

**Regulatory Board Evaluation**

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**Board of Registration  
for Sanitarians**

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**The West Virginia Board of  
Registration for Sanitarians Is  
Necessary to Protect the Public**

**The Board of Registration for  
Sanitarians Is in Partial  
Compliance With the General  
Provisions of Chapter 30, Article 1**



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John Sylvia  
Director

January 7, 2007

The Honorable Edwin J. Bowman  
State Senate  
129 West Circle Drive  
Weirton, West Virginia 26062

The Honorable J.D. Beane  
House of Delegates  
Building 1, Room E-213  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305-0470

Dear Chairs:

Pursuant to the West Virginia Sunset Law, we are transmitting a Regulatory Board Evaluation of the Board of Registration for Sanitarians, which will be presented to the Joint Committee on Government Operations on Sunday, January 7, 2007. The issues covered herein are "The West Virginia Board of Registration for Sanitarians Is Necessary to Protect the Public;" and "The Board of Registration for Sanitarians Is In Partial Compliance With the General Provisions of Chapter 30, Article 1."

We transmitted a draft copy of the report to the Board of Registration for Sanitarians on December 22, 2006. We held an exit conference with the Board of Registration for Sanitarians on December 28, 2006. We received the agency response on December 28, 2006.

Let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "John Sylvia".

John Sylvia

JS/tlc

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*Joint Committee on Government and Finance*

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# Executive Summary

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## **Issue 1: The West Virginia Board of Registration for Sanitarians Is Necessary to Protect the Public.**

The purpose of the Board of Registration for Sanitarians is to register qualified sanitarians whose duties in public health and environmental sanitation require a knowledge of physical, biological, and sanitary sciences or environmental health, and community hygiene and whose professional pursuits and duties are necessary to the promotion of life, health, and well-being of the community. The regulation of the profession of sanitarians, through a certification process that verifies the education and experience of the registered sanitarian, does afford the public confidence in the profession of environmental health services. **The Legislative Auditor finds that the regulation of the profession of sanitarians is necessary to protect the public health, and should be regulated by the Board of Registration for Sanitarians.**

## **Issue 2: The Board of Registration for Sanitarians Is in Partial Compliance With the General Provisions of Chapter 30, Article 1.**

The Board is accessible to the public. The Board is listed in the Charleston Area Telephone book. The Board holds at least one meeting per year, which are open to the public and published in a timely manner. The Board maintains a record of its proceedings. Continuing education is required and audited annually. The Board has procedural rules for describing its complaint process. The Board receives financial assistance from the Bureau for Public Health. The Board's roster and register are incomplete. The Board should require all applicants to list all names and surnames used by the applicant. The Board did not submit an annual report in 2004 and 2005.

## **Recommendations**

1. *The Legislative Auditor recommends that the Legislature should consider continuing the West Virginia Board of Registration for Sanitarians.*
2. *The Legislative Auditor recommends that the Board adopt a policy requiring that local health departments forward to the Board a copy of all complaints against any registered sanitarians.*
3. *The Legislative Auditor recommends that the Board of Registration for Sanitarians add the following information to its register: the date of the application; applicants age; the educational qualifications of the applicant; the action taken by the Board to deny or issue a license; renewal of the registration by date; and whether registrants have had their registrations suspended or revoked for cause, as specified in West Virginia Code §30-1-12(a).*

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4. *The Legislative Auditor recommends that the Board of Registration for Sanitarians add to its roster the office address of each licensee.*
  5. *The Legislative Auditor recommends that the Board of Registration for Sanitarians develop and submit an annual report as specified in West Virginia Code §30-1-12(b).*
  6. *The Legislative Auditor recommends that the Board of Registration for Sanitarians add a downloadable complaint form to its website.*
  7. *The Legislative Auditor recommends that the Board require applicants to furnish it with all names and surnames that the applicant has used or been known by in their lifetime.*



# Review Objective, Scope and Methodology

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A Regulatory Board Evaluation of the Board of Registration for Sanitarians is required and authorized by the West Virginia Sunset Law, Chapter 4, Article 10 of the West Virginia Code. The Board is intended to regulate the profession by verifying and ensuring the education and experience of sanitarians.

