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December 23, 2015

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Karen L. Smith, MD, MPH, Director and State Public Health Officer
California Department of Public Health
1615 Capitol Avenue, Suite 73.720
PO Box 997377, MS 0500
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RE: Tuberculosis Risk Assessment for Community College Employees-
Support

Dear Dr. Smith:

The California Conference of Local Health Officers (CCLHO) Board of Directors voted to recommend support of 2016 legislation to amend the California Education Code (Section 87408.6) as follows:

- Eliminate mandated Tuberculosis (TB) testing of Community College employees, in an academic or classified position, and other low risk groups as deemed necessary;
- Replace TB testing with a TB Risk Assessment developed by the California Department of Public Health (CDPH) and the California Tuberculosis Controllers Association (CTCA), and
- Require TB testing and a medical examination only if risk factors are identified.

The changes to the California Education Code outlined above are intended to extend the current risk assessment and screening requirements for designated elementary and secondary school employees to community college employees in academic or classified positions. CCLHO urges the California Department of Public Health (CDPH) to support such legislation as well.

California has the largest post-secondary education system in the United States, with 113 community colleges that serve more than 2.1 million students. In the fall of 2014, the California Community College system employed 1,947 educational administrators, 17,059 academic tenured/tenure track faculty, 41,804 academic temporary faculty, and 26,083 classified administrator, professional and support staff.

Public health and medical evidence support this policy change. Since 1999, evidence has suggested that universal TB testing of low risk populations is neither necessary nor cost-effective. The Centers for Disease Control and Prevention recommends TB testing among populations with known risk factors for TB exposure, due to the potential for false positive tests in persons with a low probability of infection.

This position is consistent with CCLHO's Criteria for Priority Legislation in that it addresses a population-based issue for Californians and is an opportunity for health officers to use their professional expertise to shape public policy. Using a risk assessment approach rather than a blanket testing approach makes judicious use of limited resources and minimizes unnecessary hazards associated with false-positive test results.

Karen L. Smith, MD, MPH
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As you know, the California Conference of Local Health Officers (CCLHO) is an organization of all legally appointed physician health officers in California's 61 city and county jurisdictions established in statute in 1947 to consult with, advise, and make recommendations to the California Department of Public Health, other departments, and the Legislature on matters affecting health.

If you have questions, please contact me at jberreman@ci.berkeley.ca.us or 510-981-5301.
Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Janet Berreman". The signature is written in a cursive style with a large, looped initial "J".

Janet Berreman, MD, MPH
President, California Conference of Local Health Officers