**Written Testimony: 105 CMR 801 Regulation**

The following written testimony follows the sequential “Section” construct of the proposed regulation.

Section 801.200 “Minimum Standards and Qualifications”: 801.200 (1) (c ) (i) (1) the word “biologically” should read “biological”

Section 801.220 “Examination”: As the immediate Past Chair of the Certified Health Officers Board I, along with my fellow CHO board members, offered the concept of a national recognized Certified in Public Health (CPH) exam to replace the current Certified Health Officers exam. The first CHO exam replacement offering was a draft exam created by local and state public health professional Subject Matter Experts (SME) based on the 3 core functions and 10 essential elements of nationally recognized public health practice standards. This draft exam was not accepted by DOL to replace the current CHO exam. The rationale for the transition to the CPH exam format included, but was not limited to, a nationally recognized exam based on core functions and essential domains/elements of public health practice at the county, state, and local level with the understanding that the content of the existing CHO exam was outdated and lacked sufficient exam preparation/self-study documents. In addition, if the CPH exam supplanted the existing CHO exam then applicants will be able to avail themselves of exam content that resonates with the core knowledge needed to develop, implement, and oversee the necessary programs to administer a functioning and an accreditation worthy local public health department in Massachusetts. Additional CHO board discussion centered on a possible Phase 1 CHO exam component that would address the jurisprudence content of existing and evolving public health practice in Massachusetts. With the approval of DOL legal counsel, I along with the Immediate Past Vice Chair of the CHO board convened a Subject Matter Expert (SME) group (that I referenced earlier) that crafted proposed CHO exam content based on nationally recognized core functions and essential domains of Massachusetts based public health practice. SMEs consisted of experienced state and local public health practitioners, public health association legal counsel and college and university public health professors. Approximately 120 draft exam question were developed by SMEs with the intent to update the existing CHO exam. These draft questions are on record with DOL and were reviewed and discussed at CHO board meetings. These draft exam questions may provide relevant jurisprudence content for a potential Phase 1 exam for the CHO exam process. Phase 2 would involve an applicant taking the CPH exam. It is also noteworthy that the Foundational Public Health Services (FPHS) listed in Governor Baker’s Special Commission on Local and Regional Public Health (SCLRPH) “Blueprint for Public Health Excellence” resonates with the need for up-to-date and relevant workforce credentials, including but not limited to the CHO credential.

Section 801.230 “Certification by Reciprocity”: Recommend adding language the specifically addresses the “grandfathering” of currently licensed Massachusetts Certified Health Officers.

Section 801.310 “Standards for Continuing Education”: 801.310 (5)(a) recommend adding a section entitled “Environmental Health”

Section 801.320 “Verification of Continuing Education”: 801.320 (3)(a-h) recommend that continuing education providers such associations and educational institutions that provide qualified courses, lectures, workshops or conferences for continuing education include application and continuing education units (CEUs) documentation that incorporate the requirements of 801.320 (3)(a-h).

Section 801.600 “Adjudicatory Proceedings”: 801.600 (2) recommend adding language that the Commissioner presiding officer(s) designee include a professional and credential public health practitioner. The professional public health practitioner designee should also possess a current CHO Certification.

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