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Longmeadow, MA 01106

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Mr. William Anderson

Office of the General Counsel

Department of Public Health

250 Washington Steet

Boston, MA 02108

Dear Mr. Anderson:

 I am offering the following written testimony in regard to proposed regulation 105 CMR 801.000: Certification of Health Officers.

 I would like to comment on three sections of the proposed regulation:

* Section 801.220: Examination

As a former member of the CHO Board I served as Vice-Chair of a Board sub-committee for review of the current CHO examination, This sub-committee reported back to the full Board that the current examination failed to provide content related to the current expanded practice areas in local health and did not assess competencies related to national public health standards. The draft regulation did not specify the examination that would be used.

*I am requesting the addition of language to this section that would provide some mention of examination content for assessment of competency in national practice standards as well as knowledge of state and local public health statutes and regulations used in local public health practice.*

I would suggest, however, to the Department (and not specified in the regulatory language) that it consider a two-part examination: an examination that covers nationally recognized standards for public health practice and an exam that would assess competency in knowledge of state and federal statutes and regulations required for local public health officials in Massachusetts. The use of a national competency examination would provide a clearer path for exam preparation for the candidate as well as our academic partners. However, this national exam would not independently adequately assess competency in federal and state statutes and regulations used in local public health practice. May I add that this two-part examination approach, I believe, is utilized for by the Board of Bar Overseers for their examination process.

If these suggestions are implemented I believe the credential of CHO will then indicate the mastery of information that can be used by local governments when selecting candidates for new public health staff.

* Section 801.230 “Certification by Reciprocity

To prevent any ambiguity*, I request that language be inserted specifically indicating that current holders of the CHO Certification be grandfathered.*

* Section 801.600(2): “Adjudicatory Proceedings”

*I recommend adding language that a public health professional holding a CHO Certification and currently practicing in a local health department and a lay person be added to presiding adjucatory panels*.

When the prior CHO Board held disciplinary hearings, it was very helpful to hear the viewpoints of current practitioners as well as the lay member in assessing cases.

Respectfully submitted,

Beverly S. Hirschhorn, MPH CHO