

## 1 Conference for Food Protection Committee FINAL Report

**COMMITTEE NAME:** Food Protection Manager Certification Committee

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

**DATE OF REPORT:** January 6, 2012

**SUBMITTED BY:** Joyce Jensen, REHS, CP-FS, Committee Chair

**COMMITTEE CHARGE(S):**

**Issue: 2010 II-020**

The Conference recommends that the Food Protection Manager Certification Committee (FPMCC), a standing committee of the Conference be charged to:

- 1) Continue working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the *Standards for Accreditation of Food Protection Manager Certification Programs* in an up-to-date format.
  - Request that ANSI and the Certification Providers will examine all options for resolving the exam security and independence issues as they pertain to trainers serving as test administrators and come to consensus with a suggested action plan as follows:
    - By April of 2011, a recommended solution to be reviewed by the ANSI / Certification providers workgroup;
    - By June of 2011 the FPMCC, Certification Providers and ANSI have reached consensus on the recommended solutions;
    - The draft recommendations will be submitted to the Executive Board for their review at the August 2011 Board meeting;
    - Recommendations approved by the Executive Board will be submitted as an issue at the 2012 biennial meeting; and
    - Pending Conference approval, the new requirements will be implemented no later than January of 2013.
- 2) Investigate if the *Standards for Accreditation of Food Protection Manager Certification Programs* should create more alignment with ISO (International Standards Organization) 17024 and propose changes if needed.
- 3) Determine how Committee membership vacancies and change of membership representation are addressed in the Committee bylaws and propose changes if needed.
- 4) Report back to the Executive Board and the 2012 Biennial Meeting of the Conference for Food Protection.

## **COMMITTEE ACTIVITIES AND RECOMMENDATIONS:**

### **Meetings and Workgroup Assignments:**

The FPMCC was charged with very important work to be completed by the 2012 CFP Biennial meeting. To accomplish those charges, each committee member was asked to participate on at least one workgroup. The FPMCC Chair Joyce Jensen and Vice-Chair Jeff Hawley selected workgroup chairs as follows:

<u>Workgroup</u>	<u>Chair</u>	<u>Function</u>
<b>Logistics</b>	Geoff Luebkekmann	Arrange for meetings, conference calls, scribe assignments, and minutes
<b>Communications</b>	George Roughan	Prepare communication re: Standards, FAQ, and CFP webpage
<b>Standards</b>	Kate Piche	Maintain the Standards, and propose revisions
<b>Bylaws</b>	Vicki Every	Review and recommend revisions to FPMCC Bylaws
<b>ANSI/Providers</b>	Jeff Hawley	Examine all options for resolving the exam security and independence issues as charged by the 2010 CFP

The FPMCC held three face-to-face meetings: August 25-26, 2010 in Rosemont, IL; April 6-8, 2011 in Indianapolis, IN; and October 5-7, 2011 in Las Vegas, NV. In addition, a face-to-face ANSI/ Certification Provider Workgroup meeting was held December 13-15, 2010, in Orlando FL. A fourth FPMCC face-to-face meeting is scheduled on April 13, 2012, just prior to the 2012 CFP Biennial Meeting.

A new committee member orientation was presented just prior to our first face-to-face meeting on August 25, 2010. This orientation provided important information about the committee's history, the Standards (*Standards for Accreditation of Food Protection Manager Certification Programs*), the terminology, and about ANSI and ACAC so new members are better prepared to participate in the committee meetings. This 2010 PowerPoint presentation is available on the CFP website.

FPMCC conference calls (or webinars) were held on: December 7, 2010; February 10, 2011; March 22, 2011; June 24, 2011; and November 16, 2011. An additional conference call is scheduled for early 2012 to review the Communication Workgroups recommendations for the CFP FPMC webpage. Changes to the webpage will be worked out with CFP Executive Director and Assistant. In addition, numerous workgroup conference calls were held in preparation for the FPMCC meetings/calls.

### **Exam Security per Issue: 2010 II-020 1) and 2):**

Following the April 2010 CFP Biennial meeting, the FPMCC Chair and Vice Chair had the task to establish an ANSI-Certification Providers (ANSI-CP) Workgroup by June 2010 to begin the work on the charge to examine all options for resolving the exam security and independence issues as they pertain to trainers serving as test administrators, and come to consensus with a suggested action plan. The workgroup members agreed that John Marcello, with FDA's permission, should facilitate the problem resolution process to meet our committee charge.

