

DEQ Customer Service Report

I: Introduction

In a budget note in Senate Bill 5517, the 71st Legislative Assembly of the State of Oregon directed the Department of Environmental Quality (DEQ) as follows:

“As a means of measuring performance and public satisfaction with Department programs and services, the agency was directed to develop a plan to regularly survey customers of agency programs. The results of the customer surveys should be used to develop ideas for new approaches toward program improvement and responsiveness. The plan and survey results shall be presented to the 72nd Legislative Assembly as part of the budget review process.”

This report presents the results of DEQ’s 2002 customer service surveys for two set of customers: air and water quality permit holders and septic system owners. DEQ focused on these areas because they were of particular interest to the Ways & Means Subcommittee.

The surveys asked customers to comment on performance, responsiveness and customer satisfaction.

The air and water permit holder survey areas outlined in this report are: overall customer satisfaction; permit application and review; clear, consistent, timely information; online permit application and renewal; enforcement actions; and dispute resolution.

The septic system owner areas outlined in this report are: overall customer satisfaction; timely permit process; accurate information and clear explanations; and consistent and flexible rule interpretation.

For each area of concern the customer service surveys identified, this report gives research findings, suggested improvements by the survey firm and DEQ’s action plan to improve our business practices and customer satisfaction with the agency.

This report also includes relevant customer improvements DEQ has put in place to make it easier to do business with our agency.

Our customers rated the professionalism and courtesy of DEQ staff very high. They also told us that we need to improve the clarity, consistency and timeliness of the information we give them and to streamline the permit process.

DEQ will conduct follow-up surveys with both air and water quality permit holders and septic system owners in 2004 and in 2006 to

continue to measure performance, responsiveness and customer satisfaction.

II: Excellence is DEQ's Number One Priority

DEQ is dedicated to providing high-quality service and making it easier to do business with us. We are pursuing activities and organizational efforts to improve customer service and to streamline permit processes. To achieve these goals, DEQ has established priorities for the agency and created a communications credo.

Through the leadership and direction of the agency's executive-level managers, DEQ crafted strategic directions that outline the agency's highest priority work and establish performance tracking mechanisms and measurement tools to help the agency achieve results.

DEQ's communications credo guides service-oriented employee conduct in external and internal business practices. This credo will become a part of the Professional Code of Conduct that DEQ will ask all employees to uphold. The communications credo will be part of employee work plans, annual performance evaluations, and new employee orientation starting in Spring '03.

III: Air and Water Permit Holder Survey: Findings and Recommendations, DEQ Actions and Expected Improvements

In May and June of 2002, DEQ contracted with an independent market research firm to survey 300 customers required to have industrial and municipal water and air quality permits. The survey purpose was to gauge customer satisfaction and to identify ways DEQ can better serve its permitted customers. The survey was administered by phone and all responses were kept confidential. Responses were summarized into categories of:

- Overall Customer Satisfaction
- Permit Application and Review
- Providing clear, consistent, timely information
- Electronic permit application and renewal
- Enforcement Actions
- Dispute Resolution

