
THIRD READING

Bill No: AB 1288
Author: Addis (D) and Valencia (D)
Amended: 8/29/25 in Senate
Vote: 21

SENATE HEALTH COMMITTEE: 11-0, 7/2/25

AYES: Menjivar, Valladares, Durazo, Gonzalez, Grove, Limón, Padilla,
Richardson, Rubio, Weber Pierson, Wiener

SENATE APPROPRIATIONS COMMITTEE: 7-0, 8/29/25

AYES: Caballero, Seyarto, Cabaldon, Dahle, Grayson, Richardson, Wahab

ASSEMBLY FLOOR: 79-0, 6/3/25 - See last page for vote

SUBJECT: Registered environmental health specialists

SOURCE: California Association of Environmental Health Administrators
County Health Executives Association of California

DIGEST: This bill makes a number of changes to the requirements to be a registered environmental health specialist, including permitting an applicant who fails to pass the written examination to take the test again after 90 days, rather than the current limitation of waiting one year if the applicant failed the examination twice, and waiting two years if the applicant failed the examination a third or subsequent time. Extends the length of time an environmental health specialist trainee can be employed without having passed the examination from three years to five years. Makes various other minor, technical, and conforming changes to update the law governing registered environmental health specialists.

ANALYSIS:

Existing law:

- 1) Defines “registered environmental health specialist” (REHS) as an environmental health professional educated and trained within the field of

environmental health who is registered in accordance with specified provisions of law, and defines “environmental health specialist trainee” as a person who possesses a minimum of a bachelor’s degree, including 30 semester units of basic sciences from an approved educational institution, but who has not completed the specific coursework and experience requirements in the field of environmental health as specified, and who is engaged in an approved environmental health training plan. [Health and Safety Code (HSC) §106615(c) and (d)]

- 2) Defines “scope of practice in environmental health” as the practice of environmental health by REHSs in the public and private sector, and includes, but is not limited to, organization, management, education, enforcement, consultation, and emergency response for the purpose of prevention of environmental health hazards and promotion and protection of the public health and the environment in the following areas: food protection; housing; institutional environmental health; land use; community noise control; recreational swimming areas and waters; electromagnetic radiation control; solid, liquid, and hazardous materials management; underground storage tank control; onsite septic systems; vector control; drinking water quality; water sanitation; emergency preparedness; and milk and dairy sanitation as specified. [HSC §106615(e)]
- 3) Permits the governing body of a local health department to employ on a full-time basis one or more REHSs for the purposes of the enforcement of statutes and regulations related to public health and any local ordinances of a local health department that relate to activities specified in the scope of practice in environmental health. [HSC §106625]
- 4) Requires REHSs to have a bachelor’s degree, and establishes a framework for the length of experience and minimum number of hours of prescribed training the applicant must complete by laying out five different pathways based on how many units of specified science courses the applicant completed (explained in more detail in comment 3) below). [HSC §106635]
- 5) Permits an environmental health specialist trainee to be employed under the supervision of an REHS until the trainee is qualified by examination, for a period not to exceed three years. Prior to employment, requires the trainee to have a current evaluation letter from CDPH stating that the education qualifications, as specified, have been met. [HSC §106625]

- 6) Establishes the Environmental Health Specialist Registration Committee (EHSR Committee) consisting of the Chief of the Environmental Planning and Local Health Services Branch of CDPH, or CDPH's designee, who serves as executive officer but does not have a vote, and 10 other members, as specified. Charges the EHSR Committee to advise and make recommendations to CDPH with respect to the proper administration and enforcement of the registration of REHSs. [HSC §106675]
- 7) Requires persons who meet the educational and experience requirements to be eligible for admission to examination for registration as an REHS. Requires the examination to be prescribed by CDPH with the concurrence of the EHSR Committee. Prohibits an applicant who fails to pass the examination twice from being eligible to be reexamined a third time until at least one year has elapsed from the date of the second examination. Specifies that an applicant who fails the third examination is not eligible to take the examination a fourth time until two years have elapsed from the date of the third examination. [HSC §106670]
- 8) Establishes the Safe Body Art Act to provide for the regulation of persons engaged in the business of tattooing, body piercing, branding, and the application of permanent cosmetics, enforced by local environmental health agencies. [HSC §119300, et seq.]

