**Conference for Food Protection**

**2010 Issue Form**

**Internal Number: 011**

**Issue: 2010 II-012**

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| **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:**

Clarifying Definitions for Step 4, Standard 2 - Program Standards

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

Revise the definitions for "Trainer" and "Training Standard" to clarify the differences in performance responsibilities and qualifications. In addition, revise Step 4, Standard 2 - Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards (2009) to include a reference to the "Training Standard" qualifications listed in the definition section of the FDA Program Standards document.

**Public Health Significance:**

In 2006, the Conference unanimously approved a recommendation from the CFP Certification of Food Safety Regulation Professionals (CFSRP) work group to revise the minimum number of inspections a Food Safety Inspection Officer (FSIO) must successfully complete as part of their Food Code standardization process. The minimum number of standardization inspections in Step 4, Standard 2, was reduced from 8 to 4 for FSIOs who would **NOT** be expected to serve as "Training Standards" responsible for standardizing other FSIOs. The standardization process must be similar to the "FDA Standardization Procedures" and address the five following performance areas:

1. Risk-based inspections focusing on the factors that contributed to foodborne illness;

2. Good Retail Practices;

3. Application of HACCP Principles;

4. Inspection equipment; and

5. Communication.

The FDA standardization procedures are based on a minimum of 8 inspections and include performance areas related to the development of HACCP flow charts, completion of a risk control plan, and verification of a HACCP Plan. FDA standardizations are conducted with regulatory retail food protection personnel who would be expected to serve as "Training Standards" responsible for standardizing other FSIOs.

Jurisdictions participating in the FDA Program Standards have indicated that the Standard 2 criteria does not clearly address the differences in the standardization process needed to be a "Training Standard" versus standardization of FSIOs who will **NOT** conduct standardizations with other FSIOs.

The CFP CFSRP work group is recommending that the definitions of "Trainer" and "Training Standard" contained in the FDA Program Standards (2009) be revised to clearly identify the requirements for each of these roles. In addition, the work group recommends that Step 4, Standard 2, be revised to include a reference to the requirements for conducting field standardization of FSIOs as presented in the work group's proposed "Training Standard" definition.

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

that a letter be sent to the FDA requesting:

* that the terms "Trainer" and "Training Standard" as defined in the FDA Voluntary National Retail Food Program Standards (2009) be revised to reflect the language below.
* that Step 4, Standard 2 be revised to include clarification regarding the "Training Standard" requirements as presented below.

Note: new language is underlined; language to be deleted is with strike through.

**DEFINITIONS**

The following definitions apply in the interpretation and application of these Standards.

24) **Trainer** - an individual who has successfully completed the training elements as outlined in Steps 1-3, Standard 2, and is recognized by the program manager as having field experience and communication skills necessary to train new employees.

1. Satisfactory completion of the prerequisite curriculum;

2. Completion of a field training process similar to that contained in Appendix B-2, and

3. Completion of a minimum of 25 independent inspections and satisfactory completion of the remaining course curriculum.

25) **Training Standard** - a trainer who has successfully completed the following training AND ~~and~~ standardization elements in Standard 2 and is recognized by the program manager as having the field experience and communication skills necessary to train and standardize new employees. The training and standardization elements include:

1. Satisfactory completion of the prerequisite curriculum;

2. Completion of a field training process similar to that contained in Appendix B-2;

3. Completion of a minimum of 25 independent inspections and satisfactory completion of the remaining course curriculum; and

4. Successful completion of a standardization process based on a minimum of eight inspections that includes development of HACCP flow charts, completion of a risk control plan, and verification of a HACCP Plan, similar to the FDA Standardization Procedures.

Step 4 - Food Safety Inspection Officer - Field Standardization  
  
Within 18 months of employment or assignment to the retail food program, staff conducting inspections of retail food establishments must satisfactorily complete four joint inspections with a "training standard" using a process similar to the "FDA Standardization Procedures." The jurisdiction's "training standard" must have met all the requirements for conducting field standardizations as presented in the definition section for these Standards. The standardization procedures shall determine the inspector's ability to apply the knowledge and skills obtained from the training curriculum, and address the five following performance areas:

1. Risk-based inspections focusing on the factors that contribute to foodborne illness;

2. Good Retail Practices;

3. Application of HACCP;

4. Inspection equipment; and

5. Communication.

**Submitter Information:**

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| 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 | | |

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