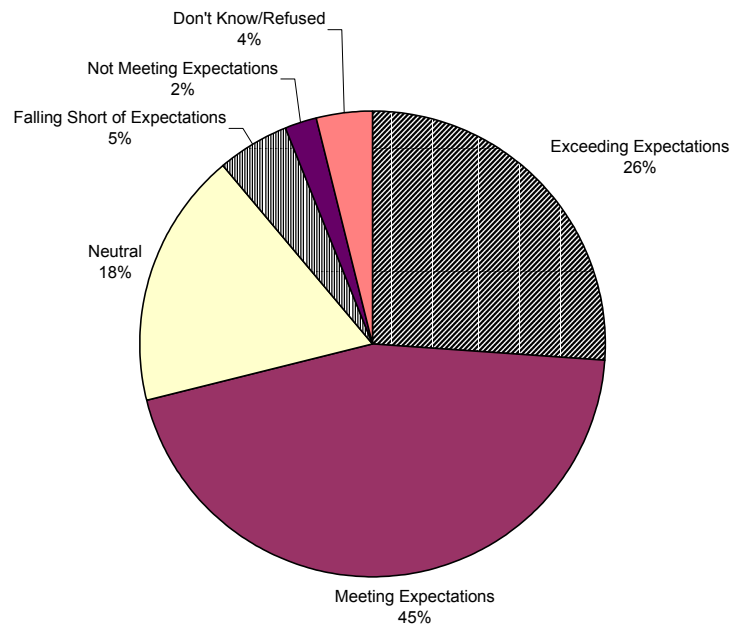
Overall customer satisfaction

Survey finding:

Customers in the regulated community generally have positive opinions about DEQ permit programs. Customers rely on DEQ staff for expert advice. And for the most part, DEQ delivers. Most respondents view DEQ staff as helpful, knowledgeable and informative.

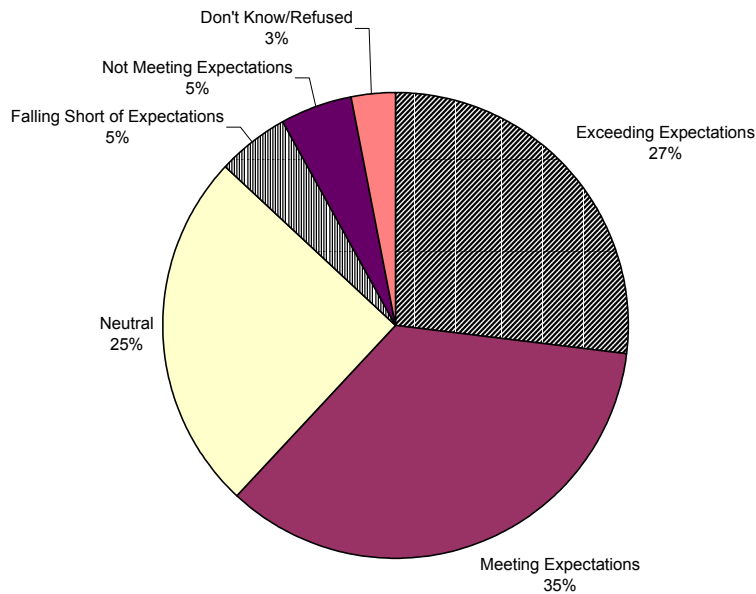
Seventy-one percent of Air Quality customers give the Air Quality Permit program favorable ratings. Sixty-two percent of Water Quality customers give the Water Quality permit program favorable ratings.

Performance Ratings for Air Quality Program



Base: Those who had contact with the Air Quality Program during the past 12 months.

Performance Ratings for Water Quality Program



Base: Those who had contact with the Water Quality Program during the past 12 months.

Permit Application and Review

Survey finding:

Timeliness in getting information and problem solving are issues for Water Quality customers, with a disparity between how long some customers think it should take and how long it actually took for their applications to be processed.

Comparing how long it took for DEQ to approve a customer's application versus how long they think it should take, those applying for Water Quality permits expect the approval process to move more

quickly. Three-quarters expect it should take less than two months for their application for a Water Quality permit to be processed, although less than half (46%) said this is how long it actually took. For the Water Quality program, this represents an opportunity for DEQ to address both the delays in permit processing and communication to the customers.

In contrast, the process for Air Quality permits generally meets expectations. Two-thirds (64%) think it should take two months or less for their Air Quality permit application to be processed, similar to the 66% who say it actually took that amount of time.

When asked what comes to mind (either positive or negative) about the permit application and review process, top-of-mind comments reveal that the Water Quality permitting process is perceived more negatively than the Air Quality program. Negative comments for the Water Quality permit application and review outweigh positive comments by a 2-to-1 margin (47% and 24%, respectively). In contrast, opinions of the Air Quality permitting process are slightly more positive (49%) than negative.

