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March 3, 2011

The Honorable Terry E. Branstad
Office of the Governor
State Capitol
1007 East Grand Avenue
Des Moines, Iowa 50319

SUBJECT: Food Establishment Inspection Frequency
POSITION: No Reduction

Dear Governor Branstad:

The National Environmental Health Association – which represents the interests and expertise of the environmental health profession across our nation – encourages you not to allow the Iowa Department of Inspections and Appeals, the agency that administers Iowa’s food protection program, to switch to a risk-based inspection schedule that decreases the number of inspections at high-risk facilities from once every four months to one every six months and from twice a year to once a year for medium-risk establishments.

In 2011, the U.S. Centers for Disease Control estimates that about 1 out of 6 Americans (or 48 million people) will contract foodborne illness, 128,000 will be hospitalized, and 3,000 will die from it. Applying CDC’s estimates to Iowa’s 3,000,000 people, in the coming year over 400,000 Iowans will get sick, over 1,200 will be hospitalized, and 30 will die of foodborne disease. In addition to the health toll, these illnesses will result in huge economic costs, including medical care and lost wages, and result in decreased productivity in the workforce and thousands of lost school days. With impacts like these, it is paramount that governments make food protection a top priority. The recent passage of the Food Safety Modernization Act by Congress would seem to bolster state and local resolve to partner with the federal government to reduce this largely preventable plague on society. To learn of what is being proposed in Iowa, reducing the frequency of food inspections at restaurants and grocery stores is deeply disconcerting.

FDA guidance on inspection frequency, as published in the FDA Model Food Code, recommends inspection frequencies ranging from 4 times per year for the highest risk settings (nursing homes, hospitals) to once per year for the lowest risk food establishments, such as convenience stores selling prepackage foods. These inspection frequencies have been set based on guidance provided by both the food industry and state and local food safety regulatory agencies.

Iowa should not be considering stepping backward in protecting the health of the Iowans from foodborne illnesses caused by contaminated food. Decreasing the inspection frequency will almost assuredly result in a reduced compliance with food safety regulations, thereby putting the public at greater risk of illness. The National Environmental Health Association urges you to direct the Iowa Department of Inspections and Appeals to maintain the current frequency of inspections for food service operations and retail food establishments.

Very truly yours,

Keith L. Krinn, RS, MA, DAAS, CPHA
President

cc: Iowa State Legislature
Eric Bradley, REHS, CP-FS, President, Iowa Environmental Health Association