



Nov. 3, 2021

## **DHEC Director Response to SHaPE SC Task Force Report and Final Recommendations**

Dear SHaPE SC Task Force members,

We are grateful to the members of the [Task Force to Strengthen the Health and Promote the Environment of South Carolina \(SHaPE SC\)](#) for your dedication and service to the people of South Carolina. I am also thankful to the South Carolina Board of Health and Environmental Control (Board) for approving the establishment of this task force.

Through SHaPE SC, we are proud to have brought together some of the most intelligent, innovative, and thoughtful minds South Carolina has to offer. Together, you have thoughtfully identified what our state agencies are doing well when it comes to providing health and environmental services, as well as core areas for improvement. As a result of your work and constructive input from the public, I am confident that we will be better able to ensure that the health of all South Carolinians and the environment in which they live is protected and improved, and that our residents have the best quality of life possible.

While there was not always agreement on every topic that was discussed, including organizational alignment, there was robust discussions on critical issues impacting our state and the task force reached consensus on many important recommendations. We certainly can and will begin to take actions to address many of the recommendations and concerns raised by the task force.

As part of my commitment to you and all those we serve, I will be sharing your recommendations with our Board, the South Carolina Mental Health Commission, the General Assembly, Governor McMaster, and members of our staff and the public. I will also be working with the team at the South Carolina Department of Health and Environmental Control (DHEC) and our many public and private partners in the coming months to further evaluate and look at ways we can implement quality improvement efforts based on the recommendations we received from the task force as approved by our Board and within the authority of our agency.

For those recommendations that require legislative action, or action from other agencies, we will work with the Legislature and those agencies to seek approval of these recommendations. In addition, I will send you periodic updates on our progress.

Below includes my individual responses to each of the final recommendations submitted by the task force.

## Cross-Cutting Recommendations

**(1.) Behavioral, environmental protection, and public health services must be better funded.**

There is currently a severe lack of sustainable funding (including flexible funding that can be allocated beyond restricted uses to where support may be more urgently needed) and resources to continue providing critical services, particularly with the increasing number of unfunded federal mandates and emerging issues of concern at the state and national levels.

*I concur with this finding. This recommendation requires legislative action, but also action from DHEC in terms of ensuring our budget requests reflect this recommendation.*

*Our budget request for next year will include a number of items that are consistent with this recommendation as outlined by both the Environmental Protection and Public Health subcommittees. It also reflects a renewed focus on investments aimed at ensuring DHEC can continue to operate the environmental protection, healthcare quality, and public health services required by law and needed to ensure the current and future health and prosperity of our state and its people. This includes funding for a new state health and environmental laboratory and for several environmental programs that have been impacted by decreased federal funding in the face of emerging issues which require support. We are also pursuing many grant opportunities to secure additional funding. Our future year budget requests will also be developed with this recommendation in mind.*

**(2.) DHEC should examine and implement the budget review and request processes to provide for greater equity between its three core deputy areas – Environmental Affairs, Healthcare Quality, and Public Health.** With respect to funding requests, the Environmental Protection and Public Health subcommittees found a need for DHEC to provide equitable consideration of budget requests from each of its three core deputy areas. The task force believes that doing so would help avoid internal elimination of reasonable budget requests prior to submission to the Legislature.

*I concur in part with this recommendation, but with the caveat that all budget requests need to be reviewed by the Chief Finance and Operations Officer (CFO) and DHEC Director prior to submission to the Legislature.*

*There is no doubt that all budget requests should be considered equitably and that reasonable requests should be submitted to the Legislature whenever possible. However, review by the CFO and director is critical for several reasons:*

- First, the impact of a request on the overall agency, and most importantly, its ability to serve the people of South Carolina must be considered. This includes reviewing the request in alignment with the agency's strategic plan and overall priorities.*
- In addition, there may be opportunities to combine efforts across deputy areas to gain greater effectiveness and efficiency, which can be identified by the senior level review.*
- The DHEC director is also responsible for all aspects of the agency, and thus needs to know about funding requests.*

*I am convinced that these goals can be achieved while still ensuring equitable consideration of all requests and will direct a review our current processes to ensure this occurs.*

**(3.) Sufficient and sustainable funding of competitive salaries for critical positions is needed to ensure South Carolina can continue to have the capacity and expertise required to deliver high-quality behavioral, environmental protection, and public health services.** Sufficient funding must be provided to offer competitive salaries to attract and retain the skilled employees necessary to provide critical services.