Researcher's suggested improvements:

DEQ should establish protocols to address timeliness of the permit application and review process. Managing customer expectations may help to address timeliness. DEQ should inform customers how long it is expected to take and, where applicable, if the permit issuance will take longer than expected.

DEQ Actions:

Air Quality Division streamlines permit process
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In 2001, DEQ streamlined the air quality permitting program to make it easier to do business with DEQ without environmental compromise. As a result of the changes, DEQ significantly reduced the amount of time to issue Air Contaminant Discharge Permits (ACDP).

When DEQ receives an ACDP or Title V permit application, DEQ gives the applicant the contact information for the permit writer who can provide information about when the permit will be completed.

About 68 percent of air permits have changed from individualized permits to general permits that are simpler and typically less costly for business. For a wide range of activities covered by general permits, DEQ can authorize operation in 3 to 10 days instead of the 2 to 3 months it took previously.

Businesses can choose from a range of options when constructing

new facilities, from “notice and go” options for minor changes to streamlined permitting options for major new facilities.

For example, a business formerly required to collect a full year of data before constructing a major new facility may now use protective assumptions during permitting, and collect the information after operation begins. A more flexible approach allows companies that keep their emissions below federal levels to avoid costly and complex federal permitting requirements.

<i>Action/Tasks</i>	<i>Expected Improvements</i>
Incorporate streamlined provisions from 2001 rule changes in all ACDP and Title V permits as they are renewed or modified (2002-2006).	Businesses will benefit from provisions that increase flexibility to change operations without needing a permit change.
Move review of modeling data for major new facilities to DEQ regional offices (March 2003).	The permit staff responsible for meeting timeliness targets will control all aspects of permitting resulting in permits for major facilities being issued faster.
Continue to track and report on timeliness (ongoing).	Timeliness has already improved from 70% before streamlining to the current level of 90%. Continued reporting will enable further improvement in this performance.
Use streamlined permitting tools, such as revised construction approval procedures, general permits and improved public involvement processes, to speed permitting of new facilities (ongoing).	Businesses will benefit from faster initial permitting.

Streamlining Wastewater Permit Process

Action/Tasks	Expected Improvements
<p>Working with cities, Clean Water Services in Washington County, and the Rogue Valley Council of Governments to develop new approach and model permit. The new permit consolidates into one permit numerous federal wastewater permit requirements for wastewater, storm water, underground injection control requirements, and TMDLs. Agreement with applicable agencies to be completed 4/04. Permit issuance will follow based on agreement guidelines.</p>	<p>Consolidated permit will make it easier and less costly for cities to plan the most cost-effective infrastructure for meeting clean water standards. One permit covering numerous facilities operated by a city will allow a more reasonable timeline for the city to design and construct facilities.</p>
<p>DEQ will continue to contract with willing cities, and seek partnerships with additional cities, to administer federal Clean Water Act permits to control construction erosion. This allows developers to obtain both state and local permits from a local city building office instead of having to go to both local and DEQ offices.</p>	<p>One-stop permitting saves time and money for developers and contractors, as well as the state.</p>
<p>Revise 2003 permit issuance schedule.</p>	<p>DEQ will be able to provide a business with a more reliable estimate of when a permit will be issued.</p>
<p>In DEQ's standard letter of response to permit applications, we will direct permit holders to web site or permit staff to share information on permit status.</p>	<p>Individual permit holders will be better informed about the status of their permit application.</p>
<p>Allow permit holders to submit required Discharge Monitoring Reports to DEQ through an electronic reporting system. (To begin in 6/03)</p>	<p>Reduced workload for permit holders and DEQ staff. Electronic reporting reduces time and paperwork for future permit work such as modifications and renewals.</p>
	<p>A reduction in the current permit backlog, development of better</p>

