A posted letter grade. A colored placard. A numeric inspection score. The weekly Dirty Dozen on the local news. Each intends to intervene—to prompt restaurant operators to manage their kitchens within the confines of known safe food handling practices. In turn, they work to avoid critical violations, a subpar grade on the window, and the resulting loss of customers and revenue.

This often-debated topic draws strong opinions from consumers, restaurateurs, and health inspectors. Is this intervention more effective than any other? Its critics say it is imprecise: the score only captures a moment in time, a virtual click of the camera's shutter. Its advocates say it's the quickest and most effective way to achieve compliance.

This column, however, is not about the practice of posting grades or placards, or its efficacy. This article is about how local health departments go about developing such a program.

From my unique perspective as a data manager and a software provider to some of the largest local health departments in the nation, I advise and assist health departments as they implement a grading and placarding program for their restaurants.

Each project begins similarly, with dawning awareness. Perhaps a citizen, civic leader, or local news reporter asks, why not us? A conference presentation might catch the attention of a food program manager. The notion grows into discovery—learning what neighboring jurisdictions have done and what works well. Once choices are weighed, there is resolve to pursue it. Resources are allocated. Committees are formed. Meetings held. Work assigned.

But, here's the rub. The implementation, by my observation, is never a direct reproduction of the model. Even in geographically adjacent jurisdictions, the implementation varies, like a copy of a copy of a copy. The formula, the policy, the visuals, the thing must get injected with local flavor. Inspectors are often pulled from the field or consultants hired at great cost, to research, advise, ponder, debate, and design the new program.

Consider the city of Pasadena and Los Angeles County Environmental Health Departments. They share a geographic border and, no doubt, restaurants and commuting citizens routinely cross this boundary without even knowing it. Both jurisdictions start an inspection with 100 points and dock points based on the severity of violations cited. From there, though, the methods start to diverge, from what resulting number counts for what score, to the score itself: LA County issues a letter grade and Pasadena a “pass/conditional pass/closed” placard. Some jurisdictions post a numbered score with pass/
conditional pass/close placard, and others use different phrasing (“consumer alert” instead of “conditional pass”) or different colors (blue instead of yellow).

What accounts for these customizations and do they deliver a measurable improvement over any other? Are consumers experiencing foodborne illnesses at a reduced rate due to the nuanced differences across the freeway?

In some cases, the agency chooses to put its own “stamp” on the project, so that it can be better defended ahead of detractors. In others, local politics rule. For example, councils in Champaign-Urbana, Illinois, and Allegheny, Pennsylvania, rejected letter grading after several false starts and debating the topic for years and $75 per hour for a consultant to study the issue for three months (http://tinyurl.com/nczb5gc), with one council member quoted as saying, “I’m not convinced this proposal increases food safety.”

At a minimum, regions should work together and expect a common standard. I understand that the state of Hawaii and at least five counties in California have all adopted Sacramento County’s placard (Figure 1), which was a major factor in Sacramento County earning the Samuel Crumbine Award for Excellence in Food Protection in 2008 (http://tinyurl.com/o9bw29). I applaud these programs and hope to see this well-developed brand spread.

Here’s our call to action. Imagine a situation where a County Board of Supervisors is presented with a vetted, science-based standard published by a nationally recognized and respected environmental health organization. We need a standard that would guide the program manager or director through every step of implementation and presentation. This package would arguably carry a great deal more weight in convincing stakeholders of the best approach—the research has been done, the design is complete—add your county seal here and go. Most importantly, the cost should be minimal and the impact the same.

By this column, I call upon NEHA, its members, leaders, and staff, to develop and present this standard, entirely compatible with the Food and Drug Administration Food Code, by which a health department can quickly and efficiently launch a grading or placarding program. The scoring method and placard design should be professional, defensible, and specific—let us settle the questions of simple math once and for all and embrace a brand.

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An Example of a “Pass” Placard

![Pass Placard Image]

Figure 1

The Journal is always looking for your feedback! We want to know what you like (or don’t like) about each issue. Submit any feedback to jeh@neha.org.

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