The ANSI-CP Workgroup had monthly conference calls with homework assignments from the facilitator to clarify and quantify the exam security issues that were experienced by the certification providers or identified by ANSI. All data submitted were sanitized by the facilitator to allow for candid and accurate information being provided by all; it was necessary to understand the scope of the problem before addressing solutions. After much "homework" collecting, quantifying, and categorizing the security issues, the workgroup held a three day face-to-face meeting in December 2010 to complete the problem resolution process and establish the recommendations to be presented to the FPMCC.

The ANSI-CP Workgroup examined all of the exam security issues experienced by the certification providers. The workgroup established both short-term and long-term objectives for improving exam security. Recommendations were presented to address all of the short-term objectives for improvement of the entire testing process based on logistics, acceptability, cost, technology, and complexity. Recommended changes to the Standards were unanimously agreed on by the workgroup to address each of the security issues identified.

#### **Exam Security Recommendations:**

- **Exam Development** – Increase the exam form item bank from 600 to 1000.
- **Test Administrator/Proctor's Roles and Responsibilities** - Clearly delineate all Test Administrator/Proctor roles and responsibilities.
- **Training of Test Administrators/Proctors** - Require the certification organizations to provide a training program for Test Administrators/Proctors based on learning objectives that reflect their roles/responsibilities.
- **Verification of Test Administrators** - Require certification organizations to notify ANSI when Test Administrator/Proctor has been removed.
- **Exam Item Exposure** - Require certification organizations to have a system to track all examinations (exam books and/or answer sheets).
- **Exam Shipping and Handling** - Restructure Standards to include provisions that ensure security for all shipping and handling of exams by certification organizations and Test Administrators/Proctors.

- **Test Sites** - Require a private room accessible only to Test Administrators/Proctors and Examinees during test administration.
- **Certificates** - Require certification organizations to have a system to provide verification to the current validation of individual certificates.
- **Advertising Standards** - Test Administrator/Proctor cannot make statements or claims, nor have affiliation with any organization making statements or claims, such as guarantees of passing the exam.
- **Management Systems** - Include a new section to the Standards that contains requirements for the implementation of management systems that include document control, internal audits, and management review.

On March 22, 2011, the ANSI-CP Workgroup and John Marcello presented the Workgroup's process and recommendations to the FPMCC in a Webinar in preparation for the April 6-8, 2011, FPMCC meeting held in Indianapolis. Attached is the document "ANSI-Certification Providers Workgroup Report" that is a detailed summary report of the process the ANSI/Certification Providers Workgroup took to come to consensus on the recommendations.

At the April 2011 meeting the full FPMCC voted to accept the Workgroup's recommendations with just one opposing vote. The opposing concern was that while these recommendations increase exam security, they did not separate the roles of trainer and test administrator/proctor at this time. The FPMCC then began the specific work of incorporating the recommendations into the Standards. The recommended revision to the Standards, especially establishing the new Standard Section 9.0 - Management Systems, creates greater alignment with ISO (International Standards Organization) 17024 as identified in Issue: 2010 II-020.

As proposed in the FPMCC charges for 2014, the FPMCC will establish criteria and protocols to evaluate the effectiveness of the increased exam security resulting from these recommendations by December 2012. The results of the final evaluation of the exam security improvements will be presented to the 2016 CFP. At that time, the FPMCC will propose when and how FPMCC will move forward to meet the long-term objective to eliminate the inherent conflict of interest within the testing process and to meet all applicable nationally accepted personnel certification Standards based on the evaluation of exam security resulting from the implementation of the new Standards. This long-term objective will create alignment with International Standards Organization (ISO) 17024 per Issue: 2010 II-020.

These exam security recommendations resulted in the most substantial revision to the Standards since the Standards were adopted. Several of these recommendations have already been implemented by the certification organizations, who have reported a significant improvement in exam security as a result.

Using the FPMCC approved recommendations from the ANSI-CP Workgroup, the Standards Workgroup then drafted proposed revisions to address exam security and proposed additional clarifications to the Standards. This includes revisions to ensure terminology used was consistent

throughout the Standards and reorganization of the Standards to eliminate redundancy when possible.