<p>DEQ will continue to work with a Blue Ribbon Committee of external stakeholders who are conducting a comprehensive review of the state's wastewater program, evaluating current performance expectations, process efficiencies and regulatory requirements. The committee began meeting 12/02 and will develop recommendations for program changes and improvements by 2/04.</p>	<p>performance measures, elimination of unnecessary work and adoption of most appropriate fee structure.</p>
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Providing clear, consistent, timely information

Survey finding:

Some air and water permit holders experience frustration with the clarity, consistency or timeliness of the information DEQ provided. This is likely to lead to some disagreements with DEQ. Customers expressed that information provided is too confusing, technical and complex.

Researcher's suggested improvements:

Providing customers with clear, thorough, consistent and timely information that is easy to understand should enhance satisfaction.

DEQ actions:

Provide staff training to DEQ employees to better deliver consistent and easy-to-understand information about DEQ permits, rules and policies

<i>Action/Tasks</i>	<i>Expected Improvements</i>
<p>Provide day-long training with a communications and customer service contractor for DEQ staff who interact most with external customers. Schedule for employee training follows:</p> <ul style="list-style-type: none"> • Eastern Region Air and Water Quality permit staff and managers (1/03) • Northwest Region and Western Region Air and Water Quality permit program staff (by 6/03) 	<p>Improved performance ratings in 2004 customer service survey regarding DEQ's ability to provide easy to understand information in a timely manner.</p>

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- Enforcement Program staff (by 6/03)

DEQ managers review training elements with staff quarterly (Beginning Spring 03)

Provide writing training for DEQ staff to improve plain language communication to all customers. (Training conducted 7/02 - 12/03, refresher training on going.)

DEQ written materials are easier to understand.

Provide rules interpretation training for all DEQ permit writers to review and discuss consistent interpretation and application of DEQ rules and policies. Each program (Air, Water and Land) will provide training to their regional and headquarters staff. Training will cover the following elements:

Ensure that all permit writers have an in-depth knowledge and understanding of rules and policies. This will result in more consistent application of DEQ rules, reduced permit application process time, better compliance and overall satisfaction with DEQ services.

Purpose of rules

How to apply the rules

Consistent up-to-date guidance

(Beginning 3/03 and will be administered quarterly.)

Electronic permit application and renewal

Survey finding:

Half of surveyed Water Quality customers said they don't know when their permits are due for renewal.

Permitted customers would be interested in various electronic services if they were offered. About half of air and water permit holders surveyed would likely use a computer to check the status of or complete applications or renewals, provide monitoring or other reports or ask questions. Few, however, are interested in paying fees electronically, and having the capability of conducting business via the DEQ website rates relatively low in terms of importance.

Researcher's suggested improvements:

The permit application and renewal process should be simplified whenever possible, especially for long-term customers who have a history with DEQ. For example, providing customers with an electronic or hard

copy of their last application might make it easier for customers the next time they have to complete and submit their application.

DEQ actions:

Air Quality electronic permit application and renewal
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<i>Action/Tasks</i>	<i>Expected Improvements</i>
Maintain web page where Air Contaminant Discharge Permit and General Air Permit application and annual emissions report forms are available online. Title V Permit application and General Air Permit application and annual emissions report forms to be available online 3/03.	Prospective and current permit holders will be able to access permit applications electronically.

Water Quality plan for electronic permit application and renewal

<i>Action/Tasks/Dates</i>	<i>Expected Improvements</i>
<p>Permit holders can currently access a static Water Quality Division permit renewal database through the DEQ Water Quality “Permit Corner” Web site (developed in 2000). A newer, more comprehensive database now allows permit holders to call up additional information about their permit, including target renewal dates. (Launched 10/02)</p> <p>Efforts made under the “Progress report on process improvement in Wastewater Management Program” will also improve communication with permit holders. This report was submitted to the Legislative Emergency Board in December 2002.</p> <p>Pilot an on-line application form (allow facilities to input data electronically, instead of by hand) and tracking system for certain permits. (7/03)</p>	<p>Provide customers with improved access to information about their permit status.</p> <p>Prospective and current permit holders will be able to complete applications on line and confirm status of permit application.</p>

Enforcement Actions

Survey finding:

Customers who have had an enforcement action are fairly neutral in their assessment of the enforcement process. However, customers said that DEQ staff are easy to work with and have an attitude of helping customers comply rather than focusing on enforcement and penalties. Customers also mentioned that the process is timely and fair.

