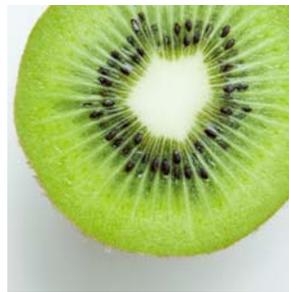


The Samuel J. Crumbine Consumer Protection Award
2009 Application Submittal

Columbus Public Health
Food Protection Program



Teresa C. Long, MD, MPH
Health Commissioner

Keith L. Krinn, RS, MA, DAAS
Administrator
Environmental Health Division

240 Parsons Avenue
Columbus, Ohio 43215

March 9, 2009

The Crumbine Award Jury
Foodservice Packaging Institute
150 South Washington Street
Suite 204
Falls Church, Virginia 22046

Re: 2009 Samuel J. Crumbine Award Application – Columbus Public Health

Dear Members of the Crumbine Award Jury:

The enclosed application and supporting documentation are respectfully submitted for your examination in consideration of the awarding the 2009 Samuel J. Crumbine Award for Excellence in Food Protection at the Local Level to Columbus Public Health. My staff and I were grateful for the positive feedback and suggestions for improvement we received from the jury concerning last year's submittal. There was never any question that we would submit again this year. We have incorporated those suggestions and added descriptions of new initiatives. The submittal demonstrates a fulfillment of a vision through clearly delineated goals that are met through subordinate objectives. Deeper references of subject matter expanded upon in the appendix are marked by hyperlinks. The quality of our program today is highly regarded and the demonstrated sustained improvement over the years of the present decade is truly remarkable.

The Columbus Public Health Food Protection Program nourishes a commitment to partnership with the food service industry in our community as an extremely important component of our approach to food protection. The direction we have taken in that approach is to gain compliance in the identification and correction of risk factors that cause foodborne illness first through understanding by extensive educational materials and opportunities, and then through consistent and transparent enforcement of the Ohio Uniform Food Safety Code.

2008 saw the expansion of SIGNS, our public health information initiative that uses color-coded signs to inform our residents and visitors of the enforcement status of our licensed establishments, to the City of Worthington. It was truly gratifying to witness their City Council pass the initiative unanimously. It also has been a great challenge to maintain our food protection program at full strength during the current economic crisis we are experiencing, but we have done just that and are fully capable to sustain that effort into the foreseeable future.

Respectfully submitted,



Keith L. Krinn, RS, MA, DAAS
Administrator
Environmental Health Division

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EXECUTIVE SUMMARY

In response to major changes in the Ohio Uniform Food Safety Code (OUFSC), Columbus Public Health (CPH) decided to use an innovative approach to manage food protection in our community. In 2002, the Columbus Board of Health (CBOH) created the Columbus Food Safety Advisory Council (CFSAC) to chart a new course in local food safety by establishing a partnership between CPH and the local food industry. CPH in collaboration with the CFSAC developed a comprehensive strategic plan to affect fundamental change to the Food Protection Program (FPP), for the needs of the community we serve. The comprehensive plan initially addressed the following issues: 1) Food safety education and training; 2) Knowledge and understanding of the changes in the new risk-based code and the science of food safety; 3) Bridging the language and cultural barriers presented by a diverse community and workforce; and, 4) Providing easy access to public information. Implementation of the plan began in 2003, marks the beginning of the sustained improvement of the FPP, and is our baseline. As the implementation progressed, new goals were identified that dove-tailed and complemented the original goals and included: 1) An increase in the number of inspections to meet state-mandated frequency of inspection criterion; 2) Addressing the concerns of food security and defense by developing emergency response for threats to the food supply; and, 3) As increased inspections resulted in increased follow-up inspections, the need to develop an improved enforcement model became apparent.

The magnitude of the information revolution was realized and the FPP sought to improve the field application and database management by the aggressive use of technology. Decade's Envision software and the deployment of tablet field computers resulted. Today the FPP uses cutting edge technology and analysis of our electronic data to maintain active managerial control of the program.

The new enforcement model provided the hearing officer component, increased enforcement actions, and more directly involved the CBOH. The CBOH's charge to develop a placarding system to complement the web posting of inspection results led to the development of the SIGNS Public Information Initiative.

Finally, the description of the Columbus program will demonstrate a commitment to sustainability and excellence, despite the current global economic crisis.

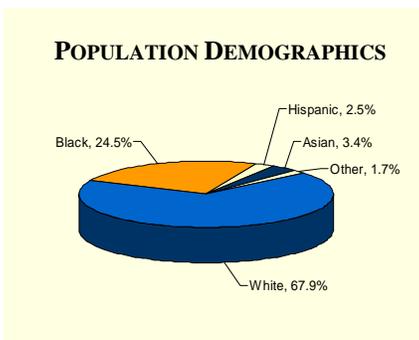
DEMOGRAPHY

The City of Columbus is centrally located in the state of Ohio and has been the state capital since 1812. It currently ranks as the 15th largest city in the United States and has a population according to 2007 U.S. Census Bureau estimates of 747,755.



The city's population is increasing at a rate of 2.7% (from 2000 to 2007), more than tripling Ohio's population increase rate of only 0.9%. Columbus is proud to have a diverse population. An estimated 45,000 Somalis live in Columbus, making it the second largest Somali community in the United States. In Columbus, 10% of the population speaks a language other than English at home. Columbus is the central city in a metropolitan area of 1.2 million, and includes several fortune 500 companies and corporate headquarters.

Downtown hosts special events almost weekly, including many festivals, concerts, and the popular Fourth of July Red, White, and Boom fireworks display. Nationwide Arena, home to the Columbus Blue



Jackets National Hockey League, and Huntington Park, the new stadium for the Columbus Clippers, the Triple-A Affiliate of the Cleveland Indians baseball team, are located in the Arena District. Only a few miles north of downtown, Crew Stadium, the first stadium built specifically for soccer in the United States, is home to the MLS Cup champion Columbus Crew, and

hosted the U.S. Men's National Team FIFA World Cup Qualifier in their victory over Mexico in early February of 2009. The nearby Ohio State University Main Campus student body totals more than 53,700, making it the largest college campus by enrollment in the United States; and adds a significant number of consumers to the city during the school year. Columbus really is a great place to live, work, and play.

RESOURCES

STAFF

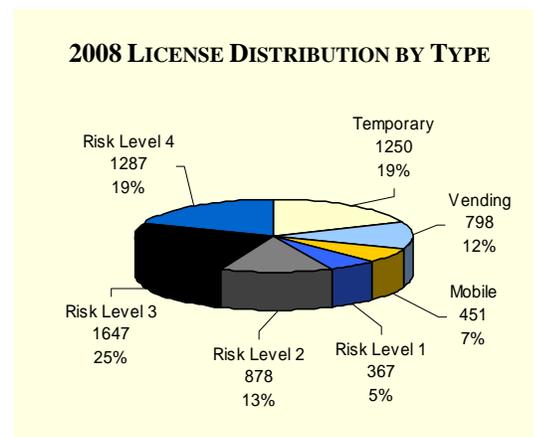
CPH's most valuable resource is its employees. The FPP staff members are Registered Sanitarians (RS) and Registered Sanitarians-in-Training (SIT) with the State of Ohio Board of Sanitarian Registration. Each RS must have earned a science-based baccalaureate degree and pass a comprehensive state examination. Each SIT

must have earned a science-based baccalaureate degree before the credential is awarded and then passed the comprehensive R.S. state examination within five years of employment. Under Ohio law, the SIT classification can conduct food safety inspections under the supervision of an RS. All sanitarians must complete at least 18 hours of continuing education annually. Tuition reimbursement has been established by the city to encourage staff to continue their education and pursue advanced degrees. Twenty-nine percent of the FPP staff have earned or are currently taking classes toward an advanced degree.

The FPP is responsible for licensing and inspecting retail food facilities, vending machine locations, mobile food concessions, and all food sold at special events, fairs and festivals. The inspections are a service provided for the public to ensure the safety of Columbus' food supply. The FPP is comprised of 28 employees: 20 field sanitarians, who are engaged in daily food safety inspections, on-site consultations, training, and compliance activities in prescribed geographic areas; four specialized sanitarian coordinators with advanced responsibilities in facility layout and equipment specifications, food safety education, foodborne illness investigations, compliance and enforcement, coordination of mobiles and vending, and associated activities; two program managers, one section chief, and the Environmental Health (EH) Administrator. The EH Division [organizational chart](#) is located in the Appendix. This summer will mark the seventh consecutive summer the division has maintained an extensive internship program. Maintaining our stellar internship program makes us well-known in the environmental health academic community, and students compete for the summer positions in our agency. The FPP benefits from the resources of having students in the workforce available to take on special projects such as Consumer Advisories, Food Security at Outdoor Events, and Rodent Control at Inner-City Retail Outlets. Many of our staff members were former interns.

