

**Conference for Food Protection  
2012 Issue Form**

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<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:**

Amendment to Standard 9 Program Assessment

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

Amend Voluntary National Retail Food Regulatory Program Standards, Program Standard No. 9 to add an additional requirement to develop targeted intervention strategy(s) designed to address the occurrence of the risk factors identified in the jurisdiction's Risk Factor Study. And, those intervention strategies are implemented and the effectiveness of each strategy is evaluated by subsequent Risk Factor Studies or other similar tool. Additional grammatical corrections are also recommended.

**Public Health Significance:**

Currently, Standard No. 9 requires jurisdictions to conduct a Risk Factor Study and analysis of the resulting data to track trends over time related to the occurrence of risk factors. What is currently lacking is a requirement for jurisdictions to attempt to improve the compliance rates for the risk factors identified as having a high out of compliance rate in their Risk Factor Study. Although one of the objectives of the Program Standards is to track the results of regulatory efforts over time, as currently written, it is possible that a jurisdiction could conduct repeated Risk Factor Studies without ever implementing any activities designed to reduce the occurrence of foodborne illness risk factors and still meet Standard No. 9 by simply collecting the data.

The proposed additional language as submitted by the Program Standards Committee provides needed grammatical corrections, but more importantly, would ensure that enrolled jurisdictions develop a targeted intervention strategy or strategies designed to address the occurrence of the risk factors identified in their Risk Factor Study, that these strategies are implemented, and the effectiveness of each strategy is evaluated by subsequent Risk Factor Studies or other similar tools.

The proposed language does not require that interventions result in a reduction in the occurrence of the risk factors, simply that it is attempted and measured. It encourages innovative approaches by suggesting jurisdictions consider various types of interventions such as code changes, educational and training activities, enforcement and compliance strategies, etc. The purpose of the proposed intervention strategy is to attempt to effect improvement in reducing priority risk factor occurrences, between measurement intervals and to assess the strategy's effectiveness.

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

a letter be sent to the FDA requesting an amendment to the Voluntary National Retail Food Regulatory Program Standards, Standard 9 Program Assessment, to add requirements to ensure that enrolled jurisdictions develop a targeted intervention strategy or strategies designed to address the occurrence of the risk factors identified in their Risk Factor Study, that these strategies are implemented, and the effectiveness of each strategy is evaluated by subsequent Risk Factor Studies or other similar tools.

- The specific revisions to Standard 9 are amended to read as follows:

*(NOTE: complete Standard 9 document with tracked changes is attached to Issue titled: Report - Program Standards Committee)*

Requirement Summary, (pages 9-2 and 9-3):

To be an active participant in the *Voluntary National Retail Food Regulatory Program Standards* and to be listed on the FDA Roll of Participating Jurisdictions, a jurisdiction must ~~assure~~ensure that:

To achieve the criteria of Standard 9 and claim Standard 9 as met, a jurisdiction must ~~assure~~ensure that:

3. A targeted intervention strategy(s) designed to address the occurrence of the risk factors(s) identified in their Risk Factor Study is implemented and the effectiveness of such strategy(s) is evaluated by subsequent Risk Factor Studies or other similar tools.

Achieving Standard 9, (page 9-5 thru 9-7):

A. 2. To evaluate trends over time to determine whether progress is being made toward reducing the occurrence of foodborne illness risk factors. Studies designed to measure trends require analysis of data over a period of time, and no single point in time can be used to derive trend conclusions.

E. A jurisdiction must ensure that a targeted intervention strategy designed to address the occurrence of the risk factor(s) identified in their Risk Factor Study (Survey) is implemented and the effectiveness is evaluated by subsequent Risk Factor Studies (Surveys) or other similar tools.

Jurisdictions are encouraged to incorporate various types of interventions such as code changes, educational and training activities, enforcement and compliance strategies, etc. The purpose of the intervention strategy is to attempt to affect improvement in reducing priority risk factor(s) occurrence rates between measurement intervals and assess their effectiveness.

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