



## **Proposed Food Inspection Scoring System and Placards**

**The San Antonio Restaurant Association strongly opposes a mandatory or voluntary food inspection scoring system that calls for public posting of a placard containing both letter and number grades.**

Food inspection reports are currently available online on the city's health department website, posted at all food establishments and available to any customer that asks for more information at a food establishment. This high degree of transparency in San Antonio's food establishment inspection system can be relied upon by consumers in choosing which food establishments to frequent. The system works well in San Antonio and many other jurisdictions throughout Texas.

**Background:** The City of San Antonio Metropolitan Health District has proposed changing the current food inspection scoring system from a demerit based grade to a number grade based on a 100-point scale. Metro Health has also proposed instituting a "voluntary" placard system in which you may choose to post a placard which would prominently showcase your score with both a letter (A-B-C) and number grade (100-90-80). San Antonio Restaurant Association (SARA) and other stakeholders have met with Metro Health and expressed concerns regarding the proposed changes.

### **Problems with a Letter Grading System:**

- **Grading Scale:** Letter grades do not accurately reflect the health inspection report of a food establishment.
  - ◆ Letter grades do not address the difference between critical or non-critical violations
  - ◆ Inspectors may not be consistent in inspections allowing for disparate treatment of food establishments
  - ◆ Letter grades are summaries of reports and do not provide the public with complete information
  - ◆ There is lack of evidence to support the notion that letter grades will lead to improved food safety
- **Substance:** The proposed letter grading system lacks details supporting alleged violations, resulting in inaccurate and potentially misleading portrayals to the public.
- There is no mechanism to inform the public that an inspection report is being appealed or that an alleged violation has been addressed and resolved.
- **Insufficient Number of Inspectors:** The proposed letter/placard system will likely increase the City health department budget and the number of annual inspections, and increase the number of inspection appeals. According to Metro Health, last year follow-up inspections and complaint inspections took the time of approximately 3.5 full time inspectors at a cost of about \$500,000 dollars.
- **Lack of Consumer Transparency:** Letter grades do not increase transparency because letter grades do not address the details of an inspection report but are merely summaries of inspection reports. Inspection reports are also readily available online and posted in every food establishment.

### **Problems with the Proposed Voluntary Placard System:**

- **Inconsistent Data:** It is likely only those who receive a grade of "A/90" or better will volunteer to post a placard with their score, leading to skewed data.
- **Intimidation:** Many operators have anxiety surrounding health department inspections and may feel like the "suggestion" to post the placard is more of a requirement.
- **Lack of descriptive information:** Unlike posting the food inspection report, proposed placards will only include a number and letter score; no supporting data or inspector notes.
- **Public Demand:** There has been no demonstrated public demand for a placard system.

### **SARA representatives have met with Metro Health and suggest:**

- TFER changes should be immediately adopted.
- Metro Health enhance their webpage to ensure all inspection reports are being posted in a timely manner.
- Create a public awareness campaign to make consumers aware that all inspection reports are available online or upon request at a food establishment.
- Additional education for restaurateurs and more one-on one support for marginal/struggling operators.