FOOD FACILITIES

The FPP issued a total of 6,678 licenses in 2008. This includes 3,001 Food Service Operations (FSO), 1,178 Retail Food Facilities (RFE), 451 mobile operations, 798 vending locations, and 1,250 temporary licenses. Of the 4,179 RFE's and FSO's: 367 are



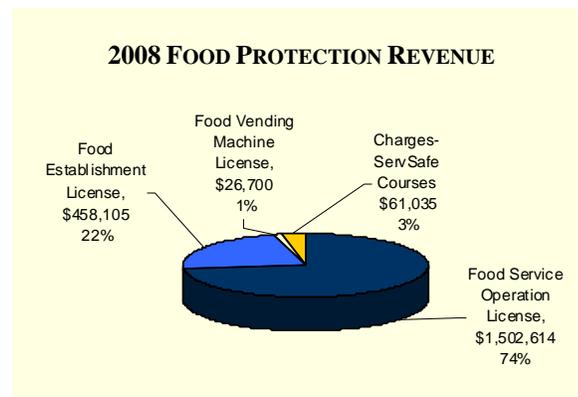


Risk Level 1; 878 are Risk Level 2; 1,647 are Risk Level 3; and 1,287 are Risk Level 4.

Almost every weekend throughout the spring, summer, and autumn there are festivals, farmers markets, and special events throughout Columbus and Worthington. Columbus is home to the Ohio Expo Center, which hosts the Ohio State Fair every summer. CPH inspects and licenses

all the permanent and mobile food facilities at the fair, which attracted more than 809,300 patrons in 2008.

CPH also inspects and licenses all the temporary, permanent, and mobile food vendors associated with The Ohio State University's home football games. Over one million people attended home games in 2008, the third highest number for NCAA football in the nation and more football fans come to the campus area to experience the excitement and gala atmosphere that extends well beyond Ohio Stadium.



REVENUE & FEES

Established in 1833, as the local public health agency for the City of Columbus, CPH has continued to strive towards achieving "healthier, safer people". CPH is comprised of a range of programs providing clinical, nursing, environmental, health, and population-based services.

2009 Food License Fees			
Food Service Operations (FSO)			
Retail Food Establishments (RFE)			
License Components	CITY FEE	STATE FEE	TOTAL FEE
Risk Levels (FSOs & RFEs)			
Level 1 < 25,000 sq. ft. (C)	\$ 228.00	\$ 28.00	\$ 256.00
Level 2 < 25,000 sq. ft. (C)	\$ 260.00	\$ 28.00	\$ 288.00
Level 3 < 25,000 sq. ft. (C)	\$ 468.00	\$ 28.00	\$ 496.00
Level 4 < 25,000 sq. ft. (C)	\$ 582.00	\$ 28.00	\$ 610.00
Level 1 > 25,000 sq. ft. (C)	\$ 324.00	\$ 28.00	\$ 352.00
Level 2 > 25,000 sq. ft. (C)	\$ 340.00	\$ 28.00	\$ 368.00
Level 3 > 25,000 sq. ft. (C)	\$1,114.00	\$ 28.00	\$ 1,142.00
Level 4 > 25,000 sq. ft. (C)	\$1,178.00	\$ 28.00	\$ 1,206.00
Level 1 < 25,000 sq. ft. (NC)	\$ 114.00	\$ 14.00	\$ 128.00
Level 2 < 25,000 sq. ft. (NC)	\$ 130.00	\$ 14.00	\$ 144.00
Level 3 < 25,000 sq. ft. (NC)	\$ 234.00	\$ 14.00	\$ 248.00
Level 4 < 25,000 sq. ft. (NC)	\$ 291.00	\$ 14.00	\$ 305.00
Level 1 > 25,000 sq. ft. (NC)	\$ 162.00	\$ 14.00	\$ 176.00
Level 2 > 25,000 sq. ft. (NC)	\$ 170.00	\$ 14.00	\$ 184.00
Level 3 > 25,000 sq. ft. (NC)	\$ 557.00	\$ 14.00	\$ 571.00
Level 4 > 25,000 sq. ft. (NC)	\$ 589.00	\$ 14.00	\$ 603.00
MOBILES	\$ 292.00	\$ 28.00	\$ 320.00
VENDING	\$ 34.50	\$ 6.00	\$ 40.50
TEMP (C) (Per Day)	\$ 58.00	N/A	\$ 58.00
TEMP (NC) (Per Day)	\$ 29.00	N/A	\$ 29.00

C = Commercial; NC = Non Commercial; n/a = Not Applicable

CPH has an annual budget of \$46 million and is staffed by approximately 445 full and part-time employees. The FPP issued 6,678 food service licenses and conducted more than 13,000 inspections of licensed retail food facilities. The FPP's budget of \$2 million is the largest in the EH Division, with 44% of the division expenditures. City and state license fees encompass more than 97% of the program's revenue, with ServSafe course fees bringing in another 3% (see chart).

The FPP establishes a new fee schedule annually for FSOs and RFEs licensed by CPH. A portion of each established license fee includes a State of Ohio surcharge. CPH completes the cost analysis and license fee calculations as required by the Ohio Revised Code and the Ohio Administrative Code using data from the previous year to calculate the actual cost of administration and enforcement attributable to each type of food license using the Cost Methodology (*see table*).

The Cost Methodology is calculated using the salary, fringe benefit, and mileage totals for all employees who worked in the FPP the previous year. Support costs may not exceed 30% of the total program expenditures, and include the partial salaries and fringe benefits of administrative and clerical staff, utilities, rent, supplies, equipment, liability insurance, laboratory costs, printing, and training are then included. The Ohio Cost Methodology system allows CPH to recover the expense of the program through license fees.

[Facility Layout and Equipment Reviews](#) are outside the Cost Methodology. Full reviews of commercial facilities are \$400 for small and \$800 for large facilities, while non-commercial facilities are charged 50% less. Extensive alteration review fees are \$200 for small and \$400 for large facilities.

BASELINE & PROGRAM ASSESSMENT

Fundamental and dynamic change in the FPP was initiated by three major events that occurred nearly concurrently and that predate our 2003 baseline - the state-wide adoption of the OUFSC in March of 2001, and both the decision to computerize the FPP, and the advent of the CFSAC in 2002. These three events gave a foundation and tools to improve deficiencies in the FPP based upon the FDA's "Voluntary National Retail Food Regulatory Program Standards."

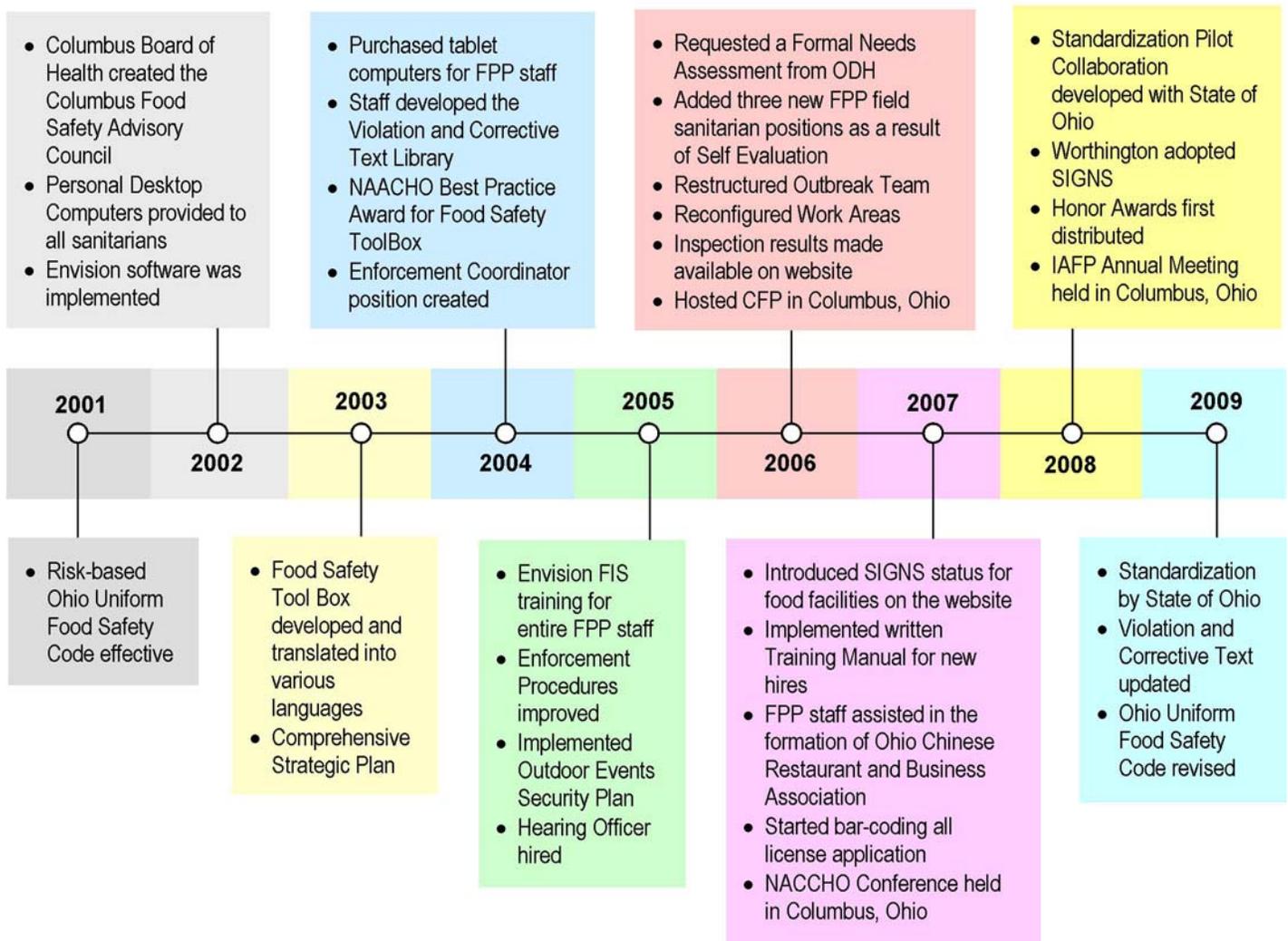
PROGRAM PLANNING

Vision, Goals & Objectives: Our vision is to reduce the risk factors associated with foodborne illnesses in licensed food service operations and licensed retail food establishments, and also to minimize the risk of food tampering or other malicious, criminal, or terrorist actions.

