

## **1Conference for Food Protection Committee Report**

**COMMITTEE NAME:** Certification of Food Safety Regulation Professionals Committee

**COUNCIL (I, II, or III):** II

**DATE OF REPORT:** December 05, 2011

**SUBMITTED BY:** Susan Kendrick, Committee Co-Chair; Ron Grimes Co-Chair

**COMMITTEE 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 opportunities 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**

## COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

### Meetings and Workgroup Assignments:

The CFSRP Work Group was charged with a great deal of significant work to be completed by the 2012 CFP Biennial meeting. In order for the Work group as a whole to accomplish these charges, the workgroup was divided into smaller sub-workgroups centering on individual committee charges. Each committee member was asked to participate on at least one sub-workgroup. The CFSRP Co-Chair Susan Kendrick and Co-Chair Ron Grimes selected sub-workgroup chairs as follows:

<u>Workgroup</u>	<u>(Co) Leaders</u>	<u>Function</u>
Subgroup 1 FSIOs	Dave Read and Michelle Motsinger	Work with FDA CFSAN on training, evaluation, and/or certification of
Subgroup 2	Lee Cornman and John Marcello	Conduct and evaluate FDA Program Performance Audit
Subgroup 3 auditors	Christina Johnson and Ruth Hendy	Research criteria used to assess qualifications third party
Subgroup 4	Michelle Samarya-Timm	Determine the best approaches to promoting CFP Field Training Manual

The CFSRP held all meetings by conference calls in an effort to ease travel restrictions that were placed on the individual committee members. The dates of the conference calls were: September 23, 2010; December 3, 2010; February 8, 2011; April 26, 2011; June 22, 2011; August 18, 2011; October 3, 2011; October 31, 2011; and November 30, 2011.

Due to the complexity of the charges and information presented, the CFSRP Work Group final report is presented in two parts:

- Part A – All committee charges and activities except for the pilot project noted in Part B.
- Part B – Uniform Inspection Program Audit Pilot Project.

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

- The FDA's Food Protection Plan, the President's Food Safety Working Group, and the recent passage of the Food Safety Modernization Act are major drivers for the development of the Integrated Food Safety System to ensure food safety in a cohesive and comprehensive manner. Collaboration and coordination of federal, state, tribal, and local food safety program efforts is essential for implementation of this system. One important step toward integration is the adoption of the Retail Food Regulatory Program Standards and the Manufactured Food Regulatory Program Standards by food safety regulatory agencies to promote uniformity and the use of best practices in their regulatory programs.

- The Conference for Food Protection has a role in assisting retail food programs to develop the capacity and infrastructure for an integrated approach.
- The CFSRP Workgroup has members participating on the Partnership for Food Protection (PFP) Training and Certification Workgroup (TCWG). The workgroup was formed in 2008 as an outcome of the FDA/ 50 State Gateway to Food Protection meeting held in St Louis, MO. The committee's charges were to:
    - Establish competencies and certification for all disciplines.
      1. Short-term deliverable: Perform a job analysis for (all governmental jobs and stakeholders) inspectors involved in food and feed protection (prevention, intervention, and response). Identify current competency assessments and credentials. Develop a set of core competencies. Develop a framework for credentialing that could be taken back to associations and agencies to share.
      2. Long-term deliverable: To expand to include other disciplines, experienced staff, and stakeholders involved in food and feed protection.
    - Establish a national training center.
      1. Short-term deliverable: Assess and review training currently available for all disciplines involved in food and feed protection (prevention, intervention, and response) and identify any gaps. Use this information to assess whether Kellogg Foundation International Food Protection Training Institute (IFPTI) proposal fits needs and goals identified by the work group.
      2. Long-term deliverable: To put together a comprehensive course catalog.
  - The PFP TCWG has worked diligently on these charges since inception. For additional detail, see the links to the 2008 50 State Meeting Report, the 2010 50 State Meeting Report, the 2010 PFP TCWG report, and the 2010 Food Safety Training and Certification Vision for Federal, State, Local, Territorial, and Tribal Regulators.  
Link directly to the 50 State Meeting Reports:  
<http://www.fda.gov/ForFederalStateandLocalOfficials/Meetings/50-StateMeeting/default.htm>  
Link directly to the Vision:  
[http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/Meetings/UC\\_M274679.pdf](http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/Meetings/UC_M274679.pdf)  
Link directly to the training work group final report:  
[http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/Meetings/UC\\_M274677.pdf](http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/Meetings/UC_M274677.pdf)
  - The TCWG developed a plan to conduct Retail Food Safety Specialist Job Task Analysis (JTA) for food inspection positions that FDA has initiated through a contract and has completed a number of JTA's for federal staff conducting specific food safety inspections. This work can be used by state and local entities

