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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



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DIRECTOR

TO: Local Health Department Health Officers and
Environmental Health Directors

FROM: Eric J. Oswald, Director
Drinking Water and Environmental Health Division

DATE: March 27, 2020

SUBJECT: COVID-19 Pause in Accreditation – Onsite Wastewater Program

The Michigan Public Health Institute (MPHI) shared with the Department of Environment, Great Lakes, and Energy (EGLE), Onsite Wastewater Program (OWP) that adjustments are being made to the Accreditation Process, especially for those local health departments (LHD) working through a Corrective Plan of Action (CPA) or the nine (9) LHDs that are scheduled for an upcoming Cycle 7 Accreditation Review.

The OWP acknowledges the ongoing demands of LHDs engaged in Michigan's efforts to slow the spread of COVID-19. The OWP also recognizes that LHDs will perform the essential functions of the OWP and that during the months that follow the COVID-19 outbreak additional time may be needed for LHDs to catch up on some site evaluations, sewage permits, final inspections, and sewage complaint documentation corresponding to minimum program requirements (MPR). The OWP will be sensitive to the LHD impact from COVID-19 and allow for a transition period to get the program back to functioning normally. The OWP provides the following guidance:

- Continue to prioritize your work based on the needs of the communities you serve.
- Once the emergency response for COVID-19 has passed, document any MPRs your department could not meet during the emergency or could not catch up on afterward. During the subsequent accreditation review covering the COVID-19 emergency period, this documentation will be used by LHDs and EGLE to exclude documented occurrences due to the COVID-19 impact.
- For the nine (9) LHDs that are scheduled for an upcoming Cycle 7 Accreditation Review, the Onsite Review schedule will be adjusted. Please anticipate the MPHI communicating these scheduling changes.
- For LHDs completing a CPA, working toward CPA compliance, and/or awaiting EGLE to complete CPA-related compliance assessments, the OWP will work through these based upon direction from the MPHI. Current MPHI direction is that all CPA-related deadlines will automatically be extended.

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- Final Inspection Documentation – LHDs having to shift staff resources for final inspections to other priorities:
 - The OWP is allowing LHDs to accept an unlimited number of installer affidavits during the COVID-19 pandemic under the following conditions and existing Accreditation Tool guidance:
 - LHDs review all submitted installer affidavits to determine the information submitted meets the minimum compliance measures. Where the LHD finds the information is incomplete, the OWP asks that the necessary information be obtained and documented prior to granting final approval.
- Sewage Complaints – LHDs focus on resolution to sewage complaints related to imminent public health hazards. The OWP recognizes the elements of complaint tracking, investigation, and related documentation in accordance with the MPR may take more time for non-imminent hazard complaints, which will be acceptable.
- Quarterly Reporting – LHDs that are unable to provide fiscal year 2020 (FY 20) second quarter activity reports within the Department of Health and Human Services (DHHS) Comprehensive Agreement timelines (15 days after the end of the quarter) due to response efforts will be granted an automatic extension to the FY 20 third quarter deadline. EGLE will track missing quarterly reports and request that they be provided at that time.

While the COVID-19 pandemic is evolving and can be expected to cycle through various stages, community expectations for services may remain. Should questions arise regarding onsite wastewater management, land development proposals, plan reviews, and/or other program work, please know that the EGLE OWP staff remain at the ready to assist and continue to provide technical assistance. For contact information, please refer to the [Onsite Wastewater Program Area Assignments Map](#), or contact Jeremy Hoeh, Supervisor, Environmental Health Programs Unit, at HoehJ@Michigan.gov or 517-284-6528.

Local public health's key role in protecting public health serves all Michigan residents and visitors. Thank you for your service and tireless dedication.

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