HAWAII DEPARTMENT OF AGRICULTURE – PESTICIDES BRANCH
ACTION PLAN: CASE DEVELOPMENT PROGRAM (Update)
February 1, 2017 - Revised

ITEM:	PROBLEM AREAS IDENTIFIED:	SOLUTIONS:	Updates	TIMELINE:
CASE FILE REVIEW – BACKLOG Backlog of over 700 cases; some since 2008. (729 cases) • (Ideally 1 month to close cases without CPs.) • Ideally no cases open for 6 months.	Insufficient resources to review cases and process/issue enforcement actions; W/N, NOV, CP's	Increase no. of case developer positions from current 2 to 4. Request 2 additional positions in 2017 legislative session. Use of 89 day hires. ~6/16, hired dedicated Deputy Attorney General. (Delanie Prescott-Tate) EPA contractor to provide assistance to HDOA with backlog of cases	Ex. 5 Deliberative Process (DP) Canceled request for EPA contractor.	In 2017 Legislature – submit request for additional 2 case developer positions. Ongoing - monitor progress in reducing backlog.
	Case review process.	Develop protocol to prioritize review of case jackets. Identify by inspection type and develop priority listing. Develop tracking system.	Case developer has formulated own review system and templates for drafting enforcement actions.	Ongoing – monitor progress in reducing case review time. Anticipate Infor system in place by end of March 2017.
	Need additional "enforcement action tool".	Consulted with Nevada SLA for "enforcement ticket" (ET) template and protocol.	HDOA Deputy AG utilizing advisory citations for certain enforcement cases.	Deputy AG reviewed Hawaii Administrative Rules Chapter 4 – 66. Includes changes to enforcement matrix. Doc will be presented to Hawaii Board of Agriculture in Feb 2017 for review then to public hearings for comments.
	Need clerical resources to process closed cases	Use 89 day hire to assist with processing files	On hold. Using 89 day hire for vacant education/certification slots.	

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UIPA REQUEST	Numerous and sporadic requests for information via Uniform Information Practices Act (UIPA). Takes away time for Case Developer and others to perform routine work functions	Hire 2 additional case developers. Use 89 day hire to assist with processing UIPA requests	Since July 1, 2016 until January 10, 2017 there has been 32 UIPA requests. Case developer, 89 day hire and HDOA Public Information Officer processing UIPA requests.	In 2017 Legislature – submit request for 2 additional case developer positions.
CONTENT OF INSPECTION JACKETS	Inspector's narratives: May be too short. May be vague at times when describing investigation or inspection. Have to send back to inspector for correction or additional documents	Asked Deputy AG and case developer to provide training and guidance to enforcement personnel on how to improve narrative writing. Refer inspectors to re-read FIFRA Manual – section on report writing and proper documentation.	New inspectors coming onboard will receive training on narrative writing from case developer and senior enforcement inspectors.	Ongoing - monitor progress
INCREASE NO. OF INSPECTORS	Insufficient no. of inspectors' state wide. Need approval from state legislature to create positions. Hiring process slow.	Request of 2014 state legislature for more inspector positions. No. of positions increased from 6 to 11.	12/27/16: 3rd Oahu inspector A. Williams hired. 1/25/17: Contingency offer to hire made to 2nd Maui inspector. 1/26/17: Contingency offer to hire made to 4th Oahu inspector.	1/28/17: Announcement to hire Kona and Kauai inspector positions will open. 2/8/17: Interviews being held for Hilo inspector position.
VACANT CASE DEVELOPER POSITION (Backfill vacant case developer position)	Have requested to fill Avis' position since Feb. 2016. HDOA personnel department backlogged in hiring` 130 vacant positions.	Upper management recommends ranking to fill positions. HDOA Board Chair moved as high priority to fill this position.	2nd Case Developer position is now 15th in the hiring queue.	Monitor progress through personnel department.

HAWAII DEPARTMENT OF AGRICULTURE – PESTICIDES BRANCH
ACTION PLAN: CHEMICAL ANALYSIS LABORATORY (CAL)
January 27, 2017

ITEM:	PROBLEM AREAS IDENTIFIED:	SOLUTIONS:	UPDATE	TIMELINE:
AWAITING ENVIRONMENTAL SAMPLES – BACKLOG (Ideally 2 – 3 week turn around)	Awaiting lab analysis of environmental samples. Experienced backlog of 10 months to run samples due to failed equipment. Need to replace old LC/MS equipment. Secure back up lab. Staff shortage. Cross training of CAL staff.	Purchase new LC/MS. Secure contract with CA Dept. of Food and Ag Lab for services. Send out certain samples to CA Dept. of Food and Ag Laboratory until backlog has ended. In 2017 Legislature - submit request for additional chemist. Provide monthly status update to Program Manager on samples pending analysis.	Completed 4th draft of MOU. However, the language in the agreement was changed by CDFA's legal department and was not in line with what the HDOA presented. We questioned the change and are waiting to hear back from CDFA. CAL renewed LC/MS repair warranty in Dec. 2016. Requested additional chemist. Environmental samples are being processed in a timely manner. High level episodes given top priority to run.	Ongoing - may have to find another lab to provide backup chemical analysis services. Monitor bills requesting chemist position during legislative session.