



Proponent Testimony – SB 338

Chairman Schaffer, Vice-Chair Huffman, and Ranking Member Fedor, my name is Garrett Guillozet and I serve as the Health Commissioner of the Ross County Health District. I am also a Registered Environmental Health Specialist, Past President of the Ohio Environmental Health Association, and a member of the Association of Ohio Health Commissioners. Today, I am offering support of SB 338.

I know that this bill may seem very technical in nature, but I assure you that this issue impacts every one of Ohio's Environmental Health Specialists, otherwise known as Health Inspectors. Ohio is a leader in our credentialing and training requirements to become a health inspector. We are required to have a four-year science degree, serve in an in-training status for two years, take a national exam, and obtain 24 hours of continuing education over a two-year period. Registration is required for anyone who is working in the environmental health field.

The oversight process of a local health department's food safety program requires that both the Ohio Department of Health (ODH) and Agriculture (ODA) survey the program once every three years. Included in the process is a field evaluation of the health inspector to determine their knowledge of the Ohio Uniform Food Safety Code. This issue specifically, has caused major disruptions within our profession and within the relationships that we build with the licensees.

Both ODA and ODH have created internal policy that is a major burden on health inspectors on licensees. Many years ago, this survey process was collaborative, it allowed the state inspectors to engage with local inspectors in a collegial method and used a risk-based approach. However, in the last decade, this process has become outlandish. Instead of a collaborative, educational, risk-based approach to positively ensure food safety in Ohio, the current field survey process leads to dramatic and increases of survey inspection times, manpower, costs, and damages relationships with industry. The agencies instruct inspectors to use a risk-based approach during normal inspections, and then during survey, they require inspectors to cite every single violation imaginable. It is common to have inspections during a survey contain hundreds of violations.

These operators, who are blindly chosen to be inspected during the field portion, are receiving unfair assessments. They are cited with hundreds of violations, most of which are non-critical violations. However, the public does not differentiate critical vs. non-critical violations. All they see is that their favorite restaurant or grocery store has received an inordinate number of violations, all because if the inspector fails to meet the proper threshold, they will be deemed "not Knowledgeable of the food code." To say that they are not knowledgeable is simply not true. A health inspector understands that a broken floor tile is a violation of the food code, but to count 17 broken tiles as 17 separate violations is just insane. This is what the state agencies require us to do.



*Garrett Guillozet, MPA, RS/REHS, AEMT, Health Commissioner
Christopher Brown, MD, MPH, Medical Director
150 E. Second Street
Chillicothe, Ohio 45601
Phone: 740.779.9652*

Additionally, these survey inspections take hours upon hours. It is common for the survey inspection to last 7 to 8 hours. This is not because the facility is in disrepair or because there are an extreme number of critical violations, it is because health inspectors feel like their careers are on the line when being surveyed. We inspect every area, and then feel pressured to go back again to make sure that every single violation, no matter how insignificant, is counted and documented. If we fail to obtain an 80% score (that is within 80% of what the state inspector cites), we are deemed not knowledgeable. The ability to cite a violation is important, but so is building trust with our operators. Compliance is not obtained by using a heavy hammer, it is obtained through dialogue, training, and building relationships and trust with our operators. This current evaluation process disregards all of that.

I will also say that the longer inspections take, the higher likelihood of increase food license fees. Simply performing inspections that take 8 hours increases the overall time spent within the facility and that time is directly used to calculate their license fees.

The agencies have the power to change this policy. It is not something that is dictated in administrative or revised code. It is department policy which instructs them to treat these field surveys as nothing more than a counting game. It makes no sense to provide training to inspectors to utilize a risk-based approach during their normal day-to-day inspections, and then require them to toss that method when they are being surveyed.

This current process is detrimental to our profession and to the public's trust. We have attempted for years, and under various administrations and directors, to engage thoughtfully with the departments on finding an alternative solution to the field evaluation. At every pass, they have not chosen to engage in a fruitful and productive manner. The ability to count as many violations as possible is not improving food safety for Ohio's consumers.

Ohio's local inspectors are doing this work every day. We are accountable to our licensees, to our Boards of Health, and to our profession. Treating and demeaning our inspections by turning this process into a counting game is not productive for anyone but the state agency inspectors who try to "out-cite" us during every field survey inspection.

I am thankful for your time and urge the passing of SB 338.

Garrett Guillozet
Health Commissioner
Ross County Health District