

**Conference for Food Protection  
2010 Issue Form**

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Issue: 2010 II-013**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

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

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**Title:**

Re-create - CFSRP Work Group

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

The CFP Certification of Food Safety Regulation Professionals (CFSRP) Work Group has identified specific initiatives pertaining to the training and professional development of regulatory retail food safety inspection officers that require continued Conference deliberation. A 2010-2012 CFP Certification of Food Safety Regulations Professional (CFSRP) Work Group should be re-created by the Conference to continue the work on these initiatives.

**Public Health Significance:**

A national model that addresses training and the professional development of all regulatory retail food safety professionals - including third party independent auditors - is essential to enhancing the effectiveness of the nation's retail food protection system. The model training plan and log, field training worksheets, and joint field training process presented in the CFP *Field Training Manual for Regulatory Retail Food Safety Inspection Officers (Field Training Manual)*, approved at the 2008 Biennial Meeting are only a part of a professional development continuum that is needed to ensure all regulatory retail food safety professionals have the knowledge and skills to effectively conduct inspections of retail food stores, restaurants, and/or institutional foodservice facility types.

The Standard 2 training and standardization model should be viewed as a working document that will need to be updated and revised to meet the ever changing retail food safety environment. The Conference for Food Protection provides the mechanism to:

- maintain and update this national training model;
- explore additional training and/or assessment needs for regulatory retail food programs; and
- build consensus among all retail food safety stakeholders.

Results from the follow-up interviews with Assessment of Training Needs ATN pilot jurisdictions indicated support for the development of an audit tool that mirrored the CFP Field Training process. The Work Group reached consensus that the audit process, whether included as part of Standard 2 or provided as a stand alone process, should be fully compatible with the CFP *Field Training Plan* included as part of Appendix B-2, Standard 2, *FDA Program Standards (2009)*.

In order to eliminate potential program redundancies, the CFP CFSRP Work Group is recommending a new 2010-2012 charge to collaborate with FDA to review all initiatives: existing, new or under development; involving the training, evaluation and/or certification of food safety inspection officers. This collaborative working relationship will ensure the sharing of information to prevent any unnecessary redundancies in the creation of work products or assignment of tasks/responsibilities. This collaborative effort will include an assessment of the need and potential structure for incorporating Food Safety Inspection Officer "Performance Audits" as a component of the Program Standards.

In addition, a new charge for this Work Group is proposed based on an increase in the number of independent third party auditors contracted to conduct regulatory oversight inspections of institutional foodservice, restaurant, and retail food store facilities. Some areas of the country are beginning to disband the local regulatory retail food protection agency and contract the work to nongovernmental organizations. Currently, a national standard upon which to evaluate the education and qualifications of independent third party auditors does not exist. Legislation has been introduced at the federal level that contains language that would recognize third party audits as a legitimate use of resources to enhance food safety. Since these issues are not solidified at the time of submittal of the Work Group report to the Conference of Food Protection, a closer look over the next two year cycle is in order.

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

that a 2010-2012 Certification of Food Safety Regulation Professionals (CFSRP) Work Group be re-created to address the following charges:

1. Collaborate with the FDA Center for Food Safety and Applied Nutrition and the FDA Division of Human Resource Development to:

- Review all initiatives: existing, new or under development; involving the training, evaluation and/or certification of Food Safety Inspection Officers. This collaborative working relationship will ensure the sharing of information so as not to create any unnecessary redundancies in the creation of work product or assignment of tasks/responsibilities.
- Review and revise, as needed, Standard 2 classroom curriculum, time frame for completion of Steps 1 through 4 for new hires or staff newly assigned to the regulatory retail food protection program.
- Determine if the CFP Field Training Manual and forms have completely addressed all recommendations received as part of the 2007 Assessment of Training Needs (ATN) pilot project.

2. Eliminate the potential redundancy of multiple verification tools (*FDA Retail Food Level I Performance Audit and FDA Procedures for Standardization and Certification of Retail Food Inspection / Training Officers*) utilized by FDA programs, work in collaboration with FDA's Center for Food Safety and Applied Nutrition, FDA's National Retail Food Team and the FDA's Division of Human Resource Development to:

- Conduct a pilot project over the next year using the *FDA Retail Food Level I Performance Audit* with a limited and selected number of jurisdictions. The *FDA Performance Audit* will be piloted for use during the two joint inspections conducted as part of the quality assurance component of *Standard 4 - Uniform Inspection Program*. An outline of the pilot project objectives, protocol, and projected timeline is included as Attachment A with this Issue. The CFP CFSRP work group will submit a

report to the 2012 Biennial Meeting that documents the result of the pilot project and any recommendations for the use of verification tools as part of the FDA Program Standards; and,

- Conduct a joint assessment of FDA *Standardization Procedures* and FDA *Performance Audit* documents to determine if both verification tools are equally viable with distinct purposes and outcomes; and,
- Explore the feasibility of merging these existing verification tool documents and provide a plan for consolidation of such; and,
- Upon determination, assess the placement and administration of final verification tool(s) within the FDA *Program Standards* as appropriate, or separately as appropriate; and,

With input and guidance from the CFSRP Work Group, FDA will determine if modifications to their draft FDA *Performance FDA Retail Food Level I Performance Audit* and/or *Standardization* documents are needed. Any modifications that would include changes to the Program Standards will be submitted as Issues by the CFP CFSRP Work Group to the 2012 Biennial Meeting.