*I concur with this finding. DHEC's strength is its people. Everything we do depends on DHEC having a professional, well-trained, committed, and motivated workforce.*

*The good news is that we have many very dedicated members of our team who have devoted their professional lives to improving the lives of the people of South Carolina. That said, we also have a high turnover rate for some of our critical positions and significant challenges filling critical positions. In addition, many of our salaries for these positions are well below the average for state employees in the same classification and are not competitive with salaries offered in the private sector. We need to increase our salaries to be competitive and to recruit and retain great people.*

*In the past year, the Legislature approved \$2.7 million for targeted salary increases for our staff, which will benefit over 1,200 DHEC employees in 19 mission-critical classifications. We greatly appreciate the Legislature's support and believe this is a meaningful start in addressing salary disparities for our dedicated and talented staff. At the same time, we recognize that we still have more to do in this area. Therefore, we have requested an additional \$13 million in the coming year's budget to further address the level of pay for our employees with the goal of bringing all DHEC positions to at least the state average.*

**(4.) State agencies providing behavioral health, environmental protection, and public health services should continue to enhance public and private partnerships to strengthen access to services.** Enhanced partnerships with other sister agencies, as well as community stakeholder groups, will be required to further optimize accessibility, effectiveness, and efficiency of health and environmental services.

*I concur with this finding. In order to be effective, DHEC must work closely with our private and public partners across the state. This includes businesses, advocacy and stakeholder groups, community groups, faith-based organizations, local governments, and other state agencies. While we already partner with many of these groups and organizations, we need to work to further strengthen and grow these relationships. We will continue to seek opportunities to develop public and private partnerships as recommended by the task force.*

**(5.) Based on input from its three core deputy program areas, DHEC must clearly and concisely define its mission-critical service objectives, including legislative priorities, on a yearly basis.** With limited resource availability, a process requiring substantial input from front-line employees and subject-matter experts tasked with delivering services is required to ensure mission-critical objectives continue to be met.

*I concur with this finding. Even before this recommendation, DHEC had started the process for reviewing and developing a revised strategic plan.*

*The current plan dates from 2015, which is out-of-date. For a strategic plan to be successful it must be evaluated and updated on a regular basis. It must also be measurable, accountable, and clearly communicated to staff and the public.*

*Importantly, strategic plan development is an agency-wide effort, with all staff having the opportunity to provide input. Once we have a revised strategic plan, which I plan to present to the Board in early 2022, we will review and update it regularly, and no less than annually, consistent with this recommendation.*

- (6.) Review and appropriate alignment of support services at DHEC are needed to maximize the provision of services within the substantive core program areas.** Administrative support services (i.e., finance, information technology, communications, human resources, etc.) must be aligned with, and to some degree located within, the substantive program areas they serve within the agency so that internal support functions are provided in the most effective and efficient manner.

*I concur in part with this recommendation, with the caveat that separate finance, IT, communications, human resources, and similar functions be maintained as separate departments, but with closer working relationships within the specific program areas they support.*

*We will work with the program areas to determine areas where support services need to be improved as well as what is going well. We will also review how other agencies/organizations manage this effectively. Using this input, we will then work to close the gaps including as appropriate, assigning staff from support services to work with specific areas so that program areas have known points-of-contact who are dedicated to supporting them.*

- (7.) DHEC should provide better communication with the Governor's Office and the General Assembly.** DHEC frequently communicates with the Governor's Office and General Assembly through the Office of Legislative Affairs. Involving the DHEC subject-matter experts, most familiar with the subject area, will provide elected officials a more comprehensive view of the issues as well as the expertise available within DHEC.

*I concur with this finding. Our subject matter experts (SMEs) regularly meet with members of the Legislature and their staffs, the Governor's Office, and local officials to answer questions, participate in constituent town halls, and other similar activities. Our Legislative Affairs team often facilitates these contacts, and we will continue to make our SMEs available to ensure decision makers have the best possible evidence-based information.*

- (8.) Financial reports must allow core-areas to better predict funds available for carrying out yearly critical tasks.** As a result of restricted funding and the complexity of overall funding mechanisms for DHEC, funding systems are so intricate that it is difficult for core program area managers to readily determine resources available to carry out critical services (including new hiring, training, mission development, etc.). Systems to improve this situation should be considered. Assuring financial resources are located directly within the core service areas should help.

*I concur with this finding. I will ask our CFO to ensure program areas have the information they need to make decisions regarding the best use of funding, and a designated point-of-contact with expertise in the programs and funds assigned to that area/program. We will also review current systems to determine if additional financial/accounting systems are needed to support this recommendation.*

**(9.) Review and streamline various internal processes.** Various internal agency processes, such as those related to hiring and purchasing, need to be examined and streamlined. Current DHEC employees indicated that it frequently takes too long to evaluate candidates and then obtain approval to hire candidates once they are approved. Through the evaluation and continuous improvement of legacy internal business processes, South Carolina's health and environmental programs will be better equipped to address needs resulting from limited staffing capacity and resources, streamline processes, and ultimately enhance service delivery and customer satisfaction.