## Objective

The objective of this audit is to determine if the Board is necessary for protecting the public interest and whether or not the Board is operating in compliance with the policies and provisions of Chapter 30 of the *West Virginia Code* and other applicable laws and rules.

## Scope

The scope of this report is from calendar year 2003 to December 2006. The scope of the audit included a review of the Board's complaint process, and continuing education assessment process.

## Methodology

The methodology of this evaluation included reviewing Chapter 30 provisions and other applicable statutes, Board documents and records, interviews with the Board's current Chairman, the former Chairman, and the Administrative Assistant of the Bureau for Public Health, as well as internet research. All aspects of the audit complied with Generally Accepted Government Auditing Standards.



## **The West Virginia Board of Registration for Sanitarians Is Necessary to Protect the Public.**

The purpose of the Board of Registration for Sanitarians is to register qualified sanitarians whose duties in public health and environmental sanitation require a knowledge of physical, biological, and sanitary sciences or environmental health, and community hygiene and whose professional pursuits and duties are necessary to the promotion of life, health, and well-being of the community. The regulation of the profession of sanitarians, through a certification process that verifies the education and experience of the registered sanitarian, does afford the public confidence in the profession of environmental health services. According to the Board's statement of justification:

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*The regulation of the profession of sanitarians, through a certification process that verifies the education and experience of the registered sanitarian, does afford the public confidence in the profession of environmental health services.*

---

*Because of the "registration process" through the Board of Registration for Sanitarians, communities gain assurance that the sanitarian workforce handling the regulatory responsibilities of their job is competent, properly trained and equipped to carry out their duties. Without the Board of Registration for Sanitarians this assurance cannot be provided and the training requirements and professionalism of the workforce would be lost.*

Two hundred and two (202) sanitarians are registered in West Virginia. They perform a variety of public health services that require a thorough knowledge of the specific nature of detecting and preventing the spread of frequently evolving communicable diseases, whether they are food borne, water borne or carrier based. Sanitarians perform a critical role in the detection and prevention of illness due to communicable diseases. The Board indicated:

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*Two hundred and two (202) sanitarians are registered in West Virginia.*

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*The Registered Sanitarian (R.S.) and Sanitarian-in-Training (S.I.T.) are credentials that demonstrate competency in the environmental health profession of the public health arena. This profession is a synthesis of numerous disciplines such as: Food & Milk Safety/Protection; Wastewater; Drinking water; Infectious Medical Waste; Swimming Pools and Recreational Facilities; Disaster Sanitation and Threat Preparedness; Institutional and Housing Sanitation; School Sanitation; Insect and Rodent Control; Infectious Disease Investigation; Nuisance Investigations; and Tattoo & Body Piercing Establishment Sanitation.*

Sanitarians inspect swimming pools and public bodies of water and administer permits for septic system installation, in order to protect the public from water borne diseases. Sanitarians inspect restaurants, grocery stores, school cafeterias and temporary food vendor establishments for compliance with basic sanitary methods, such as adequate hand washing facilities and facility cleanliness in order to prevent the spread of food based diseases. Sanitarians inspect and issue permits to tattoo studio

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businesses to ensure compliance with good hygiene to prevent the spread of blood borne pathogens. Sanitarians also assist the Bureau of Public Health in the detection of rabid animals by investigating suspected cases of rabies and administering rabies testing of suspect animals.

Sanitarians help detect and prevent a wide range of communicable diseases. For example, in 2003 the restaurant chain Chi Chi's was found to be responsible for an outbreak of Hepatitis A, which sickened at least 660 people and resulted in 4 deaths. An outbreak of salmonella-tainted tomatoes from the Sheetz convenience stores sickened about 400 people in 2004. In 2006 several food related illnesses gripped the nation, including an outbreak of E-coli related to contaminated spinach which by October had sickened 199 people and resulted in 3 deaths. In December, the Taco Bell restaurant chain pulled green onions from its menu, because of illness in at least three (3) states. Also this year, West Virginia is experiencing an increase of rabies cases, which endangers the public, their pets and the agriculture industry. In each of these cases, sanitarians are the first line of defense for the detection and prevention of the spread of environmental health related illness and disease.