In 2003, the FPP developed a comprehensive strategic plan using an all hazards approach, which includes the following goals: 1) Provide enhanced food safety education and training materials to food service

managers and workers in various languages; 2) Increase the number of inspections and follow-up inspections to meet state-required frequency of inspection criterion; 3) Provide cultural awareness training for the FPP staff; 4) Work with the Conference for Food Protection (CFP) and the Ohio Retail Food Safety Advisory Council to discuss, research, and suggest changes to the FDA Model Food Code and the Rules based on the current science of food safety; 5) Develop methods to provide the general public easy access to information so they can make healthier, safer choices; 6) Develop an improved enforcement model; and 7) Address the concerns of food security and defense by developing emergency response for natural disasters and terrorist attacks associated with the food supply.

FOOD PROTECTION PROGRAM TIMELINE
2001-PRESENT



The following narrative chronicles the steady progress in improvement of the FPP by initiating and achieving objectives that realize the stated goals and developing added enhancements that evolved to make the

program outstanding. Effective January 1, 2009, the program changed its name from the “Food Safety Program” to the “Food Protection Program”, which more closely describes roles in both food safety and food defense, as well as illustrate our all hazards approach to protecting the food supply in our community.

Risk Orientation: The FPP program operates under the OUFSC, which is based on the FDA Model Food Code. There have been several recent updates and revisions to the code, the most recent becoming effective on March 1, 2009. Ongoing training of the FPP staff allows us to stay current with the changes in the code. Regular contact with the Ohio Department of Agriculture (ODA) and the Ohio Department of Health (ODH) is maintained and a pilot standardization program is underway. Science-based health and safety training focused on the five CDC risk factors that are associated with foodborne illness is emphasized. The FPP has been communicating these risk factors to the operators and the public by performing risk-based inspections, emphasizing critical violations in red font on the inspection reports, providing extensive food safety information on the CPH website, and developing the SIGNS Public Information Initiative to promote transparency and better disclose compliance and enforcement information to the public. As part of the SIGNS initiative, consumers can search our website for details of critical violations observed during previous inspections. A durable plastic sign which uses a color-coded system to inform the public of the facility’s compliance and enforcement status is posted at the entrance of licensed facilities.

The FPP conducts risk-focused outreach programs by presenting regularly scheduled food safety training classes in English, Spanish, Mandarin, and Somali. A four hour Person-in-Charge (PIC) training class that covers many of the basics of food safety is provided in multiple languages. The cornerstone of the food safety training provided is the nationally recognized ServSafe training program which draws students from across the state. The FPP also offers onsite training at the facility as needed. Handouts, training materials and posters to promote proper food safety and good retail practices are also utilized. Risk orientation and its successful integration into a food protection program are crucial elements for the effective managerial control and prevention of major risk factors that cause foodborne illness.

Staff Participation: A positive attitude and approach toward working with small business operators, large facility representatives and a culturally diverse community are valued traits in our sanitarians. Staff

members are also encouraged to assume leadership roles in organizations and associations that promote food safety and environmental health. Since the implementation of the comprehensive risk-based inspection program, emphasis is placed on the field sanitarian working with the facility to immediately correct any critical violations and to ensure the food service operator understands the relationship between a critical violation and the risk of foodborne illness. The FPP uses a team approach to food safety which recognizes license holders are customers who must be provided with quality service and respect. The Central Ohio Restaurant Association and the Ohio Grocers Association have recognized this approach as a model for health departments in the state.

Involvement in the Conference for Food Protection, National Environmental Health Association (NEHA), National Association of County and City Health Officials (NACCHO), International Association for Food Protection (IAFP), Ohio Environmental Health Association, and other state, national and international forums allows our staff members to fully understand the very complex food delivery system and food safety network that exists in this global market. In recognition of this expertise, the Section Chief of the FPP presented at the Dubai International Food Safety Conference in February 2009, regarding our compliance and enforcement activities, as well as the SIGNS Public Information Initiative. CPH staff members also presented a poster session on the same material at the NEHA Conference in Tucson, Arizona in June 2008.

Staff members have the ability to identify program needs and are encouraged to help design solutions based upon their areas of expertise. In February 2009, FPP sanitarians taught an Asian and Hispanic cultural diversity continuing education seminar for sanitarians, and other central Ohio local health departments were invited to attend. The training covered customs; traditional foods and ingredients; common violations; concerns of sanitarians, such as how to politely decline gifts; and methods to communicate effectively with operators. The FPP leadership encourages staff members to develop their ideas into program enhancements, such as guidance documents for [mobile food facilities](#), [facility layout and equipment specification reviews](#), [temporary food facilities](#).

Self-Evaluation: A review of the FPP after the implementation of the new OUFSC revealed the need to increase staff, conduct risk-based inspections under the authority of the new law, utilize electronic inspections for uniformity and efficiency, and improve our utilization of data in order to both track inspection frequency

and the trends of critical food safety risk factors. As a result of the review, three new field sanitarian positions, a fourth sanitarian coordinator, and a second program manager were added between 2003 and 2005. In 2006, CPH requested a formal personnel needs assessment from ODH, which confirmed the CPH self-evaluation that additional sanitarians were needed in the mandated programs, including the FPP. An additional three sanitarian positions were added to the FPP in 2006, and the work areas were reconfigured to accommodate the new staff. Columbus has been steadily growing and the staff increase provided an opportunity to use current food facility distribution data to re-allocate and balance [work areas](#) in response to the city's recent growth patterns.

PROGRAM MANAGEMENT

Active Managerial Control: Where the “rubber meets the road” in food protection in our community is at the interface of the field sanitarian and the PIC. The 20 field sanitarians conduct the standard inspections, have day-to-day contact with the operators of food facilities, and are the heart of the FPP. While not having supervisory oversight, the four sanitarian coordinators assist the field sanitarians and conduct complex specialized duties. The two environmental health supervisors maintain control of the field operations with a mix of personal field oversight and allowing the professionals reporting to them to exercise professional judgment and freedom to learn from mistakes. The supervisors are encouraged to spend time in the field with their staff and regular performance appraisals, field observations, and field audits are required. The section chief supervises the supervisors and is primarily responsible for assembling and maintaining the data for program planning, budgeting, and staffing and assists the EH Administrator in developing and revising policies, procedures, regulations, program criteria, and management tools. The analysis of electronic data using Crystal reports has been developed to harvest data from the Envision program to monitor both quantitative and qualitative field activities. A monthly running tabulation is maintained to mirror the required frequency of inspections and the daily oversight of overtime is carefully watched.

Epidemiological Capability: The CDC estimates some 76 million cases of foodborne illness occur annually in the United States. Because of the prevalence of disease outbreaks identified in Franklin County, CPH reorganized the Outbreak Team in 2006 to assemble specialists from EH, Communicable Disease and Epidemiology. The diversified team is better able to identify foodborne illness outbreaks and prevent further

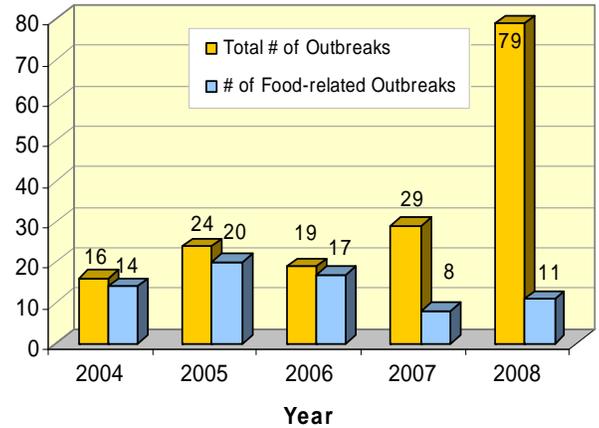
disease transmission; to conduct consistent, timely, and professional foodborne illness investigations; to protect the confidentiality of those individuals involved in an investigation; and, to educate and promote safe food handling practices by the general public and the food service industry to prevent future illness. By conducting consistent and timely investigations, the Outbreak Team is able to statistically link outbreaks to a specific facility more easily. When a facility has been statistically implicated in a foodborne outbreak the FPP requires a plan of action from the owner, mandates employees receive food safety education, and places the facility on increased monitoring for three months.