- to compare to their own inspection activities to verify similar activities and identify differences or gaps that may exist between federal, state, and local food inspection activities.
- The TCWG also endorsed the IFPTI as a training institute to deliver food safety training to federal, state, and local food safety staff. Additionally, the IFPTI has inventoried food safety training available around the country into a course catalog currently available on their website at [www.ifpti.org](http://www.ifpti.org). The IFPTI established a Curriculum Development Team that included members of the CFSRP and the PFP TCWG to design a competency based framework to identify and develop food safety curriculum addressing four professional levels (entry, journey, technical, and leadership) for training people at different stages of their career. The IFPTI Curriculum Framework is attached to this report.
  - As a result of the ongoing work of the Partnership for Food Protection Training and Certification Workgroup, the CFSRP workgroup decided **not** to recommend revisions to Retail Food Regulatory Program Standard 2 until more information is available from the Retail Food Safety Specialist Job Task Analysis for state and local food safety regulatory professionals.
  - Once the Retail Food Safety Specialist Job Task Analysis is complete, the information can be used to review the Standard 2 curriculum to identify any gaps and recommendations for change and has been included as a continuation charge – See Issue titled: Re-create CFSRP Work Group.
  - A follow-up survey to the CFSRP 2008 Assessment of Training Needs Pilot Project was conducted (see attached *Assessment of Training Needs Survey Summary*).
    - The original pilot project participants were re-surveyed to identify and assess existing training and gaps in training for food safety inspection officers (FSIO's).
    - The survey was completed by 16 of the 30 original pilot project participants and 53% of respondents represented State agencies while 35% represented local county agencies, and 12% represented local city agencies.
  - A majority of respondents require a Bachelors Degree (94%) as the minimum level of education an FSIO must have to be considered for employment with their agency, and 70% require at least 30 semester hours of science as a part of their academic degree prior to employment or assignment to the retail food protection program.
  - As a part of their agency's training program, a large majority of respondents had utilized FDA sponsored food safety classroom courses (82.4%) and FDA web-based learning such as ORA-U (100%). Additionally, many also provided in-house classroom courses (71%) and over half were utilizing IFPTI as a mechanism for training (59%).
  - Feedback on course delivery, effectiveness, content, and objectives were very favorable for all of the above-mentioned training methods.
    - Respondents did offer suggestions for improvement including:
      1. Providing better information before the course,
      2. Updating content,
      3. Adding video as a training method,
      4. Making courses more interactive, and more difficult.

- Feedback from respondents also indicated there was a gap in training and that some topics were not currently being addressed in trainings, including:
  1. Communication,
  2. Problem solving,
  3. Conflict management, and
  4. Actual application of learned knowledge and skills in a classroom environment.
- The 2010-2012 CFP CFSRP Work Group is recommending that a new charge be assigned to a re-created CRFSP Work Group to collaborate with the FDA Center for Food Safety and Applied Nutrition, the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to:
  - Continue review of 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.
  - When completed, use the Retail Food Safety Specialist Job Task Analysis being developed under the umbrella of the PFP TCWG to review and revise the Standard 2 curriculum to identify any gaps and recommendations for change and review the 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 need to be revised based on the findings of the PFP TCWG and the Retail Food Safety Specialist Job Task Analysis.

**Charge 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, and 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.

