en œuvre de la stratégie, tant à court terme qu'à long terme, en tenant compte des éléments suivants :

- a) la mise en place progressive des composantes-clés, la nouvelle technologie de l'information constituant la première étape de ce processus;**
- b) l'instauration du système d'information à titre de projet pilote (c.-à-d. commençant par un seul district de la ville la première année) afin de permettre le règlement graduel des coûts de conception et d'équipement ainsi que des frais associés à la formation du personnel et aux améliorations fonctionnelles connexes;**
- c) les besoins de postes de techniciens ou d'experts en systèmes et d'autres spécialistes (notamment en contrôle de la qualité, en formation et en administration) afin de soutenir l'installation et l'entretien courant des outils;**
- d) les prévisions relatives au nombre d'ISP nécessaires, en s'appuyant sur des études menées dans le secteur (dans le cadre de la présente vérification) pour établir le ratio du nombre d'établissements par ISP selon la catégorie (établissements à risque élevé, modéré ou faible), et en tenant compte des autres tâches que doivent effectuer les ISP;**
- e) les plans de mesures d'urgence pour veiller à ce que le système permette une intervention efficace en cas d'épidémie ou de situation d'urgence;**
- f) les enquêtes menées sur les accords de partage des frais avec la Province pour la mise en place d'un système d'information amélioré sur l'hygiène du milieu.**

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

De nouvelles exigences de financement seront identifiées dans le cadre du processus budgétaire de 2009 en vue de trouver des solutions à court et à long terme.

- a) La direction continuera à examiner les exigences de financement et à réaliser des études de faisabilité afin de mettre en place un système d'information sur l'hygiène du milieu et sur les coûts à court et à long terme de l'initiative mentionnée par la direction dans sa réponse aux recommandations 3 a) et b).

- b) La direction continuera de faire appel à Services de technologie de l'information pour obtenir du soutien dans l'élaboration pour 2008 d'un plan de travail sur la mise en place du SIHM et pour lancer une demande de propositions à cet égard.
- c) La direction établira les exigences relatives au poste de soutien ou de spécialiste en contrôle de la qualité, cherchera à obtenir des fonds pour financer ce poste et créera une description d'emploi d'ici le troisième trimestre de 2008.
- d) La direction continuera à travailler avec Services aux employés à l'analyse des niveaux de dotation afin d'établir, d'ici le deuxième trimestre de 2008, des éléments de comparaison avec les autres villes de l'Ontario. Le nombre d'inspecteurs de la santé publique (ISP) par 100 000 habitants est le facteur qui détermine la pratique exemplaire à privilégier. À l'heure actuelle, le nombre d'ISP employés par SPO (4,29 ISP par 100 000 habitants) est inférieur à la moyenne provinciale, qui est de 6,14 ISP par 100 000 habitants.
- e) La direction examinera les options et les possibilités qui seront prises en considération dans le plan d'urgence visant à répondre à une demande accrue en cas d'épidémie ou de situation d'urgence de grande envergure. Ces options peuvent comprendre la conclusion de protocoles d'entente avec les services de santé publique de villes voisines en vue d'obtenir du renfort au besoin.

Il importe de noter qu'il y a actuellement au pays une pénurie d'ISP agréés, ce qui rend difficile l'élaboration d'un plan de redoublement des services en cas d'urgence. Toutefois, la direction déploiera tous les efforts voulus pour réaliser ce projet d'ici 2009.

f) La direction demeurera en contact avec le MSSLD afin de conclure une entente de partage des coûts du projet de SIHM entre la Ville et la Province. Pour le moment, le Ministère ne participe AUCUNEMENT au financement des SIHM en place dans les services de santé publique de l'Ontario. Le Ministère s'est engagé, dans son rapport de vérification 2005 sur la salubrité des aliments, à concevoir un SIHM pour tous les services de santé publique de la province. Or, comme le Ministère a annoncé au début de 2007 qu'il revenait sur cet engagement, chaque service de santé publique doit se charger de la mise en place et du financement de son système.

Recommandation 5

Que la direction se concerta avec le personnel de Services des règlements municipaux pour assurer la coordination efficace du processus d'octroi de permis d'exploitation de services d'alimentation avec la Division de la protection de la santé et de l'environnement, selon les modalités suivantes :

- a) **inclure la Division de la protection de la santé et de l'environnement dans la liste des services auxquels sont acheminées les demandes de permis d'exploitation de services d'alimentation;**
- b) **envisager de donner au personnel de la Division de la protection de la santé et de l'environnement accès en ligne aux demandes de permis d'exploitation de services d'alimentation pour en faciliter le suivi;**

- c) **veiller à coordonner l’approbation de l’octroi de ces permis par toutes les parties responsables (Zonage, Direction des services du bâtiment, Division des programmes et de l’octroi des permis et Division de la protection de la santé et de l’environnement);**
- d) **ne pas émettre de permis à une entreprise de services d’alimentation sans avoir obtenu au préalable l’approbation de la Division de la protection de la santé et de l’environnement.**

Réponse de la direction

La direction est d’accord avec cette recommandation.

- a) En vertu de l’annexe 7 du Règlement n° 2002-189 sur les permis, l’émission d’un permis d’exploitation de services d’alimentation est conditionnelle à l’approbation de la Division de la protection de la santé et de l’environnement. Celle-ci doit donc figurer sur la liste des services auxquels sont acheminées les demandes de permis d’exploitation de services d’alimentation au cours du processus d’approbation normal. Le personnel de la Direction des services des règlements municipaux continuera de suivre cette procédure.
- b) Le personnel de la Division de la protection de la santé et de l’environnement collabore actuellement avec la Direction des services de technologie de l’information pour déterminer le niveau d’accès requis au Partenariat d’applications SIG municipales (PAM) selon les besoins de l’unité de travail et d’autres facteurs pertinents, ce qui permettrait au personnel de la Division d’accéder en ligne aux demandes de permis d’exploitation de services d’alimentation.
- c) En vertu de l’annexe 7 du Règlement n° 2002-189 sur les permis, un permis d’exploitation de services d’alimentation ne peut être octroyé tant que les conditions d’émission n’ont pas été respectées, c’est-à-dire une fois que toutes les approbations requises, y compris celle de la Division de la protection de la santé et de l’environnement, ont été obtenues. Un processus est présentement en place pour assurer que toutes les parties visées donnent leur approbation par voie électronique ou manuscrite au personnel de Services des règlements municipaux. Le personnel des directions chargées de l’approbation desdits permis continuera de collaborer avec les autres services afin d’assurer un service coordonné.
- d) En vertu de l’annexe 7 du Règlement n° 2002-189 sur les permis, un permis d’exploitation de services d’alimentation ne peut être octroyé sans l’approbation de la Division de la protection de la santé et de l’environnement. Le personnel de Services des règlements municipaux a, conjointement avec le personnel de la Division de la protection de la santé et de l’environnement, élaboré un processus d’approbation simplifié. Les employés de ces deux unités continueront de collaborer afin de poursuivre cette pratique.

Recommandation 6

Que la direction examine et revise les rôles et les responsabilités rattachés aux postes de gestionnaire de programme et de superviseur pour les adapter au contexte élargi des plans stratégiques du Programme de salubrité des aliments et d'autres programmes d'hygiène du milieu, notamment en se penchant sur :

- a) la création de postes et la dotation en personnel une fois seulement que les besoins ont été entièrement justifiés et pris en considération dans la stratégie globale de la Division de la protection de la santé et de l'environnement;**
- b) l'adoption de nouvelles technologies;**
- c) les incidences de tout autre changement prévu (c-à-d divulgation de renseignements en ligne et formation obligatoire sur la manipulation des aliments);**
- d) la mise en œuvre d'un programme de contrôle de la qualité;**
- e) la modification des politiques et des procédures de manière à rendre celles-ci plus claires.**

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Le rapport stratégique exhaustif sur la salubrité des aliments qui sera soumis chaque année au Conseil (se reporter à la recommandation 1) contiendra une section sur les rôles et les responsabilités rattachés aux postes de gestionnaire de programme et de superviseur dans une unité de travail donnée, lorsque de nouveaux postes sont cernés.

Au milieu de 2006, la nécessité de créer des postes de supervision a été cernée et évaluée, et lesdits postes ont été affichés et dotés au début de 2007. Selon la direction, la dotation immédiate de ces postes a permis la mise en place d'un volet rigoureux axé sur le contrôle de la qualité du Programme de salubrité des aliments et l'accroissement continu des efficacités réalisées au cours des deux années précédentes.

En outre, il est essentiel que l'effectif affecté au Programme compte des postes de supervision avant que de nouvelles technologies ne soient adoptées et que la divulgation de renseignements en ligne ne soit permise, puisque les superviseurs joueront un rôle déterminant en veillant à l'uniformité des données recueillies et téléversées dans le nouveau SIHM.

Les superviseurs travaillent actuellement, avec l'aide de la direction et des employés, à revoir et à préciser les politiques et les procédures, ce qui facilitera la communication entre la direction et les employés et donnera des orientations claires pour la mise en place du volet sur le contrôle de la qualité. Les conclusions qui se dégageront de cet exercice et tout changement ou correctif proposé aux postes existants de superviseur figureront dans le rapport stratégique exhaustif de 2008 sur la salubrité des aliments.

Recommandation 7

Que la direction mette en œuvre une stratégie globale de recrutement pour attirer des inspecteurs de la santé publique (ISP) qualifiés et les conserver, laquelle comprendra les mesures suivantes :

- a) charger le personnel de Services aux employés de mener une étude de marché sur les niveaux de rémunération des ISP;
- b) remettre sur pied le programme de stages, dont les frais seront assumés par la Ville, qui aidera au recrutement d'étudiants et mènera à l'obtention d'une accréditation en échange d'un engagement de la part des étudiants à occuper, à la fin de leur stage, un emploi pendant une période donnée.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Des réunions avec le personnel de Services aux employés ont eu lieu en octobre 2007 afin de trouver des solutions en ce qui touche le recrutement d'employés et leur maintien en poste. La direction continuera d'assister aux salons de l'emploi organisés par quatre universités du pays en vue de recruter des nouveaux diplômés pour SPO. Services aux employés collaborera avec la Division de la protection de la santé et de l'environnement pour élaborer le matériel promotionnel à cet égard.

a) Services aux employés réalisera une étude de marché une fois qu'elle aura recueilli toutes les données requises à la fin d'octobre 2007. Un sondage sera mené auprès de huit municipalités aux fins de comparaison et les résultats de l'étude serviront à la mise en œuvre de la stratégie de recrutement d'ISP.

b) Santé publique Ottawa, de pair avec la Direction des services aux employés, évalue actuellement les frais associés à la remise sur pied du programme de stages, qui comprennent le coût des livres et les droits de scolarité pour les quatre années que dure le programme d'hygiène du milieu menant à l'obtention d'une accréditation. Les résultats de cet examen seront connus d'ici janvier 2008. Le programme de stages vise à encourager les élèves des écoles secondaires locales à choisir la carrière d'inspecteur de la santé publique et à s'inscrire au programme pour ensuite accepter un emploi à la Ville d'Ottawa à la fin de leurs études et de leur formation. Le programme de stages initial a été supprimé en 1996 par suite de compressions budgétaires. Il importe de noter que bon nombre des ISP actuellement employés par Santé publique Ottawa sont des diplômés de ce programme. Au troisième trimestre de 2008, la direction soumettra au Conseil un rapport contenant l'analyse de rentabilité sur la remise sur pied du programme de stages.

Gestion financière**Recommandation 8**

Que la direction prépare les budgets annuels de la Division de la protection de la santé et de l'environnement selon des priorités et des objectifs stratégiques clairs relativement au Programme de salubrité des aliments et à d'autres initiatives en

hygiène du milieu (par exemple, élaborer d'abord une stratégie globale pour le Programme de salubrité des aliments).

