

**Conference for Food Protection
2010 Issue Form**

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Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

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Title:

Clarifying language for Step 2, Standard 2 - Program Standards

Issue you would like the Conference to consider:

Revise Step 2, Standard 2 - Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards (2009)

Public Health Significance:

The CFP Certification of Food Safety Regulation Professionals (CFSRP) Work Group received a charge from the 2008 Biennial Meeting to re-examine the Standard 2 criteria requiring new hires or staff newly assigned to the retail food protection program to conduct a minimum of 25 joint field inspections with the jurisdiction's designated trainer. Feedback from the jurisdictions that participated in the 2007 Assessment of Training Needs (ATN) pilot project, administered through the Conference, indicated a wide variation in opinion as to the appropriate number of joint field training inspections needed to prepare new Food Safety Inspection Officers (FSIO) for conducting independent inspections of foodservice and retail food facility types. A summary of the jurisdiction responses to appropriate number of joint field inspections is contained on pages 48 and 49 of the 2007 Assessment of Training Needs Pilot Project Report which is available from the Conference for Food Protection web site.

Sixty-five percent (65%) of the jurisdictions participating in the pilot project indicated that 25 joint field training inspections was the appropriate minimum number to include in Standard 2. Of the 10 that responded with a "no", the number of joint field training inspections recommended ranged from 10 to 100, with an average of 75. From comments received from the pilot jurisdictions, the appropriate number of joint field training inspections is primarily based on an individual's skill, capability and affinity for learning new tasks or accomplishment of certain skills. These learning characteristics will vary from one individual to another.

In 2009, the CFP CFSRP Work Group conducted follow-up interviews with the jurisdictions that participated in the pilot project to assess their experiences with the continued use of the CFP Field Training Manual and forms. Twenty-two jurisdictions were canvassed, fifteen (68%) indicated a minimum of 25 joint field inspections was the appropriate number. A recurring comment from these jurisdictions was that the number of joint field inspections was not the performance measure they used to determine a trainee's readiness to conduct

independent inspections. The ultimate performance measure is the trainee's ability to successfully demonstrate all the competencies listed on the CFP Field Training Plan contained in Appendix B-2, Standard 2.

Many jurisdictions indicated that having a minimum of 25 joint field training inspections specifically referenced in Standard 2, provided the jurisdiction's trainer with expectations on time commitments/resources that should be devoted to the training process. It provides for a degree of quality assurance and expectation of the training process for both the candidate and trainer.

The CFP CFSRP Work Group has deliberated the information received from jurisdictions that have implemented the Standard 2 training process. Based on this research, the CFP CFSRP Work Group is recommending that the Conference retain the reference to the minimum of 25 joint field inspections in Step 2, Standard 2, but also include language that would allow a trainer to conduct a fewer number provided that exception was supported by written documentation, such as completion of the CFP Field Training Plan included in Appendix B-2, Standard 2.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting that Standard 2 - Trained Regulatory Staff, *FDA Voluntary National Retail Food Regulatory Program Standards (2009)* be revised as follows:

Note, in the context below:

-- FSIO is a "Food Safety Inspection Officer" and the acronym is spelled out and defined earlier in the Standard.

-- wording to be inserted is indicated with underline format; wording to be deleted is with strike through.

REQUIREMENT SUMMARY

STEP 2 - Completion of a minimum of 25 joint field training inspections or a sufficient number of joint inspections determined by the trainer and verified through written documentation that the FSIO has demonstrated all performance elements and competencies to conduct independent inspections of retail food establishments.

AND

successful completion of the jurisdiction's FSIO Field Training Plan similar to the process outlined in Appendix B-2.

Step 2: Initial Field Training and Experience

The regulatory staff conducting inspections of retail food establishments must conduct a minimum of 25 joint field inspections with a trainer ~~or the jurisdiction's designated staff member,~~ who has successfully completed all training elements (Steps 1 - 3) ~~required by~~ of this Standard. The 25 joint field inspections are to be comprised of both "demonstration" (trainer led) and "FSIO-led" (trainee led) inspections and include a variety of retail food establishment types available within the jurisdiction. If the trainer determines that the FSIO has successfully demonstrated the required performance elements and competencies, a lower minimum number of joint field training inspections can be established for that FSIO provided there is written documentation, such as the completion of the CFP Field Training Plan in Appendix B-2, to support the exception.

Demonstration inspections are those in which the jurisdiction's trainer ~~and/or designated staff person~~ takes the lead and the FSIO observes the inspection process. FSIO-led inspections are those in which the candidate takes the lead and demonstrates competencies identified in the jurisdiction's retail food program training plan. The jurisdiction's trainer is responsible for determining the appropriate combination of demonstration and FSIO-led inspections based on the FSIO's food safety knowledge and performance during the joint field training inspections.

The joint inspections must be conducted using a field training process and forms similar to ones presented in the *CFP Field Training Manual* included as Appendix B-2. The *CFP Field Training Manual* consists of a training plan and log, trainer's worksheets, and procedures that may be incorporated into any jurisdiction's retail food training program. It is a national model upon which jurisdictions can design basic field training and provides a method for FSIOs to demonstrate competencies needed to conduct independent inspections of retail food, restaurant and institutional foodservice establishments.

Jurisdictions are not required to use the forms or worksheets provided in the *CFP Field Training Manual*. Equivalent forms or training processes can be developed. To meet the intent of this Standard, documentation must be maintained that confirms FSIOs are trained on, and have demonstrated, the performance element competencies needed to conduct independent inspections of retail food and/or foodservice establishments.

NOTE: The CFP Field Training Manual is designed as a training approach providing a structure for continuous feedback between the FSIO and trainer on specific knowledge, skills and abilities that are important elements of effective retail food, restaurant, and institutional foodservice inspections.

· *The CFP Field Training Manual is NOT intended to be used for certification or licensure purposes.*

· *Regulatory jurisdictions are NOT to use the CFP Field Training Manual for administrative purposes including but not limited to, job classifications, promotions, or disciplinary actions up to and including termination.*

FSIOs must successfully complete a joint field training process, similar to that presented in the *CFP Field Training Manual*, prior to conducting independent inspections and re-inspections of retail food establishments in risk categories 2, 3, and 4 as presented in Appendix B-3 (taken from Annex 5, Table 1 of the 2005 FDA Food Code). The jurisdiction's trainer/food program manager can make a determination as to the FSIO's readiness to conduct independent inspections of risk category 1 establishments as defined in Appendix B-3 at any time during the training process.

NOTE: The criterion for conducting a minimum of 25 joint field training inspections is intended for new employees or employees new to the food safety program. In order to accommodate an experienced FSIO, the supervisor/training officer can in lieu of the 25 joint field inspections

· *Include a signed statement or affidavit in the employee's training file explaining the background or experience that justifies a waiver of this requirement; and*

· *The supervisor/training officer must observe experienced FSIOs conduct inspections to determine any areas in need of improvement. An individual corrective action plan should be developed outlining how any training deficiencies will be corrected and the date when correction will be achieved.*

Reference:

APPENDIX B-2: CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers, Standard #2 - Trained Regulatory Staff, *FDA Voluntary National Retail Food Regulatory Program Standards*, referenced in this Issue is available from the following CFP web link:

www.foodprotect.org/media/guide/CFPFieldTrainingManual-1-7-08.pdf

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