**Conference for Food Protection**

**2010 Issue Form**

**Internal Number: 009**

**Issue: 2010 II-009**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Council Recommendation:** | Accepted as  Submitted |  | Accepted as Amended |  | No Action |  |
| **Delegate Action:** | Accepted |  | Rejected |  |  |  |

*All information above the line is for conference use only.*

**Title:**

Allergen Management Course Addition to Appendix B-1, Standard 2

**Issue you would like the Conference to consider:**

The CFP Certification of Food Safety Regulation Professionals (CFSRP) Work Group is recommending that the Allergen Management course currently under development within FDA's Division of Human Resources Development be included as part of the required "post curriculum" contained in Appendix B-1, Standard 2, of the FDA National Voluntary Retail Food Regulatory Program Standards (2009) upon completion and review by the CFP Food Allergen Committee.

**Public Health Significance:**

At the 2008 Biennial Meeting, the Voting Assembly of Delegates unanimously approved the Council III recommendation contained in Issue 2008 III-007, Food Allergy Information for state/local regulatory officials, stating:

The Conference recommends that the Food Allergen Committee be reestablished and that a letter be sent to the FDA recommending that food allergen resource information be included as part of the recommended curriculum in the FDA Voluntary National Retail Food Regulatory Program Standards, Standard #2, Trained Regulatory Staff and that a compendium of educational materials be made available to state/local regulators.

The Conference further recommends that the Food Allergen Committee work with the FDA to develop an appropriate educational component regarding food allergen awareness.

The Executive Board of the Conference charged the CFP CFSRP Work Group with incorporating Food Allergen resource information as part of the recommended curriculum in Standard #2, Trained Regulatory Staff, FDA Program Standards (2009). The CFP CFSRP Work Group conducted follow-up interviews with State/local/tribal jurisdictions that participated in the CFP Assessment of Training Needs Pilot Project in 2007. One of the objectives of this pilot project was to assess the appropriateness of the Standard #2 curriculum. The feedback received indicated overwhelming support for inclusion of an Allergen Management Course as part of the Standard #2 curriculum.

Appendix B-1 of Standard #2 contains a listing of the training curriculum expected to be completed by new hires or staff newly assigned to the regulatory retail food protection program. To be included in this listing, the subject matter must be in the form of a course with learning objectives. FDA's Division of Human Resource Development has developed several of the core elements for an Allergen Management Course. FDA's Center for Food Safety and Applied Nutrition is currently working on an Allergen Management guidance document. This document will include specific recommendations for the retail food industry. FDA is planning on collaborating with the CFP Food Allergen Committee to obtain feedback on the information contained in the Allergen Management guidance document. Once the document is finalized, FDA will include specific allergen management guidance for foodservice and retail food operations in the Allergen Management course.

The CFP CFSRP Work Group is recommending that the FDA Allergen Management course be incorporated as part of the Standard #2 post curriculum upon its completion and review by the CFP Food Allergen Committee. This course is not likely to be ready for posting by the 2010 Biennial Meeting but may be ready shortly there after. Rather than waiting another 2 years to deliberate the inclusion of this course into the Standard #2 post curriculum at the 2012 Biennial Meeting, the CFP CFSRP thinks it is prudent for the Conference to send a letter to FDA recommending that upon its full completion, the Allergen Management Course be included as part of the Standard #2 post curriculum when FDA revises the Standards document to reflect the recommended changes and/or revisions approved at the 2010 Biennial Meeting.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to FDA requesting:

* that upon its completion the FDA Allergen Management Course be reviewed by the re-created CFP Food Allergen Committee.
* the inclusion of the finalized Allergen Management Course as part of the "post curriculum" training in Appendix, B-1, Standard 2 - Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards when the next subsequent version is drafted. Moreover, at the time the Allergen Management Course is ready for inclusion as part of Appendix B-1, the total post curriculum hours and total Standard 2 training hours should be revised accordingly.

**Submitter Information:**

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | John A. Marcello, Co Chair | | |
| Organization: | CFP Certification of Food Safety Regulation Professionals Work Group | | |
| Address: | 51 W. 3rd Street, E-265 | | |
| City/State/Zip: | Tempe, AZ 85281 | | |
| Telephone: | 480 829-7396 ext. 35 | Fax: | 480 829-7677 |
| E-mail: | john.marcello@fda.hhs.gov | | |

**Attachments:**

* "Program Standard 2 Appendix B-1"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.