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*Sanitarians are the first line of defense for the detection and prevention of the spread of environmental health related illness and disease.*

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According to the National Environmental Health Association, Sanitarians are regulated in 19 states. Sixteen (16) states have voluntary programs while 15 states have no form of regulation. Mandatory regulation is required for sanitarians in the surrounding states with the exception of Virginia, which has a voluntary program. The surrounding states with mandatory regulation are by the following arrangement:

- Maryland has a Board of Environmental Sanitarians, within the Maryland Department of the Environment.
- Ohio has the State Board of Sanitarian Registration.
- Kentucky registered sanitarians are organized under the Division of Health Protection & Safety.
- Pennsylvania registers sanitarians through the Commonwealth Board for Registration of Sanitarians.

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*West Virginia is one of 19 states that regulates sanitarians.*

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West Virginia is one of 19 states that regulates sanitarians. The specific education that Sanitarians receive, on an ongoing basis, is beyond the expertise of the general public and no other profession exists to aid the public in detecting and preventing a wide range of communicable diseases. **Sanitarians play a critical role in the first line of defense in the state's public health system, which includes Homeland Security responsibilities.** The protection of the public health is enhanced by those practitioners being qualified and trained in using the best and most recent methods of disease detection and prevention.

West Virginia has chosen to regulate this profession through an independent board. This choice helps to provide uniform standards and

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avoids potential conflicts of interests if local or a state health department were to regulate the profession, since most sanitarians work for these entities. The Board of Registration for Sanitarians protects the public through a process of independent verification that those professionals certified as *Registered Sanitarians* meet uniform standards of qualification in their education and training. Local health departments may not be objective in the assessment of the qualifications of sanitarian applicants due to staffing shortages and other local pressures or they may adopt standards for qualifications that are not uniform throughout the state as the many different non-smoking ordinances adopted by the local health departments suggest. In addition, the acting commissioner for the Bureau for Public Health indicated that, while the Bureau provides the Board with administrative assistance, the Bureau does not:

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*The Board of Registration for Sanitarians protects the public through a process of independent verification that those professionals certified as Registered Sanitarians meet uniform standards of qualification in their education and training.*

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*...wish to be placed in the position of regulating sanitarians that are not employed by the BPH; nor do we wish to become the entity that provides registration for our own employees. We believe these functions can best be performed by an independent Board.*

**Therefore, the Legislative Auditor finds that the regulation of the profession of sanitarians is necessary to protect the public health, and should be regulated by the Board of Registration for Sanitarians.**

## **Recommendation**

1. *The Legislative Auditor recommends that the Legislature should consider continuing the West Virginia Board of Registration for Sanitarians.*



## Issue 2

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### **The Board of Registration for Sanitarians Is in Partial Compliance With the General Provisions of Chapter 30, Article 1.**

The West Virginia Board of Registration for Sanitarians is in partial compliance with applicable state laws and rules. These laws and rules, primarily found within the Board's own enabling statute and in the general provisions of Chapter 30, are important in the effective operation of a licensing board. The Board has complied with the following requirements:

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*The Board verifies and audits the submission for credit for continuing education of every registered sanitarian of the Board on an annual basis.*

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- At least one member of the Board has attended the orientation training provided by the State Auditor's Office (§30-1-2a(b));
- The Board has adopted an official seal (§30-1-4);
- The Board has at least one meeting a year (§30-1-5(a));
- The Board has a listing in the state government section of the Charleston area telephone book (§30-1-12(c));
- The Board has set fees by rule (§30-1-6(c));
- The Board's meetings are open to the public and published in a timely manner (§6-9(a)-3); and
- The Board maintains a record of its proceedings (§30-1-12(a));

