



# Holmes County General Health District

Prevent. Promote. Protect.

Health Commissioner  
Michael Derr, MBA  
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May 27, 2022

Agriculture and Natural Resources Committee:

Thank you for your time and attention to SB 338 and for allowing me to present proponent testimony. Ohio Revised Code (ORC) 3717.11 requires the Directors of Agriculture and Health to survey local boards of health to determine qualifications and capacity to enforce the laws and rules pertaining to food safety. The Ohio Administrative Code (OAC) 901: 3-4-17(B)(2) and 3701-21-24(B)(2) specify the survey methodology, that includes a field survey component for local health districts.

The Holmes County General Health District (HCGHD) understands and appreciates the necessity of program surveys and the evaluation of Environmental Health Specialist's knowledge of the food code. However, over the course of the last decade, numerous issues have been noted and expressed by local health districts across Ohio in regards to the field survey portion of the food program survey.

For the local health district, building and maintaining a positive working relationship with our licensed food operators is absolutely essential to food safety and code compliance. The HCGHD prides ourselves on conducting inspections that are risk-based, collaborative, and educational in order to establish and maintain our high standards for food safety. Significant time is invested with each food operation to identify critical violations (violations that are correlated with risk for food borne illness) and educate on proper food handling practices and facility sanitation standards.

The field survey has disregarded any of the above mentioned, successful food safety strategies that are so vital to a local health department's food program. The emphasis on excessively violating an operation as a method of demonstrating knowledge of the food code not only ignores a large portion of the actual practice of food safety in public health, but is also demoralizing and destructive to our industry partners and the Environmental Health Specialists. Many surveys have resulted with an operation, in which we previously had a positive rapport, emphatically requesting that we do not return with the particular State agency involved. Much effort is then required of our food safety inspectors to reestablish the positive working relationship and voluntary code compliance.

The HCGHD welcomes all Ohio Department of Health and Agriculture program surveys and strives to maintain a productive and positive collaboration with our state partners. An evaluation of each food program Environmental Health Specialist that is also mindful of industry burden and local district procedures is essential for successful food safety efforts across the State of Ohio. Each Registered Environmental Health Specialist in Ohio has earned a Bachelor's Degree focused in science, demonstrated extensive science and math coursework to a registration board to gain the ability to begin a 2-year training period, and obtained State licensure after successful completion of an extensive examination. Environmental Health Specialists, along with their local health districts, do not wish to "lower the bar" in any way. Instead, our profession is in need of a productive and collaborative survey experience in order to maintain high food safety standards and be engaged in a process of continuous program improvement. SB 338 establishes a standardized and equitable method of evaluating Environmental Health Specialist's food code knowledge. This type of program code knowledge evaluation is already successfully utilized by the Ohio Department of Health in the Private Water Program. For all of these reasons, the Holmes County General Health District is in support of SB 338.

Thank you for your time and efforts to improve the assessment process of Environmental Health Specialists.

Sincerely,

Sarah Burkholder, REHS, MPH  
Environmental Health Director



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