This bill:

- 1) Extends the length of time that an environmental health specialist trainee may be employed under the supervision of an REHS without having passed the required examination to become an REHS from three years to five years.
- 2) Deletes the prohibition on an applicant who failed the exam twice from being eligible to take it again until one year from the date of the second examination and from being eligible to take it a fourth time until two years after that, and instead requires applicants who fail the examination to wait 90 days between tests.
- 3) Revises the educational course requirements to become an REHS in the following ways:
 - a) Specifies that coursework can be taken in person, virtually, or a combination of in person and virtually;

- b) Conforms the number of required laboratory courses throughout the different pathways of meeting the minimum education and training requirements by requiring at least three of the basic science courses to include a laboratory in all pathways;
 - c) Adds educational institutions that are approved by the National Environmental Health Science & Protection Accreditation Council (EHAC), in addition to educational institutions approved by the EHSR Committee, as meeting the criteria to use the educational and training pathway that does not require any additional training or experience to qualify for the REHS examination; and,
 - d) Deletes a requirement that all basic science coursework, including mathematics, be equal to that acceptable in an approved environmental health degree program.
 - e) Defines “basic sciences” as including life sciences, natural sciences, physical sciences, and health sciences, and specifies that social science courses, such as sociology or psychology, do not count toward basic sciences.
 - f) Requires, for a laboratory to count towards basic science coursework, that it be in person, with real-time instruction, or virtually with onsite, real, hands-on equipment and virtual real-time instruction during an experiment.
- 4) Updates the scope of practice of an REHS to reflect the responsibility of local environmental health agencies to enforce provisions of law governing body art and medical waste.
- 5) Revises the required program elements in an approved environmental health training program by doing the following:
- a) Renaming a list of “basic” training elements to instead be “primary” training elements, and reducing the number of required primary elements in a training plan from six to three to provide additional flexibility in developing a training plan;
 - b) Deleting bathing places as a primary training element, adding recreational health and body art to the list of primary training elements, and updating the terminology of other primary elements;
 - c) Moving vector control to the list of secondary training elements and adding medical waste; and,
 - d) Making other clarifying and technical changes to the required training program elements.

- 6) Deletes the limitation of no more than two successive four-year terms for members of the EHSR Committee, and specifies that the public members cannot currently be within the field of environmental health rather than not having been engaged in the field at any time within five years preceding their appointment.
- 7) Requires the EHSR Committee to meet quarterly, rather than twice annually, and permits the meeting to be virtual. Permits the Chairperson to cancel a meeting if there is insufficient business to warrant convening a scheduled meeting. Specifies that a simple majority of the filled committee seats constitutes a quorum, rather than six members, and makes other minor and technical changes to the EHSR Committee.
- 8) Requires the EHSR Committee to make the registry of all REHSs and all environmental health specialist trainees in the state publicly available on its internet website within 90 days of the administration of an examination.
- 9) Makes other minor, technical and clarifying changes.

Comments

According to the author of this bill:

REHSs play a critical role in protecting public health. They help ensure that the places we eat, the water we drink, and the places we live comply with health and safety standards so that we can enjoy our daily lives free from hazards caused by unsanitary or dangerous conditions. This bill provides much-needed updates to the REHS trainee experience that will help retain and train skilled, science-focused professionals. This bill will strengthen California's public health organizational infrastructure, improve regulatory efficiency, and ensure that these professionals have the training and experience necessary to not just succeed, but also excel in their official positions once they pass their exams. Evolving health and safety conditions require a workforce that can evolve with them, and this bill will help our REHSs meet those challenges head-on.

Background

Background provided by the author. The REHS workforce has had difficulty recruiting and retaining professionals to maintain the essential services they provide. After meeting with stakeholders such as the California Association of Environmental Health Administrators and the County Health Executives Association of California, as well as polling county health departments themselves,

several factors were identified as key contributors to this issue.

The first issue identified was the exacerbated stress levels associated with the time limit to take the REHS certification exam. When REHSs are chosen to serve as trainees, they can only hold this position, in which they receive training to conduct REHS duties, for a maximum of three years. After these three years, they would be released from their positions if they had not passed the exam. After this, many of the trainees choose not to pursue a REHS career, or they are reassigned to another position. Furthermore, every time a candidate fails the exam, they face increasingly harsh time penalties, reducing the number of times they can take the test, which is only offered three times a year. This combination causes stress around the process and has likely contributed to the average passing rate of about 55.6% over the past four years.

The second issue identified was overly rigid education requirements. The REHS field is a very broad field with responsibilities touching almost every aspect of our lives, so the professionals entering the workforce should be equally as diverse. Currently, state law requires basic science courses to match an approved environmental health degree program. This limits access for otherwise qualified candidates and creates unnecessary barriers to entering the field.

Finally, since the creation of the EHSR Committee, the language governing its operation has not been substantially updated to bring the committee into the modern era. Older, defunct positions are still mentioned in the leadership structure, and the committee has a difficult time establishing a quorum due to position vacancies. This makes it difficult for the EHSR Committee to conduct business and provide CDPH with recommendations regarding the proper administration and enforcement process of REHSs.