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Le rapport stratégique exhaustif sur la salubrité des aliments mentionné à la recommandation 1 constituera la première étape fondamentale de ce projet. L'équipe de direction de la Division de la protection de la santé et de l'environnement est en fait chargée de préparer des budgets annuels pour la Division, y compris de définir les priorités et les objectifs stratégiques du Programme de salubrité des aliments et de tous les autres programmes sur l'hygiène du milieu. En 2004, en 2005 et en 2006, Santé publique Ottawa n'a pas épuisé le budget consacré au Programme de salubrité des aliments vu son incapacité de doter les postes d'inspecteur de la santé publique (ISP). Le recrutement d'ISP et leur maintien en fonction constituent les principales préoccupations de SPO et influent sur la capacité de la Division de la protection de la santé et de l'environnement de se conformer aux exigences provinciales. Grâce à un programme de recrutement agressif, tous les postes d'ISP devraient être dotés au plus tard en 2009.

Recommandation 9

Que la direction envisage de puiser dans les excédents du budget consacré au Programme de salubrité des aliments, du budget de Santé publique Ottawa et du budget de Services communautaires et de protection pour financer les initiatives de la Division de la protection de la santé et de l'environnement avant de demander des ressources supplémentaires dans le cadre du processus budgétaire de 2009.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

La direction examinera toutes les possibilités de financement qui lui sont offertes dans le cadre du processus budgétaire de 2009.

Recommandation 10

Que la direction évalue, dès qu'une stratégie de gestion plus efficace aura été mise en œuvre pour le Programme de salubrité des aliments, la faisabilité d'instaurer des frais d'inspection ou d'imposer des frais additionnels aux récidivistes (c'est-à-dire un supplément lorsque le nombre de visites annuelles requises pour veiller à ce que l'établissement respecte les normes provinciales excède la fréquence prescrite par la Province).

Réponse de la direction

La direction n'est pas d'accord avec la recommandation du vérificateur concernant les frais d'inspection, car il ne s'agit pas d'une pratique exemplaire de l'industrie.

Des 36 services de santé publique de l'Ontario, seulement un (celui de Hamilton) impose des frais d'inspection et les autorités municipales s'apprêtent à abroger le règlement municipal à cet égard. Conformément à la *Loi sur la protection et la promotion de la santé*, SPO est tenue de réaliser des inspections et de mener des enquêtes sur tout cas signalé de maladie d'origine alimentaire et ne peut refuser d'effectuer une inspection sous prétexte que l'établissement ne veut pas payer les frais en question.

La direction accepte la recommandation du vérificateur concernant le supplément imposé aux récidivistes.

Il a été démontré dans le passé que certaines entreprises de services d'alimentation omettent à plusieurs reprises de se conformer au Règlement sur les dépôts d'aliments. Les ISP consacrent énormément de temps à réinspecter les établissements de ces exploitants et à mener des enquêtes sur les plaintes dont ils font l'objet. Une grille tarifaire devra donc être intégrée au règlement et adoptée par le Conseil municipal. Au premier trimestre de 2009, la direction soumettra au Conseil une ébauche de règlement à cet égard.

Recommandation 11

Que la direction examine les coûts et les avantages potentiels d'une hausse des frais associés à la prestation de la formation sur la manipulation des aliments en comparant les tarifs en vigueur à Ottawa à ceux imposés par d'autres villes ontariennes.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

En janvier 2008, une étude comparative sur les coûts de formation de tous les services de santé de l'Ontario sera réalisée et, par le fait même, la grille tarifaire de SPO sera revue et modifiée au besoin. Il importe de noter que si une formation obligatoire sur la manipulation des aliments est mise en place, les frais qui y seront associés devront être raisonnables tout en permettant à SPO de recouvrer une partie des coûts.

Recommandation 12

Que la direction assure une répartition appropriée des tâches liées à la perception et au traitement de toutes les recettes.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Depuis juin 2007, l'inscription à la formation sur la manipulation des aliments est effectuée par l'entremise du système CLASS de la Ville, qui facilite l'inscription en ligne et élimine la nécessité de manipuler de l'argent ou des chèques. La Division de

la protection de la santé et de l'environnement veille au traitement approprié de toutes les recettes avec l'aide de l'Unité de soutien financier, selon l'usage établi.

Recommandation 13

Que la direction demande à Services financiers de revoir les procédures de perception des recettes de la Division de la protection de la santé et de l'environnement.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Le personnel de direction de la Division de la protection de la santé et de l'environnement consulte l'Unité de soutien financier selon les besoins et établira, au premier trimestre de 2008, un calendrier de réunions ordinaires au cours desquelles les procédures de perception seront examinées.

Progrès réalisés depuis 1992

Recommandation 14

Que la direction améliore les communications au sein des districts et entre eux par les mesures suivantes :

- a) la définition des attentes ou des normes et des priorités relatives à la fréquence des inspections jusqu'à ce que Santé publique Ottawa puisse respecter les exigences provinciales;
- b) la mise en place de pratiques uniformes d'un district à l'autre;
- c) l'organisation de réunions ordinaires de district (districts Ouest, Centre et Est) permettant à chaque groupe de travail d'examiner les plans, les normes et les lignes directrices, l'état d'avancement des projets, les stratégies, le niveau d'accès à l'information, les outils et les ressources, ainsi que les mesures de sécurité prises sur le terrain;
- d) la réorientation des réunions de la Division de sorte qu'elles portent sur des questions de sensibilisation plus vastes en ce qui touche les mesures législatives, l'exercice professionnel et les considérations juridiques;
- e) la réorganisation des séances d'échange d'information afin qu'elles stimulent davantage la mise en commun d'idées entre les participants;
- f) la résolution en privé des questions de rendement avec les membres du personnel concernés, au besoin.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

a, b et c) La création de postes de supervision, l'augmentation de la fréquence des réunions des ISP et la tenue régulière de séances d'échange d'information faciliteront l'adoption de pratiques uniformes et la communication de renseignements normalisés entre les secteurs et les districts. En 2005, un bureau auxiliaire de la Division a été établi dans l'édifice situé sur le boulevard Centrum à Orléans, où ont

été affectés 10 ISP qui assurent des services aux résidents du secteur Est d'Ottawa. Mis à part quelques problèmes de communication qui n'ont toutefois pas tardé à être résolus, la transition s'est déroulée sans heurts et la communication entre les deux bureaux s'est grandement améliorée.

d) et e) Les réunions mensuelles des ISP continueront de faciliter la mise en commun de renseignements sur des questions de sensibilisation, l'exercice professionnel et les considérations juridiques. Les séances d'échange d'information seront rétablies à compter du premier trimestre de 2008 et auront lieu par la suite chaque trimestre pour que les membres du personnel puissent avoir l'occasion d'exprimer leurs idées.

f) Tous les employés affiliés au Syndicat canadien de la fonction publique (SCFP) et leurs gestionnaires de programme ont pris part au projet pilote de Programme d'amélioration du rendement (PAR). Ce processus a permis de résoudre certaines questions relatives au rendement individuel et continuera d'être utilisé chaque année après 2007.

Recommandation 15

Que la direction examine régulièrement les éléments suivants et fasse rapport au Conseil à cet égard :

- a) les stratégies proposées pour améliorer le rendement (actuel et futur) du Programme;**
- b) les progrès réalisés dans la mise en œuvre des initiatives d'amélioration;**
- c) les tendances ou les indicateurs qui témoignent de la réussite du Programme et des résultats obtenus, en vue de faire rapport sur l'évolution des taux de conformité des collectivités (c.-à-d. le respect des pratiques reconnues en matière de manipulation sécuritaire des aliments).**

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur (comme pour la recommandation 1).

La Division de la protection de la santé et de l'environnement fera rapport chaque année au Comité des services communautaires et de protection et au Conseil à compter du deuxième trimestre de 2008. Des statistiques et des propositions de stratégies visant à accroître le rendement du Programme et à accélérer les progrès à cet égard figureront dans le rapport stratégique exhaustif sur la salubrité des aliments produit chaque année.

Recommandation 16

Que la direction prenne des mesures concrètes pour améliorer les procédures et veille, selon les besoins et sur une base continue, à l'uniformité des pratiques utilisées dans toutes les unités de la Division, y compris en ce qui concerne :

- a) le respect des politiques et des procédures en matière d'application des règlements;**

- b) la documentation des projets d'analyse des risques et de maîtrise des points critiques (HACCP);
- c) la mise à jour ou l'amélioration des formulaires d'inspection.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Le personnel de la Division de la protection de la santé et de l'environnement a formé un comité de l'éducation qui a pour mission de rafraîchir les connaissances du personnel sur les nouveautés en ce qui touche les procédures, les politiques, les protocoles du Ministère et les orientations dans le domaine. Ce comité s'occupera également de régler des problèmes de procédure, notamment les changements apportés aux formulaires d'inspection et aux documents existants (y compris ceux touchant les HACCP). Les membres se réunissent tous les deux mois et les renseignements pertinents sont communiqués au personnel aux réunions des ISP tenues régulièrement.

Recommandation 17

Que la direction mette en place un programme structuré d'orientation à l'intention des nouveaux inspecteurs de la santé publique et de ceux qui sont appelés à travailler en rotation.

Réponse de la direction

La direction est d'accord avec la recommandation du vérificateur.

Le nouveau comité de l'éducation mis sur pied en août 2007 offrira aux nouveaux employés un programme d'orientation structuré et préparera des séances de perfectionnement semestrielles à l'intention de tous les ISP. Ces séances auront lieu aux premier et troisième trimestres de 2008.

Conclusion

À l'heure actuelle, la Ville ne respecte pas les normes provinciales en matière d'inspection des services d'alimentation. Sous la supervision du groupe de direction en place, le personnel a tenté de résoudre certaines des préoccupations sous-jacentes liées à la technologie et aux ressources humaines; toutefois, ces questions demeurent non réglées. Comme il est décrit dans le présent rapport, une stratégie globale devrait être retenue pour résoudre les préoccupations actuelles de manière plus proactive et complète. Plus précisément, il faudrait améliorer les outils en technologie de l'information afin de permettre une utilisation plus efficace et efficiente des ressources, et prendre les mesures nécessaires pour favoriser le recrutement et le maintien en poste d'ISP qualifiés et compétents. Il importe qu'une telle stratégie fasse l'objet d'un rapport au Conseil précisant les facteurs qui influent sur la conformité de même que les solutions proposées pour résoudre la question.

Nous sommes d'avis que si la Division de la protection de la santé et de l'environnement est en mesure de mettre en œuvre les recommandations formulées dans le présent rapport, elle devrait pouvoir accroître grandement le rendement de son Programme de salubrité des aliments, respecter les exigences provinciales en la matière et protéger plus efficacement les résidents d'Ottawa contre les maladies d'origine alimentaire.

Remerciements

Nous tenons à remercier la direction et le personnel de leur bienveillante collaboration et de l'aide qu'ils ont apportée à l'équipe de vérification.

1 INTRODUCTION

The Audit of the Food Safety Program was included as part of the 2007 Audit Plan of the Office of the Auditor General, first presented to Council as part of the 2005 Annual Report.

2 PURPOSE

The purpose of this audit was to provide an independent and objective assessment of the Food Safety Program's performance in terms of compliance with legislative and regulatory requirements; the appropriateness of the management framework to facilitate the delivery of effective and efficient services; the adequacy of financial management practices; and, the degree of progress since the previous audit in 1992.