Timely and thorough investigation is critical to minimizing the impact of foodborne illness and preventing further illness. During an investigation, Outbreak Team members meet regularly and utilize a shared intranet space to post new information for other members to review. The Outbreak Team also maintains contact with the Public Information Officer, the Medical Director, and the Health Commissioner. The Outbreak Team assists with the development and distribution of educational materials for the general public, the medical community, and the food facility or food service industry when there is evidence associating a food or organism with the outbreak, as well as media notification if public safety is at significant risk. The Primary Nurse Investigator serves as the central collection point for all CPH foodborne illness investigations and enters suspected outbreaks into the Ohio Disease Reporting System. As part of the process, FPP sanitarians gather necessary information; review the records and past inspections of the implicated facility; investigate licensed facilities; arrange for collection, lab submission, and track food samples; and serve as the primary contact with the food facility.

CPH epidemiologists, collaborating with the Outbreak Team, determine actions based on known information received from the initial report and develop the questionnaire to obtain information to conduct an optimal epidemiologic investigation. An appropriate epidemiologic study is tailored to evaluate the specific outbreak, and members of the Outbreak Team contribute to the final foodborne illness outbreak investigation report, which is forwarded to ODH and the CDC.

In the summer of 2008, the FPP dealt with a multi-state *E.coli* O157:H7 outbreak. The Outbreak Team worked collectively with the ODH and CDC to determine one source was ground beef from a local grocery chain. Through use of the grocery store rewards cards the Outbreak Team was able to collect the information necessary from customers to help with the recall of the ground beef. Our jurisdiction also experienced large non-food related outbreaks of shigellosis and cryptosporidiosis in 2008, which is reflected in the graph.

**OUTBREAKS IN COLUMBUS AND FRANKLIN COUNTY, 2004-2008:
TOTAL VS. FOOD-RELATED**



Currently the FPP has been handling the *S. typhi* outbreak involving peanut-based products. CPH’s Public Information Officer provided media outlets with the complete list of the recalled items initially compiled for the field sanitarians and placed the information on the CPH website. FPP sanitarians checked their facilities, especially large institutions and small markets, for recalled items and informed operators about the recalls.

Data Management & Utilization: The EH Division adopted Decade Software Company’s Envision software as a uniform system for maintaining records between our various programs, including the FPP, Water Protection, Body Art, and Healthy Homes in 2002. Previously 27 different systems were used to manage different types of data, none of which interfaced, and much of the data was only maintained in paper form. Decade’s system uniformly maintains data including financial and billing records, ownership records, facility records, complaints, and daily activities of our staff including food inspections. In 2004, the EH Division expanded our technology by integrating Decade’s new Field Inspection System (FIS), a portable component of Envision for use in the field. The system includes a local copy of the complete database synchronized on slate-style tablet computers along with a wireless printer. The new system has dramatically improved the quality of service CPH provides to our food facilities and the public. For the first time, CPH sanitarians had complete access to facility histories, prior complaints, and appropriate contact information for any facility from the field. This information allows the sanitarian to thoroughly review the specific hazards and problems present in food facilities to provide a higher quality inspection. Additionally, the system markedly improved the legibility, and

consistency of the reports provided to the operators by providing a printed report with a standardized violation text and corrective measures for each violation at the time of inspection.

Decade's Field Inspection System achieved the FPP's objective for sanitarians to spend more of their time in facilities conducting inspections and improving the efficiency of the program by eliminating the need to enter hand-written paper inspections into the database. CPH continues to improve and advance the methods in which we utilize our available technology and data. Additional reports were developed as the need for managerial tools were identified, and have been proven valuable. Envision allows administrators to manage with continually updated data. The application allows the tracking of open complaints and critical violations. Reports of inspections completed or due, as well as tracking the propensity of certain violations to be marked, can be generated. Employee time, in terms of daily entries, different categories of activities, and specific violations are monitored, and that data can be used to determine the needs of our staff when scheduling continuing education. State oversight requires a prescribed frequency of state-mandated inspections, and monthly reports are generated to verify the progress. Envision allows us to easily access data for reports and to populate our website. Another key function of Envision is the ability to link our financial transactions with our program records. All invoicing for licenses is processed directly from Envision. Since 2007, the license applications have been bar-coded. Returned applications and payments can be processed in a timely manner and licenses batch-printed by Envision. Since 2007, the license applications have been bar-coded, which has improved the efficiency and accuracy of our licensing staff and has allowed us to perform the work with one less clerk due to the increased efficiency.

State-approved digital versions of the traditional inspection forms have been created, which Envision populates with our inspection data. CPH spearheaded the development of a massive electronic "library" of violation and corrective text table built around the OUFSC. Sanitarians can use these formatted tables in the Envision FIS to choose the specific violations noted during the inspection, and then add any additional comments for each violation. At the conclusion of the inspection, the



Sanitarian Teresa Lenehan conducting an inspection with a tablet PC

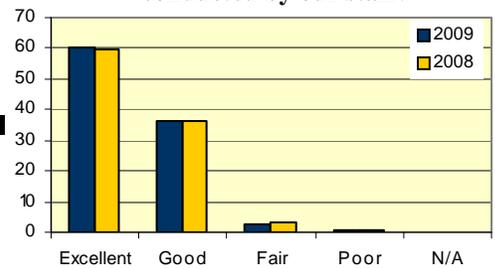
sanitarian explains the report to the facility PIC, collects an electronic signature, and prints the inspection report. Envision then creates a PDF image of the report which is digitally archived.

The ability to utilize Press Agent, another add-on component of Envision, makes the inspectional data available to the public-facing website and empowers consumers to make informed choices regarding patronage. The FPP worked with Decade to incorporate SIGNS data on our website search page, so the actual sign graphic appears for the searched facility. Local television stations have covered the enforcement cases on their evening [newscasts](#) featuring inspection and enforcement data from Press Agent. Our neighboring local health department, the Franklin County Board of Health, has decided to utilize Decade’s software. We have shared our violation and corrective text library, as well as all our custom Crystal reports that allow us to manage our data and print inspection reports that are state-approved digital duplicates of the official inspection forms.

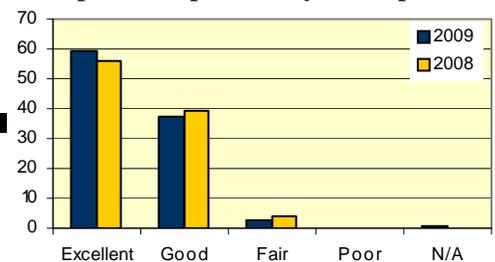
Analysis of Outcomes: According to annual surveys conducted over the last two years, the overwhelming majority of our licensees are very pleased with our ability to provide them with quality food safety education and objective inspectional evaluations of their facilities. The ability to produce legible detailed inspection reports in the field has improved the ability of our licensees to read and understand the report. Likewise, having all that data readily available for review and evaluation by our staff has allowed us to

LICENSEE SURVEY RESULTS: 2008 & 09

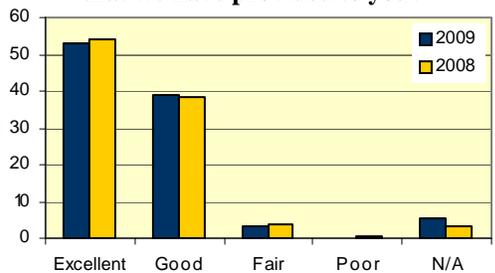
How would you rate the inspection conducted by our staff?



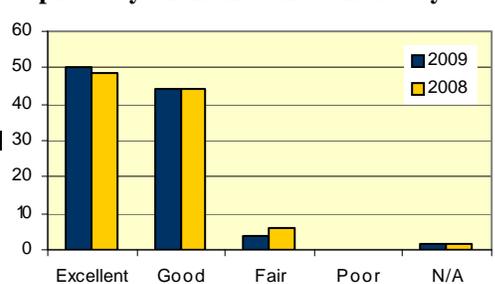
How easy is it for you to understand the inspection report left by the inspector?



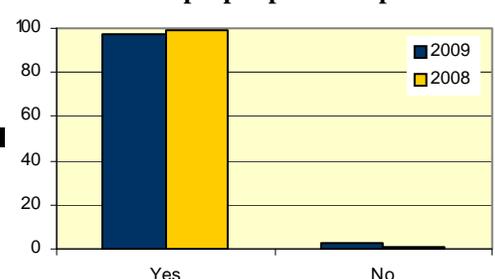
How do you rate the food safety education that we have provided to you?



How would you rate the time it takes for us to process your license and send it to you?