A draft of the Standards revisions was presented to the CFP Executive Board at the August 30, 2011, meeting in Ann Arbor, Michigan. The Board asked questions and then voted to accept the report and recommendations presented by the FPMCC.

The FPMCC held a meeting in Las Vegas on October 5, 6, and 7, 2011, to refine the proposed revisions to the Standards to ensure clarity and consistency. A FPMCC conference call in November finalized the last of the wording changes made in a few areas.

The two FPMCC Issues submitted related to the *Standards for Accreditation of Food Protection Manager Certification Programs* have been separated into the substantive revisions related to exam security, and non-substantive cleanup revisions which include consistent terminology and a new numbering system. (See Issues titled “Standards - Strengthening Exam Security” and “Standards - Non-Substantive Revisions.”)

### **Evaluating Effectiveness of Revised Standards on Exam Security**

It is important to the FPMCC that the results of these revisions address the short term objectives as identified by the ANSI-CP Workgroup for: improving the entire testing process based on logistics, acceptability, cost, technology and complexity to enhance procedures and accountability of the test administrators, proctors and certification organizations; and to formalize a management system that creates systematic, continuous improvement process through document control, internal audits and management review.

The outcome of the proposed Standards revisions must then be evaluated to ensure that they are resulting in substantial improvement in exam security. The FPMCC is proposing a plan to work with ANSI to update the ANSI accreditation application to incorporate the final changes approved at the 2012 Biennial Meeting Standards, develop surveillance documents, establish an analysis framework and research plan for data collection and evaluation of improvement in exam security, complete a preliminary study to ensure that the evaluation tool works, and report to the 2014 Biennial Meeting.

Following the 2014 Biennial Meeting the FPMCC will then be prepared to complete an evaluation of the results of the 2012 Standards revision with a complete year of data from the certification organizations after implementation of the revised Standards. The FPMCC would then propose reporting back to the 2016 Biennial Meeting the results of the evaluation, and where the process is at relative to the long term objectives as identified by the ANSI-CP Workgroup for eliminating the inherent conflict of interest within the testing process and meeting all applicable nationally accepted certification standards.

The FPMCC understands that with improved surveillance and the implementation of the formal management systems (proposed new section of the Standards) there will be an initial increase of identified security breaches as compared to the information collected in 2010 by the ANSI-CP Workgroup. We recognize that this would not be reflecting an increase in actual security breaches, but rather a better system for identifying and reporting of these breaches.

To ensure that this evaluation work will be completed, the FPMCC has established the following work plan to be used for proposed FPMCC charges for both the 2012 and the 2014 Biennial Meetings of the Conference for Food Protection.

### **FPMCC Plan for Evaluation of the New Security Standards**

**April 2012** – Recommend to the CFP by approval of Continuing Charges to the FPMCC the formation of the Security Evaluation Workgroup for the purpose of starting the evaluation process by July 1, 2012.

**June 30, 2012** - Establish an ad hoc workgroup (Security Evaluation Workgroup) for the purpose of:

- 1) Drafting ANSI revisions to the accreditation application,
- 2) Developing surveillance documents, and
- 3) Establishing an analysis framework and research plan for data collection and evaluation of improvement in exam security.

The FPMCC Chair will form the Security Evaluation Workgroup which will include:

- ANSI representative
- ANSI field research design (data) subject matter expert
- CFP ACAC representative
- One representative from each Certification Organization
- FPMCC Chair & Vice Chair
- One food industry representative
- One food regulatory representative

The Security Evaluation Workgroup will formulate a foundation for quantitative/qualitative analysis that addresses the long term goal to eliminate the inherent conflict of interest within the testing process by reducing undue trainer influence (when a trainer acts as a test administration/proctor) on exam administration and report its results of the analysis at the CFP 2014 Biennial Meeting.

**July 2012** – The Security Evaluation Workgroup begins their work with a deadline to report findings to the FPMCC by December 1, 2012.

**August 2012** – The FPMCC members are approved for the 2012-14 biennium.

**October 2012** – The Security Evaluation Workgroup reports progress to full FPMCC meeting.

**December 1, 2012** – The FPMCC receives, reviews, and approves the report of the Security Evaluation Workgroup.

**June 30, 2013** – the deadline for full implementation of security Standards as approved at the 2012 Biennial Meeting.

**June through October 2013** – The collection period of data compiled by ANSI for preliminary review and validation of the research plan, data collection instruments, and methods.