3 BACKGROUND

The Food Safety Program exists as part of the Environmental & Health Protection Division of the Public Health Branch of the Community & Protective Services Department of the City of Ottawa. This Program was last audited 15 years ago when it existed as part of the Health Department of the former Regional Municipality of Ottawa-Carleton. At that time, while the Program was recognized as one of the leaders in Ontario, a number of areas were identified as requiring improvement. This Program provides an important service to the public in protecting people against food-borne illness; and City Councillors have expressed a keen interest in ensuring that the Program delivers against these expectations.

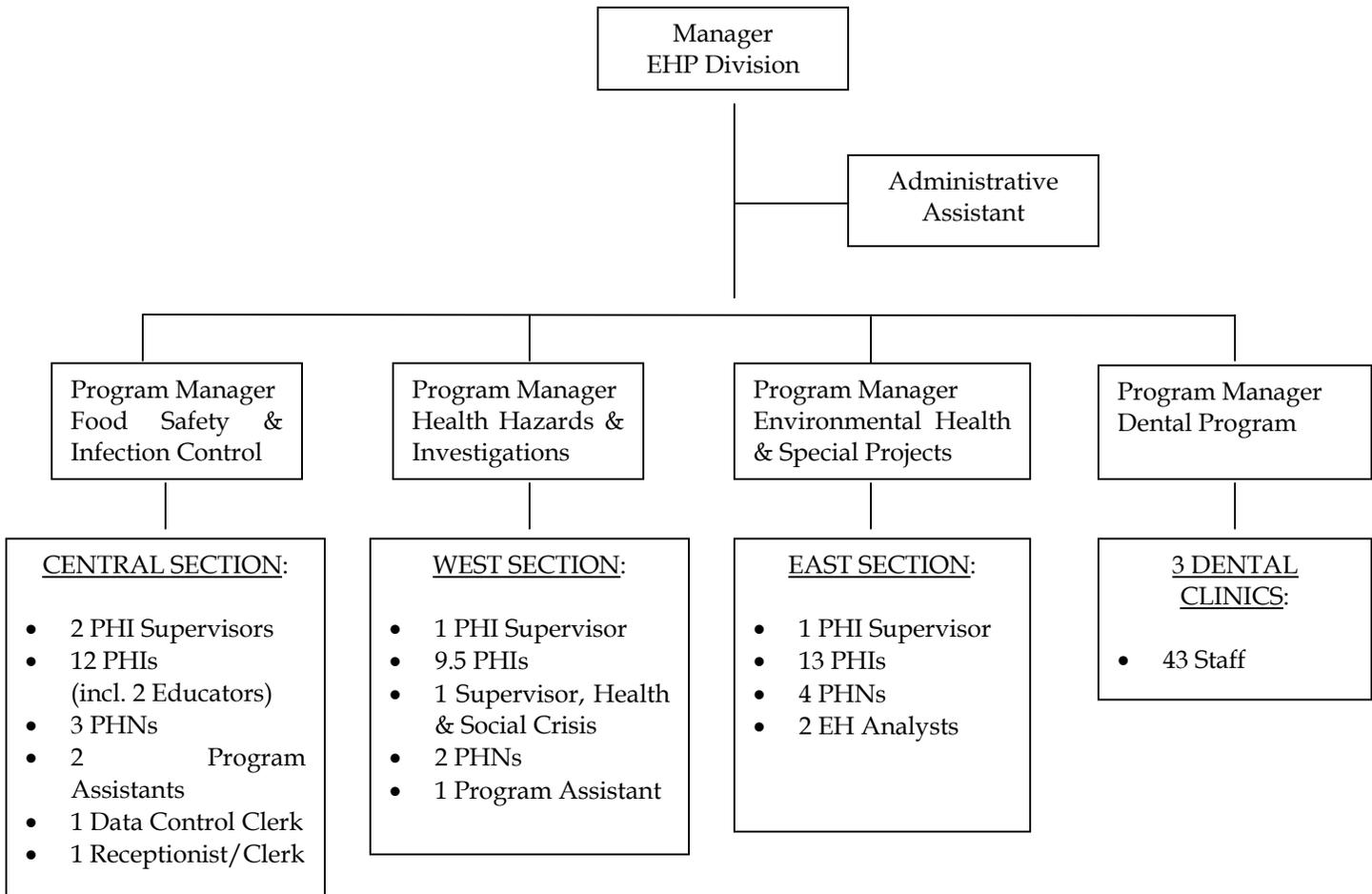
The 2006 budget for the City's Food Safety Program was \$2.4 million with \$2.1 million in actual expenditures. Provincial funding now covers 75% of this budget. Because the budget is partially funded by the Province and was underspent, funds would be returned to the Province as part of the year-end reconciliation process.

Currently, a total of 36.5 Public Health Inspector (PHI) positions deliver the various Environmental Health services for which the Division has responsibility. Of these, 21.5 PHIs deliver Food Safety services, representing 93% of the Food Safety Program budget. Services are delivered across the City from two locations (Constellation and Centrum) as illustrated in the organization chart shown below at Table 1.

The Health Protection and Promotion Act (HPPA), 1990 defines the role and responsibility of all Boards of Health in Ontario. Ottawa's Board of Health is City Council. Under the Act, the Executive Director of the Board of Health is the Medical Officer of Health (MOH). The MOH has legislated responsibility for community health protection and the control of communicable diseases in the City. The HPPA mandates the inspection of "food premises and any food or equipment therein or thereon...for the

purpose of preventing, eliminating, and decreasing the effects of health hazards". Food premises are inspected under the HPPA and the Food Premises Regulation 562.

Table 1 EHP Division Organization Chart



4 AUDIT OBJECTIVES AND SCOPE

The focus of this audit was to review the processes for the inspection of all food establishments for which the Food Safety Program is responsible, with particular attention given to restaurants and supermarkets as the major service providers. The types of food establishments for which the Program has responsibility include restaurants, bars, retail food outlets (e.g. supermarkets, bakeries, delis), itinerant vehicles (e.g. hot dog carts, chip wagons), dairies, special events such as exhibitions or fairs, communal living centers such as nursing homes and hospitals, nursery schools, day care centers, school cafeterias, and summer camps.

As indicated above, the purpose of this audit was to provide assurances that this Program is being managed with due consideration given to compliance, performance management and financial management issues. This audit also included a review of the

progress made since 1992 with respect to the main areas of concern identified at that time.

Specific audit objectives and criteria can be found at the beginning of the discussion of observations and recommendations of each of the four audit issues included in Section VI of this report.

5 APPROACH AND METHODOLOGY

This audit commenced at the end of November 2006 with preliminary interviews and detailed project definition; and fieldwork was conducted from February to April 2007.

Fieldwork included:

- Detailed interviews with the Manager of the Environmental & Health Protection Division and the 3 Program Managers;
- Consultation with the Medical Officer of Health;
- Conducting a file review of 100 files of the various types of food establishments;
- Focus group sessions with all of the Food Safety Public Health Inspectors (PHIs) of the west, central and east sections;
- Individual follow-up interviews with three Food Safety PHIs;
- Consultation with the Ministry of Health & Long Term Care regarding legislative requirements and provincial guidelines;
- Telephone interviews with Environmental Health counterparts in five comparable cities in Ontario to review industry standards and current practices for effective Food Safety Programs;
- A review of:
 - provincial standards, guidelines and applicable regulatory requirements;
 - budget information for the Food Safety Program from 2004-2007;
 - financial management practices;
 - the management structure of the Division and the Food Safety Program;
 - management information systems and key reports;
 - corrective action resulting from the 1992 audit; and,
 - any performance measures used to track achievements or progress.
- A “tour” of the management information systems and records;
- Consideration of input from the Community and Protective Services Committee obtained by the Office of the Auditor General; and

- Project status meetings with the EHP Management Team and the Medical Officer of Health.

6 OBSERVATIONS AND RECOMMENDATIONS

6.1 COMPLIANCE

6.1.1 Audit Objective

Is the City in compliance with Provincial requirements?

6.1.2 Audit Criteria

- If not, where are the gaps?
- What is being done about it? What is Public Health's strategy?
- Is the risk assessment approach adopted adequate?
- Are inspection records adequate?
- Are strategic directions and decisions pertaining to program compliance adequately documented?
- How is Council being kept informed of policy decisions, performance results and related issues of concern?

6.1.3 Observation/Issue

6.1.3.1 Mandate

Under the Health Protection & Promotion Act (HPPA) and the Food Premises Regulation, the City is mandated to inspect all types of food premises ranging from restaurants to fast food establishments, workplace and school cafeterias, mobile food premises, grocery and convenience stores. The only food premises exempt from the regulation are boarding houses with fewer than 10 boarders; religious, service and fraternal organizations that prepare and serve food for special events or bake sales; and farmers' market food vendors. The Provincial Food Premises Regulation describes specific requirements related to food handling, personnel, cleaning and sanitation as well as the physical structure, equipment, maintenance and sanitary facilities.

6.1.3.2 Provincial Requirements

In Ontario, Health Units are required to classify all food premises in accordance with associated risk levels of food-borne illness. Annual risk assessments are to determine/confirm the appropriate risk category of each premise in accordance with the Ministry's Health Hazard Analysis Critical Control Point Protocol, depending on menu complexity, volume of food prepared and the target population. There are three risk categories - high, medium and low. High-risk premises include restaurants, caterers, nursing/retirement homes, hospitals, full-menu daycares, and premises previously implicated or confirmed as a source of food-borne illness or outbreak. Medium-risk premises include bakeries, butcheries, delicatessens, fishmongers, fast

food establishments, and submarine and pizza shops. Low-risk premises are those that store, display and sell pre-packaged goods and/or non-hazardous foods, involving no food preparation. Inspection frequency is mandated by Provincial legislation as follows:

- High-risk premises are to be inspected at a minimum of three times annually;
- Medium-risk premises, a minimum of two times annually; and
- Low-risk premises, a minimum of once a year.

The Regulations also require that inspections of high-risk premises include annual Hazard Analysis Critical Control Point (HACCP) audits of at least two food products through several stages of critical control points. HACCP audits involve the detailed observation and documentation of the food preparation process from raw goods to finished food product. This is a detail-intensive procedure that, for example, involves monitoring and graphing food temperatures at various points during food preparation.

6.1.3.3 Infractions

An infraction or deficiency is when the operator is not in compliance with the requirements of the legislation. These are noted on inspection reports. Deficiencies are classified as critical or non-critical. Critical requirements relate to the internal temperature of hazardous food; food handling and storage practices; sourcing of food (from an approved facility); supply of potable water/ice; chemical storage; the provision of hand washing facilities in food preparation areas; personal hygiene of staff and their freedom from infectious disease. These factors have an immediate impact on the food's safety as they can lead to food-borne illness. Non-critical requirements relate to the establishment's sanitation, design and maintenance. Operators are required to address any critical deficiencies within 24 hours, and a re-inspection is conducted to confirm that noted deficiencies have been corrected. Non-critical deficiencies must be corrected on or before the next scheduled routine inspection. Failure to correct a deficiency can result in the issuance of a Provincial Offence Notice (PON) or summons, seizure and destruction of food, the issuance of an order under the HPPA or closure.

6.1.3.4 Non-Compliance

The Provincial Mandatory Guidelines for Food Safety are not being met by the City of Ottawa. Completion rates of annual inspections, particularly of high-risk premises, are significantly below prescribed levels. In addition, there is limited evidence that prescribed Hazard Analysis Critical Control Point (HACCP) audits are being completed as required by legislation.