Are the materials that we give to you each year routed to the proper person/department?



better meet our objectives to tailor initiatives and educational materials for our licensees; make better use of our staff resources; and, more effectively target our staff training based upon prevalence of violations noted during inspections. According to a 2008 internship project, 55% of consumers look at food facility inspection results on our website, and 80% indicate that sign color determines where they patronize.

ColumbuStat is a mayoral tribunal which meets every six weeks to review the status and performance of all programs throughout the city. CPH is required to attend quarterly to address specific ColumbuStat concerns. The ODH Performance Standards and CPH's Performance Management System are used to provide monthly performance-based measurements to ColumbuStat via the Dashboard, which acts as a visual representation of our program's status for evaluation outcomes, such as quantitative and qualitative measurements of sanitarian output; facility compliance statistics; and percentage of completed mandated inspections which we populate with data from Envision.

Support & Resources: The FPP is fortunate to have the support of other programs in the division and CPH. The EH Division's Office Manager and five staff handle all the financial and licensing aspects of the FPP, receive inbound telephone calls, assist walk-in customers, and are instrumental in our equipment and office supply purchases. Computer needs of the program are supported by the city's Department of Technology, while all support for the Envision software program is handled by an in-house Systems Analyst. FPP also has the assistance of a talented graphic artist who designs our educational materials and website content. CPH additionally employs a full-time Public Information Officer who is able to disseminate our messages, as well as handle media inquiries and public information requests.

Likewise, the FPP is able to work with other city departments to resolve problems, sometimes on an individual basis and also through the Nuisance Abatement Group (NAG). The initial purpose of NAG was to enforce liquor laws, as the city council makes annual recommendations to Ohio's Division of Liquor Control regarding renewal of liquor licenses within our jurisdiction. The evolution of NAG, which is composed of representatives from various city departments, has increased coordination between the city departments who work as a team to identify and inspect facilities of common concern for enforcement activities, regardless of liquor license status. The FPP has been able to use the assistance provided by NAG to enhance FPP

enforcement in extreme cases. This assistance has ranged from executing bench warrants of recalcitrant unlicensed operators to non-uniformed police officers monitoring certain food facilities for the FPP. The City Attorney's Office assists the FPP with compliance and enforcement issues. CPH also works directly with the Fire Department and Parks and Recreation. The city's 3-1-1 system allows citizens to have one number to call for all their complaints and service requests. Due to the infrastructure provided in the OUFSC, the FPP depends on the assistance and oversight of the ODA and ODH. Additionally we also have a good working relationship with the Ohio Department of Natural Resource's Division of Wildlife and the Ohio Department of Commerce's Division of Liquor Control, and joint inspections are often conducted.

Columbus Public Health has a strong working relationship with community partners that assist developing small businesses in our community. Owners of Columbus facilities have been referred to, and received, grants available through the Economic and Community Development Institute to help with necessary expenses. These expenses often correspond with food safety issues, especially when the grant funds are used to purchase commercial equipment that meet the standards set forth in the OUFSC.

EXTERNAL INVOLVEMENT

Industry & Consumer Interaction: CPH has been an active participant in the Ohio Retail Food Safety Advisory Council, which was established in 2002 to facilitate the transition to the OUFSC. The FPP relies heavily upon its interface with the food service industry provided by the CFSAC, which was created in the image of the Ohio Retail Food Safety Advisory Council. In 2006, CPH was the host agency for the CFP, which was the largest to date with nearly 500 attendees. CPH



was responsible for appointing the members of the local arrangements committee to help plan and organize the conference. As a long-time partner with the retail food industry, CPH recognized the importance of including regulatory, industry, academia and consumer groups in the framework of the local arrangements committee. In 2007, the National Association of County and City Health Officials chose to have their annual conference in Columbus. The International Association for Food Protection held its 95th Annual Meeting in Columbus in

August of 2008, and more than 1800 food safety professionals participated; CPH was proud to have many of its employees in attendance, including the current President of the Ohio affiliate and 20 volunteers.

CPH currently licenses 451 mobile concession units, ranging from large concession trailers to the very small hot dog vendor located on downtown street corners. During the current economic downturn, this low cost, all cash business model is popular. To aid these entrepreneurs, CPH created an [Introduction to Mobile Food Units](#) manual which is available on our website. This web-linked tutorial is a wealth of information for individuals inquiring about starting a mobile concession business.

Community Educational Outreach: Over the past decade, Columbus has experienced an increase in its new American population, which contributes to the cultural richness, and enhances the economic growth and development of the city, but can also pose daily challenges to those working with them. In order to ensure a smooth transition and seamless integration process, Mayor Michael B. Coleman created the New Americans Initiative to give all immigrant and refugees living in Columbus access to city

services and programs to help improve their lives. CPH assists the new Americans and continually strives to reduce barriers between these individuals and CPH. In order to accomplish this, the FPP program employs two bicultural/ bilingual field sanitarians. One, a native of Taiwan, is fluent in English, Mandarin and Taiwanese. She acts as the community liaison with the Columbus Asian community, and assisted the local Asian restaurants and



Local Spanish newspaper "Fronteras" front page featuring Food Protection Program Sanitarian Vincent Fasone

grocery stores in the formation of the Ohio Chinese Restaurant and Business Association in 2007. The second bicultural/bilingual food safety sanitarian acts as the liaison with the Columbus Hispanic community, and helped to create a local organization of Hispanic mobile food vendors. In 2008, he educated local Hispanic temporary food vendors about requirements to sell safe food at the Interlatinos Soccer League, which involves approximately 30 teams and thousands of spectators every Sunday for seven months of the year. Both sanitarians conduct food safety inspections in their designated work areas and also educate new Americans on food safety by teaching the PIC and ServSafe classes. In 2008, a total of 327 individuals were trained between PIC, ServSafe and on-site training classes in Spanish and Mandarin. These specialists also assist other field

sanitarians with interpretation during food safety inspections when communication challenges arise, and are responsible for the translation of CPH’s food safety information into their respective languages. The EH division employs field sanitarians in other programs who are fluent in Somali, Russian, German, Italian, Farsi, and Arabic. These individuals are also available to assist with food safety education as needed.

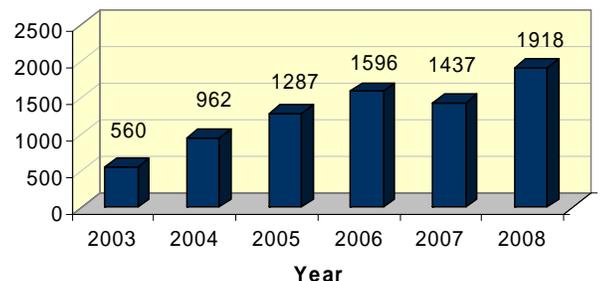
Manager/Food Worker Training Partnerships: The OUFSC requires a qualified PIC oversees the safe preparation of food during all hours of operation. A PIC must have knowledge of food safety principles such as approved source, time/temperature relationship, safe cooking temperatures, personal hygiene practices, and the prevention of cross contamination. To aid the industry in meeting this requirement for qualified PIC personnel, the FPP has taken an active role in providing instruction and education. PICs must understand there are both public health concerns and economic aspects to food safety.

In response to the new OUFSC changes, the FPP developed a “[Food Safety Toolbox](#)”, and provided it to all licensees. It includes a copy of the current OUFSC, along with laminated posters outlining food safety issues including no bare hand contact with ready-to-eat foods, hand washing, cooking temperatures, three compartment sink set-up and use, a consumer advisory example, refrigerated storage organization, employee illness exclusion requirements, and how to calibrate a thermometer. The Food Safety Toolbox is also provided in Spanish, Mandarin, and Somali. In 2004, CPH received a NACCHO Best Practice Award for the Food Safety Toolbox when it was presented at the national conference in St. Paul, Minnesota.

CPH has a long history of food safety education which began in the early 1980’s with a two-hour Food Safety Basics workshop offered on request and the partnership with the National Restaurant Association’s Educational Foundation’s ServSafe program. An updated version continues to support our inspection program and is presented numerous times in multiple languages each year (English, Spanish, Mandarin, and Somali). The annual

schedule of classes held at CPH includes a four hour PIC workshop and the sixteen hour ServSafe course. The classes are offered in multiple languages: English, Spanish, and Mandarin. In 2008, the schedule included 54

**FOOD SAFETY PROGRAM
LICENSEE TRAINING ATTENDANCE: 2003-2008
(PERSON-IN-CHARGE & SERVSAFE)**



classes. Participation has grown each year, beginning at 400 in 2002 to more than 1,900 in 2008. Both the [2008](#) and [2009](#) schedules are in the Appendix.

PROGRAM IMPLEMENTATION

Enforcement: Due to Ohio's strong tradition of home rule, only local boards of health are empowered to suspend, revoke, or limit a food facility license. The OUFSC allows local boards of health to appoint a hearing officer, who is required to be licensed to practice law in Ohio, to hear the testimony concerning enforcement cases and to render recommendations to the local board of health based upon that testimony. Ohio law allows a board of health to take action based upon those recommendations.