*I concur with this finding. As noted by the task force, continuous review and improvement of our processes will enhance DHEC's ability to perform its mission. To further support a culture of continuous improvement within the agency, we will be working with our staff and partners to help identify processes that can be improved and then will work to implement needed changes.*

## Service-Specific Recommendations

Service-specific consensus recommendations from the subcommittees, included:

### Behavioral Health

**(1.) Addressing the stigma associated with behavioral health services** through partnering and co-locating with local, county-based public health departments.

*I concur with this finding. This recommendation will require concurrence from the South Carolina Department of Mental Health (DMH) and possibly the Legislature. There is very strong research evidence showing that co-locating mental health and substance abuse services with primary care and similar services (including those provided at public health clinics) reduces stigma and improves compliance and outcomes. This recommendation also has the potential to improve communication and collaboration between DMH and DHEC, which will be very important moving forward, and help decrease operating expenses by reducing the need for separate facilities. Ensuring sufficient space will also need to be addressed as part of meeting this recommendation.*

**(2.) Continuing to pursue opportunities to integrate primary and behavioral healthcare services** to improve the quality and effectiveness of patient care.

*I concur with this finding. This recommendation will require concurrence from the DMH. As noted above, integrating primary and behavioral healthcare services leads to better outcomes and should be pursued. DHEC will work to facilitate collaboration between primary care providers and DMH.*

**(3.) Pursuing opportunities to collaborate and coordinate in the use of South Carolina Department of Mental Health federal mental health funding and South Carolina Department of Alcohol and Other Drug Abuse Services federal substance use disorder (SUD) funding** to improve co-occurring behavioral health services.

*This is primarily a recommendation for DMH and the South Carolina Department of Drug Alcohol and Other Drug Abuse Services (DAODAS) and does not require action by DHEC or the DHEC Board.*

**(4.) Expanding behavioral health services in jails and prisons** across the state.

*This is primarily a recommendation for DMH, however improving services in jails and prisons will improve the health of those receiving the services and therefore contributes to public health. **Therefore, I concur with and support this recommendation.***

**(5.) Investing in workforce development** for behavioral health and substance use disorder professionals.

*This is primarily a recommendation for DMH and DAODAS and does not require action by DHEC or the DHEC Board.*

**(6.) Increasing availability of diversionary courts**, such as mental health and drug courts.

*This is primarily a recommendation for DMH, however mental health and drug courts have been shown to reduce recidivism rates and improve treatment compliance and outcomes. Therefore, this recommendation contributes to public health. **I concur with and support this recommendation.***

**(7.) Eliminating roadblocks to information sharing** by allowing easier sharing of patient information among treating professionals.

***I concur with this finding.** This recommendation will require concurrence from DMH and DAODAS. DHEC is currently implementing an electronic health record (EHR) which will ease adoption of this recommendation. Sharing patient information across public health clinics and DMH facilities (and to the degree consistent with federal law, DAODAS) will improve continuity of care, ease referrals, and help ensure safe prescribing.*

**(8.) Evaluating the use of paraprofessionals** and new, innovative ways to staff behavioral health services.

*This is primarily a recommendation for DMH, however, DHEC Healthcare Quality may have a role as it regulates some of the facilities where paraprofessionals practice. In addition, paraprofessionals may have a role in public health clinics, especially if the recommendation to co-locate services is adopted. **Therefore, I concur with this recommendation.***

**(9.) Continuing active participation and engagement with the Behavioral Health Coalition.**

***I concur with this recommendation.** DHEC is currently an active member of the Behavioral Health Coalition. The Coalition brings together behavioral health stakeholders from across the state and has provided important recommendations to improve behavioral health services across the state.*

## Environmental Protection

**(1.) Addressing the cost of increasing unfunded federal mandates,** while maintaining the critical environmental protection services needed to keep pace with current and anticipated economic development and population growth.

*I concur with this finding and recommendation.* Increasing regulatory requirements lead to increased costs to educate stakeholders and enforce those requirements. Current funding is insufficient to meet these needs.

*The request for next year's budget includes several increases in funding for environmental programs that have been impacted by increasing mandates, and additional requests will be submitted in subsequent years as needed.*

**(2.) Conducting a cross-analysis of agency salaries** for mission critical positions.

*I concur with this finding.* As noted in cross-cutting recommendation 3, ensuring DHEC offers competitive salaries is very important to ensuring recruitment and retention of great people. Conducting an analysis of agency salaries is an important part of this effort.

