

Summary of Minimum Qualifications for Public Health Directors

Purpose

1. Required as part of the Public Health Act-SB-194-08
2. A revision of the current rules for organized health departments (none currently for nursing service directors)
3. New agencies and county commissioners have requested this rule making prior to the July 1, 2009 deadline for establishing local/district public health agencies
4. Challenge has been to develop consistent qualifications across the state, based on national standards, while respecting the limited resources of many counties.

Process

1. A sub group of the Public Health Act Advisory Group-Mark Johnson, Jackie Brown, Jeff Stoll (staff) prepared the proposal based on:
 - a. Review of job descriptions 13 from local agencies in 9 states, 3 from Colorado
 - b. Existing Colorado SBOH Requirements
 - c. Input from Advisory Group, and a sample of local ph directors and nursing service directors
2. Drafts presented to three nursing service regional meeting covering the San Luis Valley, West/Northwest and South Central and to PHDoC- edits made based on input from over 75 people, mostly current directors of both nursing services and health departments.

Proposed Changes (one job description rather two based on population size of < or > than 100, 000)

1. **Physician Director:**

- a) Be licensed to practice medicine in the State of Colorado within six months of hire.
- b) Medical Degree (MD or DO), preferably certified by the American Board of Preventive Medicine or American Board of Osteopathic Preventive Medicine
- c) Five years within the past 10 years of successful and responsible administrative experience in public health or a closely related field, including at least two years experience in supervising public health professionals.
- d) A candidate with one year of graduate study in a recognized school of public health is preferred.

2. **Non-Physician Director:**

- a) Have a Master's degree, in a public health discipline such as environmental health, health education, epidemiology, health administration/policy, biostatistics; nursing, public administration, health administration or a closely related discipline; and
- b) Have five years within the past 10 years of successful and responsible administrative experience in public health or a closely related field, including at least two years experience in supervising public health professionals.
- c) A nurse candidate shall be licensed to practice in the State of Colorado within six months of hire.

3. **Medical Officer:**

If the public health director is not a licensed physician, a designated medical officer (advisor) shall be employed or contracted (paid or volunteer) by the district or county board of health to advise the public health director on medical decisions and be available at all times to the Public Health director. The medical officer must be a graduate from an approved medical school (MD or DO) and licensed to practice medicine in the State of Colorado.

4. **Substitutions and Waivers**

(1) At the request of a county or district board of health, the State Board of Health may substitute year for year experience for certain academic requirements or year for year academic preparation for certain experience requirements when a candidate is otherwise prepared to carry out the duties of a public health director.

(2) A county or district board of health may apply to the State Board of Health for a waiver of the minimum qualifications set forth in these rules. Beginning July 1, 2009, the State Board of Health shall consider the following when granting or denying a waiver request:

- (a) the population of the jurisdiction for the county or district served and its ability to recruit a qualified candidate;
- (b) whether the candidate for public health director will seek to additional public health education and experience within five years of the waiver; and
- (c) the county or district board of health has explored joining or establishing a district public health agency with a qualified public health director.

(3) Waivers shall be submitted to the State Board of Health for approval every five years if a public health director meeting the qualifications provided in section 1.2 or substitution in section 1.3 (1) of these rules has not been appointed.

(4) Substitutions and waivers made before July 1, 2008 and approved as appropriate by the State Board of Health under 6 CCR 1012-1 will remain in effect.

Considerations

1. Grandfathering- While considered, the attorney review indicated that the law requires that the new BOH appoint (or re-appoint) a public health director. Therefore, only prior waivers and substitutions could remain in effect for the organized health departments under the old Part 5, not appointments. Grandfathering was not an option for nursing service directors as minimum qualifications had never been established under the old Part 6 rules.
2. Education-The available information indicated that approximately 75% of the current directors of health departments have masters or medical degrees and this is the requirement in the existing minimum qualifications for all counties regardless of size. Approximately 10 nursing service directors meet the education requirements. A masters in nursing, environmental health was added to the list of options.
3. Substitution of experience for education is in both the old and proposed qualifications. It is estimated that approximately 25 current directors would be able to substitute to experience for education. Probably only 2 or 3 directors would need a waiver.
4. Education is expected to become more available with the new Colorado School of Public Health and educating the workforce throughout the state is part of the mission. The School's Center for Public Health Practice will be assessing needs and developing programs.
5. Many of the drafts proposed language regarding public health education in the form of certificates, graduate level certificates, coursework etc, but it was determined that rather than trying to develop criteria for these options, this type of education would be part of the substitution or waiver process.
6. This level of education is standard for director positions nationally and it is anticipated that it will be expected in future accreditation processes.
7. Authority-it was proposed (and rejected) that the local board of health have the authority to approve substitution of experience and education, rather requesting the approval from the state Board of Health. Waivers would be required to be approved by the state BOH.
8. Simplicity of process-it is proposed that once the minimum qualifications are decided, a simple waiver form will be developed for local boards to submit that will delineate the criteria. A list of all substitutions could be submitted in bulk for 2009.