

**Responses to Survey - Board of Sanitarians**

Total responses: 83 (of which 2 out-of-state)

<p><b>Highest Compliment</b></p>	<p><b>Ability to monitor on behalf of licensees</b> - 51  <b>Ability to keep profession from criticism because of bad actors</b> - 20  <b>Other:</b> it defines a set of standards that an individual must meet in order to do a job. - Ability to require consistent high standards of education, training, requirements and professionalism in the whole state as to citizen protection and environmental protection. - Good communication. - That the Board licensing my profession continues to exist, and has not been rolled into or combined with another</p> <p><b>Ability to streamline Continuing Ed</b> - 10  <b>None</b> - 13</p>
<p><b>Biggest Complaint</b></p>	<p><b>Licensing fees too high</b> - 52  <b>Licensing renewal timelines too strict</b> - 1  <b>Other:</b> Licensing fees are high for our small professional group. But the DOLI charges only what is needed to cover costs. - We have too few members to make our license fees reasonable. - The board is not easy to work with nor are they prompt in their responses. We don't really get a service for the amount of money we pay and the credential and training that is expected considering the salaries out there. It's insane that we pay more to work than the places we inspect pay to operate. - They are totally disorganized. -- Fee trend is up. - The process to obtain your license is too lengthy and expensive and some parts are simply unnecessary. - Not clear what our board does, nor how they spend our money, as they do a poor job of informing the folks they license. I'm sure there is good work there, but it isn't clear what they specifically do. Having more information about their activities might help alleviate this. - No access to budget to see where fees go! - It's unclear how the 100s of dollars in licensing fees I pay to the Board benefit me in my occupation. - I see no professional benefit, there are personal agendas and seems to be a forum to grind old axes. - Microbiology requirements keep fluctuating for new applicants - transfers from other states have issues.</p> <p><b>Lack of Information</b> - 3  <b>Board's response to unlicensed practice</b> - 6  <b>Regulations too strict</b> - 1  <b>None</b> - 19</p>
<p><b>Other reasons the board is important:</b> - We benefit as a society by having higher standards for professionals than states that do not have the same high standards. It helps protect the public, the taxpayers and our children into the future if we maintain a higher standard. This helps our state protect the investment that the citizens make to meet those standards and avoids the deterioration of our infrastructure. Health, safety and environmental protection is not supposed to be a disposable concept without careful thought of the consequences. -- The role of the board is to maintain a high standard to protect the Montana public and public health from untrained and unprofessional practices. Sanitarians and Public Health Nursing are the two arms of public health practice. Both are currently professionally licensed in Montana and must remain so licensed to assure the public of high standards. The National Voluntary Accreditation Standards for public health are aimed at maintaining or improving a high standard for the public health workforce. Montana must remain one of those states that has established high standards for our public health workforce. Professional licensing is one aspect of achieving that standard. -- It defines a set of standards that an individual must meet in order to do a job. -- The standard for Registered Sanitarians should remain as is; we should have a licensing requirement. It is very important when performing tasks such as wastewater permitting/land use, conducting public water system inspections, restaurant inspections, general EH (environmental health) complaints, air quality compliance, etc., that qualified people are doing these jobs. Without a registration the professionalism of EH specialists is at risk for being lost. I think it is important that there is a high standard for becoming a registered sanitarian as well as requiring ongoing CEU's. In some cases, the general public already does not care for government employees; having a minimum standard of qualification to do our jobs is just another means to say that we ARE qualified professionals. Allowing a nonqualified person to do what EH professionals do seems wrong and would lower standards, which is not the direction our profession should be going. -- We need to keep a high standard of education and performance for the protection of public health and welfare. Sanitarian positions are critical in that they are the "boots on the ground" front line for public health issues. The board helps to maintain professionalism in the environmental health field. This results in the best team available to protect the public health and safety of Montana's citizens. Having worked in four different counties in Montana over the past 10 years, I can see the level of professionalism has been raised up since the early 1970's. People look to us and depend on us to give them good answers to food safety, onsite wastewater, well care, indoor air quality, outdoor air quality, hantavirus, rabies, q-fever, and a myriad of other environmental health questions. - The protection of public health is the highest concern. Sanitarians must be absolute professionals and highly educated and trained to ensure the general public health is protected. People should not have to worry if their next bite of food or next drink of water will make them sick or that the environment in which they live is contaminated. -- Provides an added level of professionalism to the certification. (continued next page)</p>	