As part of this audit, a file audit of premise records was conducted consisting of a review of 100 randomly selected files including 50 high-risk premises, 33 medium-risk and 17 low-risk. Within this sample were approximately 60 service establishments, 30 retail and 10 processing. It should be noted that a total of 11% of premises were not

inspected at all in 2005 and 8% were not inspected in 2006. Management had estimated that as many as 15-20% of premises may go un-inspected. A total of 8 files were not useable and the observations provided have been prorated accordingly. These 8 files were not useable because they were either misfiled, newly established premises not yet assigned an inspection schedule, and/or were in the process of being entered into the system and not easily accessible at the time of the audit.

The results of the file audit are summarized in Table 2 below. According to the audit sample, in 2006:

- 63% of high-risk establishments were inspected at the prescribed frequency or higher (i.e., three inspections per year);
- 87% of medium-risk establishments were inspected at the prescribed frequency or higher (i.e., two inspections per year); and,
- 79% of low-risk establishments were inspected at the prescribed frequency or higher (i.e., one inspection per year).

While annual HACCP audits are to be conducted for all high-risk premises, only 61% of audited premise files contained any HACCP reports at all, in most cases from prior years.

By way of comparison, in 2006, EHP reported the following compliance rates to the Province:

- 64% of high-risk establishments inspected at the prescribed frequency with 8% having had no inspections;
- 63% of medium risk establishments were inspected at the prescribed frequency with 18% having had no inspections; and
- 70% of low risk establishments were inspected at the prescribed frequency with 30% having had no inspections.

Table 2: Premise Records File Audit Results

Items of Interest	Premises by Risk Category		
	High	Medium	Low
Inspection Frequency meets or exceeds Provincial Requirements (see Note a):			
➤ 2005	56%	80%	71%
➤ 2006	63%	87%	79%
Inspection Frequency exceeds Provincial Requirements (see Note b):			
➤ 2005	31%	13%	14%
➤ 2006	33%	13%	14%

Items of Interest	Premises by Risk Category		
	High	Medium	Low
Inspection Frequency meets Internal Risk Assessment Protocol (see Note c):	79%	97%	93%
➤ 2005	81%	100%	93%
➤ 2006			
Premises NOT Inspected:			
➤ 2005	4%	1%	29%
➤ 2006	2%	3%	21%
Average Number of Annual Inspections:			
➤ 2005	2.9	2.2	0.9
➤ 2006	3.0	2.3	1.0
2006 Critical Violations Resolved within 24 hours	90%	97%	100%
2006 Complaints Followed-up within 24 hours	98%	97%	N/A
2006 Cases where Enforcement Proceedings commenced	2%	0%	0%
Premises with formal HACCP Assessments (see Note d):	61%	7%	0%
Premises with CCP Monitoring (see Note e):	90%	83%	50%
Premises receiving On-site Safety Training (see Note f):	75%	70%	36%

Notes to Table 2:

- a) Provincial requirements regarding minimum inspection frequencies are: 3 inspections of high risk premises; 2 of medium; and 1 of low, annually.
- b) Extra inspections were needed beyond the standard number of compliance inspections required by the Province. This could mean re-inspections/follow-up visits (to ensure previously identified violations were resolved) or complaint investigations.
- c) Given present resource limitations, management has reduced expectations of minimum inspection frequencies as follows: 2 annual inspections of high-risk premises, 1 annual for medium-risk and bi-annually for low-risk. Priority is given to the re-inspection of premises with identified risks and the investigation of complaints.
- d) Inspection reports indicate that a formal Hazard Analysis Critical Control Point (HACCP) assessment has been conducted at some point in the history of the premise.
- e) Inspection reports indicate that some level of Critical Control Point (CCP) monitoring is occurring during inspections.
- f) Inspection reports indicate that some level of on-site training has been provided during inspections.

A comparison of Ottawa's compliance rates to available provincial statistics suggests that, while Ottawa is not the only city in non-compliance with provincial requirements, our Food Safety Program falls well below the provincial average in terms of inspection

completion rates. Table 3 below provides some relevant statistics from the Ministry of Health and Long-Term Care (MOHLTC) 2005 Audit Report.

Table 3: MOHLTC 2005 Statistics

INSPECTION REQUIREMENTS	OAG STATISTICS		PROVINCIAL STATISTICS	
	COMPLIANCE RATE	# OF PREMISES	AVERAGE RATE OF COMPLIANCE	AVERAGE # OF PREMISES
HIGH-RISK PREMISES	74.1%	1,729	85.2%	456
MEDIUM-RISK PREMISES	68.8%	2,387	79.8%	845
LOW-RISK PREMISES	65.0%	1,556	71.7%	794
HACCP AUDITS	21.6%	1,729	70.0%	456

Management's concerns regarding compliance were reported to Council during the 2005 budget deliberations, at which time management requested additional PHI positions. These positions were approved, however there have been difficulties in recruiting and delays in filling the new positions. Although discussed during budget deliberations, there is a need for more focused and in-depth discussion with Council as the Board of Health for the City of Ottawa regarding the current situation and the implications. A comprehensive proactive strategy should be developed and proposed to Council clearly outlining the factors affecting compliance and what is proposed to address the issue. Further details on what this strategy should include are discussed in the subsequent section of this report.

6.1.3.5 Inspection Records

In terms of the quality and completeness of inspection records, individual files contain inspection reports and many other pieces of relevant documentation pertaining to each premise which makes it possible to review the general history of any given premise. However, confirmation that building plans have been approved prior to licensing cannot be easily traced within files. This information is contained in the original file for a premise but nothing is carried forward into the current file. In addition, requests for information about premise histories and education records are kept separately from inspection reports. It would be useful to be able to review all of this information pertaining to each premise. All of these records issues could be most effectively addressed through an improved electronic information management system as discussed under "Information Management" in the observations regarding "Performance" below.

6.1.3.6 Monitoring Compliance Rates

EHP monitors compliance rates on an ongoing basis and maintains statistical reports. Reports including inspection completion rates are regularly produced by EHP's Data Entry Clerk. Each Program Manager closely monitors individual premise inspection reports for their respective section, and they review quarterly statistical reports that include cumulative totals of inspections completed in relation to risk assessment and inspection frequency requirements. PHIs are regularly provided with reports for their own districts, highlighting those premises that require their attention in order to meet requirements. Annual reports are provided to the Province, and the MOHLTC issues audit reports which include compliance rates and other statistics for cities across Ontario.

6.1.4 Cause

Management has indicated that resource issues have presented ongoing challenges in terms of the number of Public Health Inspector (PHI) positions and the ability to attract certified PHI's to the City. Currently a total of 36.5 PHIs deliver the various Environmental Health services to the Ottawa community. Of these PHIs, 21.5 deliver Food Safety services to close to 6,000 fixed food premises across the City and approximately 366 special events and festivals (many of which are on the scale of the Bluesfest or Winterlude). Based on a 2003 province-wide survey of all PHI staffing, Ottawa ranked as the second lowest with, on average, 3.23 PHIs per 100,000 population, the average being 6.14. Ottawa's current PHI staffing level is 4.29. These PHIs deliver a range of Environmental Health programs including Food Safety, and Ottawa currently has 2.59 PHIs per 100,000 population focused on delivering the Food Safety program. In comparison to other cities across Ontario, Ottawa remains well below the provincial average in terms of a PHI staff-to-population ratio.

Because Ryerson University, located in Toronto, is the closest qualifying school, the City has always experienced difficulty in attracting new PHIs. The majority of students do their practicums in Toronto and have many opportunities for employment there. The lack of up-to-date technology and the fact that Ottawa's PHI salary level is not competitive are other contributing factors. A 2005 provincial survey conducted by the City concluded that Ottawa's PHI salary levels ranked in the 23rd percentile. At that time, EHP was advised that further research of market comparators and precedents would be necessary to build a case to address the situation; however, it was deemed an inappropriate time to pursue the issue due to budget pressures and union negotiations.

Given current resources, management has adopted a risk assessment approach that incorporates a reduced standard of inspection frequencies, placing priority on high and medium-risk premises, and, in particular, the re-inspection of premises with identified risks as well as the investigation of complaints.

Based on the file audit sample, inspection frequencies actually exceeded provincial requirements for 33% of high-risk premises. For medium- and low-risk premises this figure was 13% and 14% respectively. Routine compliance inspections of high-risk premises tend to be more time-intensive (i.e., a minimum of 1 hour) than medium or low-risk; and the time-consuming nature of the detailed observation and documentation required by HACCP audits significantly adds to the workload of PHI's. In most cases, the file review indicates that PHI's opt for a less intensive, informal monitoring of the HACCP. All of this indicates that approximately 30% of high-risk operators are monopolizing PHI staff time with re-inspections to follow up on identified violations or to investigate complaints. Discussions later in this report regarding mandatory food handler training and possible changes to inspection fees are presented as potential strategies for addressing operators which require multiple inspections.

6.1.5 Impact/Risk

According to a University of Guelph food safety expert, 11-13 million Canadians fall ill each year from food and water consumption problems. The most common problems that put the public at serious risk are inadequate food holding temperatures; contamination; poor sanitation and inadequate hand-washing. These are dangerous food safety issues that cause bacteria growth and the development of toxins.³

EHP management believes that their risk assessment protocol, which facilitates focusing priority attention on premises where potential health hazards have been identified, is the best and only recourse available under the present circumstances. In 2006, 2,068 premises required re-inspection to ensure that reported deficiencies had been corrected; and 522 complaint investigations and 111 suspect food-borne illness investigations were conducted. Decision-making has been aimed at the goal to protect public health and safety; and management is encouraged by the fact that there have been no major outbreaks of food-borne illness in Ottawa.

It should be noted that, in 2006, EHP reported to the Province that 8% of high-risk premises, 18% of medium-risk premises and 21% of low-risk premises were not inspected at all. Based on the file audit, critical violations in 10% of high-risk premises were not resolved within the required 24 hours; and complaints were also not consistently followed up within the specified 24 hours.

The City may be vulnerable given its inability to meet provincially legislated Food Safety requirements. Management is also concerned that EHP's lack of surge capacity could be a limiting factor in the case of a large-scale outbreak or other emergency.

³ Based on an excerpt of an interview conducted by CBC with Ben Chapman, a University of Guelph food safety expert. The interview was aired on February 21, 2007 as part of CBC's Marketplace program, and can be viewed at http://www.cbc.ca/marketplace/2007/02/coffee_shops.html.

Council should be fully informed and involved in establishing the strategic direction to be followed.

Recommendation 1

That management formally report to Council outside of the budget process on the various factors effecting non-compliance with Provincial requirements and reduced food safety standards and present to Council a comprehensive strategy to achieve compliance, incorporating the key components outlined under Recommendation 3 below.

Management Response

Management agrees with the Auditor's recommendation.

The Environment and Health Protection (E&HP) division will report annually, starting in Q3 2008, to the CPS Committee and Council (as the Board of Health) on food safety statistics and issues including but not limited to: numbers of inspections and re-inspections; closures; Provincial Offence Notices issued; food handlers certified; staffing levels; progress on the Environmental Health Information System (EHIS); food borne illness reports and disclosure requests. This process will ensure that when staffing or resource issues are identified they are raised with Council. This was the case in 2004, 2005 and 2006 when the food safety budget was under spent due to the inability to staff and fill Public Health Inspector (PHI) positions. Recruitment and retention of PHI are the primary issues, which affect the ability of the E&HP division to attain compliance with Provincial requirements.

The E&HP division will also be presenting a comprehensive Strategic Food Safety Report to Council at the end Q2 2008, following the release of the audit. This report will include long term strategies to be undertaken by management in order to address staffing needs, technology enhancements and a Quality Assurance Program.

Recommendation 2

That management inform the Province of non-compliance concerns and planned corrective action.

Management Response

Management disagrees with the Auditor's recommendation.