This bill is a product of an ad hoc committee. At the beginning of January 2025, the California Conference of Directors of Environmental Health (CCDEH) convened an ad hoc committee to review the REHS statutes and build consensus on changes to modernize the code and ease hiring hurdles at the local level. The California Association of Environmental Health Administrators, a co-sponsor of this bill, is the advocacy arm of CCDEH. The ad hoc committee had eight voting members comprised of two members from each of CCDEH's four geographic regions, plus included nonvoting members from the CCDEH Executive Committee and partner organizations, including the County Health Executives Association of California (the other co-sponsor), the California Conference of Local Health Officers, and the California Environmental Health Association. The ad hoc

committee conducted a survey of environmental health directors to better understand hiring obstacles. When asked to identify the primary reasons that trainees could not pass the REHS exam, the top reasons were that a) the REHS exam is not reflective of REHS real-world job tasks; b) trainees struggled with test-taking in general; and, c) the trainee was not personally committed to preparing for the exam. The ad hoc committee met weekly, and proposed changes were taken back to the environmental health directors in each region for approval which the voting members then used to cast their votes to recommend the changes proposed by this bill.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: No

According to the Senate Appropriations Committee, unknown ongoing General Fund costs, likely low hundreds of thousands, for CDPH for state administration.

SUPPORT: (Verified 9/2/25)

California Association of Environmental Health Administrators (co-source)
County Health Executives Association of California (co-source)
American Federation of State, County, and Municipal Employees, AFL-CIO
California Environmental Health Association
California State Association of Counties
California State Council of Service Employees International Union
City and County of San Francisco
City of Long Beach
City of Vernon
County of Alameda
County of Butte
County of Contra Costa
County of Del Norte
County of El Dorado
County of Fresno
County of Humboldt
County of Imperial
County of Inyo
County of Kings
County of Lassen
County of Los Angeles
County of Monterey
County of Orange
County of Riverside

County of Sacramento
County of San Bernardino
County of San Diego
County of San Luis Obispo
County of San Mateo
County of Sierra
County of Sonoma
County of Tulare
County of Yolo
Health Officers Association of California
Rural County Representatives of California
Urban Counties of California

OPPOSITION: (Verified 9/2/25)

None received

ARGUMENTS IN SUPPORT: This bill is co-sponsored by the County Health Executives Association of California and the California Association of Environmental Health Administrators, which submitted a joint letter in support. According to the sponsors, the REHS workforce ensures the health and safety of the general public via key environmental health services, including food safety and restaurant inspections, land use regulation, and water quality programs. While working toward certification, individuals may be employed as an REHS trainee for up to three years. However, limited examination offerings and strict limitations on how often a trainee may take the exam have resulted in trainees being reassigned or released, even if they wish to continue to pursue a career as a REHS. Initially, this bill was designed to extend the time in which REHS trainees could be employed from three to five years to allow more time to pass the certification exam. In recognizing the need for additional REHS workforce across the state, additional provisions were added to make it easier for people to become REHS trainees, and allow more opportunities to take the test. This bill will also increase the number of training topics local jurisdictions can cover to better prepare their trainees. The sponsors argue that all of the provisions of this bill are designed to strengthen and increase the local REHS workforce without increasing state costs or placing burdensome new duties on existing CDPH staff. Numerous counties and public health departments, SEIU California, the American Federation of State, County and Municipal Employees, the Health Officers Association of California, and other organizations support this bill, making similar arguments.

ASSEMBLY FLOOR: 79-0, 6/3/25

AYES: Addis, Aguiar-Curry, Ahrens, Alanis, Alvarez, Arambula, Ávila Farías, Bains, Bauer-Kahan, Bennett, Berman, Boerner, Bonta, Bryan, Calderon, Caloza, Carrillo, Castillo, Chen, Connolly, Davies, DeMaio, Dixon, Elhawary, Ellis, Flora, Fong, Gabriel, Gallagher, Garcia, Gipson, Jeff Gonzalez, Mark González, Hadwick, Haney, Harabedian, Hart, Hoover, Irwin, Jackson, Kalra, Krell, Lackey, Lee, Lowenthal, Macedo, McKinnor, Muratsuchi, Nguyen, Ortega, Pacheco, Papan, Patel, Patterson, Pellerin, Petrie-Norris, Quirk-Silva, Ramos, Ransom, Celeste Rodriguez, Michelle Rodriguez, Rogers, Blanca Rubio, Sanchez, Schiavo, Schultz, Sharp-Collins, Solache, Soria, Stefani, Ta, Tangipa, Valencia, Wallis, Ward, Wicks, Wilson, Zbur, Rivas

Prepared by: Vincent D. Marchand / HEALTH / (916) 651-4111
9/2/25 18:19:13

**** END ****