



HAMILTON COUNTY PUBLIC HEALTH

PREVENT. PROMOTE. PROTECT.

250 William Howard Taft Road
Cincinnati, OH 45219
Phone: 513.946.7800 Fax: 513.946.7890
hcph.org

May 31, 2022

Senate Agricultural Committee
77 South High Street, 13th Floor
Columbus, Ohio 43215

Please find this letter as proponent testimony for Senate Bill – 338 and implementing a testing process to replace field surveys for environmental health specialists performing food service inspections.

For many years, Hamilton County Public Health has worked with its food service operators using an *education over enforcement* model. This model has allowed us to consistently bring operators into compliance with the food code, while providing the basis for more permanent solutions as operators learn how to implement safe food handling practices properly and completely.

The survey process conducted by the Ohio Departments of Health and Agriculture to ensure our application of the food code has forced us into a much more adversarial relationship with the operators we have worked so hard to educate and bring into compliance. For instance, the survey process encourages registered environmental health specialists or environmental health specialists in training (REHS/REHSIT) to spend an inordinate amount of time completing inspections while writing as many violations as possible to demonstrate knowledge of the food code. Again, this process is antithetical to the *education over enforcement* model we have worked so hard to build.

These surveys are often conducted by non-REHS/REHSITs, which further compounds the issue as surveyors are not necessarily involved in the day-to-day duties of REHS/REHSITs enforcing the food code. The surveys encourage an unsustainably lengthy inspection that could not possibly be implemented under current cost methodology for food service inspections.

We are in favor of the proposed solution to eliminate field surveys and replace them with testing for REHS/REHSITs. Testing will provide the vehicle to maintain and improve REHS/REHSITs' knowledge of food code and safe food handling practices.

Thank you for your consideration.

Sincerely,

Greg Kesterman
Health Commissioner
Hamilton County Public Health



PREVENT. PROMOTE. PROTECT.