The Ministry of Health and Long Term Care (MOHLTC) determines the reporting requirements of health units across the Province through the Provincial Mandatory Core Service guidelines. The E&HP division has been reporting to the MOHLTC annually (as mandated through the Provincial Mandatory Core Services Guidelines) regarding compliance in the Food Safety Program, and has done so diligently since the reporting requirement came into effect over 15 years ago. This is not a new requirement from the Province and the E&HP division is already meeting this requirement.

Included in the annual report are compliance factors indicating number of premises and number of inspections and re-inspections, Hazard Analysis and Critical Control Points audits completed at high risk premises, number of food handlers trained and on duty at time of inspection, and number of inspections resulting from investigation of food borne illness, food outbreaks, consumer complaints and food recalls. Of the 36 health departments across Ontario only three are meeting 100% of the mandatory core requirements for high-risk premises.

Management does not agree with the auditor's recommendation to report on planned corrective action, as the MOHLTC does not require health departments to describe planned corrective action, under the local authority, and the information would not be utilized by the Ministry. The MOHLTC is aware that all health departments are managing with the resources available to them at the present time. Consequently, it is not necessary, nor is it mandated, to report to the MOHLTC any actions being taken by individual health departments regarding corrective actions.

In the 2005 MOHLTC Food Safety Audit, the conclusions indicate the following: "Several operational factors will continue to affect the percentage completion rate and reported food safety data at the local health unit level." A few of the factors are:

- Number of FTEs (PHIs) assigned to the Food Safety Program
- Number of re-inspections performed
- Number of inspections performed for investigation of food borne illnesses and food borne outbreaks, consumer complaints and food recalls
- Time required for seasonal, new and closed premises

A significant challenge affecting Ottawa Public Health (OPH) is the number of inspections required for special events (i.e., Winterlude, Ottawa Ex, Tulip Festival, Hope Volleyball, FIFA games) where the food premises inspections completed are not factored into the Ministry's statistics as the food vendors are not considered to be "fixed" premises. OPH still completes inspection of these premises as a means of ensuring the safety of residents, even though it puts a greater strain on already limited resources.

Since 2005, with the addition of eight PHI positions, the E&HP division has increased productivity by 34% (3900 inspections) with a staffing increase of only 26%. This increase in inspection rate can be attributed not only to the additional FTEs, but also to more efficient work practices in the Food Safety Program, which allowed the average number of inspections completed per inspector to increase. In order to be able to ensure 100% compliance, OPH requires seven additional/new FTEs to be assigned to the Food Safety Program. The utilization of these new resources, if they are obtained, will be part of the comprehensive Strategic Food Safety report to be presented to Council at the end of Q2 2008.

6.2 PERFORMANCE

6.2.1 Audit Objective

How is the group performing from an efficiency and effectiveness standpoint?

6.2.2 Audit Criteria

- Is staff appropriately deployed to maximize the achievement of program goals?
- How will management's plan to introduce a supervisory layer contribute to program performance?
- Is the integrity of the program protected by appropriate quality controls? How well is the process of reviewing inspection reports working? Is the rotation of staff working?
- How much time does management spend on file reviews?
- How accessible is the data needed to plan, organize, control, assess and report on the program's performance?
- Should technology enhancements be considered to improve performance?

6.2.3 Observation/Issue

The Food Safety Program budget represents about 30% of the Environmental & Health Protection Division's (EHP) overall budget with Provincial funding now covering 75% of this total. As Table 4 below shows, the annual budget for Food Safety has increased from approximately \$1.6 million in 2004 to \$2.4 million in 2006, an increase of 50%. The bulk of this increase has been to the compensation budget which increased \$800,000 over this time period. Largely as a result of difficulties in recruiting new PHIs, the program has underspent its budget in each of these years by a total of approximately \$890,000. While there are restrictions on how compensation budgets can be utilized, the amount of unused funding during this period is significant and indicates a lost opportunity to fund and pursue some of the enhancements proposed in this report in previous years.

Table 4: Food Safety Program Budget Figures for 2004-2006

	BUDGET	ACTUAL	SURPLUS/ DEFICIT	VAR.%
2004	1,574,073.00	1,146,299.60	427,773.40	27.18-
2005	2,063,039.04	1,912,350.72	150,688.32	7.30-
2006	2,436,619.00	2,120,829.07	315,789.93	12.96-

Despite annual increases in funding, the group is still operating with an inadequate number of PHIs and out-dated information technology. As a result, it is struggling to meet the legislative requirements of the Food Safety program.

In 2004, EHP management introduced computers and cell phones for the Inspectors. For a group that had previously shared one computer between 12 staff members, this was a significant step forward and, for some, a major transition which was resisted. In 2005, Council approved 8 additional PHI positions and, as a result, the staff-to-population ratio has improved from 3.23 to 4.29 PHIs per 100,000 population (the provincial average in 2003 was 6.14 per 100,000). Both management and staff have recognized that the program is in a chronic reactive state and has not been able to take a more proactive, strategic approach.

Currently, formal performance measures are not tracked beyond the inspection statistics required by the annual provincial audit. The City's final 2006 performance measurement report provides the total number of inspections as the only measure of performance for the Food Safety Program. As such, these figures do not address compliance to provincial legislation.

Opportunities for improved priority setting, workload distribution, quality assurance and efficiency, and the required resources and tools to achieve these are outlined below.

6.2.3.1 Information Management

PHIs are assigned a number of food premises (i.e., 200-300 units each) as well as other Environmental Health program responsibilities (i.e., complaints, dog bites, water sampling), in wards within their designated districts (i.e., west, central or east) in the City. As of February 7, 2007, there were a total of 5,723 fixed food premises being inspected by EHP. The tracking of these premises from the point of plan approvals (at business licensing) to initial risk assessment to annual compliance inspections, HACCP audits, re-inspections in the case of infractions, tracking of any complaints, investigations of reported food-borne illnesses, lab reports, re-assessment of risk level, etc. are all manually documented by PHIs and filed by a Records Clerk. Basic data about premises is entered from inspection report forms into a simple FoxPro database by a Data Entry Clerk. The Data Entry Clerk provides quantitative reports that show the number and type of inspections completed indicating inspection frequencies by premise type, the strategies employed and uncorrected deficiency counts as well as a list of un-inspected premises. Quarterly reports show the accumulating numbers of inspections completed by premise type and risk level and total numbers for high, medium and low-risk premises, all visits by the Inspector, strategies employed and types of critical hazard violations. At present, the only way for PHI's or management to review the history of any given premise is to request the manual files for that premise from the Records Clerk.

An inadequate information management system is presenting many challenges with respect to planning, risk assessment, workload distribution; organization of work; monitoring of in-field activity; analysis of inspection results; quality control; and performance reporting. Many PHIs and members of the management team expressed frustration over the present inaccessibility to reliable data about the history of premises. The City also offers public disclosure of food premise inspection results, and yet, the appropriate technology does not exist to manage this efficiently. As a result, responding to requests from the public or media involves reviewing manual files and photocopying inspection reports. This is an exceedingly time-intensive process, particularly in the case of media requests for hundreds of premises.

6.2.3.2 Upgrading Information Technology

For years, MOHLTC had planned to develop a province-wide Environmental Health Information System (EHIS). In recent years, it has become evident that there is insufficient funding and commitment to complete this initiative, and some cities have proceeded independently. While EHP management initiated the development of an EHIS for the City in 2005, the project was abandoned upon the advice of corporate IT due to technical support issues. Enhanced information technology geared specifically to the needs of municipal Environmental Health programs has become far more readily available and affordable in the last few years. Other Ontario municipalities (e.g. Hamilton, York, Niagara and Peel) have forged the way and have developed a new industry standard in this regard. Environmental Health Information Systems now used in many other jurisdictions in Ontario include modules to support various programs including Food Safety, Rabies, Drinking Water, Swimming Pools, etc. Indications are that the Province may contribute to systems development costs, provided that the system supports province-wide monitoring and analysis requirements.

Likely costs have been estimated for the implementation of upgraded information technology for the Food Safety Program. It should be noted that this is an approximate cost projection for a pilot project based on informal discussion with other cities that have, in recent years, implemented Environmental Health Information Systems geared specifically to the needs of Ontario municipalities.

The envisioned pilot project would represent the first phase of introducing a new information system to support the Food Safety Program. In year one, this first step would involve implementing the system in one of the three sections of the Environmental & Health Protection Division. The anticipated cost of such a pilot project is expected to total under \$150,000. Implementing the system in the remaining sections of the Division would involve the purchase of the additional hardware for another 20+ staff (i.e., approximately \$84,000) and ongoing annual licensing fees for all staff (i.e., approximately \$36,000 for 30 users).

As indicated, these projections are based on limited information and real costs should be determined by management on the basis of more solid information from potential suppliers. These figures are not comprehensive (i.e., a web integrator, space on the server, an implementation team have not been factored in). A breakdown of this cost projection estimate is available at Appendix A.

6.2.3.3 Staff Recruitment

As indicated previously, attracting and retaining qualified staff has been an ongoing challenge. Factors such as intense competition from the various GTA municipalities and the lack of up-to-date technology tools in Ottawa have contributed to these difficulties.

PHI salary levels in the City of Ottawa are also a factor. In 2005, at the request of the Manager, EHP, Employee Services conducted market research comparing the PHI position to comparable cities across Ontario. While this study concluded that the City's PHI position is underpaid relative to other cities in the province, adjustments have yet to be made pending further research by Employee Services.

A PHI Trainee program which offered tuition and certification as hiring incentives was eliminated a few years ago as a result of budget cuts. Given the high demand for these resources and the prolonged difficulties experienced by the City in filling vacant PHI positions, there is a need for a more creative recruitment strategy that considers compensation levels and incorporates internship/trainee opportunities.

6.2.3.4 Food Handler Training

EHP also offers food handler training courses and certification to food premise operators and the public. In 2006, 1,344 food handlers were certified. This service is intended to take a proactive approach to reducing the need for re-inspections by increasing awareness of food safety risks and providing instruction on proper preparation and handling techniques. In cases where operators do have certified staff on the premises, PHIs have observed improved compliance rates. A training program is an effective means of reducing risks and infractions; thereby reducing the requirement for repeat inspections as a result of violations and allowing PHIs to visit a greater number of premises. However, training is voluntary and PHIs find that the operators most in need of certification tend not to pursue it, contributing to the need for frequent follow-up visits to ensure that Food Safety violations have been resolved. The City of Toronto created a bylaw in 2006 making training mandatory and many other cities in Ontario are in the process of doing the same.

6.2.3.5 Licensing

EHP becomes aware of new food premises and changes in ownership through the Licensing function within By-Law Services. There is a need for improved coordination to ensure that EHP is included in the distribution of all food premise applications for

approval. While improvements have been made over the years, Inspectors still report that they discover new licensed food establishments while out in the field. Unfortunately, this puts the Operator in the position of having to respond to demands for changes to the premises after construction has been completed in order to conform to Food Safety requirements. EHP management is pursuing the development of a MAP-based database (already in use by other departments such as Licensing) to be underway later in 2007 to facilitate record-keeping related to the intake function (i.e., complaints, consultation on license applications, requests for inspections to approve new premises, referrals to other departments/ agencies, etc.). This initiative should improve coordination between EHP and Licensing.

6.2.3.6 Supervision

While the Food Safety program takes up an estimated 80% of inspection staff time, the Manager and Program Managers of EHP have diverse responsibilities related to various other mandated Environmental Health programs. The Food Safety Program represents less than 1/3 of EHP's total budget of about \$8 million. Beyond the needs of the Food Safety Program, management is concerned about neglecting other Environmental Health programs. The Manager EHP has overall responsibility for Environmental Health with a total staff complement of just over 100, including three Dental Clinics, the Street Health Program, the Health and Social Crisis Team, the Outbreak Management Team and the Rural Health Program. Each of the three Program Managers has responsibility for one of three geographic districts (i.e., west, central or east) with portfolios that incorporate a range of program responsibilities including Food Safety.

