

**Conference for Food Protection
2014 Issue Form**

**Internal Number: 104
Issue: 2014 II-010**

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

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Title:

SDCERC 3 - Continued Data Collection to Determine Public Health Scoring

Issue you would like the Conference to consider:

The Conference send a letter to FDA encouraging them to continue exploring ways, such as the current work with NACCHO and data collection with the Risk Factor Studies, to determine if there is a statistically significant public health impact related to scoring, and if one scoring system has a greater public health impact.

Public Health Significance:

During the 2012 Conference Issue # 2012- 11- 35 resulted in the following charge:

The Conference recommends that a committee be created to study how health department inspection data can be collected more uniformly through the use of standardized formats to enhance public health. Utilizing Food Code Annex 7, Form 3-A (Food Establishment Inspection Form) and Guide 3-B (Instructions for Marking the Food Establishment Inspection Report, Including Food Code References for Risk Factors/Interventions and Good Retail Practices) as the starting point, the committee is charged to consider:

- (1) Uniform violation categories/types, by utilizing the FDA inspection form,*
- (2) Consistent scoring methodology, and*
- (3) The best means of electronically collecting, analyzing and sharing inspection data.*

These activities should be undertaken with the intent of eventually creating a national database to warehouse inspection data from contributing states, local jurisdictions and other sources.

The committee will report on its findings, along with implementation recommendations at the 2014 CFP Biennial Meeting.

The committee's initial discussions led to consensus that encouraging regulatory jurisdictions to use the FDA Food Code, Annex 7, Form 3-A as their inspection report, would lead inherently to uniform violation categories. To accomplish the remaining work outlined in the committee charge, the committee decided to form two separate sub-committees - the IT sub-committee focused on task (3) of the charge and the scoring sub-committee focused on task (2) of the charge.

The Scoring Sub-Committee had several conference calls to review and discuss various scoring systems. Several studies and published articles were reviewed and previous CFP committee reports were shared. The Committee quickly realized that without data linking

different scoring methods to public health outcomes, choosing one scoring system over another simply became a matter of personal preference. The sub-committee also learned that FDA was working with NACCHO on collecting data relative to inspection scoring and was also incorporating data collection points in the upcoming Retail Food Risk Factor Study. For this reason, the sub-committee decided that any single method of scoring health inspections, could not be proven scientifically to show a better public health outcome, and therefore, could not be chosen for inclusion in a national database.

The committee also concluded that the Conference and this committee did not have the funding and expertise to undertake a scientific study to evaluate scoring systems with respect to public health impact. In light of the several initiatives already undertaken, the committee determined that the best solution was to encourage FDA to continue efforts themselves, and with partner organizations, such as NACCHO, AFDO, and academia, to evaluate scoring methodologies.

Recommended Solution: The Conference recommends...:

that a letter be sent to FDA encouraging them to continue exploring ways, such as the current work with NACCHO and data collection with the Risk Factor Studies, to determine if there is a statistically significant public health impact related to scoring, and if one scoring system has a greater public health impact.

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