The FPP leadership assessed compliance and enforcement procedures as increased follow-up inspections necessitated enforcement and determined existing procedures were not consistent with our objectives related to improved enforcement. Therefore, in 2004, a sanitarian coordinator position was created to develop and implement the FPP compliance protocol, and the [Compliance and Enforcement Procedures Manual](#) was developed.

A crucial element of any successful food safety program is to ensure the follow-up inspections are conducted to verify compliance. If risk factors still exist after the follow-up inspection, the facility enters enforcement and is brought to CPH for an informal administrative meeting referred to as the pre-hearing conference. The PIC is required to bring a written plan of action regarding the correction of violations. During the pre-hearing conference the plan of action is reviewed along with past inspection reports. Additional educational opportunities for facility owners, managers and employees are strongly recommended. Finally, a new compliance date is agreed upon. If a follow-up inspection reveals critical violations persist after that date, charges are filed with the issue of a Notice of Violation and a hearing is scheduled before the Hearing Officer.

The OUFSC prescribes a two-pronged enforcement model. Immediate suspension of a food license is available for cases of immediate or substantial hazard due to "clear and present danger" to public health. Enforcement procedures for unlicensed food facilities are handled through the Franklin County Environmental Court. In 2005, the hearing officer proviso was incorporated into our existing enforcement procedures for licensed facilities. A contract was entered into for attorney services, the selected attorney became familiar with

the issues associated with food safety, and the CBOH began rendering enforcement decisions based upon the recommendations of the Hearing Officer. CPH is the first, and to date, the only Ohio local health department utilizing the hearing officer provision of the state law. The FPP now has three attorneys under contract to hear both food protection and Smoke-Free Ohio cases. The Hearing Officer hears testimony and renders recommendations to the CBOH. A final follow-up inspection, subsequent to the formal hearing and before the CBOH meeting, is conducted and the inspection report is reviewed by the CBOH. The Hearing Officer is charged by the CBOH with examining evidence provided by both the FPP and the facility representatives, to listen to testimony from both sides, and to render a recommendation to the CBOH. The recommendation could be to either dismiss the charges allowing the facility to operate without sanction, or to invoke remedies an Ohio board of health is empowered with. The CBOH may suspend, limit, or revoke a facility's license, and may also require an increased frequency of inspections, additional training, facility improvements, or retention of a consultant to assist in the safe operation of the facility. If critical violations remain on the final inspection, the CBOH typically suspends the license for a minimum number of days during which all critical violations must be corrected, and also requires various amounts of training. After the suspension period when a follow-up inspection determines the requirements of the CBOH have been met, the facility is allowed to reopen and placed on an increased frequency of inspection from three to six months. If a facility continues to fail risk-based inspections, the license can be revoked.

Formal Staff Training Program: Prior to 2004, formal staff training at CPH was not fully developed. Needs were identified and training programs were initiated for new and current CPH employees. A specific schedule of training was designed to expose new staff members to all aspects of the EH Division through rotations and observations with our experienced staff. As part of the training program, new hires are required to take ServSafe. A seasonal in-service continuing education training program was instituted in December 2007. Guest speakers from the FDA, ODA, and ODH have presented sessions to the staff on advanced food safety topics. The FPP frequently attends statewide trainings and participates in association conferences.

Emergency All-Hazards Response Capability: The events of 9/11 gave rise to concerns about attacks to the homeland, including the threat of intentional contamination of the U.S. food supply. The initial response

to terrorism or natural disasters begins at the local level and CPH foresaw the need to incorporate best practices planning for possible contingencies. We believed our community was particularly vulnerable in the area of mass gatherings at outdoor events given the numerous outdoor festivals county-wide and in particular huge outdoor events such as Ohio State Football and the Ohio State Fair. Professional staff from CPH and the Franklin County Board of Health collaborated as a part of a 2004 Ohio Preparedness Leadership Institute cohort, and developed an [Outdoor Events Security Plan](#) which utilized an all-hazards approach. Prior to completing the plan, research was conducted by the project team and found no specific guidelines regarding food security for outdoor food operations existed anywhere in the United States. Additional research on assessing risk in the foodservice industry determined the basic process used by the National Restaurant Association called the Operational Risk Management Systems Approach, a decision-making tool used to identify operational risks could be modified for outdoor event applications. The project team enhanced the plan by identifying the flow of food steps from the HACCP process to develop an [Outdoor Events Security Risk Assessment Matrix](#).

The Outdoor Events Food Security Plan was incorporated in 2005 for inspections at outdoor festivals, the Ohio State Fair, and OSU Football. Additionally, a summer internship project focused on food security awareness at several summer festivals including the Art's Festival and the Columbus Jazz and Rib Fest. FPP staff members have been trained in the plan and are expected to incorporate its objectives during event inspections and to familiarize festival organizers with food defense concepts. The FPP incorporated the plan into the temporary food field activities and the license application process. Additionally, all FPP staff members have completed the required Federal National Incident Management System (NIMS) trainings and are familiar with utilizing the Incident Command System (ICS).

The emergency all-hazards training and preparation was tested in response to two recent events in Columbus where NIMS principals were utilized. In May 2007, CPH activated the ICS to respond to an elemental mercury contamination of a local FSO. An interior mercury spill had caused elevated levels of mercury vapor at $>100\mu\text{g}/\text{CM}$ throughout the facility causing mass contamination of a licensed FSO and its immediate closure by the Health Commissioner due to a clear and present danger to public health. All food in the establishment was placed under embargo, as mercury had even been tracked into the walk-in coolers. The

CPH Incident Command, utilizing multi-agency partners, established a mercury screening event in the FSO's parking lot for employees and customers, which was advertised via a media release and press conference. Some 160 individuals were screened, and footwear and car floor mats were confiscated. The event was chronicled in a presentation at the 2008 NEHA Conference. In September 2008, more than 354,000 customers lost electricity in central Ohio, as the remnants of Hurricane Ike quickly moved north creating a storm surge that affected Central Ohio with winds gusting up to 78 mph, ripping roofs from buildings, downing trees, and blocking roadways. Governor Strickland declared a state of emergency for Ohio. As the power failure continued for a week in some areas of the city, food storage issues in licensed facilities and private homes became a major issue. FPP staff members were dispatched to assess risk associated with the food supply. FPP sanitarians spent more than 400 hours educating licensees of the dangers of serving unsafe food and closing non-compliant licensed facilities. As the power failure continued, the American Red Cross opened a number of community shelters and the FPP, operating as a part of a multi-coordinated system, provided trained sanitarians to conduct health, safety, and FSO inspections at those facilities. Using lessons learned from both experiences CPH continues to improve its objectives for all hazards response and strengthen the public health infrastructure at CPH and in the community.

Internal Quality Assurance: The mission of the FPP is to reduce foodborne illness associated with licensed food facilities in our community. Emphasis is placed on conducting follow-up inspections in a timely manner to ensure critical violations have been addressed. Supervisors also review inspection reports daily. The quality assurance program is adaptable, introspective, and continues to progress as improvement plans are implemented regularly. Improvement ideas are sought from the field staff, clerical personnel and our customers. A problem common to food protection programs, especially in large jurisdictions with a high number of staff who conduct inspections, is the issue of consistency. The FPP has made great strides in addressing the issue in recent years with specific continuous training on the recognition of violations and the establishment of standardized language in citing violations. Additionally, the FPP staff members developed a comprehensive violation and corrective text library for the computerized inspections which standardizes the nomenclature sanitarians use on inspection reports. Supervisory oversight was enhanced with the development of an internal policy calling for a prescribed number of field evaluations and field audits. Nevertheless,

examples of inconsistency are still occasionally identified during managerial overview of field activities.

FPP staff members expressed an interest in participating in a formal standardization; therefore, in early 2008, CPH requested assistance from the two state agencies with oversight of the FPP, ODA and ODH, to develop a process for the standardization and certification of CPH's FPP field sanitarians. It was based on the current FDA Model Food Code, the FDA Standardization Procedures, as well as a more refined focus on foodborne illness risk factors. A series of meetings were held with representatives of both state agencies to discuss how the FPP staff might be evaluated by the three FDA-certified Training Standards employed by ODA and ODH. Since there are only three FDA-certified Training Standards from the two state agencies, and the leadership of the FPP wanted all qualified Candidates to complete the standardization process, the logistics of implementation needed to be developed. As the planning meetings progressed, the concept of developing a pilot project with the State of Ohio to develop a model that could be replicated across the 130 local health departments in Ohio began to take shape. Currently, both the ODA and ODH perform surveys of each local health department in the state every three years in order to determine compliance of the program. The current survey program is long and arduous, straining the resources of both state agencies. The surveys, among other parameters, encompass taking each FPP sanitarian out in the field for four inspections to observe proficiencies. The survey of a large health department, such as CPH, can easily take three weeks to complete. Each state agency conducts separate surveys, so the process is arguably redundant. As the concept was further discussed in the meetings, the belief was expressed that the pilot project could be refined and replicated across the state. If the FPP staff of a local health department had achieved standardization certification, there would be no need to complete a field evaluation component during the surveys - by far the most time-consuming aspect of the agency audits. A "win-win" outcome between the State of Ohio and local Ohio health departments could result. After those initial meetings, it was decided ODA and ODH would meet privately to develop the criteria for the pilot project.