In an effort to place a greater focus of Food Safety, management decided, prior to this audit, to create three Supervisor positions to be assigned to each of the three districts and to focus predominantly on supporting PHI's with Food Safety responsibilities. Currently, the main quality control measure involves the Program Managers reviewing every inspection report for the PHIs in their district before reports are passed on for data entry and filing. Reviewing every inspection report represents a significant amount of work for Program Managers. While reviewing inspection reports is an important part of quality assurance, reviewing a sample of files on a periodic basis can be just as effective while far less time consuming for managers and supervisors. In addition, the use of an enhanced information technology tool and the management reports that would be available with it, offers an opportunity to streamline the oversight process while also making it more effective.

Staff rotation every three years had been introduced in the past, however, the practice is not consistently followed across EHP. Rotation of staff is practiced in a number of other cities contacted during the audit and is seen as an important tool in minimizing the risk of operators exercising undue influence over inspectors.

It is management's intent to have the new Supervisor positions take over responsibility for quality control and to provide an increased level of in-field support to PHIs. The respective roles and responsibilities of the Program Manager and Supervisor positions will need to be refined within the broader context of strategic plans, once developed, for the Food Safety Program as well as other Environmental Health programs.

6.2.3.7 Staff Safety

In the course of carrying out inspection visits, Inspectors are, at times, faced with aggressive Food Premise Operators. While it is not a daily occurrence, some Operators have behaved in a threatening manner, creating a potentially dangerous situation for Inspectors working alone in the field, particularly after hours. As a result, management is pursuing the procurement of radio equipment with GPS-locator technology linked to the City's Dispatch/Call Centre. A pilot project is currently being discussed with By-Law Services regarding dispatch capabilities and costs.

6.2.4 Cause

The Food Safety program is operating much as it did 15 years ago when it was last audited. Some improvements have been made since that time including, for example upgraded and public inspection reports (i.e., upon request); clearer enforcement practices; better records management; a more practical and simplified policy and procedure manual; and Food Handlers can obtain provincial certification (i.e., in safe food handling practices) via the City. However, the group has not kept pace with technological advancements or new strategic approaches and performance is still limited by antiquated tools and a lower level of human resources than in other Ontario municipalities. Some senior staff members initially resisted the introduction, in 2004, of cellular phones and computers for PHIs but it was a significant step forward that was long overdue.

Under the direction of the current management group, attempts have been made to address both the underlying IT and PHI salary-level issues, however, these issues remain unresolved. Despite current challenges, overall, the audit indicated that most PHI staff are committed to protecting the public from food-borne illness. A review of Internet usage in the group revealed much lower than average usage as compared to the rest of the City.

Based on industry practices research undertaken as part of this audit as well as consultation with the Ministry of Health & Long-Term Care (MOHLTC), five key components have been identified for management to develop a more effective and efficient Food Safety Program:

- An Environmental Health Information System (EHIS) with a module designed specifically for Food Safety inspections is seen as a fundamental tool for management and PHI staff. Information should drive management decisions and is

essential to managing resources well. An EHIS will also act as an enabler for other key components such as quality assurance.

- Online Disclosure of inspection results, via an EHIS, provides a much more responsive, user-friendly, and efficient approach to providing public access to information.
- Mandatory food handler training and certification is a proactive strategy for promoting effective food handling practices; it serves to increase compliance rates and reduces the need for re-inspections.
- Quality Assurance (QA) strategies are critical given the dangers posed by food-borne illnesses and the fact that PHIs work so independently in the field. Inspection information management systems such as those implemented in Peel, York, Niagara, and Toronto have QA features built into the system. For example, items must be checked off in sequence in order to complete an inspection report, an annual risk assessment must be completed before subsequent inspection reports can be entered in the system and standard comments promote consistent terminology. Other important QA measures include file audits, accompanied in-field visits, periodic training on policies, procedures and consistency issues, and PHI rotation.
- A comprehensive human resource strategy designed to implement a more competitive salary level for PHIs, improve recruitment of new PHIs and ensure retention of existing resources.

6.2.5 Impact/Risk

The City's Food Safety Program is currently unable to perform as it should, and the challenge is expected to grow as the number of new premises continues to increase. The rate of growth is difficult to project accurately at this time without a more reliable information system. Between 2002 and 2003, the number of premises in the system dropped by 19%. However, since that time, the number has increased by 1 to 5% annually and a total of 8% over the 3 year period. Without improved technology tools and an adequate level of PHI resources, efficient use of resources, effective performance and compliance with Provincial requirements will not be possible and will likely decline.

Recommendation 3

That management develop a comprehensive strategy to improve the performance of the Food Safety Program and achieve Provincial requirements, including the following components:

- a) **An Environmental Health Information System, beginning with a Food Safety Module designed and geared specifically for public health inspections;**
- b) **Online Disclosure;**
- c) **Quality Assurance; including;**
 - **EHIS management reports,**
 - **Sample file audits,**

- **Accompanied in-field visits,**
 - **Periodic re- training for PHIs on policies, procedures and consistency issues, and**
 - **PHI rotation; and,**
- d) **Mandatory Food Handler Training.**

Management Response

Management agrees with the Auditor's recommendations.

a & b) Management had been notified by the MOHLTC (Food Safety Audit 2005) that the Ministry was in the process of developing a food safety Environmental Health Information System (EHIS) for all of Ontario. In early 2007 the Ministry elected not to commit to developing and supporting a province-wide system. Consequently, the E&HP division began an exploration into a new EHIS system. The development of an EHIS that will allow online disclosure and real time reporting will require a number of supporting factors including new hardware and software.

In Q2 2008 Ottawa Public Health will develop a business case in accordance with the corporate information technology value assessment process to develop an RFP to secure a company to provide the hardware and software required to facilitate an EHIS system installation. A budget will then be determined and monies requested in order to proceed with this recommendation. The costs will include such expenses as hardware, software, annual licensing, repair and updating/upkeep of technology. E&HP has estimated that the annual ongoing maintenance cost of such a program would be \$250,000. This does not include the initial costs associated with hardware and technology, which cannot be determined until a provider is chosen. The capital and operating costs will be identified as part of the 2009 budget process.

In order to ensure the effectiveness of the system a pilot project would be undertaken (10 users to start) at a cost of approximately \$150,000.

c) Three (3) PHI Supervisory positions were created and staffed in the summer of 2007 to facilitate and ensure quality assurance within the Food Safety Program. The supervisors are solely dedicated to overseeing PHIs in the Food Safety Program and monitoring their reports and inspection forms for accuracy and consistency; accompanying staff on inspections in the field when required; trouble shooting and liaising with staff for consistent information sharing and distribution of new policies and procedures. An Educational Committee was also established (August 2007) to ensure semi-annual training sessions are offered to staff to keep them updated on new relevant information and policies. Finally, PHI rotation will be formally initiated by Q2 2008 to allow staff opportunities to work in different areas of the City, in both rural and urban settings. It is the intent of OPH to rotate staff in the Food Safety Program every 18-24 months.

d) Currently the provincial mandate is limited to providing or making available food handler training. The initiation and implementation of a mandatory food handler

training bylaw will require an additional three FTEs for the E&HP division for the management and delivery of the training, and the creation of a City bylaw by City Council.

Management will support the establishment of a City of Ottawa bylaw and E&HP will bring forward a proposed bylaw in Q3 2009 to Committee and Council. At this time there is only one Health department in the province that has successfully initiated a bylaw for mandatory food handler training and that is the City of Toronto.

It should be noted that in the MOHLTC 2005 Food Safety Audit report released in June 2007, identified that Ottawa Public Health has trained the second highest number of food handlers (1,848) in the province, after the City of Toronto.

Recommendation 4

That management assess funding requirements to implement this strategy, both for the short and long-term, including:

- a) Phasing in key components, beginning with new information technology as the first step;**
- b) Implementing the new information system on a pilot basis (i.e., starting with one district in the City in year one) to phase in design and equipment costs as well as staff training and associated operational adjustments;**
- c) Technical/systems and other specialist position requirements (e.g., QA, training, administration) to support implementation and ongoing maintenance stages;**
- d) Projecting PHI staff numbers required, drawing on industry research (conducted as part of this audit) to develop PHI staff-to-premise ratios for high, medium and low-risk premises and factoring in other workload;**
- e) Contingency plans to provide surge capacity to deal with a large-scale outbreak or other emergency; and,**
- f) Investigating cost-sharing arrangements with the Province regarding improved Environmental Health information technology.**

Management Response

Management agrees with the Auditor's recommendations.

New funding requirements will be identified as part of the 2009 budget process for both short and long term solutions.

- a) Management will continue to explore funding requirements and conduct feasibility studies in relation to initiating and implementing an EHIS to determine short and long-term costs as identified in the management response to Recommendation 3 a & b.
- b) Management will continue to engage the IT Services for assistance in the establishment of an EHIS work plan 2008 and to create an RFP.
- c) Management will determine the requirements of a specialist/QA support position, seek funding and create a job description by Q3 2008.

d) Management will continue to work with Employee Services to assess staffing levels and to determine comparators across the province by Q2 2008. The best practice determinant is the number of PHIs per 100,000 residents. OPH is currently staffed below the Provincial average. (Provincial average is 6.14 PHIs per 100,000 and Ottawa has 4.29 PHIs per 100,000.)

e) Management will explore options and possibilities to be included in the establishment of a contingency plan that would address surge capacity in the event of a large-scale emergency or outbreak. This may include Memorandums of Understanding with adjacent health departments to provide support if required.

It should be noted that currently there is a shortage of certified PHIs across the country, which is problematic in establishing a surge capacity contingency plan, but management will make a best effort to complete contingency planning by 2009.

f) Management will continue to liaise with the MOHLTC to explore cost sharing opportunities for an EHIS. Currently the Ministry is NOT cost sharing with any of the Ontario health departments that have an EHIS in place. The Ministry committed (2005 Food Safety Audit) to producing an EHIS for all Provincial Health departments, but that commitment was withdrawn in early 2007. Consequently health departments are individually establishing and funding EHIS systems.

Recommendation 5

That management liaise with Bylaw Services to ensure adequate coordination of the business licensing process for Food Premises with EHP as follows:

- a) **Include EHP in the distribution of all Food Premise license applications;**
- b) **Consider the feasibility of on-line access by EHP to the status of Food Premise applications to facilitate tracking and follow-through;**
- c) **Ensure that all parties responsible for sign-off prior to licensing have a coordinated response with Operators (i.e., Zoning, Building Services, Licensing, EHP); and,**
- d) **Do not issue business licenses for Food Premises without EHP approval.**

Management Response

Management agrees with this recommendation.

a) Schedule 7 to Licensing By-Law 2002-189 requires approval from E&HP as a condition for the issuance of a food premise license. E&HP is therefore included in the distribution of all food premise license applications as part of a standard approval process. By-law and Regulatory Services branch staff will continue this practice.

b) E&HP staff is currently working with Information Technology Services to determine the required and appropriate level of access to MAP given the needs of the business unit and other relevant considerations, which would provide for on-line access to food premise license applications.

c) Schedule 7 to Licensing By-law 2002-189 requires that a food premise license shall not be issued until the conditions for issuance have been met; that is, all required approvals, including that of E&HP, have been obtained accordingly. A process is currently in place to ensure that all relevant parties provide to By-law and Regulatory Services said approval either electronically or manually. Staff of the various approval branches will continue to work cooperatively to provide a coordinated response to operators.

d) Schedule 7 to Licensing By-law 2002-189 requires that a food premise license shall not be issued until approval from E&HP has been obtained. By-law and Regulatory Services staff has, in conjunction with E&HP, developed a process to facilitate approval. Staff of both branches will work cooperatively to continue this practice.