**Other reasons board important (continued):** -- The fact that we have a professional license gives credibility to our profession. The mandatory CEUs, Board oversight and methods for taking action on those operating without a license give the profession an important distinction from nonlicensed professions. It gives us a comparative standing with other public health professionals. Without this, our profession has the potential to lose the training requirements and the level of service that we provide that may result in people becoming ill. Ours is a prevention profession. So our success is in measuring what doesn't happen. - I believe it is important for environmental health practitioners to be licensed and national organizations offer licensing process. It has become too expensive to support a state board that functions redundantly with other national organizations. - Our profession is small and goes under attack by those who think the professional requirements should be relaxed. Registered Sanitarians hold a high degree of responsibility and are often the "go to" people in their counties. It is important to monitor the level of professionalism within the group and have the resources of a board to solve problems. It is necessary to have a separate entity assuring the professionalism and competency of my profession. Licensing ensures that the requirements remain strong. - We do our jobs to protect public health, jobs that include permitting septic systems, inspecting licensed facilities (restaurants, hotels, etc.), regulating air quality, regulating a junk vehicle program and all other things related to public health. I believe these programs deserve to have competent people overseeing them with the public's health in mind. Competent people are developed first by having to become registered. This alone gives the profession a sense of importance that would not be there without that requirement. Secondly, competency is grown through continually learning and perfecting. Without the Board's oversight, how would one know or regulate whether a sanitarian is doing this? I believe by getting rid of the Board of Sanitarians, and consequently the requirement to become a Registered Sanitarian, our profession would lose the high level on consistency, integrity and competency that has become expected of us by the public and has been fought for so hard by those that came before us. - It gives us credibility. - It is a privilege to hold a state license. The process and licensees should be closely regulated to maintain a level of professionalism, and also to prevent abuse or misuse of the license.

<b>Public Health</b> - 31	<b>Public Welfare</b> - 2	<b>Public Safety</b> - 1	<b>None of these</b> - 8	<b>All or combination</b> - 41
<b>Scope of Practice:</b>	<b>Too Narrow</b> - 4	<b>Too Broad</b> - 9		<b>Just Right</b> - 65

**Problems with own BA or other professions' scope of practice** - None with own profession = 19 Yes. Board of Professional Engineers and Land Surveyors 2  
 -- **Comment regarding too broad a scope:** I think we need endorsements on our licenses to show that we are proficient in specific fields. For instance someone that works in onsite wastewater treatment may not be professionally competent enough to work in air quality or food safety. The range of items a sanitarian must know about and deal with are pretty overwhelming. - The educational requirements are too broad. Should require more CEUs. -- There are too many expectations of a sanitarian. The license itself does not qualify a licensee to perform all of the functions of a sanitarian. Licenses should be specialized; for example, food safety sanitarian, septic sanitarian, etc.  
 -- **Comments regarding just right scope:** The responsibilities of a sanitarian are multidisciplinary by nature. In conjunction with Local Boards of Health, we work in public health law, regulation, water quality, wastewater treatment, food safety, air quality, subdivision review, and administration and management. The broad science background required by sanitarian registration is essential to having the basis by which to make public health decisions. The continuing education credits assure that we are staying up to date with current science and learning new skills either in environmental health or public health administration. - As the foundation of public health, sanitation and environmental health specialists have their hands full! I wish we had more time to work on other environmental health concerns versus just programs that have funding or are mandated by law. In general, I feel the scope of our profession is to maintain the basics of public health---clean water, safe waste disposal and food safety. - The profession has long been directed at ensuring that public health and environmental health are protected and it should stay that way. - Most Sanitarians practice as generalists, at least in the rural counties. The scope of practice is wide, because that is the nature of work in public and environmental health. -- I am fortunate in that we have several Sanitarians within our county, and are thus able to split duties among several folks. Otherwise, the field of Environmental Health might be too broad. I would feel this more acutely working in a smaller department, where we would be required to do everything from respond to waterborne illness outbreaks, to food inspections, to septic system permitting, to air quality issues, etc. -- Environmental Health Specialists are responsible for a vast array of public health arenas, including air quality, septic, water and food safety. If the scope narrowed, it would mean dropping off some of these important topics and disenfranchising professionals whose work lies outside the narrowed scope. For example, a rigid focus on food safety for continuing education credits would have no use for those who work in water or air quality.