A few customers who experienced an enforcement action expressed that continued improvements in the following areas should be a priority for the DEQ Enforcement Program: stringency in enforcement, emphasize compliance rather than enforcement, a perceived lack of fairness, staff attitude, better record keeping/tracking.

DEQ actions:

Review of enforcement rules, staff guidance, record keeping
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Action/Tasks

Expected Improvements

Comprehensive review of enforcement rules, particularly the penalty calculation process, to determine whether changes are needed to ensure equity in enforcement. The review will include a public and stakeholder involvement process (Summer 2003)

Achieve established strategic directions priority to provide an effective compliance and enforcement program that is understandable, equitable, and encourages procedures to ensure consistent and timely enforcement, as evidenced by improved ratings in 2004 customer service survey.

Review Enforcement Guidance in drafting Notices of Non-compliance and determining enforcement referrals for consistency, clarity and overall impact on enforcement process. (Summer 2003)

Improve enforcement data tracking to make compliance and enforcement data more easily accessible to customers electronically. (Ongoing)

Customers will know the status of their compliance and enforcement case in DEQ's system.

Dispute resolution

Survey finding:

One-third (33%) of surveyed Air Quality and 28% of surveyed Water Quality customers have had a disagreement with DEQ because they didn't agree with a rule or thought an interpretation was wrong.

Those who have had a dispute with DEQ have mixed opinions about the experience. The staff's professionalism receives the most favorable marks. 60% of Air Quality and Water Quality customers rate their professionalism positively. But impressions of the overall process, as well as its timeliness and outcome, are less favorable.

Researcher's suggested improvements:

Suggestions from those who had a disagreement with DEQ during the past year were elicited on an unaided basis. Suggestions for improving the process of handling disagreements are varied, which indicates there is not one particular area standing out as a source of dissatisfaction. Most Air Quality and Water Quality customers who have had a disagreement with DEQ were unable to provide suggestions.

Improving communications and explanations, being more flexible, being timelier and a more knowledgeable staff were suggested improvements by both Air Quality and Water Quality customers.

Receiving the correct information or approval the first time was mentioned by 8% of Water Quality customers. Meanwhile, 2% of Air Quality customers cite lower fees, though fees were not cited by Water Quality customers.

DEQ actions:

Plan for resolving disputes

<i>Action/Tasks</i>	<i>Expected Improvements</i>
<p>Provide rules interpretation training for all DEQ permit writers to review and discuss consistent interpretation and application of DEQ rules and policies. Each program (Air, Water and Land) will provide training to their regional and headquarters staff. Training will cover the following elements:</p> <p>Purpose of rules</p> <p>How to apply the rules</p> <p>Consistent up-to-date guidance</p> <p>(Beginning Spring 03 and will be administered quarterly.)</p>	<p>Ensure that all permit writers have an in-depth knowledge and understanding of rules and policies. This will result in more consistent application of DEQ rules, better compliance and overall satisfaction with DEQ services.</p>

<p>IV: Septic System Owner Survey: Findings and Recommendations, DEQ Actions and Expected Improvements</p>

The survey universe consisted of 200 septic system owners interviewed by phone. The survey was administered during April and May 2002 and all responses were confidential. Responses were summarized into categories of:

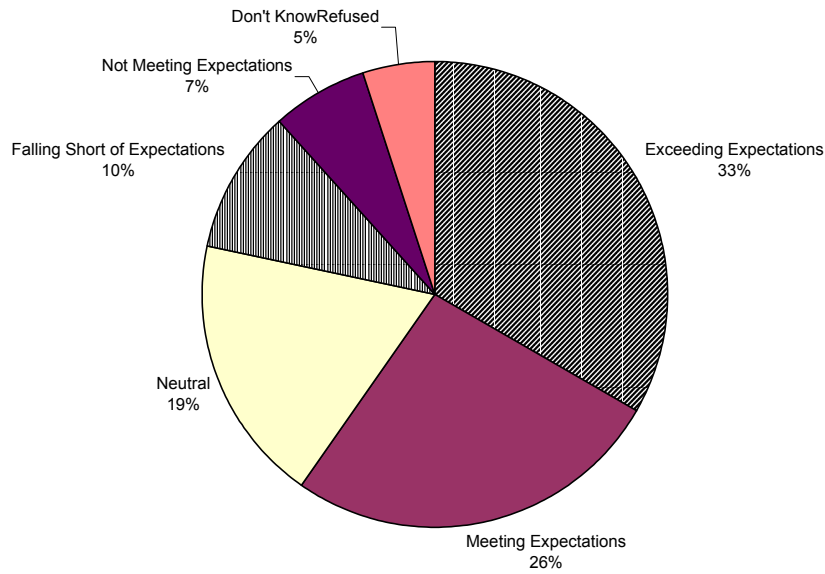
- Overall Customer Satisfaction
- Timeliness
- Accurate information and clear explanations/dispute resolution
- Consistency and flexibility/dispute resolution

<p>Overall customer satisfaction</p>

Survey finding:

On-site septic customers generally have positive opinions regarding DEQ service. Septic inspectors receive praise for their technical skills, while support staff's strength lies in their customer service skills. 61% of septic system customers indicated positive ratings for their overall satisfaction with DEQ.

Overall Satisfaction with DEQ



Note: Total may not sum to 100% due to rounding.

Timeliness

Survey finding:

Timeliness is an issue for customers, with a disparity between how long some customers think it should take and how long it actually took for their applications to be processed.

Researcher's suggested improvements:

DEQ should establish protocols to address timeliness. For example, have inspectors and support staff call people back within a certain time frame or establish a goal that a percent of applications will be reviewed and approved within two weeks.

DEQ should inform every customer of the estimated time for application review and approval and if the process will take longer than

expected. Having a separate number for emergencies or some other means of prioritizing calls is another option.

DEQ actions:

Improving timeliness of processing septic system applications

<i>Action/Tasks</i>	<i>Improvements; Expected Improvements</i>
Add service hours back to small field offices. (2002)	<p>A full time technical staff person is now assigned to DEQ Warrenton office.</p> <p>DEQ Grants Pass office has additional field staff as needed for the construction season.</p> <p>DEQ Baker City office is closed to the public to reduce costs. Technical staff remains in the area to conduct inspections.</p>
Improve management of application processing. (Summer 2002).	Provide faster technical advice to customers about their application, including estimated processing time.
Develop new statewide database to track applications (Summer 2002)	Allows DEQ to more accurately assign appropriate staff resources depending on workload
Work with DEQ advisory committee to comprehensively review the state’s sewage program rules.	Simplified permitting process to make it easier to work with us.
Septic system installers reviewing and providing comments on the revised DEQ permit applications and guidance documents.	Paperwork that is easier to understand and follow.

Accurate information and clear explanations/dispute resolution

Survey finding:

Disagreements with DEQ are a source of dissatisfaction for some customers, leading to negative perceptions of DEQ. Customers who have had disagreements with DEQ express greater dissatisfaction with the overall service provided by DEQ and the dispute resolution process.

Researcher’s suggested improvements:

DEQ should provide customers with accurate information and clear explanations that are easy to understand to minimize misunderstandings.