### **Continuing Education Is Required and Audited**

The Board, as required by West Virginia Code §30-1-7a, has established criteria for continuing education hours for individuals registered as sanitarians. Each registered sanitarian is required to complete 15 hours of continuing education annually. Sanitarian training courses that qualify for continuing education hours include classes on the following: microbiology; outbreak investigation; rodent control; medical waste; bottled water; tattoos and body piercing; waterborne diseases; private water supplies; swimming pools; indoor air; and sewage. The Board verifies and audits the submission for credit for continuing education of **every** registered sanitarian of the Board on an annual basis.

### **The Board Has Procedural Rules for Complaints Against Registrants**

The Board of Registration for Sanitarians has received only three complaints in the past several years. Two were received in 2006 and one in 2005. The Board took an average of 92 days to resolve its complaints. Because of the low number of complaints, the Legislative Auditor questions

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whether all complaints are being forwarded to the Board. The majority of sanitarians are employed by county health departments and there is a possibility that complaints against licensees are received by the employer rather than the state Board. According to the Acting Secretary of the Board, county health departments could be administering this function of receiving and resolving complaints as a matter of personnel policy at the local level rather than forwarding to the Board. A recent example of a case in which the complaint was first received by a local health department was in Berkeley County. In December of 2006, a Berkeley County Health Department Sanitarian was charged with bribery and extortion. The complaint was eventually forwarded by the Berkeley County Health Department to the Berkeley County Sheriff and the Berkeley County Prosecutor to investigate. Once substantiated, the Board of Registration for Sanitarians was informed of the complaint. Since investigation of complaints against registrants is a responsibility of Chapter 30 boards, it could be argued that the complaint should have been sent to the Board before it was substantiated by the local entities for its own investigation of one of its registrants.

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*The Legislative Auditor finds that a potential complaint against licensees could be received by a county health department and not forwarded to the Board of Registration for Sanitarians.*

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While in the previous example, the complaint was eventually forwarded to the Board, the Legislative Auditor finds that a potential complaint against licensees could be received by a county health department and not forwarded to the Board of Registration for Sanitarians. Such a complaint could therefore result in a disciplinary action by one county health department, while the Board may be unaware of the sanctionable behavior of registrants and at the same time those certified sanitarians maintain their certificates of registration. The potential exists for sanitarians to then seek employment with another employer. The Legislative Auditor therefore recommends that the Board of Registration for Sanitarians adopt a policy requiring all local health departments and other employers of registered sanitarians to forward a copy of complaints.

### **The Legislative Auditor Recommends That All Regulatory Boards Require Applicants to Provide All Names Used in the Applicants Lifetime.**

Currently, the Massage Therapy Licensure Board, the Board of Examiners for Registered Professional Nurses, the Board of Optometry, the Board of Law Examiners, the Board of Medicine, the West Virginia State Bar, the Board of Osteopathy, the Board of Physical Therapy, the Real Estate Commission, the Board of Examiners for Licensed Counselors, and the Secretary of State (for Private Investigators) are the only Chapter 30 profession regulators that require applicants to provide all names that the applicant has used or been known by in the applicant's lifetime. The Board of Veterinary Medicine requires applicants to provide birth and maiden names. However, this would not necessarily include all names that could have been used by the applicant between the time of birth and the time that the application for license, certificate, or registration is received. Examples where names could be excluded include female applicants that



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have been married more than once and applicants of either gender that have undergone legal name change for any reason.