After numerous planning sessions between the two state agencies, state program directors met with the management of the CPH FPP to introduce the pilot program and receive feedback. The plan was enthusiastically embraced and implementation began at once. The ODH and ODA generously agreed to provide

the standardization and certification opportunity to the four sanitarian coordinators, one supervisor, and one field sanitarian, who would in turn train and certify the rest of the FPP staff who qualify in the standardization process over a six-month process. Under the criterion established by ODA and ODH, a sanitarian must first qualify for candidacy by fulfilling training and experience requirements. Those requirements include holding the RS credential with the Ohio Board of Sanitarian Registration, having at least one year of fulltime experience in a food safety program within the last three years, and having conducted at least 100 inspections of RFEs or FSOs within the same time period. ODA and ODH Training Standards previously standardized by FDA Regional Food Specialists begin the pre-standardization process with a joint orientation and classroom exercise with the cohort. The full-day classroom component addresses what to expect in the field exercises. The forms to be used in the field inspections are introduced and principals of standardization and what it attempts to achieve are learned. Finally, the classroom exercise will test the Candidate's knowledge of HACCP and its application. The Candidate must prepare a Process Flow Chart identifying Critical Control Points and only two errors are permitted. The subsequent standardization process that follows and encompasses two days in the field is not a training exercise, but a test of the ability of the sanitarian to perform knowledgeable and effective inspections. The standardization process requires the Candidate to take the lead on six non-regulatory inspections chosen by the Training Standard at random that includes Risk Categories III and IV and one that serves a highly susceptible population. Additionally, the Candidate must prepare a Risk Control Plan for two of the establishments chosen by the Training Standard and only one error is permitted. The field performance areas include demonstration of knowledge of the OUFSC, the ability to interpret and apply it, and provisions related to interventions and risk factors that are associated with foodborne illness. Additionally, the sanitarian must have and be familiar with the equipment essential for inspections. The Candidate must finally demonstrate the ability to effectively communicate with the PIC and be able to explain significant inspection findings on a pass-fail basis. Upon successfully achieving the required level of 90% agreement on CDC-identified risk factors, 80% agreement on good retail practices or non-critical violations, 80% agreement in comparison to code references, and the aforementioned communication requirement, the Candidate will be issued a certificate from both state agencies. The pre-standardization process for the six initial staff members began the first week

of March to coincide with the effective date of the changes to the OUFSC, which brings the OUFSC in

conformance with the 2005 FDA Food Code and the 2007 Supplement to the 2005 FDA Food Code.

Standardization is a fundamental step that will result not only in the prevention of foodborne illness but also a more uniform application of the OUFSC.

ISSUES/CHALLENGES, OBJECTIVES & METHODS

CHALLENGE: STREAMLINING ENFORCEMENT & COMMUNICATING RISK

Objective: The SIGNS Public Information Initiative evolved from the

FPP's identified need to streamline our enforcement process and better

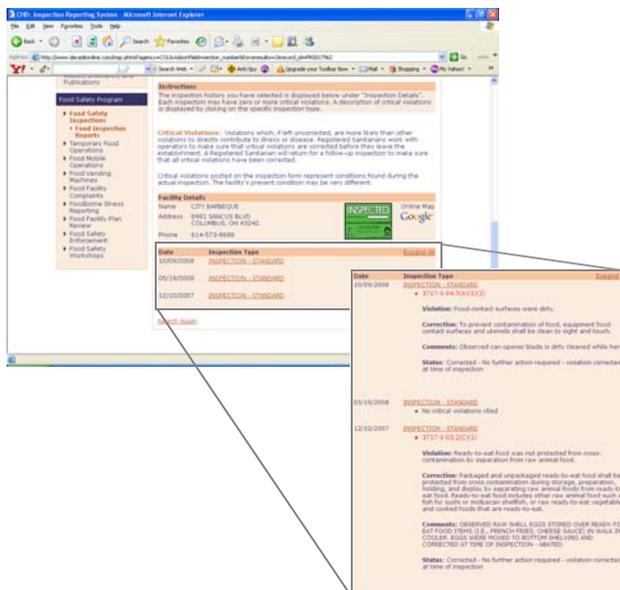
communicate risk to our community. The FPP needed to better educate our licensees and the general public on

these important changes to the OUFSC, and communicate the process and related risk factors in order to

increase compliance and, thereby, reduce the occurrence of these risk factors at our licensed facilities.

Methods: Since the adoption of the new code the CBOH experienced a marked increase of cases

involving licensed food facilities being brought before them for action against their licenses. The media



coverage of the enforcement hearings during the CBOH

meetings intensified, and our board members were anxious to

expedite the process, while fostering public disclosure of

compliance and enforcement activities. The EH Division was

already pursuing plans to post inspection results on our

website. This included acquiring new features from Decade

Software's Envision program called Press Agent that

automatically capture data from Envision and post it to our

website. The last objective involved researching public

information disclosure systems and developing best practices to implement a new disclosure system in

Columbus. The ODH was concerned about the negative aspects associated with the scoring and grading of

restaurants, especially since Ohio had ceased including a score as part of the inspection process in 2001. Ohio

now uses a risk-based inspection program which focuses on the correction of critical violations, and provides a more accurate representation of the condition of the food facility and its food handling processes. A placarding system based upon a single inspection, which is really just a snapshot in time and place, could also be



inaccurate, which defeats the purpose of a public disclosure initiative. FPP leadership had always believed the public had a right to know when a licensed facility entered into enforcement, and were already posting the information concerning CBOH actions on the CPH website. It was felt a system based upon a single inspection did not present residents and visitors with a true reflection of any risk associated with their patronage. Finally, the placarding

system should provide an incentive for correcting critical violations within a proper time frame. A public disclosure system needed to accurately represent information regarding compliance and enforcement activity on the placards. Our research demonstrated it should be a color-coded, low-literacy system that could be easily understood by the public, so there was an attraction to “traffic light” colors, first used in Toronto, since they are universally recognized. Eventually, a fourth color was selected to denote facilities on an increased frequency of inspection after coming off a license suspension. The plan reflected our enforcement protocol and allowed for

due process, since a facility would continue to keep their green sign until it actually entered the enforcement process. The plan called for a dated green sign for “Inspected” which indicates a standard inspection took place and either no critical violations were cited, or there were violations cited with a follow-up

inspection scheduled. A second follow-up inspection may only be scheduled at the discretion of the supervisor. If the facility remains noncompliant, after follow-up inspection(s), the owner of the facility is called in to a pre-hearing conference, and a yellow sign is posted to indicate the facility has entered the enforcement process. If a subsequent follow-up inspection confirms the critical violations have been corrected, then the yellow sign is removed and the green sign restored. If little or no progress has occurred, the yellow sign remains posted, a legal notice of violation is issued, and the facility is

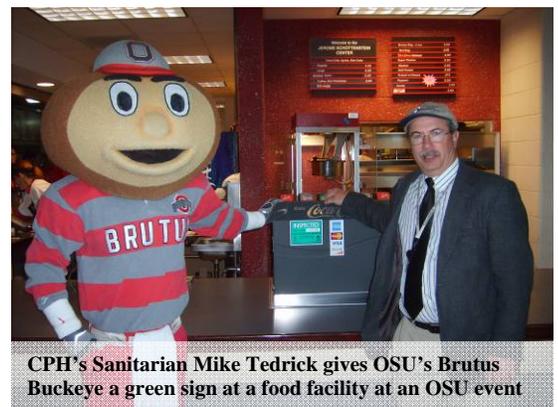


scheduled for a formal hearing before the Hearing Officer. Upon a CBOH order of suspension, the yellow sign is removed and the red “Closed” sign posted. When the facility is allowed to re-open under the increased frequency of inspection proviso or if the CBOH did only required increased monitoring in lieu of suspension, a white “Inspected” sign indicating the facility is scheduled for a required follow-up inspection is posted. In the event a facility has uncorrected critical violations during the increased frequency of inspection, the white sign is replaced with the red sign and the facility is closed until the violations are corrected. After the period of increased frequency of inspection has passed, the white sign is replaced with the green sign and the next standard inspection would take place as scheduled. A detailed enforcement [flow chart](#) may be found in the [SIGNS Standard Operating Procedure](#).

The FPP maintains a very strong relationship with our CFSAC, which is an industry-affiliated group. While initially there were mixed feelings about SIGNS, the FPP was able to provide them with literature gathered during our research that made compelling arguments for public disclosure, including a study of the Los Angeles five-year placarding outcomes published in the March, 2006 *Journal of Environmental Health*. The CFSAC agreed to support the initiative, but were adamant they be given a major role in the development of operating procedures. The CFSAC proposed professional-looking, unobtrusive durable plastic signs which could be updated to reflect the new inspection date. Another outcome of the collaboration with the CFSAC is the protocol for yellow sign placement can only be made at the supervisory level and the sign is taken to the facility by a sanitarian coordinator or a supervisor, instead of the inspecting sanitarian.

