

May 31, 2022

Members of the Senate Agriculture and Natural Resources Committee
Senate Building
1 Capitol Square, Ground Floor
Columbus, OH 43215

RE: Letter of Support - Senate Bill 338

Dear Chair Schaffer and Members of the Senate Agriculture and Natural Resources Committee:

I am writing in support of Senate Bill 338 which would eliminate the field surveys of local health departments' food programs and instead require Registered Environmental Health Specialists to pass a written or electronic test to demonstrate their knowledge of Ohio Administrative Code §3717-1 (The Ohio Uniform Food Safety Code).

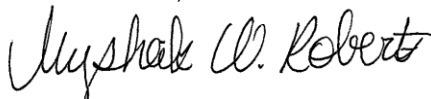
Central Ohio is a booming market for new facilities, and Columbus Public Health currently licenses over 5,000 food service and retail food operations. Environmental health professionals play a critical role in protecting the health of the community. Columbus Public Health employs over 70 environmental health staff, most of whom are involved in the licensing or assessment of food facilities.

When the Ohio Department of Health or the Ohio Department of Agriculture conduct program surveys, a key component is the evaluation of staff for their knowledge and application of the code. For any given survey, state agencies spend three to four weeks physically setting up at our facility with most of that time spent taking staff out for day-long field evaluations. While Columbus Public Health and most other local health departments understand the need for quality control for staff, this process is ripe for improvement. Columbus already performs biannual audits and field evaluations for our credentialed staff (EHSIT, REHS) to ensure that the high standards for public health risk assessment and rule enforcement are met, making the field evaluation portion of the state surveys unnecessary and burdensome to our staff and food operators.

Additionally, Senate Bill 338 is important because of the effect these evaluations have on our operators. Public health work is focused on the evaluation and mitigation of risk. While the state agencies push for risk-based inspections of food service and retail food establishments as they should, the field evaluation portion has a tendency to overly focus on what could be described as minor violations of the rules (e.g., cleaning) which is in contrast to a focus on what makes people sick (e.g., food handling, employee health). As a result, operators are unable to truly focus on significant public health issues due to the potential volume of violations, most of which are usually insignificant to public health.

Overall, moving to a model of evaluation via testing, SB 338 will reduce the burden on all parties involved while continuing to protect the health and safety of our community. As such, I strongly encourage you to pass SB 338.

Best of Health,



Mysheika Roberts, MD, MPH
Health Commissioner