The Legislative Auditor finds that the collection of this information is a simple and cost free method of collecting more information on individual applicants. This information would be beneficial in verifying the supporting documentation that is required to be submitted along with the application. Supporting documentation could include college transcripts and diplomas, which could reflect alternate names. Additionally, the collection of all names would be beneficial in verification of an applicant's criminal history as reported on an application. **For these reasons, the Legislative Auditor recommends that the Board require applicants to furnish it with all names and surnames that the applicant has used or been known by in their lifetime.**

### **The Board Receives Financial Assistance From the Bureau of Public Health**

*Without the financial assistance from the Bureau for Public Health, the Board most likely would not be self supportive.*

West Virginia Code §30-1-6(c) requires Chapter 30 boards to be financially self sufficient. Currently, the Board of Registered Sanitarians is housed in the Bureau for Public Health offices, and the administrator for the Board is a Bureau of Public Health employee. Without the financial assistance from the Bureau for Public Health, the Board most likely would not be self supportive. Since FY 2004, the Board has averaged only \$4,724 in annual revenues. Table 1 below shows the revenue and expenses for the last three fiscal years.

<b>Fiscal Year</b>	<b>Revenue</b>	<b>Expenses</b>	<b>Year end balance</b>
2004	\$5,131.24	\$5,580	\$8,147.12
2005	\$3,900	\$4,434.94	\$7,612.18
2006	\$5,140.00	\$3,399.21	\$9,352.97

*Source: Digest of Resources in West Virginia*

West Virginia Code §30-17-11 has set the original registration fee and annual renewal fee at twenty dollars. The concern of the Legislative Auditor is that without the continued support of the Bureau for Public Health, the Board would not be able to sustain itself with the current fee structure and with the number of registrants. While the Board has a positive balance, it is only solvent because of the support of the Bureau.

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## **The Board's Roster and Register as Specified by West Virginia Code Are Incomplete.**

The Board of Registered Sanitarians maintains a roster of registrants, but it is incomplete. West Virginia Code §30-1-13 states that the Board shall maintain a roster that includes:

*...the names and office addresses of all persons licensed, or registered...*

While the Board's roster does state the name of the employer, the roster does not include the office address. The Legislative Auditor recommends that the Board add the office address for each registrant as required.

The Board also maintains a register of applicants, but it is practically identical to the roster of registrants. The register does not include the education or other qualifications of the applicant; does not specify the applicants age; action taken by the Board to deny or issue a license; renewal dates; whether registrants have had their registration suspended or revoked; and does not show the date of the application for all applicants. These requirements for the register are stated in West Virginia Code §30-1-12(a). Board administrators stated that they had not realized that this information was to be included in the register. The Legislative Auditor recommends that the Board add all data to its register in order to become compliant with West Virginia Code §30-1-12(a).

*In order to improve public accessibility, the Legislative Auditor recommends that the Board consider adding a downloadable complaint form to its website.*

## **The Board Did Not Submit an Annual Report in 2004 and 2005.**

The Board of Registered Sanitarians did not submit an annual report in 2004 and 2005 as required by West Virginia Code §30-1-12. The Board submitted an annual report in December 2003, and then did not submit another one until December 2006. According to the Board, the former secretary moved into another position, and the current secretary was not aware of the annual report requirement. The Legislative Auditor recommends that the Board continue to submit an annual report to the Governor and Legislature as required.

## **The Board Could Improve Public Accessibility by Having a Downloadable Complaint Form on Its Website.**

The Board has a website that is operated by the Bureau for Public Health. The site includes registration information, applicable code, and information on programs that sanitarians review. However, the Board does not have a complaint form against registrants accessible on the site. In order to improve public accessibility, the Legislative Auditor recommends that the Board consider adding a downloadable complaint form to its website.

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## Conclusion

The Board of Registration for Sanitarians is in partial compliance with the general provisions of Chapter 30 of the West Virginia Code. The Board has established continuing education requirements and the Board audits each submission for continuing education of every licensee annually.

The Board of Registration for Sanitarians is in partial compliance with the requirement for maintaining a roster of registrants and a register of applicants. The Board is also only self sufficient because of the assistance of the Bureau of Public Health. Finally, the Board is not in compliance with the requirement of submitting an annual report to the Governor and Legislature.

