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**NEHA Testimony on HB551  
Before the House State Government Committee  
of the Ohio General Assembly  
November 17, 2016**

Chairman Maag, Vice Chairman Hambley, Ranking Member Boccieri, and members of the House State Government Committee, thank you for allowing me to provide testimony today on HB 551. My name is Lynne Madison, and I am a Regional Vice President for the National Environmental Health Association (NEHA).

NEHA cautiously supports HB 551, because it addresses the legitimate issues raised by the Ohio Environmental Health Association (OEHA) and the Association of Ohio Health Commissioners (AOHC). However, NEHA believes it would be better for the Department of Health and the Department of Agriculture to work cooperatively with OEHA and AOHC to require that those conducting food surveys be experienced and thoroughly trained RS/REHSs and to adopt the Voluntary National Retail Food Regulatory Program Standards and implement them statewide. Such a course of action would not require state legislation and would resolve many of the issues raised by OEHA and AOHC.

The National Environmental Health Association (NEHA) has reviewed the issues presented by the Ohio Environmental Health Association (a NEHA affiliate) and the Association of Ohio Health Commissioners in their 27 September 2016 letter to the directors of the Ohio Department of Health and the Ohio Department of Agriculture. The six concerns raised by their letter are legitimate and should be addressed.

NEHA strongly supports state and local adoption of the Voluntary National Retail Food Regulatory Program Standards (National Program Standards). The National Program Standards were developed by food safety experts from across the country under the auspices of the U.S. Food and Drug Administration and provide an objective basis for thorough evaluation of all aspects of a local health department's food safety program.

Standard 2 (Trained Regulatory Staff) of the National Program Standards provides a blueprint for comprehensive training of those conducting food safety inspections. This training includes classroom and online training, mentored experience conducting food safety inspections, and a standardization exercise in the field with a certified retail food safety standardization officer.

Standard 4 (Uniform Inspection Program) of the National Program Standards provides the methodology for evaluation of those conducting food safety inspections. The focus of this methodology is on food safety risk factors and interventions. These are tied to critical violations (now called "priority" and "priority foundational" violations by FDA). The evaluation methodology does not focus on good retail practice (non-critical) violations.

NEHA believes that those conducting surveys of food safety programs at local health departments should as a minimum:

1. Be credentialed as a registered sanitarian or registered environmental health specialist (RS/REHS), which is required in Ohio after 5 years of professional practice,
2. Be certified by FDA as a state retail food certification officer or be certified by a state retail food certification officer as a state, regional, or district retail food standardization officer, and

3. Be trained in retail food safety to the standard described in Standard 2 (Trained Regulatory Staff) of the National Program Standards.

To have inexperienced state sanitarians-in-training evaluating the work of local sanitarians seems very prone to error. Those conducting food surveys should be experienced and thoroughly trained RS/REHSs.

Thank you for the opportunity to testify regarding this legislation.

Respectfully,

Lynne Madison, R.S.  
NEHA Region 6 Vice-President

NEHA is a professional association currently serving 5,000 members to advance the environmental health professional for the purpose of providing a healthful environment for all. Professionals who earn a Registered Sanitarian/Registered Environmental Health Specialist credential from NEHA are recognized as having achieved an established standard of excellence. In addition to maintaining high standards of practice and testing for its credentialing programs, NEHA provides training and resources for continuing education through online courses and an online bookstore; holds an annual conference; fosters networking and career growth; and publishes the widely-respected peer-reviewed *Journal of Environmental Health*. NEHA is governed by a 14-member board of directors and benefits from various committees and technical advisors who serve as subject matter experts. NEHA employs approximately 30 paid professionals dedicated to providing quality programs to the NEHA Membership.