Before the enabling local legislation was crafted, meetings

were held with the Directors of the ODA and the ODH, who both supported the concept and one suggested it could be used as a pilot for a possible state-wide program. After consulting with our city attorneys, and both of the aforementioned state agencies, the decision was made to expand the public disclosure initiative to all licensed EH programs including swimming pools, manufactured home parks, body art facilities and campgrounds. The CBOH is empowered to promulgate law in the Columbus City Health Code. The legislation



was drafted and, after two public hearings, was passed by the CBOH in January 2007. Concurrently, a marketing campaign was developed to introduce the system to the local media, the foodservice industry and the public. A subcommittee was formed from the CFSAC to help develop content for the public information meetings. Fourteen industry specific educational forums were held after the passage of the legislation in cooperation with the Central Ohio Restaurant Association. Of those, three were co-sponsored by the Ohio Chinese Restaurant and Business Association and were conducted in Mandarin, three were held in Spanish, and another in Somali. The final educational forum was conducted as a part of the annual Sysco Food Show.

The Healthier, Safer People Honor Award was concurrently created with the SIGNS initiative to recognize facilities that performed above the criterion established for the green sign. Criteria for this higher



standard were developed for food facilities in collaboration with the CFSAC.

Subsequently, criteria were also developed for the remaining licensed EH programs

as detailed in the [SIGNS Standard Operating Procedure](#). For the 2007 award, 150

licensed food facilities qualified by having no critical violations cited that required

follow-up inspections, providing documentation of food safety training for management or staff, paying all license fees on time, having no substantiated smokefree violations, and being in good standing with other city departments. The criterion for the award is structured to encourage continued and increasing levels of education in subsequent years.

The SIGNS Public Information Initiative was made public on May 29, 2007 by Columbus Mayor Michael B. Coleman who personally gave out the first green sign immediately after an inspection at a popular downtown restaurant. Since that time, the SIGNS initiative has also been enacted in our contracted



jurisdiction, the City of Worthington. Initially, Worthington opted out of the SIGNS program because adjoining suburbs would not be participating. In viewing the success of the program within the City of Columbus, the Worthington City Council voted to pass the initiative on April 21, 2008, and the first green sign in Worthington was posted on May 15, 2008. Worthington's SIGNS initiative mirrors Columbus' SIGNS initiative exactly,

except for the city logo printed on the sign itself.

CHALLENGE: IMPLEMENT CUTTING-EDGE TECHNOLOGIES IN THE FIELD OF FOOD SAFETY

Objective: Increase productivity and enhance the inspection process by decreasing hand-written paperwork and data entry, and improve the standardization of report language. With less time spent on hand-written reports and data entry, the staff members can focus more time on education and guidance in the field in order to reduce the occurrence of food safety risk factors at licensed facilities.

Methods: Since there were only two computers in the entire FPP prior to 2002, CPH made a strong commitment to embrace technology. Today, the FPP is on the cutting edge of environmental health delivery due to the aggressive use of advanced technology. CPH was the first EH agency in Ohio to use tablet computers for all food safety inspections and is now in the fourth year of that acquisition. However, one of the most difficult challenges in sustaining that advanced technology level is the cost associated with replacing the tablet units when city government is facing severe budgetary constraints. The tablet PCs were first introduced in 2005, and training continued throughout the year. An initial group of six sanitarians were trained on the tablet PCs for two months, who then served as trainers for the rest of the staff. This gradual phase-in of the technology was useful in trouble-shooting any potential difficulties with the technology or with standard operating procedures regarding its use. A written protocol was also developed for that training. Plans continue for updates in technology in order to better serve our licensees. Currently, the entire EH Division is migrating to Decade's web-based EnvisionConnect, and in a second phase will utilize the broadband wireless capability of the new system. Additionally, the FPP is taking the necessary steps to allow for a dramatic reduction in paper use by providing PDF format reports electronically. When necessary, reports will be printed on new lighter thermal printers. The new methods of report delivery will reduce costs, and decrease the amount of paper generated daily from inspections. Eventually, the new report delivery system will also eliminate the need to file paper reports in our office, which complies with the city's "Go Green" environmental initiative.

CHALLENGE: LANGUAGE & CULTURAL OUTREACH

Objective: Communicate food safety issues and proper food handling practices to the culturally diverse food service industry in our jurisdiction. With an increased knowledge of food safety practices and guidelines,

we anticipate a reduction in the occurrence of food safety risk factors at our licensed facilities.

Methods: In order to overcome cultural and language barriers, CPH instituted an outreach program that involved both the written translation of food safety materials and the hiring of bilingual staff members to educate and train food service workers. The outreach program was fully implemented when the increased enforcement activity caused major concerns, especially in the Asian community. Because of the misconception that Asian restaurants were being targeted for enforcement, FPP established a steering committee to develop a working relationship and form a better communication pathway between the Asian community and the FPP. The goals of this intervention initiative were to improve food safety practices of operators and employees of Asian restaurants and to provide training on Asian languages, culture, and cooking styles utilizing the bicultural food safety sanitarian at CPH. This intervention initiative ultimately resulted in the formation of the Asian American Commerce Group, which partners with CPH to promote and enhance food safety in Columbus.

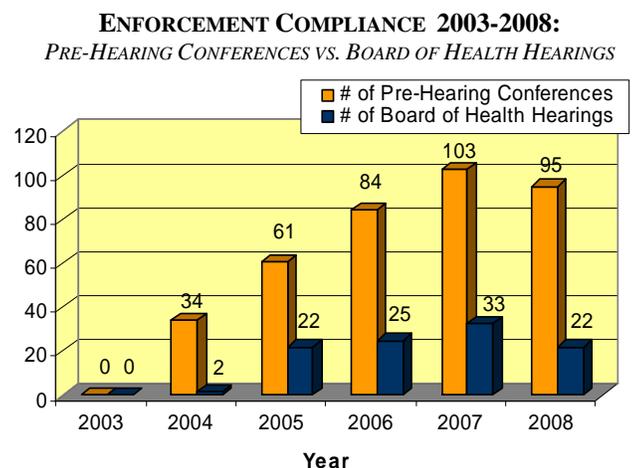
MEASURABLE OUTCOMES & ACHIEVEMENTS

Reducing foodborne illness-related risk factors is the cornerstone of the program and a key component is providing licensees with proper food safety knowledge through education and outreach. As with any food safety program, we track the compliance rate of our licensed facilities. Through the

Envision application, the FPP tracks various data, allowing the analysis of the program and the identification of strengths and weaknesses. SIGNS together with the transparency of web-posted inspection results have most notably resulted in the increased compliance at the pre-hearing stage of the enforcement process. Operators have responded to the knowledge that the public is aware of inspection data, and seek to avoid the enforcement process and the accompanying “dreaded” yellow sign.

PROGRAM SUSTAINABILITY

The effect on local governments across the United States from the current global economic crisis has



been profound. Our city is going through the most difficult economic period of our lifetimes. Every day we are faced with more bad economic news: financial markets in a tailspin, unavailability of credit, companies laying off thousands of employees, a stagnant housing market as vacant and abandoned buildings multiply, and soaring bankruptcies and foreclosures. The number of program cuts and layoffs for local and state governments are increasing daily. Through sound fiscal policies, Columbus remains the only one of the 25 largest cities in the nation to maintain a Triple-A bond rating from both Moody's Investors Service and Standard & Poor's, yet Columbus is not immune from the economic downturn and the State of Ohio has been one of the hardest hit. President Obama mentioned Columbus governmental layoffs during the signing ceremony of the American Recovery and Reinvestment Act of 2009 on February 18th in Denver. Our city is an open community that values diversity and nurtures innovative ideas. Columbus will get through this crisis, and we will come out of it a better city. A balanced city budget is required by law and CPH has felt the pain of reductions - the EH Division has suffered an 18% reduction during the last fourteen months. Despite these losses, the FPP has remained fully staffed during the current economic downturn, by transferring sanitarians from other EH programs to fill the fee-supported vacancies. Since food protection is paramount to the vision of CPH, is the most visible program in the CPH organization, and generates two million dollars in licensing revenue, the commitment has been made to sustain the FPP - even as other program elements in the EH Division suffer reductions. The fee-based funding mechanism through the Ohio Cost Methodology system is solid and will continue to generate revenue in direct proportion to the number of licenses issued in the jurisdiction.

The technological progression to Decade Software's newest web-based iteration of their product is exciting, and ultimately, EnvisionConnect will enable the FPP to be even more efficient and effective and enable staff members to use their tablets entirely in a wireless mode resulting in an increase of productivity. All EH tablet computers will be replaced over the next two years with replacement costs already budgeted.

Our remarkable progress over recent years has resulted in an outstanding food protection program. We are committed to providing excellent food safety education to the industry, enforcing the OUFSC in our jurisdiction, being prepared for food supply emergencies, and affording our residents and visitors with timely and accurate information - empowering them to make *healthier, safer* choices.