## Recommendations

2. *The Legislative Auditor recommends that the Board adopt a policy requiring that local health departments forward to the Board a copy of all complaints against any registered sanitarians.*
3. *The Legislative Auditor recommends that the Board of Registration for Sanitarians add the following information to its register: the date of the application; applicants age; the educational qualifications of the applicant; the action taken by the Board to deny or issue a license; renewal of the registration by date; and whether registrants have had their registrations suspended or revoked for cause, as specified in West Virginia Code §30-1-12(a).*
4. *The Legislative Auditor recommends that the Board of Registration for Sanitarians add to its roster the office address of each licensee.*
5. *The Legislative Auditor recommends that the Board of Registration for Sanitarians develop and submit an annual report as specified in West Virginia Code §30-1-12(b).*
6. *The Legislative Auditor recommends that the Board of Registration for Sanitarians add a downloadable complaint form to its website.*
7. *The Legislative Auditor recommends that the Board require applicants to furnish it with all names and surnames that the applicant has used or been known by in their lifetime.*



# Appendix A: Transmittal Letter

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## WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

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John Sylvia  
Director

December 22, 2006

WV Board of Registration for Sanitarians  
1 Davis Square, Suite 200  
Capitol and Washington Streets  
Charleston, WV 25301-1798

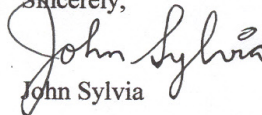
Dear Mr. Thornton and Mr. Harvey,

This is to transmit a draft copy of the **Regulatory Board Evaluation** of the **Board of Registration for Sanitarians**. This report is scheduled to be presented during the **January** interim meetings of the Joint Committee on Government Operations. The meetings have been requested for January 7<sup>th</sup> and 8<sup>th</sup>. We will inform you of the exact time and location once the information becomes available. It is expected that a representative from your agency be present at the meeting to orally respond to the report and answer any questions the committee may have.

We need to schedule an exit conference to discuss any concerns you may have with the report. We would like to have the meeting on **December 28, 2006, from 2:00 to 3:00 p.m.** In addition, we need your written response by noon on **January 3, 2007** in order for it to be included in the final report. If your agency intends to distribute additional material to committee members at the meeting, please contact the House Government Organization staff at 340-3192 by Thursday **January 4<sup>th</sup>, 2007** to make arrangements.

We request that your personnel not disclose the report to anyone not affiliated with your agency. Thank you for your cooperation.

Sincerely,

  
John Sylvia

Enclosure

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*Joint Committee on Government and Finance*

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# Appendix B: Agency Response

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**WEST VIRGINIA  
BOARD OF REGISTRATION  
FOR SANITARIANS**

Capitol and Washington Streets  
1 Davis Square Suite 200  
Charleston West Virginia 25301-1798

December 28, 2006

John Sylvia, Director  
Performance Evaluation and Research Division  
Building 1, Room W-314  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305-0610

**R E C E I V E D**  
DEC 28 2006

PERFORMANCE EVALUATION AND  
RESEARCH DIVISION

Dear Mr. Sylvia:

The West Virginia Board of Registration for Sanitarians is in receipt of the draft copy of the Regulatory Board Evaluation of the Board of Registration for Sanitarians. The following represents the Board's response to the report

First, the Board wishes to thank the Performance Evaluation and Research Division (PERD), especially Steve Thompson for working with us in a very professional and courteous manner and helping us work through this audit. Board members were unfamiliar with this process and found the Division and Mr. Thompson to be very helpful in advising us what information was needed and the format in which it needed to be presented. The Board wants to do everything within its power to operate as required by Chapter 30. Therefore, this audit has been enlightening and educational as to additional information and items the Board needs to be doing to properly fulfill its duty.

Board members found that the Research Division did an exceptional job in capturing the necessity for the Board of Registration for Sanitarians under Issue 1. Sanitarians spend their career working to protect the public health through many different programs. Sanitarians, by necessity, must be familiar and knowledgeable of the many different laws and practices in many different fields to function properly. The Board's function is to verify that they have the ability, training and expertise to do these duties. This function is handled differently between the various states but we have found that an independent board is the best way to protect the public and have a properly trained sanitarian.