-- **Comments regarding too narrow a scope:** --We would benefit by greater authority or cooperation with the due process system. - The requirement to be a sanitarian only applies to local government workers. Private and state workers don't have to be licensed. Not only is that inequitable, it makes the pool of licensees so small that the fees have to be high to cover the cost of the Board. - Some requirements are keeping out-of-state applicants from coming to Montana when we are in need of new members of our workforce as a large proportion of sanitarians are due to retire in the next few years. - We would benefit by greater authority or cooperation with the due process system.

**What laws/regulations have caused the most problems? None = 15**

-- State law exempts state employees from registration. It is unfortunate in that state employees conducting the same public health work as county sanitarians are not required to be registered. I believe it would both protect public health and add to our profession to require state employees conducting the same public health duties to be registered. For example: DPHHS Quality Assurance staff who conduct inspections of food services in nursing homes and hospitals are not required to be registered sanitarians. It is unbelievable that our most vulnerable populations are not being afforded the same food safety protection as the general public. -- Changing educational requirements often. -- Many of the laws regarding food service and public accommodations cause problems, due to the fact that the requirements are varied depending on the situation. For example, people cannot make non-hazardous baked goods and preserves in their homes for sale to the public, unless they have a bake-sale waiver, or are making items to sell at a farmers market. So is it a public health hazard for people to bake in their homes, or not? [2011 comment] -- The policy that we, the licensees, must financially support our board---and the infrastructure of all the other boards. We are small in number, so the burden of paying for our share of the licensing bureaucracy is burdensome to sanitarians. I am fortunate in that my employer pays my license fees, but not all departments offer that benefit. Is so much overhead really necessary in the dept. of licensing? At a conference I was told that was why our licenses had jumped so high in cost. Now we are told we may lose our board all together! This would be grievous to the profession and detrimental to the public's health in Montana. -- Any law that tries to lessen environmental protection for the sake of profits. -- State employees who do the same job as sanitarians at the local level are not required by state law to obtain the professional license. If they do the job, they need the license. -- Requirements of microbiology are unnecessary for sanitarians who are NOT food sanitarians. -- While I firmly believe that we need oversight and licensing of Registered Sanitarians, I don't think we need our own separate board. We need to ensure that folks aren't running around saying they are Sanitarians without the licensure, but do we need a dedicated board to ensure that? - I would like to see our board supported, by the state, to maintain professional standards. - All laws that undermine the U.S. Constitution. We need to value the protection of the United States Of America and protect it from deterioration, degradation, and exploitation, because that affects all of our health and safety and welfare into the future. We don't want to deteriorate like the Roman Empire did.

**Consumer complaint filed?**

No = 74  
 Yes = 6 (two against licensees in other boards) Board was effective = 2. Both related to complaint against engineers.  
 Board was not effective = 4 (two of which were about boards) One wrote a letter to the licensee..

**Nonlicensee comments**

Saying Board of Sanitarians:  
 Necessary for Public Health - 155, Public Safety - 127, Public Welfare - 110. Some respondents marked all or a combination.

as of June 2013