- Developed a uniform inspection program audit pilot project jurisdiction feedback on the audit process and forms.
- Seventeen jurisdictions enrolled in the pilot study. Fourteen of those completed the pilot and returned the forms (6 State, 7 County, 1 City jurisdiction).
- Results of the feedback from the Standardization/Certification of Retail Food Safety Inspection Officers Pilot Project was statistically analyzed and categorized.
- The Pilot Project is presented under separate cover as an Issue document titled: Report – CFSRP Part B – Uniform Inspection Program Audit Pilot Project.
- Participating jurisdictions have indicated that both the FDA Standardization Procedures and FDA Performance Audit documents are valuable verification

tools but rather than merging the two documents, they would prefer to have the training tool as an Appendix to Standard 4.

- The Conference recommends that a letter be sent to FDA requesting that they:
  1. Work in collaboration with the Program Standards Committee to revise Standard 4, Uniform Inspection Program, to address the pilot project comments and to assess the criteria in Standard 4 to make it more program focused rather than focused on the individual.
  2. Review for potential revisions to the Standard 4 Uniform Inspection Program criteria and field inspection review process, the following recommendations contained in the CFP CFSRP Uniform Inspection Program Audit Pilot Project Report.
    - Revise the Guide to Conducting a Uniform Inspection Program Audit. Some changes that should be considered include:
      - Developing a more comprehensive guidance document similar to the CFP Field Training Manual contained in Standard 2 that explains the criteria for each component of the audit process;
      - Clarifying the process for selecting the establishments that are to be used for the file and field review;
      - Clarifying the parameters for what is to be included as part of the establishment file review;
      - Providing expanded guidance on the auditor's qualifications, role, and responsibilities.
    - The 10 Program Elements contained in Standard 4 need to be aligned with the Performance Elements and competencies identified in the Standard 2 – CFP Field Training Plan. This alignment would necessitate revisions to the Guide to Conducting a Uniform Inspection Program Audit, Audit Worksheet, and Audit Reference Guide.
    - The presentation of the 10 Program Elements contained in the Standard 4 criteria, the Guide to Conducting a Uniform Inspection Program Audit, and Audit Worksheet need to be presented in a linear format to reflect a logical sequence to the inspection process.
    - The information contained in the Audit Reference Guide should be incorporated into the Guide to Conducting a Uniform Inspection Audit to eliminate the need for multiple documents.
    - The weighting/assessing of each of the 10 Program Elements is not consistent. Some Program Elements, such as the one that relates to assessing risk factors, are much more complex than others, such as the timely filing of reports and documents. A more equitable, objective assessment system should be established for the audit process.
    - The Standard 2 – CFP Field Training Plan builds in the flexibility for a jurisdiction to include performance elements / competencies that are important to their program. The Standard 4 criteria and associated audit

worksheet and guides are more rigid in their format. The audit process and worksheet should be designed to allow jurisdictions the flexibility for assessing inspection Program Elements that are specific to their retail food protection program.

- The field inspection assessment conducted as part of Standard 4 seems to take an all or nothing approach. Item 1 for example pertains to an assessment of observations of risk factors and public health interventions – eleven different categories. If an inspector fails to make an observation of just one item in this category, this Program Element is not met. This level of performance is higher than what is used for FDA Food Code Standardizations. The assessment protocol for Performance Elements needs to be re-evaluated and better guidance provided as to what constitutes an effective performance measurement.
  - Some of the Program Elements are very subjective in nature and do not contain definitive performance measurements, such as producing legible reports. The Program Elements contained in Standard 4 should have defined performance measurements that are quantifiable.
  - The Audit Worksheet should include a comment section so that a more detailed description can be provided as to the observations made of an inspector's performance of any one of the 10 Program Elements.
3. Obtain input and feedback from the CFP Program Standards Committee to assist FDA in the review of the recommendations contained in the CFP CFSRP pilot project report.

**Charge 3:** Collaborate with FDA, other federal agencies, and 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.

- Explored option of obtaining third party audit information from NEHA surveys, but these did not provide any information relevant to the work of this committee.
- Decided to survey States to see where Third Party Audits could/were being utilized to offset regulatory inspections.
- Developed a short four question survey (see attached *Third Party Auditor Survey Summary*).
- Discussed how contract inspectors might be standardized.
- The 2010 CFP delegates were sent a survey but only 36% responded.
- A follow-up email to the non-responsive states was conducted.
- The results of the survey revealed mixed results of the 18 respondents:
  - Only two states indicated that there are third party auditors performing inspections in their states.
  - One State indicated authority to authorize third party inspections of lodging facilities but they were not aware of any current situations.

