**Conference for Food Protection**

**2012 Issue Form**

**Internal Number: 051**

**Issue: 2012 II-025**

**Title:**

Recommendations from Uniform Inspection Program Audit Pilot Project

**Recommended Solution: 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:  
  a) 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;  
  b) Clarifying the process for selecting the establishments that are to be used for the file and field review;  
  c) Clarifying the parameters for what is to be included as part of the establishment file review;  
  d) Providing expanded guidance on the auditor's qualifications, role, and responsibilities.
* Align the 10 Program Elements contained in Standard 4 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.
* Present the 10 Program Elements contained in the Standard 4 criteria, the Guide to Conducting a Uniform Inspection Program Audit, and Audit Worksheet in a linear format to reflect a logical sequence to the inspection process.
* Incorporate the information contained in the Audit Reference Guide into the Guide to Conducting a Uniform Inspection Audit to eliminate the need for multiple documents.
* Ensure consistency in the weighting/assessing of each of the 10 Program Elements. 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.
* Design the audit process and worksheet to allow jurisdictions the flexibility for assessing inspection Program Elements that are specific to their retail food protection program. 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.
* Re-evaluate the assessment protocol for Performance Elements and provide better guidance as to what constitutes an effective performance measurement. 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.
* Provide defined performance measurements that are quantifiable within the Program Elements contained in Standard 4. Some of the Program Elements are very subjective in nature and do not contain definitive performance measurements, such as producing legible reports.
* Include a comment section within the Audit Worksheet 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.

**Reference:**

The Uniform Inspection Program Audit Pilot Project Report was submitted as an attachment to the Issue titled: Report - CFSRP Part B - Uniform Inspection Program Audit Pilot Project.

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.