Recommendation 6

That management review and realign the respective roles and responsibilities of the Program Manager and Supervisor positions within the broader context of strategic plans for the Food Safety Program as well as other Environmental Health programs, including:

- a) **Creating and staffing any new positions only after the rationale has been completely formulated and incorporated into the EHP Division's comprehensive strategy;**
- b) **The introduction of new technology;**
- c) **The implications of any other planned changes (i.e., on-line disclosure and mandatory food handler training);**
- d) **Implementing a Quality Assurance Program; and,**
- e) **Revising and clarifying policies and procedures.**

Management Response

Management agrees with the Auditor's recommendation.

The comprehensive Strategic Food Safety Report to be delivered annually to Council described in recommendation 1 will include a discussion of the respective roles and responsibilities of the program manager and supervisor positions within the unit where new positions are identified.

The need for supervisory positions was identified and evaluated in mid 2006, and in early 2007 the positions were posted and filled. Management believes that the benefits of staffing the positions immediately were the start of a rigorous QA Food Safety Program as well as continuing to increase efficiencies made over the previous two years.

In addition, it is essential to have a supervisory level in place prior to the introduction of new technology and on-line disclosure, as the Supervisors will be instrumental in ensuring consistency in data collected and downloaded into the new EHIS system.

Supervisors are currently revising and clarifying policies and procedures with input from management and staff, which will result in increased and facilitated communication between staff and management, and clear direction to enable the QA Program. The results of this discussion and any changes or realignment of the existing Supervisor positions will be addressed in the 2008 comprehensive Strategic Food Safety Report.

Recommendation 7

That management implement a comprehensive recruitment strategy to attract and retain qualified PHIs, including:

- a) **Requesting that Employee Services proceed with market value research on PHI salary levels; and,**
- b) **Resurrecting a Trainee program to assist in recruiting students, offering tuition and certification in exchange for a job term commitment.**

Management Response

Management agrees with the Auditor's recommendation.

Meetings with the Employee Services were held in October 2007 to address recruitment and retention issues. Management will continue to attend career fairs at the four universities across the Country in an attempt to recruit new graduates to OPH. Employee Services will work with E&HP to develop promotional materials and;

a) Employee Services will be conducting market value research pending current data collection at the end of October 2007. Eight comparator municipalities will be polled by Employee Services and the results of this research will inform the recruitment strategy for PHIs.

b) Costs associated with the resurrection of a Trainee Program are being investigated and will be compiled by January 2008 in conjunction with Employee Services. These will include the costs of books and tuition for the four year Environmental Health Degree Program. The strategy of a Trainee Program is to encourage local high school students to pursue a career in Public Health Inspection with the expectation that they will return to Ottawa once they have completed their training and schooling. The original Trainee Program was discontinued in 1996 due to budgetary pressures. It should be noted that many of the current PHIs employed by Ottawa Public Health were graduates of the Trainee Program. Management will present a report to Council in Q3 2008 outlining the business case for the reinstatement of the Trainee Program.

6.3 FINANCIAL MANAGEMENT

6.3.1 Audit Objective

How adequate are financial management practices?

6.3.2 Audit Criteria

- How is the budget prepared?
- How is spending monitored and controlled?
- Do budget decisions appropriately reflect the program's mandate, strategic plans and priorities?

6.3.3 Observation/Issue

The budget of the Environmental & Health Protection Division is prepared and controlled in accordance with corporate requirements and guidelines. A review of planned and actual costs over the past three years shows a negative variance each year, and as high as 30% for 2004. Management has suggested that this pattern of under-spending on approved budgets has, for the most part, been related to unsuccessful recruitment efforts to attract new PHIs. See Table 4 presented earlier for details.

The Division collects revenues in the order of \$31,000 (2006) to offset the cost of providing educational services and record searches to the community. The audit found that there are opportunities for segregation of duties to be improved. Management has initiated the implementation of a new information system (effective July 3, 2007) to better support the administration of education services, which will result in improvements to the associated registration and payment processes including the segregation of duties. Changes are required to effect similar improvements to the segregation of duties associated with record searches. See the explanation provided below under "Revenue Collection" for further details.

6.3.4 Cause

6.3.4.1 Budget Preparation and Control

The budget for the Environmental & Health Protection Division is prepared on the basis of the previous year's budget, adjusted to address new requirements and priorities that have arisen. Budget submissions are prepared annually by the Manager, EHP Division when forms are provided by the department's Financial Support Unit (FSU). Spending is monitored by the Manager via quarterly statements provided by the FSU, and any budget adjustments are authorized by the Manager.

6.3.4.2 Revenue Collection

Revenue is collected by EHP for the provision of Food Handler training/certification (all Operators undertaking Food Handler Training/Certification pay for the service

with the exception of high schools, Ontario Works and City-run facilities) and the conduct of record searches requested by prospective new establishment owners or their lawyers. Nominal fees offset the cost of providing these services but do not cover all expenses. Food Premise Operators are charged \$25 a person per in-class course or \$30 for on-site instruction and \$10 for certification testing and fees for record searches are \$100. Revenues collected in 2006 totalled less than \$31,000, including \$10,300 for record searches and \$20,291 for Food Handler training and testing. Charges for these services are low in comparison to other cities across the Province and consideration should be given to basing these fees on a cost-recovery basis.

EHP is in the process of switching to a new information system for health education and this will include the course registration process (i.e., the CLASS system also used by Parks & Recreation versus the old ACCESS system). Course registration will be done with an interactive phone system supported by a website and in-person service via the City's Client Services Centre. Fees will be collected through the Finance group of Parks & Recreation and reports will be generated by the CLASS system. Certification will be withheld until payment is received and any NSF cheques are cleared.

Currently, payment for Food Handler training is received by cheque or money order. Some PHIs carry schedule packages and provide them with application forms directly to Operators during inspection visits. Operators mail in or drop off application forms and receipts of payment are either mailed out or provided at the time of course delivery. The Administrative Assistant to the Manager, EHP Division issues certificates and processes cheques. NSF cheques are returned by Finance and an EHP Educator contacts Finance for refunds if course participation is cancelled. The new approach with the CLASS system (described above) will provide for a more user-friendly, efficient process with appropriate segregation of duties related to the exchange of funds for Food Handler education. Efficiency gains are expected to significantly increase the time available for course delivery and to respond to requests for off-site training.

Revenue collected for requested record searches is received by the Administrative Assistant (reporting to the Manager, EHP), and cheques or money orders are forwarded to Finance.

6.3.4.3 Inspection Fees

Most Ontario cities, including Ottawa, do not charge fees for inspections of food premises. Hamilton is one of the only cities that does and fees are collected as part of the business licensing process. Annual charges for prescribed visits in Hamilton are \$30 for low-risk establishments, \$60 for medium and \$90 for high-risk (plus license renewal fees of \$45). Hamilton is considering revisiting this practice due to difficulties that arise when 100% of inspections are not completed and because programs are mandated and already funded. As discussed previously, about 30% of food premise operators in

Ottawa seem to be monopolizing inspection staff time with the need for re-inspections of repeat violations.

The possibility of a surcharge should be considered for those operators whose practices result in the need for additional inspections beyond provincial requirements.

6.3.4.4 Budget Decisions

While EHP maintains detailed operational plans, a strategic planning process is currently not in place. A comprehensive and longer-term view of objectives, priorities and funding requirements has historically been missing to guide budget decisions. As discussed in the previous section under Observation #2 on Performance, in-depth research and analysis undertaken during this audit have led to the identification of key components for a comprehensive strategy for the Division.

6.3.5 Impact/Risk

Audit recommendations presented earlier in this report provide specific direction on what is needed to move EHP forward to a higher level of performance. EHP management's plan to address audit recommendations will, in effect, form the basis of a strategic plan for the Division which should inform future budget development.

Effective revenue collection procedures (e.g. the separation of duties associated with the collection/processing of revenues and other Food Safety Program operations) are necessary to ensure that funds are used to offset Program costs as intended.

Recommendation 8

That management prepare annual budgets for the Environmental & Health Protection Division based on clear strategic objectives and priorities for the Food Safety Program and other Environmental Health programs (e.g. develop the comprehensive strategy for the Food Safety Program as a first step).

Management Response

Management agrees with the Auditor's recommendations.

The comprehensive Strategic Food Safety Report discussed in recommendation 1 will be a fundamental first step. The E&HP Management team does prepare annual budgets for the division, including strategic objectives and priorities for the Food Safety Program and all other E&HP programs. In 2004, 2005 and 2006 the food safety budget was under spent due to the inability to staff and fill Public Health Inspector (PHI) positions. Recruitment and retention of Public Health Inspectors are the primary issues, which affect the ability of the E&HP division to attain compliance with provincial requirements. With an aggressive recruitment program the expectation is that all existing PHI positions will be filled by 2009.

Recommendation 9

That management, before requesting any additional resources as part of the 2009 budget submissions, explore options for funding from any surplus Food Safety budget, from within the Public Health Branch budget and from within the Community & Protective Services Department budget.

Management Response

Management agrees to the Auditor's recommendations.

Management will explore all funding opportunities within their authority as part of the 2009 budget submission.

Recommendation 10

That management, once a more strategic approach to managing the Food Safety Program has been established, pursue the feasibility of inspection fees or especially a surcharge for repeat offenders (i.e., charge for extra visits required to ensure compliance, beyond the Provincially-mandated annual inspection frequency).

Management Response

Management does not agree with the Auditor's recommendation regarding inspection fees, as it is not industry best practice.

Of the 36 health departments in Ontario, only one charges a fee for inspection (Hamilton) and they are in the midst of repealing their bylaw. Under the HPPA, OPH is required to inspect and investigate all reports of food borne illness and cannot refuse to perform an inspection, because the premise will not pay an inspection fee.

Management agrees with the Auditor's recommendation regarding repeat offenders.

Historically it has been demonstrated that there are identified food premises operators that repeatedly fail to comply with the Food Premises Regulation. These operators consume an inordinate amount of a PHI's time with re-inspections and complaint investigations. A surcharge fee structure would have to be incorporated into a bylaw and passed by Council. Management will present a draft bylaw to Council in Q1 2009.

Recommendation 11

That management examine the potential cost/benefits of increasing fees for the delivery of Food Handler Training, comparing Ottawa rates to other cities in Ontario.

Management Response

Management agrees with the Auditor's recommendation.

A comparator survey of all Ontario Health Department's training fees will be conducted in January 2008 and at that time the fee structure will be reviewed and revamped if necessary. It should be noted that with the possible advent of

mandatory food handler training the fees will have to be 'reasonable' reflecting a cost recovery structure.

Recommendation 12

That management ensure the appropriate segregation of duties associated with the collection and processing of all revenues.

Management Response

Management agrees with the Auditor's recommendation.

As of June 2007 the food handler training course registration is done via the City's "CLASS" system, which facilitates on line registration and eliminates the need to directly handle cash or cheques. The E&HP division ensures appropriate processing of all revenues through consultation with the Financial Support Unit (FSU) as per current practice.

Recommendation 13

That management request that Financial Services review revenue collection procedures within the EHP Division.

Management Response

Management agrees with the Auditor's recommendation.

E&HP management currently consults on an ad hoc basis with the FSU, and will establish a regular meeting schedule to review collection procedures in Q1 2008.

6.4 PROGRESS SINCE 1992

6.4.1 Audit Objective

What sort of progress has resulted since the audit conducted in 1992?