3. Collaborate with FDA, other federal agencies, professional and industry associations to research what criteria is currently being used to assess the education and training qualifications of independent third party auditors that have been contracted to conduct institutional foodservice, restaurant, and retail food compliance inspections in lieu of a State/local/tribal regulatory retail food program. The re-created Work Group is to provide a report to the 2012 Biennial Meeting that:

- Assesses the number of jurisdictions and geographic areas where retail food compliance inspections are conducted by independent third party auditors in lieu of a regulatory compliance program;
- Delineates the reasons jurisdictions have moved to a third party auditor inspection compliance program;
- Summarizes criteria used to select third party auditors for inspection compliance oversight responsibilities including, but not limited to, education and training qualifications;
- Assesses and determines appropriate training and standardization processes/protocols for third party auditors, and
- Identifies any agencies/organizations/working groups currently addressing education and training standards for third party auditors conducting retail food compliance inspections.

Based on the above research, the work group will provide a recommendation to the Conference as to what actions/initiatives, if any, need to be undertaken to provide a national structure for ensuring that third party auditors possess the necessary knowledge, skills, and abilities to conduct retail food program compliance inspections.

4. Evaluate and determine the best approaches to promoting awareness and implementation of the national training model contained in the CFP Field Training Manual and forms, Appendix B-2, Standard 2. The Work Group will:

- Research the use of websites, list serves, newsletters, testimonials, presentations, and training workshops, etc.
- Assess opportunitite for enhancing the electronic versions of the CFP Field Training Manual and forms to minimize paperwork.

5. Report back to the 2012 Biennial Meeting its findings regarding the above charges.

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**Attachments:**

- "Proposed Performance Audit Pilot Project Objectives and Time Line"

*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.*

# **CFP Certification of Food Safety Regulation Professionals Work Group**

## **Proposed Performance Audit Pilot Project Objectives and Time Line**

### **Objectives of Pilot Project**

1. Evaluate the FDA *Retail Food Level I Performance Audit* (Audit) documents [i.e., Guide to the Performance Audit Process for State, Local & Tribal Food Safety Inspection Officers (hereafter FSIO), Retail Food Level I Performance Audit Criteria for FSIO, Audit Failure Reference Guide, Level I FSIO Audit Results Summary Form, Level I FSIO Audit Worksheet, Level I FSIO Auditor Feedback Form]
  - Review the performance elements and criteria for omissions, additions, and items not applicable.
  - Determine the strengths and weaknesses of the documents.
  - Verify ease of use of the documents, including instructions and format. Are jurisdictions able to utilize documents independently without direct supervision or oversight?
  - Determine length of time required to use the documents and complete the Audit process.
2. Assess the use of the Audit process
  - Verify that the Audit process is appropriate to assess the FSIO's knowledge, skills and ability when applying the competencies required during a field inspection.
  - Verify the appropriate placement of the Audit process application tool; as a stand-alone document or within the Voluntary National Retail Food Regulatory Program Standards as part of the training process (Standard 2 – Trained Regulatory Staff) or as part of the ongoing quality assurance program (Program Standard 4 – Uniform Inspection Program).
3. Gather and analyze data from the pilot study and prepare a Pilot Project Report for the Conference for Food Protection Certification of Food Safety Regulation Professionals Work Group (Work Group) at the 2012 biennial meeting of the Conference for Food Protection (Conference).

**Pilot Project Timeline**

March 2010	Begin development of Pilot Project packages / Fact Sheet (web-based, paper, etc.)
April 2010	Solicitation of interested jurisdictions during the 2010 biennial meeting of the Conference
May 2010	Selection of jurisdictions for Pilot Project (Minimum of 8 jurisdictions desired)
June 2010	Send out Pilot Project packages to selected jurisdictions and notify jurisdictions not selected
July 2010	Conference call with selected jurisdictions (Overview of Pilot Project objectives, goals, methodology, data collection, etc.)
January 2011	Interim data collection from jurisdictions (Data may be received through CFP website)
February 2011	Interim conference call with jurisdictions (Review of data received to date, overview of progress, solicitation of questions, reminder of deadlines, etc.)
July 2011	Completion of field component of Pilot Project and collection of completed data reports from jurisdictions
August 2011	Convene conference call focus group of jurisdiction representatives to review Pilot Project outcomes
Sept / Oct 2011	CFP Work Group review, analysis, summary and development of Pilot Project results into Conference report and issue.
December 2011	Submit final Work Group report and any Issues for consideration at the 2012 biennial meeting of the Conference.