**October or November 2013** – FPMCC meeting, prepare report for the 2014 Biennial Meeting.

**December 2013** – FPMCC draft Final Report and proposed Issues submitted for the 2014 Biennial Meeting.

**April 2014** - FPMCC reports findings and Issues to the 2014 CFP Biennial Meeting and recommends appropriate action.

**June 30, 2014** – “New Security Standards” that are approved at the 2012 CFP Biennial Meeting become auditable with one year of data, to coincide with ANSI accreditation assessment period of the Certification Organizations.

**Fall 2014** - FPMCC meeting; ANSI presents report to FPMCC on the quantitative/qualitative analysis findings on “New Security Standards” effectiveness.

**Fall 2014 to Fall 2015** – FPMCC formulates recommendations.

**December 2015/April 2016** - FPMCC reports findings and Issues to the 2016 CFP Biennial Meeting and recommends appropriate action.

### **FPMCC Bylaw Revisions (per Issue: 2010 II-020 3):**

The Bylaws Workgroup drafted revisions to the FPMCC Bylaws based on the charge and CFP Executive Board input from the August 24, 2010 meeting in Rosemont, Illinois. The Bylaw workgroup was formed at the August 25-26, 2010, FPMCC meeting in Rosemont. Vicki Everly, Workgroup Chair, sought input from Ruth Hendy, the CFP Constitution and Bylaw/Procedures Chair, to address consistence with the CFP Bylaws when possible. The Bylaws Workgroup was tasked to explore the following areas in the FPMCC Bylaws and, if necessary, to make recommendations for language changes:

- Term limits and membership retention.
- Special rules (to replace existing “modified” Robert’s Rules of Order language).
- Language Consistency – both within the FPMCC Bylaws and with the CFP Bylaws.
- Quorum language.
- Committee structure and voting (including workgroups and sub-committees).
- Removal of committee members for non-participation.
- Edit/revise “alternates” language.
- Edit to clarify “issue” terminology.
- Clarification of comments regarding adherence to CFP Bylaws and Robert’s Rules of Order.

Proposed Bylaw revisions were presented and discussed at the April 8, 2011 FPMCC meeting in Indianapolis, and the October 5, 2011 meeting in Las Vegas.

The two FPMCC Issues submitted related to the *Food Protection Manager Certification Committee Bylaws* have been separated into:

- a) the substantive revisions including the new language addressing membership from potential additional certification organizations, adding language to address alternate members and advisors to the committee; and
- b) non-substantive changes which include consistent and accurate terminology and updating to current procedures.

### **Communication Workgroup:**

It is a challenge to keep the information provided on the CFP web page up-to-date and current. The Communication Workgroup, with George Roughan as Chair, reviewed the CFP website. Concerns and broken links were identified, recommendations were provided, and many updates made as a result of their review. In addition, specific changes have been made to the Food Protection Manager Certification page.

The workgroup will continue to review and propose changes to update the webpage to keep it current and to make sure that the work of the FPMCC is available to all who want to keep up with the important work of the committee. Changes to the webpage will be approved by the FPMCC and then forwarded to the CFP Executive Assistant to post.

### **ANSI/ACAC:**

At the August 25-26, 2010 FPMCC meeting, the committee discussed and provided input to the American National Standards Institute (ANSI) regarding proposed amendments to the Accreditation application based on the changes to the Standard approved at the 2010 CFP Biennial Meeting. The FPMCC voted unanimously to accept the changes in the application as amended, and voted unanimously to establish an implementation date of July 2011, the beginning of the next application cycle.

At the August 30, 2011 CFP Executive Board meeting, the Board accepted the FPMCC nomination of Joyce Jensen to serve as one of the two CFP designated ANSI-CFP Accreditation Committee (ACAC) members to begin after her tenure as FPMCC Chair ends at the 2012 CFP Biennial Meeting. Lee Cornman continues to serve as the other ACAC member representing CFP.

### **Acknowledgments:**

The FPMCC would like to thank Dr. Roy Swift, Senior Director, Personnel Credentialing Accreditation Programs, with ANSI, for his work with the FPMCC. He has been a knowledgeable resource in personal certification, providing guidance that helped the FPMCC accomplish significant improvements to the Standards, especially over the past two years.