The Board has the following specific responses to the Recommendations contained in the report.

1. "The Legislative Auditor recommends that the Legislature should consider continuing the West Virginia Board of Registration for Sanitarians" **Response:**

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The Board supports this recommendation. The Board aids in protecting the public by maintaining standards for the sanitarian profession to ensure that those practicing are knowledgeable in their field.

2. "The Legislative Auditor recommends that the Board adopt a policy requiring that local health departments forward to the Board a copy of all complaints against any registered sanitarians." **Response:** There is some uncertainty as to the Board's authority to place a requirement on local health departments and/or other employers of sanitarians. Legal research will be conducted to determine current authority. At a minimum the Board will issue a written request to local health departments and other employers that they forward a copy of any complaints against sanitarians as well as a report of any actions they have taken with regard to the complaint.
3. "The Legislative Auditor recommends that the Board of Registration for Sanitarians add the following information to its register: the date of the application; applicants age; the educational qualifications of the applicant; the action taken by the board to deny or issue a license; renewal of the registration by date; and whether registrants have had their registrations suspended or revoked for cause, as specified in West Virginia Code 30-1-12(a). **Response:** The Board has much of this information on the written applications submitted by each applicant but did not realize it needed to be on the computer files and reportable on the register. After clarification of a few of the above items with the Auditors' Office, the Board will add these items into the database and will have it available on the register. The Board's target date for completing this task is July 1 2007.
4. "The Legislative Auditor recommends that the Board of Registration for Sanitarians add to its roster the office address of each licensee." **Response:** The database has already been changed to add the office address of those working for local health departments and the state health department. This information will be added into the roster report. The applications and renewal forms will be changed to require the reporting of the full office address so that the addresses of those working outside the state and local health departments can be obtained and added to the database and therefore to the roster. Renewals are due by July 1, 2007. Our target date for completing this task is August 1, 2007.
5. "The Legislative Auditor recommends that the Board of Registration for Sanitarians develop and submit an annual report as specified in West Virginia Code 30-1-12(b)." **Response:** The Board is pleased to report that as a result of earlier comments about this requirement, an Annual Report was developed and submitted to all required officials during the week of December 18, 2006. In the future, the Board will submit a report on a yearly basis as required.
6. "The Legislative Auditor recommends that the Board of Registration for Sanitarians add a downloadable complaint form to its website." **Response:** The Board is in agreement with this recommendation. The Acting Secretary will, with



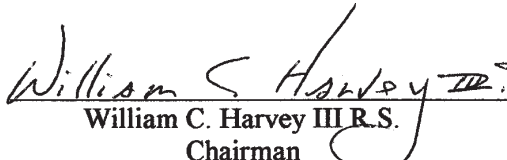
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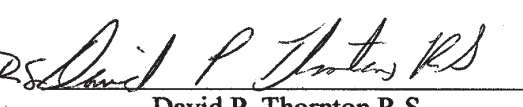
the advice of the Board, develop a complaint form to be presented to the Board at its next meeting scheduled for March 9, 2007. Upon approval by the Board the form will be posted on the website.

7. "The Legislative Auditor recommends that the Board requires applicants to furnish it with all names and surnames that the applicant has used or been known by in their lifetime." **Response:** The Board agrees to add this requirement onto our registration and renewal forms. This information will then be added to our database. The Board's target date for completing this task is August 1, 2007.

Once again, thank you to the Performance Evaluation and Research Division, especially Steve Thompson, for working with us so well. Your assistance has helped the Board better understand and implement the full requirements of Chapter 30 as it relates to the Board. If further clarification is needed on any of the above responses, please feel free to contact William C. Harvey III or David P. Thornton at 304-558-2981.

Sincerely,

  
William C. Harvey III R.S.  
Chairman  
WV Board of Registration for Sanitarians

  
David P. Thornton R.S.  
Acting Secretary  
WV Board of Registration for Sanitarians

