

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 23, 2014 3:10:34 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 23, 2014 2:29 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 23, 2014 - 14:28

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Rick

Last Name: Ramirez

Title: Intergovernmental Relations Manager

Organization you are affiliated with: City of Sugar Land, Texas

City: Sugar Land

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: The City of Sugar Land strongly opposes the Sunset Advisory Commission's recommendation to discontinue the Code Enforcement program of the Department of State Health Services (DSHS). This program is important to the City as all ten (10) of the Code Enforcement Officers in the City of Sugar Land are licensed through the Department of State Health Services. In reference to Issue 3 of the Sunset Advisory Commission's Staff Report, state regulation of this occupation does not "merely prohibit the use of the title" by those not properly licensed. It sets minimum education requirements regarding State statutes and requires officers to remain informed of ongoing legal issues through documented continuing education hours. Code Enforcement Officers support and even enhance the quality of life within communities. In many cases they are the first line of defense in dealing with issues such as self-neglect and hoarding which is sometimes seen with elderly, disabled, or mentally ill individuals. Furthermore, studies have shown that communities with areas of blight and deterioration will see a gradual increase in crime and a decrease in property values. Proper training and certification of Code Enforcement Officers is vital in effectively accomplishing the goal of providing residents with a safe and healthy environment in which to live and thrive. This is a goal that is shared by municipalities, counties, and the State alike. Deregulation of this occupation would be doing the residents of Texas a great disservice. The City recommends to either continue this program through DSHS or to move this program to the Texas Department of Licensing and Regulation with similar professional requirements and continuing education.

Any Alternative or New Recommendations on This Agency: The City recommends to either continue this program through Department of Safety Health Services or to move this program to the Texas Department of Licensing and Regulation with similar professional requirements and continuing education.

My Comment Will Be Made Public: I agree

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, June 24, 2014 3:58:01 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 24, 2014 10:15 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 10:15

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Rick

Last Name: Ramirez

Title: Intergovernmental Relations Manager

Organization you are affiliated with: City of Sugar Land, Texas

City: Sugar Land

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed:

High volume food processing and preparation operations have increased the need for improved sanitary practices from processing to consumption.

Inexperienced food service workers who have received little or no training have been given sanitation tasks. These workers should have knowledge about safe food receiving, storing, preparing, handling, cooking, and reheating. Presently, this is being accomplished thru the licensing programs for Certified Food Manager and Food Handlers.

The education and certification of food handlers provides more qualified employees, thereby reducing the risk of foodborne illness outbreaks caused by improper food preparation and handling techniques. Many uncertified food handlers simply do not have the proper training related to cross contamination, cooking and holding and storage of food.

The Certified Food Manager licensing program educates food service employees about preventive measures to protect consumer health and includes practices and procedures which effectively control the introduction of pathogens, chemicals and physical objects into food. It further establishes five (5) key public health interventions to protect consumer health. Specifically, these interventions are: demonstration of knowledge, employee health controls, controlling hands as a vehicle of contamination, time and temperature parameters for controlling pathogens, and the consumer advisory.

Epidemiological outbreak data has repeatedly identified five major risk factors related to employee behaviors and preparation practices in retail and food service establishments as contributing to foodborne illness: improper holding temperatures; inadequate cooking, such as undercooking raw shell eggs; contaminated equipment; food from unsafe sources; and poor personal hygiene.

The Staff Report prepared by the Sunset Advisory Commission stated that both the Certified Food Handlers and the Certified Food Managers programs are “also provided regulation by another state or local regulatory program or private section accreditation”. Although specifics were not offered as to why this was decided, it is important to note that while national food chain restaurants require extensive training and have high standards for sanitation, local small scale establishments may not. Local food inspectors and other programs geared towards identifying violations do not proactively ensure that food handlers and managers have the proper training in order to carry out these important public safety tasks. It is through the Certified Food Manager and Food Handlers programs that a standard can be set that is identifiable and that can ensure public safety. The importance of these programs provides safeguards to public health and provides food to consumers that is safe, unadulterated, and honestly presented.

Any Alternative or New Recommendations on This Agency: The City of Sugar Land recommends that the Certified Food Manager and Certified Food Handler programs be continued through DSHS or transferred to the TDLR.

My Comment Will Be Made Public: I agree