- One State indicated “consultants” certified to conduct inspections by the State Dept of Public Health could be utilized.
    - One State is considering recognizing third party audits for manufactured foods.
  - The 2010-2012 CFP CFSRP Work Group is recommending that new charges be assigned to a re-created CFSRP Work Group to:
    - Collaborate with FDA, other federal agencies, and professional and industry associations to evaluate the results of the Retail Food Safety Specialist Job Task Analysis being developed under the umbrella of the PFP TCWG to:
      1. Assess and determine appropriate training and standardization processes/protocols for third party auditors.
      2. Identify any agencies/organizations/working groups currently addressing education and training standards for third party auditors conducting retail food compliance inspections.
      3. 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.

**Charge 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 2010-2012 CFP CFSRP Work Group recommends that the FDA serve as the appropriate authority to implement and promote the CFP Field Training Manual. The Work Group has identified the following items to provide assistance to the FDA in their promotional activities:
  - CDC’s Environmental Public Health Performance Standards toolkit, which was created in partnership with National Association of County and City Health Officials (NACCHO), was reviewed and determined to be a valuable model for promotion and implementation of the CFP Field Training Manual.
  - Case studies of jurisdictions that use the CFP Field Training Manual would be a valuable resource in a toolkit provided by FDA to jurisdictions that are working to include the Field Training Manual in their program.
  - Application forms for available financial incentives would be an asset in a toolkit provided by FDA as financial assistance would promote implementation of the Field Training Manual in jurisdictions that are not currently using the Manual.
  - The toolkit should also include references of agencies and subject matter experts to contact for implementation questions.

The Conference recommends that a 2012-2014 Certification of Food Safety Regulation Professionals Work Group be re-created to address the charges listed above.

**REQUESTED ACTION:**

The Committee submits the following Issues and attachments to the 2012 CFP Biennial Meeting:

- 1) Issue #1: CFSRP Part A – Work Group Report  
Recommendating acceptance of CFP CFSRP Work Group Report  
Attachments to this Issue includes:
  - o 2012 CFP-CFSRP Committee Final Report (content attachment to be reviewed and acknowledged by Council II)
  - o CFSRP Work Group Roster (supporting attachment)
  - o IFPTI Curriculum Framework (supporting attachment)
  - o Assessment of Training Needs Survey Summary (supporting attachment)
  - o Third Party Auditor Survey Results (supporting attachment)
- 2) Issue #2: CFSRP Part B – Uniform Inspection Program Audit Pilot Project  
Recommendating acceptance of CFP CFSRP Uniform Inspection Program Audit Pilot Project  
Attachments relevant to this Issue include:
  - o Uniform Inspection Program Audit Pilot Project Report (content attachment to be reviewed and acknowledged by Council II)
  - o Guide to Uniform Inspection Program Audit, Worksheet, and Reference Guide (supporting attachment)
- 3) Issue #3: Recommendations from Uniform Inspection Program Audit Pilot Project  
Attachments relevant to this Issue include:
  - o The *Uniform Inspection Program Audit Pilot Project Report*, submitted as an attachment to the Issue titled: “CFSRP Part B – Uniform Inspection Program Audit Pilot Project.”
- 4) Issue #4: Recommendations for Promoting the Field Training Manual
- 5) Issue #5: Re-create Certification of Food Safety Regulation Professionals Work Group

**ATTACHMENTS:**

- o IFPTI Curriculum Framework
- o Assessment of Training Needs Survey Summary
- o The Uniform Inspection Program Audit Pilot Project Report
- o Guide to Uniform Inspection Program Audit, Worksheet, and Reference Guide
- o Third Party Auditor Survey Results
- o CFSRP Work Group Roster

**COMMITTEE MEMBER ROSTER:**

- See attached: CFP CFSRP Work Group Member Roster (pdf)