6.4.2 Audit Criteria

What progress has resulted in relation to the main areas of concern identified at that time as follows:

- Records/Information Management?
- Procedures?
- Performance Management?

6.4.3 Observation/Issue

A previous audit of the Food Safety Program was conducted by the former Regional government in 1992. Recommendations at that time pertained to records/information management, procedures and performance management. Progress has been reviewed within the context of prior concerns.

Over the years, some progress has been made in the three areas where improvements had been recommended in 1992; however, industry practices have changed significantly since that time and Ottawa has fallen behind in technological advances and strategic approaches. While the 1992 Program was considered to be one of the leaders in the Province 15 years ago, it has not met legislated requirements since at least 2003.

6.4.3.1 Records/Information Management

Premise records and inspection reports have improved. Each premise has its own file that tells the history and track record. Records are managed in accordance with corporate guidelines and a Records Clerk has responsibility for all records management within EHP. Inspection reports have been upgraded and are available to the public upon request. A database is in the process of being established to more effectively track complaints, information requests and other aspects of the EHP intake function. As discussed, there is a need for an improved information system to provide electronic access to inspection reports and the history of each premise in order to facilitate access by PHIs and management as well as the public and media.

The previous audit recommended that Public Health provide Council with more information about the Program including enforcement statistics and meaningful trends or indicators on the Program's success. Regular information is provided regarding the issuance of tickets, fines and closures, and the Medical Officer of Health has informed Council during budget deliberations of EHP's inability to meet Provincial Food Safety requirements. As discussed earlier, there is a need for more complete reporting to Council as the Board of Health on the results achieved by the Program and strategies to improve performance.

6.4.3.2 Procedures

While management's expectations with regard to enforcement appear to be clearer than years ago, this continues to be an area that requires monitoring to ensure consistency. Consistency between districts has generally been a challenge and any inconsistency in applying enforcement policies impacts on the Program's credibility in the Community. For example, leniency in terms of not reporting a first-time offense or providing a second chance to address an unresolved violation before ticketing can undermine enforcement policies and result in complaints or challenges to policies.

The application of the modified HACCP protocol is another area that will require ongoing attention. While staff indicated that most PHIs complete HACCP monitoring

as a regular routine during inspections, there is no evidence of this on reports or elsewhere in premise files. HACCP forms require detailed descriptions and graphs of food preparation processes which make them time-consuming to complete, and, as a result, they are rarely used. It appears there may be some opportunity to streamline the documentation process for HACCPs, perhaps incorporating HACCP records as part of the inspection report itself, to make it more user-friendly for PHIs as well as Food Handlers. The interpretation of new or revised guidelines from the Province also requires ongoing attention to ensure consistent application, and these are typically discussed at Division-wide monthly meetings. It is management's intention that the new Supervisors will play a key role in addressing consistency issues as part of their quality assurance role.

The Education Program has not changed significantly over the years. Two PHIs act as full-time Educators and EHP now offers provincial certification of Food Handlers and certified 1,848 people in 2005. It does not appear that previous recommendations, regarding targeting priority groups for training, were implemented. However, it may not be possible to do this effectively without introducing Mandatory Food Handler Training. As indicated by PHIs, Operators with a history of repeat violations have historically been the most resistant to signing staff up for training, which is voluntary. Meanwhile, PHIs have observed that Food Handler certification correlates with improved compliance rates. While the Province continues to indicate that it plans to create legislation to address this, many cities in Ontario are now enacting bylaws for Mandatory Food Handler Training. Such provincial legislation does exist in British Columbia, Alberta, Saskatchewan and Nova Scotia.

6.4.3.3 Performance Management

Quality assurance measures have not been adequately built into the inspection process. While PHI rotation was introduced in the 1990's, it has not continued on a consistent basis. It appears that Program Managers started reviewing each inspection report in response to previous concerns about monitoring in-field activity. While it is understood that the reports themselves currently provide the best information available, this approach is inefficient and redundant. As previously recommended, a staff rotation schedule, a process of random file audits, and in-field observation should be introduced. These measures in concert with the development of a reliable Environmental Health Information System with built-in controls will provide for effective and efficient checks and balances.

A hard copy manual, accessible to all PHIs, does provide a more practical and simplified set of guidelines on key policies and procedures. However, there is a need for further elaboration in some areas. PHIs indicated that a more formal orientation program would be helpful for new staff members as well as when PHIs are rotated to a new district. All students completing their three-month practicums, prior to Provincial certification, must be assigned a mentor. Currently, a "buddy system" is used by EHP

whereby a fellow PHI is assigned to guide new PHIs. Inspectors felt that a formal process and package of materials would be more effective. It was suggested that the same concept could be applied when PHIs are rotated to new districts to ensure that the newly assigned PHI is introduced to the new district by the old PHI who is experienced with that area and its operators.

Staff indicated that communication between management and staff could be improved to keep the group more up-to-date regarding changes in legislation and policy. While articles and information are shared (i.e., via email), PHIs have limited time in the office and many do not keep up this way. Many felt that it would be more useful if the monthly Division-wide meetings could have a more educational focus and regular section meetings could be established for each working group (i.e., west, central and east) to provide a forum for more open discussion than is possible in the large group meetings. In terms of opportunities for continued education, PHIs are interested in keeping a current knowledge base, developing a broader view of professional practice issues and receiving clarification on legal requirements as issues arise. Staff would welcome section meetings to discuss specific issues such as completion rates, strategy in difficult cases, the interpretation and application of legislation to specific situations, workload distribution, coverage during absences, and security issues, etc. It is felt that the staff-chaired, monthly "Info-share" meetings provide an important opportunity for exchanging ideas but would benefit from some added structure to ensure that sessions are productive and remain on-topic.

6.4.4 Cause

As indicated previously, industry practices have evolved over the years that have intervened since the audit of 1992, and this group has fallen behind. EHP has been challenged by inadequate resources, tools and information. Changes in the management structure were introduced prior to municipal amalgamation and created a gap in leadership for a number of years. The former Director position was eliminated when the incumbent retired in 1999. Two of the three Program Managers were assigned temporary responsibility in an Acting Manager capacity until the current Manager was recruited in 2003. While Division leadership is now considered to be strong and gains have been made, there is an immediate need to address shortcomings in equipment and resources, and to improve performance of the Food Safety Program.

The Province reviews the performance of Food Safety Programs across Ontario through annual surveys which collect statistics on the number and types of inspections conducted. While this process provides useful comparative statistics, this review comments on the Program in strictly quantitative terms without providing an assessment of the quality of inspections or the results of the Food Safety Program. Management should self-assess and report to Council on improvements to performance of the Program in terms of the recommended comprehensive strategy for change. It

should also report on results within the broader context of community compliance with legislated safe food handling practices.

6.4.5 Impact/Risk

EHP will continue to perform below Provincially mandated levels in terms of inspection completion rates.

Recommendation 14

That management improve communications within and between districts by:

- a) Clarifying expectations/standards and priorities regarding inspection frequencies for the interim until Provincial requirements can be met;**
- b) Establishing consistent practices between districts;**
- c) Establishing regular section meetings for each working group (i.e., west, central and east districts) to review plans, standards and guidelines, work progress, strategies, access to information, tools/materials, and in-field security measures;**
- d) Refocusing Division-wide meetings to deal with broader educational issues of legislation, professional practice and legal considerations;**
- e) Restructuring 'Info-Share' sessions to ensure they provide a productive opportunity for the exchange of ideas; and,**
- f) Addressing any individual performance issues with staff members one-on-one as required.**

Management Response

Management agrees with the Auditor's recommendations.

a, b & c) Consistent practices and sharing of standardized information between areas and districts is being facilitated by the implementation of the Supervisory positions, additional PHI meetings and continued info-share meetings. In 2005, a sub-office was established in Orleans at the Centrum location where 10 PHIs were relocated to facilitate customer service to residents in the east end of Ottawa. The transition to the sub-office initially led to a few communication challenges, but over time the transition smoothed and the flow of information between the two offices increased substantially.

d & e) Monthly PHI meetings will continue to facilitate sharing of educational issues, professional practice and legal considerations. "Info-share" meetings will be reinstated on a quarterly basis to ensure productive opportunities for the exchange of ideas commencing in Q1 2008.

f) All CUPE staff and their program managers have participated in the PDP pilot project. Individual performance issues have been addressed through this process, which will continue to be utilized after 2007 on an annual basis.

Recommendation 15

That management monitor and report regularly to the Council on:

- a) Proposed strategies to improve Program performance (now and in the future);**

- b) Progress in implementing improvements; and,
- c) Meaningful trends or indicators of the Program's success and the results achieved, working toward reporting on the evolution of community compliance rates (i.e., with legislated safe Food Handling practices).

Management Response

Management agrees with the Auditor's recommendation (as agreed to in recommendation #1).

The E&HP division will report annually to CPS Committee and Council starting in Q2 in 2008. Included in the annual Strategic Food Safety Report will be statistics as well proposed strategies to improve performance and progress to date.

Recommendation 16

That management implement procedural enhancements and ensure consistent practices across the Division as appropriate on an ongoing basis, including:

- a) The application of enforcement policies and procedures;
- b) Documentation of HACCP assessments; and,
- c) Updates/upgrades to the inspection form.

Management Response

Management agrees with the Auditor's recommendations.

An educational committee has been established in the E&HP division to address issues of updating staff on new procedures, policies, Ministry protocols and orientation. This committee will also address procedural challenges including any changes to existing inspection forms and documentation (including HACCP assessments). The Committee meets every 2 months and information is shared with staff during regularly scheduled PHI meetings.

Recommendation 17

That management establish a formal Orientation Program for new and rotating inspection staff.

Management Response

Management agrees with the Auditor's recommendation.

A newly established education committee (August 2007) will ensure a formal orientation program for new staff, and will develop semi-annual training sessions for all PHIs. Staff training will be held in Q1 and Q3 of 2008.

7 CONCLUSION

The City currently is not in compliance with provincially mandated inspection standards. Under the direction of the current management group attempts have been made to address some of the underlying issues regarding technology and human resources, however, these issues remain unresolved. A comprehensive strategy, as

outlined in this report, is necessary to address current issues in a more proactive and complete manner. Specifically, information technology tools need to be enhanced to allow for more efficient and effective use of resources and a better approach is required to enable more effective recruitment and retention of qualified and skilled PHIs. Such a strategy should be formally reported to Council clearly outlining the factors affecting compliance and what is proposed to address the issue.

It is felt that by implementing the recommendations contained in this report, the EHP Division will be able to significantly improve the performance of the Food Safety Program, comply with Provincial legislative requirements, and more effectively protect the Ottawa community from food-borne illness.

8 ACKNOWLEDGEMENT

We wish to express our appreciation for the cooperation and assistance afforded the audit team by management and staff.

APPENDIX A: Upgrading Information Technology - Breakdown of Estimated Cost Projection

Software development	\$50,000	Includes all modules built into the system (i.e., Food Safety, Rabies, Tobacco, Drinking Water, Swimming Pools).
Data mapping conversion	\$10,000	Conversion of present to future system over 1 week period involving several PHIs' time
Hardware	\$4,200 per user	Includes: <ul style="list-style-type: none"> • Tablets, notebooks or laptops (incl. full keyboard and mouse) • Carrying cases • Portable printers and extra printer cartridges • Car kits to plug tablets into car • Docking stations
	+ 2,000 per user	If "rugged-ized" tablet desired. Note that increased insurance on equipment may be considerably cheaper.
Licensing Fees	\$1,200 per user annually	Licensing fees provide access to entire system – no additional fees for other modules such as Rabies, Drinking Water, etc. (Potential extra expenses here would relate to design costs for customizing to suit the City's particular needs.)