

DAVID J. STEIL, MEMBER  
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*House of Representatives*

COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

Original: 1858

Harbison

cc:

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August 13, 1999

Mr. Robert Nyce  
Mr. Jim Smith  
Mr. John McGinley  
PA Independent Regulatory Review Commission  
333 Market Street - 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Final Form Regulation, PA Dept. of Agriculture  
PA Food Employee Certification ID No. 2-107, 7 PA Code Chapter 76

Gentlemen:

It has come to my attention that the American Food Safety Institute has requested a revision to the above regulation to set the state minimum training standard for food employee certification at 8 hours, instead of the currently proposed 15 hours. I am writing to express my support for the revision.

The spirit and intent of this regulation is to reduce the risk of foodborne disease to the public by ensuring that at least one person at each food service establishment has received basic food safety education and passed a Department-approved examination. If this goal can be met in 8 hours, as the experience of many US health jurisdictions, AFSI and the National Grocers Association has shown, then we should not impose greater costs of compliance on industry in the form of 15 hours of classroom training.

Furthermore, since health departments which inspect most of the food service establishments in PA (Bucks, Philadelphia, Allegheny and Chester counties) already accept the 8-hour standard, it is unfair to penalize businesses in these counties by passing a Department-approved examination.

For these reasons, I ask that you revise the regulations to include a minimum standard of 8 hours for food employee certification. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'David J. Steil', written over a large, stylized flourish.

David J. Steil  
Representative 31<sup>st</sup> Legislative District