



January 18, 2023

Janet Woodcock, M.D.
Principle Deputy Commissioner
Office of the Commissioner
Food and Drug Administration

Erik Mettler
Assistant Commissioner for Partnerships and Policy
Office of Regulatory Affairs
Food and Drug

Dear Dr. Woodcock and Mr. Mettler;

We are pleased to submit this correspondence which outlines how the National Environmental Health Association (NEHA) can assist the FDA with the recommendations outlined in the Reagan-Udall Foundation report. We represent almost 7,000 governmental and private sector environmental health professionals throughout the U.S., our territories and people in the uniformed services. We are the profession's strongest advocate for excellence in the practice of environmental health. Our mission is to build, empower and sustain the environmental health profession. We achieve this through the provision of quality training, continuing education, and credentialing to our members and environmental health profession.

NEHA supports the recommendations of the Reagan-Udall Foundation to improve our nation's food safety system. We are prepared to assist FDA in its efforts, through our network of state, local, tribal, and territorial food safety officials who will be responsible for implementing changes to FDA's food safety system, through our credentialing programs, our training of the food safety workforce, through the data we possess on the retail food safety workforce, and through our relationships with other associations that promote food safety.

Our recommendations will focus on three (3) key recommendations where we are able to assist FDA to enable it to achieve the goals of the report – working with the State, Local, Tribal and Territorial workforce the US Food Safety System, Personnel and Workforce, and Financial within FDA's Food Safety Resources.



NEHA's resources to support the recommendations of the Foundation's report

1. Regarding the US Food Safety System Structure

- A new Foods Advisory Committee, at the Commissioner-level, should be established to strengthen external input to Human Foods Program activities.
[Recommendation/Structure6]

Our Association represents the second largest workforce in public health – the environmental health workforce, making it the largest single workforce performing food safety in this nation. NEHA's membership represent the state, local, tribal and territorial (SLTT) food safety officials. SLTT officials implement most food safety inspections, throughout the human and animal food regulatory sphere. Most enforcement actions are performed by SLTT agencies, under SLTT authorities. Retail food and manufactured food operations rarely interface with FDA or any federal agencies; they primarily deal with the SLTT food safety inspectors and officials.

NEHA can offer FDA direct access to SLTT food safety inspectors, administrators, and agencies. This access will allow FDA to share its reorganization plans, as well as hear directly from the members of the workforce most directly involved in the implementation and administration of the nation's food safety system. We have observed over time that locals are frequently overlooked when important decisions are made, and policies are developed. The authors that developed Reagan-Udall report are an example.

2. Regarding the FDA Food Safety Resources

A. Personnel and workforce

- FDA should secure the agile hiring authorities and salary flexibility of the 21st Century Cures Act to improve its ability to recruit, hire, and retain personnel with the needed skills to effectively meet its public health mandate around food. FDA should also work with OPM to develop solutions to facilitate hiring professionals matching the Human Foods Program's needs. [Recommendation/Resources1/ (Also in Authorities)]

NEHA has long acknowledged the difficulties in hiring a qualified environmental health workforce with a knowledge of food safety. We have supported additional resources and recognition for the workforce, including credentialing, internships, and workforce data.

NEHA supports the credentialing of the environmental health workforce. We manage the Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS) credential (which addresses food safety), the Certified Professional-Food Safety and the two NEHA credentials created through a cooperative agreement with FDA – the Certified in Comprehensive Food Safety (CCFS) and Food Safety Auditor (RFSA). These credentials are recognized in most states, in most of the territories and in the District of Columbia.



SLTT environmental health programs carried out by Registered Environmental Health Specialist/Registered Sanitarians (REHS/RS), as well as other credentialed personnel, serve to prevent illness, injury, and death. Credentialed personnel within these programs work to improve the health and quality of life of people living in their communities. Their services prevent adverse health outcomes and help communities prepare for, respond to, and recover from disease outbreaks and disasters.

NEHA possesses extensive experience in conceptualizing, creating, and implementing workforce capacity building programs. First, we sponsor internship programs - developing students seeking a career in environmental health by providing two types of academic internship programs and a working committee that focuses on student engagement in the environmental health workforce.

Second, NEHA has strong alliances with universities and school of higher learning focusing on food safety. We have a strong presence in the accreditation systems for the Council on Education for Public Health (CEPH) and Association of Environmental Health Academic Partners (AEHAP). These are the premiere public health oriented academic environmental health bodies in this country.

Third, our Association publishes more peer-refereed research on retail food safety and environmental health than most other public health oriented Associations. Additionally, we publish the [Journal of Environmental Health](#), which is the go-to source for current issues in the profession for science, practice, and the practitioner. In addition, we successfully secured input from almost 2500 retail food practitioners on their training needs in a national survey which was completed in December 2022.

B. Personnel and workforce

- To further expand its utilization of state capabilities, FDA should move to a stronger, more cooperative relationship with states and other local authorities. [Recommendation/Resources2]
- FDA should expand staff engagement in outside conferences. [Recommendation/Resources3]
- FDA should develop and implement a strategic plan for a robust competitive external research structure. [Recommendation/Resources4]

One of NEHA's strategic pillars is thought leadership. We publish the Journal of Environmental Health. Our members and staff are active contributors to journal articles focusing on retail food safety and the targeted workforce. We can assist FDA in the identification of priority research areas with an emphasis on translation research – research findings that can be adopted and scaled up by the practice community, as well as performing research on the food safety workforce.

NEHA sponsors the foremost conference for the environmental health workforce – its [Annual Education Conference \(NEHA AEC\)](#). The NEHA AEC is the single largest gathering of



environmental health practitioners, providing FDA access to thousands involved in the food safety workforce.

Finally, as noted above, we have the staff, resources and ability to perform research to gather data and analyze measures to improve the efficiency and effectiveness of the food safety workforce.

3. **Financial**

- FDA should give the highest priority to the formulation of an appropriations strategy that begins with a well-defined agenda and a clear case for why increased Program funding is necessary. [Recommendation/Resources6]
- In addition, while the Panel recognizes that prior efforts have been unsuccessful, FDA should actively engage stakeholders to explore additional mechanisms for industry support of the Human Foods Program. [Recommendation/Resources7 (Also in Authorities)]

NEHA can assist FDA through its efforts in Congress, its state affiliates and its network of associations. We host an annual Hill Day, where our Board of Directors meet with Congressional Appropriators to advocate for FDA's food safety budget. Our [41 state affiliates along with the territorial affiliates, business and industry, and Uniformed Services affiliates](#) also communicate on federal food safety activities and funding with Congress and federal officials.

NEHA works alongside with its food safety partner associations, including the Association of Food & Drug Officials (AFDO), the Association of State & Territorial Health Officials (ASTHO), the National Association of City & County Health Officials (NACCHO), the Association of Public Health Laboratories (APHL) and the National Association of State Departments of Agriculture (NASDA). These associations share information on efforts to promote FDA's food safety efforts before Congress. Through this network of national associations promoting food safety, we can share the national overview of this nation's food safety system with Congress and other federal officials to demonstrate the need by the SLTT food safety agencies for FDA's financial resources.



Food safety is a critical public health issue that affects individuals and communities across the U.S. and around the world.

We look forward to working with you and the FDA in implementing the recommendations of the Reagan-Udall Foundation report to improve the nation's food safety system. Please contact Mr. Rance Baker or Doug Farquhar if you have immediate questions. We would also be delighted to speak with you.

In Health,



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