The FPMCC would like to thank John Marcello, Retail Food Specialist, FDA, for his facilitation of the ANSI-Certification Providers Workgroup. His organization skills and leadership through this process was outstanding. He helped the workgroup identify the problems and then led the group to find solutions that everyone could agree with.

The FPMCC would like to thank Dr. Cynthia Woodley, Vice President, Professional Testing Inc., for updating the orientation PowerPoint and presenting the new member orientation on August 25, 2010. Dr. Woodley was a long time member and past Chair of the FPMCC. This PowerPoint is available on the CFP website for anyone interested in the committee.



To assist with the logistics for the FPMCC meetings, a special thank you to:

- US Food Service for providing the meeting room for the August 25-26, 2010 FPMCC meeting in Rosemont, IL.
- Harris Teeter for hosting the December 7, 2010 conference call.
- National Registry for providing the meeting room and refreshments for the ANSI-Certification Providers workgroup December 14-16, 2010 in Orlando, FL.
- National Restaurant Association Solutions for hosting the February 10, 2011 FPMCC webinar/conference call.
- Prometric for hosting the March 22, 2011 webinar presented by John Marcello.
- The Florida Restaurant Association, the National Restaurant Association Solutions, and the National Registry for providing the meeting room and refreshments for the October 5-7, 2011 FPMCC meeting in Las Vegas, NV.

The Chair would like to recognize and thank the Vice-Chair Jeff Hawley, and the Workgroup Chairs: Kate Piche, Vicki Everly, George Roughan, and Geoff Luebkekmann. They embraced their responsibility to accomplish a significant amount of the committee work during the past two years.

Last, but not least, the Chair would like to recognize and thank the 2010-2012 FPMCC members, and the organizations/agencies they represent, which allowed them to participate on the FPMCC. Without our involved, committed, and active members, we would not have been able to achieve as much as we have. As a result of respectful debate and discussion, a significant impact of the credibility of the Food Protection Manager Certification has been accomplished.

#### **REQUESTED ACTION:**

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

- 1) Report - FPMCC (Food Protection Manager Certification Committee Final Report)
- 2) Standards - Strengthening Exam Security (*Standards for Accreditation of Food Protection Manager Certification Programs* Security Revisions)
- 3) Standards - Non-Substantive Revisions (*Standards for Accreditation of Food Protection Manager Certification Programs* Non-Substantive Revisions)
- 4) FPMCC Bylaw Revision (*Food Protection Manager Certification Committee Bylaws* Revisions)
- 5) FPMCC Bylaw Non-Substantive Revisions (*Food Protection Manager Certification Committee Bylaws* Non-Substantive Revisions)
- 6) FPMCC - New and Continuation Charges

**ATTACHMENTS:**

- 1) *Standards for Accreditation of Food Protection Manager Certification Programs* (with revisions tracked in legislative format)
- 2) *Food Protection Manager Certification Committee Bylaws* (with revisions tracked in legislative format)
- 3) ANSI-Certification Providers Workgroup Report (process and recommendations for resolving concerns with Food Protection Manager exam security)
- 4) Food Protection Manager Certification Committee Member Roster

**NEW OR CONTINUATION CHARGES:**

- 1) Continue working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the *Standards for Accreditation of Food Protection Manager Certification Programs* in an up-to-date format.
- 2) Revise/Update the *Standards for Accreditation of Food Protection Manager Certification Programs* Preamble and Annexes.
- 3) Request approval of the formation of the Security Evaluation Workgroup by the FPMCC Chair for the purpose of starting the exam security evaluation process by July 1, 2012, with workgroup representation as follows:
  - ANSI representative,
  - ANSI field research design (data) subject matter expert
  - CFP ACAC representative
  - One representative from each Certification Organization
  - FPMCC Chair & Vice Chair
  - One food industry representative
  - One food regulatory representative
- 4) Evaluate the results of the Standards revisions as approved by the 2012 Biennial Meeting to ensure that they are resulting in substantial improvement in exam security. The FPMCC is proposing a plan to:
  - work with ANSI to update the ANSI accreditation application to incorporate the final Standards changes as approved at the 2012 Biennial Meeting,
  - develop surveillance documents,
  - establish an analysis framework and research plan for data collection and evaluation of improvement in exam security, and
  - complete a preliminary study to ensure that the evaluation tool works.
- 5) Report back to the Executive Board and the 2014 Biennial Meeting of the Conference for Food Protection.