In addition to improving the dispute resolution process, DEQ should also endeavor to avoid disputes in the first place, whenever possible. Improving communications, information on regulations, reliability and consistency of information should help.

DEQ actions

Improve communication with customers, counties, and the septic system industry

<i>Action/Tasks</i>	<i>Improvements; Expected Improvements</i>
Provide communication and customer service training for DEQ on-site septic program and county staff. (2001) Additional training planned for existing and new staff. (2003-2004). Training to be held on an annual basis as resources permit. DEQ managers review training elements with staff quarterly (Beginning Spring 03)	Improved communications, evaluated through 2004 customer service survey.
DEQ produced new information materials with easier to understand information about septic systems and working with DEQ <ul style="list-style-type: none"> • Brochure on septic systems with easy to follow steps • “Consumer Corner” section on the DEQ Web site home page in March/02. 	Making it easier to do business with DEQ by communicating information in a positive, understandable manner.
Produced radio ads that began airing	Provide key information to the public so

free of charge in July '02 continuing through May '03 in the following cities: Hermiston, Pendleton, The Dalles, LaGrande, Ontario, Bend, Burns, John Day and Klamath Falls. Ads provide basic septic system maintenance and permit application process information.

new customers will know basic procedures of the permit process.

Conduct training sessions and information exchange meetings for DEQ, counties, and on-site septic installers.

Improved DEQ-county communications and problem solving, more consistent decision-making, better technical skills.

Example: Information sharing on difficult site conditions to render consistent decisions statewide.

Two-day meetings held in January, 2000, January, 2001 and January 2002. Five workshops were held in April and May, 2000, and four in 2001 and four in 2002. This will continue annually as resources allow.

OSU and DEQ soil scientists provide new and upcoming information to DEQ and county inspectors. Inspectors will conduct more accurate site evaluations as a result.

DEQ regional staff meets with contract county staff twice yearly.

Improve consistency, share information and resolve problems.

Consistency and flexibility/dispute resolution

Survey finding:

Customers want both consistency and flexibility. It seems that sometimes these two goals are at odds. Inspectors must walk a fine line between interpretation and enforcement of regulations. On the one hand, adherence to guidelines contributes to a perception that DEQ is inflexible. However, allowing leeway in interpretation and enforcement to account for different circumstances may contribute to inconsistency or favoritism perceptions.

Researcher's suggested improvements:

Ensuring consistency between inspectors is one way of reducing instances where conflicting information or decisions are received. Efforts should also be made to avoid disputes in the first place, whenever

possible. Improving communications, information on regulations, reliability and consistency of information should help.

DEQ actions:

DEQ changes On-site Program rules

<i>Action/Tasks</i>	<i>Improvements; Expected Improvements</i>
<p>Provide rules interpretation training for all DEQ permit writers to review and discuss consistent interpretation and application of DEQ rules and policies. Each program (Air, Water and Land) will provide training to their regional and headquarters staff. Training will cover the following elements:</p> <ul style="list-style-type: none"> Purpose of rules How to apply the rules Consistent up-to-date guidance <p>(Beginning Spring 03 and will be administered quarterly.)</p>	<p>Ensure that all permit writers have an in-depth knowledge and understanding of rules and policies. This will result in more consistent application of DEQ rules, better compliance and overall satisfaction with DEQ services.</p>

V: Summary and Conclusions

Protecting public health and the environment and supporting Oregon’s economy requires a commitment to science, effective regulation and high quality customer service.

These customer surveys are valuable tools to help DEQ improve its programs and responsiveness to customers. While DEQ is meeting or exceeding customer expectations in some areas, we must continue to improve the way we do our work to make it easier for people to do business with us.

We take the feedback we received from our customers seriously and we are taking action to improve our service.

DEQ will implement the new approaches outlined in this report to improve the clarity, consistency and timeliness of information we provide and to streamline the permit process. We look forward to seeing higher customer ratings in 2004 and 2006 as a result of these improvements.