## **Methodology**

**Selection of jurisdictional participants:** Criteria for participation in the Audit Pilot Project is as follows:

- Jurisdictions MUST be enrolled in Program Standards to participate.
- Jurisdictions must agree to follow the training criteria specified in Program Standard 2, Steps 1 – 3 (includes use of a field training process and documentation similar to that contained in the CFP Field Training Manual and forms, Appendix B-2) with newly hired FSIOs while a participant in the Pilot Project.
- Jurisdictions must have a sufficient number of FSIOs that have successfully completed Standard 2, Steps 1-3 .
- Jurisdictions must make a commitment to meet the Pilot Project timelines, reporting protocols. and participate in conference calls.
- Jurisdictions must agree to publication of their participation in Pilot Project Report (note: individual responses will remain confidential).
- Any jurisdictions not selected will be notified.

**Distribution of Pilot Project Package:** All selected jurisdictions will receive an Electronic Pilot Project Package containing the following materials:

- Copy of newly revised Standard 2 – Trained Regulatory Staff(as approved by the 2010 biennial meeting of the Conference) and Standard #4 – Uniform Inspection Program
- Copy of the FDA Retail Food Level I Performance Audit process documents including instructions.
- Copy of the *CFP Field Training Manual*.
- Performance Audit Pilot Project protocol and timeline.
- Contact information for Performance Audit Pilot Project Director.

**Launch of Pilot Project:** Pilot Project will be initiated with a conference call of all participating jurisdictions. The purpose of the conference call will be to provide an overview of the Pilot Project objectives, goals, timeline, methodology, participant expectations, data collection, and other reporting criteria.

**Interim Progress Review of Pilot Project:** Participating jurisdictions will submit reporting documents completed to date to Pilot Project Director. Data will be analyzed and summarized to identify any potential challenges, omissions, or errors that would hinder completion of the project. Additionally, a conference call will be conducted with participating jurisdictions for additional verbal feedback and clarification.

**Data Collection and Reporting:** The design of the Data Collection and Reporting Instrument will incorporate the following:

- A questionnaire designed to solicit information.
- Demographical information
- Focus Group(s) designed to solicit additional anecdotal information and recommendations.

**Roles and Responsibilities**

The following roles and responsibilities are integral to this Pilot Project:

<b>Role</b>	<b>Responsibility</b>
Conference for Food Protection Certification of Food Safety Regulation Professionals Work Group	Staff all Pilot Project Activities, review the Pilot Project outcomes and make further recommendations to the Conference.
Pilot Project Subgroup	Prepare Pilot Project Package, prepare Fact Sheet, solicit jurisdictional participation, select participants, distribute Pilot Project Package, receive Pilot Project data from the Pilot Project Director, tabulate and analyze data, summarize the results of the Pilot Project and prepare the Pilot Project Report (including recommendations) for presentation to the 2012 biennial meeting of the Conference.
Pilot Project Director	Serve as the central point of contact for the Pilot Project, collect data and forward to the Pilot Project Subgroup, coordinate focus group meetings, and present Pilot Project findings to the Conference.
Jurisdictional Participants	Carry out the activities of the Pilot Project including following the criteria specified in <i>Retail Food Level I Performance Audit</i> documents. Jurisdictions must be active participants in the FDA Program Standards and will have met the requirements of Standard 2, Steps 1 – 3, relative to use of the <i>CFP Field Training Manual</i> ; must also be able to assess the feasibility of using the Audit documents with newly hired or existing FSIOs relative to applicability to Standard 4; completing the data reporting instruments; participating in focus group calls; agreeing to publication of Pilot Project participation; and providing feedback to the Pilot Project Subgroup.
Conference for Food Protection	Provide assistance as requested by the Work Group to disseminate and collect information.
FDA	Will collaborate with the Pilot Project Subgroup in the design and format of the Pilot Project, analysis of data, and subsequent recommendations for use and placement of the Audit documents and/or process.

### **Analysis of Data**

The Pilot Project Subgroup will analyze the data by tabulating and summarizing all responses to the questionnaire and the focus group meetings. Based on the results of the Pilot Project, the Work Group will determine necessary or recommended changes that need to be made to the training/Audit documents and/or process.

### **Preparation of Pilot Project Report**

A report of the results of the Pilot Project will be created. The report will include a summary of the results of the data tabulation (including participant list, demographics, and questionnaire results), a list of recommended changes to the Audit documents and a list of recommended changes to the Voluntary National Retail Food Regulatory Program Standards (Standard #2 and/or Standard #4). This report will be submitted to the 2012 biennial meeting of the Conference for Food Protection.

Additionally, Pilot Project results and recommendations will be developed in collaboration with FDA's Division of Human Resource Development to assist in the development of a performance assessment specific to the responsibilities of state, local and tribal retail food safety inspection officers.