



## **Senate Bill 830**

*Environmental Health Specialists and On-Site Sewage Disposal Systems – Reform  
(Environmental Health Systems Support Act of 2023)*

MACo Position: **SUPPORT**  
**WITH AMENDMENTS**

To: Education, Energy, and the Environment  
Committee

Date: February 23, 2023

From: Sarah Sample and Dominic J. Butchko

The Maryland Association of Counties **SUPPORTS SB 830 WITH AMENDMENTS**. This bill could establish, update, and refine the process of managing and installing on-site sewage disposal systems across the state.

The legislation proposes beneficial advances, such as establishing a student loan forgiveness program for environmental health specialists, and standardized regulations and guidance for on-site sewage disposal systems. The bill also seeks to provide more funding and resources at the state level to tackle some of the goals set forth, including adding new positions, allocating funding, exploring the use of a statewide database, and creating a standardized permit form. While these elements could be welcome advances, they are complementary to, rather than centered upon, the area of greatest need in this field: the professional environmental health positions tasked with the actual inspection and evaluation duties.

Considering the significant demand on these departments locally and the necessity for more resources to meet those needs, this legislation presents an opportunity to bring about many changes for the better if some of the intent is more equitably focused across the entities that do the work. Therefore, MACo suggests that SB 830 be amended to address the central and alarming challenge facing this field.

For background, most county environmental health departments are carrying out these inspections and related functions through either their county government, the local health department, or a contracted entity. There is a great deal of variability in how each jurisdiction operates and organizes these departments and their efforts across the state have maintained the safety of vital resources that no one can live without – food, water, and a healthy environment. The great effort and importance of these programs cannot be overstated.

Counties appreciate that this bill attempts to take a comprehensive look at some of the issues facing state and local environmental health departments. Unfortunately, the bill focuses too

directly on resources at the state level without drilling down into the challenges that local jurisdictions are facing in implementation, rather than coordination. The needs of local governments (and most often local health departments) must be met if meaningful reform is to be effective and prompt. SB 830 could be the foundation for that needed effort.

The central amendment counties seek would be a requirement that the Department of Budget and Management collaborate with local jurisdictions on updating current salaries for local environmental health specialists, and proceeding with position reclassifications where they are found appropriate based on market trends. Attracting and retaining qualified professionals will not be possible until a reasonable wage is paid to recognize the market value of these individuals with a 4-year science degree. While SB 830's student loan forgiveness program is a very good step, it could never fully address this labor market discrepancy.

The bill adds funding for new positions at the state level, but nothing for the individuals with "boots on the ground." Similar legislation last year evolved into a stakeholder-driven framework, providing \$5 million to help with wage issues at the local level. This is, simply put, the magnitude of the change needed to bring this important local function into the modern workforce climate, and to deliver for resident needs – and it cannot happen without State leadership.

Despite differing models at the county level, there is unanimous agreement that guidance is needed from the State on standards and regulations, which this bill establishes. However, this guidance is coming at a very late stage in this process and therefore should seek to set minimum standards that are required rather than setting both the floor and ceiling into which each jurisdiction must force compliance. The same is true of a standardized form – counties prefer to seek improved data through minimum requirements, rather than strict uniformity.

The problems that environmental health specialists have been facing in Maryland are significant at every level. Without a focus on the local implementation challenges, SB 830 will fall short of its worthy goals. MACo would like to work with all parties to make this a more intuitive approach.

Accordingly, MACo urges a **FAVORABLE WITH AMENDMENTS** report on SB 830.