

San Juan County Health & Community Services

Overall, I support the draft rule as written. Speaking from the perspective of a small LHJ with minimal resources I make the following comments:

173-312-080(2)- The revised allocation is reasonable. The 80/20 split was acceptable and allowed for adequate funding of both enforcement and implementation during historically higher CPG funding levels. However, the allocation needs to be revised based on the current decreasing CPG funding trend to allow LHJs to retain the capacity to carry out our mandated enforcement programs.

173-312-080(3) - I agree that there should be criteria to evaluate performance, however the 10% penalty should only be applied when several of the criteria are not being met to address repeated patterns of underperformance. It shouldn't be a one strike and you're out system. I would welcome the opportunity to continue to work with the Department on developing and implementing the performance evaluation program.