**(3.) Dedicating state resources to fund the addition of an environmental toxicologist** to address regulatory risk-assessment and communication.

*I concur with this finding.* This initiative can be achieved by converting an existing open position to an environmental toxicologist and therefore does not require legislative action. Adding this area of expertise will support both environmental and public health efforts. The agency will take immediate action to begin the process to assess the current need requirements for such a position and conduct a hiring process.

**(4.) Providing greater opportunity for advancement and fair compensation** for non-management scientists.

*I concur with this finding.* Providing opportunities for advancement and fair compensation for nonsupervisory experts is very important to ensure their contributions are recognized and to help recruit and retain highly qualified experts.

## Public Health

**(1.) Hiring and appointing capable leadership and staff** with appropriate public health and environmental experience, and then supplementing through active public and private partnerships.

*I concur with this finding.* DHEC has an outstanding team, many with extensive experience in public health and environmental protection. In addition, as noted in cross-cutting recommendation 4, DHEC has many public and private partnerships, and will continue to work to grow and expand these relationships.

**(2.) Addressing communication gaps between DHEC Central Office and Regions,** particularly with respect to agency-level directives.

*I concur with this finding.* Much of the public health work of DHEC is done in the regions, but regional leadership is not directly represented on most executive leadership groups. This can lead to a lack of input into agency-wide decisions, and challenges communicating those decisions to regional and local staff.

*Consistent with this recommendation, I plan to meet with regional leadership and implement changes to ensure they are represented in the decision-making process.*

**(3.) Continuing to strengthen relationships with counties and local governments** to assure consistent resources across the state.

*I concur with this finding. We are actively working to strengthen relationships with county and local governments.*

*As part of this work, regional and local DHEC leaders are encouraged to work with local officials to address public health and environmental issues. In addition, working with county and local governments was added to the position description of the recently hired Director of Legislative Affairs. DHEC also has groups focused on local school superintendents related to COVID-19 and plans to extend to broader public health issues in schools.*

*We will continue to work to expand these relationships.*

**(4.) Providing greater interagency coordination** in key areas to eliminate gaps in services.

*I concur with this finding. DHEC relies on many other state and federal agencies to support its efforts, and we are focused on continuing to develop and expand these relationships.*

**(5.) Maintaining the existing mission-driven synergy** between public health and environment.

*I concur with this finding. There are many existing synergies between DHEC's deputy areas of Public Health and Environmental Affairs. Some examples include food-borne outbreaks, illness related to contaminated water, and disaster response.*

*A close working relationship between Public Health and Environmental Affairs is necessary to ensure the best possible services are provided to the people of South Carolina. If these services become realigned into two separate agencies, it will be very important to ensure the existing close relationship and collaboration continues.*

**(6.) Preserving efficiencies created during the COVID-19 response**, such as use of telehealth, internal rapid hiring processes, and use of Community Health Workers.

*I concur with this finding. Although this recommendation focuses on public health efficiencies, this can equally be applied to DHEC's deputy areas of Healthcare Quality and Environmental Affairs.*

*The COVID-19 pandemic has led to many changes that have proven to be effective and more efficient than processes in place prior to the pandemic. As part of the after-action reviews of the COVID-19 response, these changes are being reviewed, and those that have proven to be effective will be retained and expanded.*



### **Discussions Related to the Question of Alignment**

The task force did not come to a consensus regarding future alignment of DHEC functions. The Behavioral Health Subcommittee recommended keeping DMH and DAODAS autonomous, while the Environmental Subcommittee did not reach consensus on a recommendation. Meanwhile, the Public Health Subcommittee recommended keeping public health and environmental protection services in the same agency.

This may indicate that more than one approach to alignment can be successful. I look forward to working with the Legislature, Governor's Office and stakeholders on the future of the alignment of DHEC's core functions with the goal of ensuring the future alignment supports improving the quality of life for all South Carolinians and maximizes the effectiveness and efficiency of health and environmental services.

### **Our Path Forward**

As a follow-up to this task force, I plan to provide you with an update in a few months to let you know our progress in implementing core improvements measures related to your recommendations. I also hope to have another touch point meeting in about a year, as long as the task force is interested and willing, to review our progress and hear back from the members of SHaPE SC and the public about how you feel we're doing.

In the meantime, I look forward to our continued work together as we set our goals on improving the health and environmental services provided by our state.

Sincerely,

A handwritten signature in cursive script that reads "E. Simmer".

**Edward Simmer, MD, MPH, DFAPA**

Director, South Carolina Department of Health and Environmental Control