

**Conference for Food Protection
2014 Issue Form**

**Internal Number: 072
Issue: 2014 I-034**

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

All information above the line is for conference use only.

Title:

Priority Designations: Clear Understandable Language

Issue you would like the Conference to consider:

1. Deleting the terms Priority, Priority Foundation and Core and replacing them with Priority 1, Priority 2 and Priority 3.
2. Keeping the definitions the same.

Public Health Significance:

Food establishment owners, operators and workers must be able to understand the requirements of the FDA Food Code (Code) in order to consistently and efficiently achieve compliance. The clearer and more understandable the Code language, the more likely it is that the regulated parties will be able to easily comply. The terms, Priority, Priority Foundation and Core as used in the Code are not readily and easily understandable by many food establishment owners, operators and workers. This is especially true for those persons that do not have English as their first language.

The regulating agencies could spend time training people about the terms and their contextual meanings but using simple, easy to understand language would save this training time that would be better spent on education about other requirements.

The Minnesota Departments of Health and Agriculture surveyed a random sample of licensed food establishments. We found the majority of respondents would rather have any other terms used. Only 4% chose Priority, Priority Foundation and Core as their first choice. It shall be noted that there was no education done for prospective respondents prior to the survey. (Three Tier Survey Results attached.)

In addition, the terms are not located next to each other in the definitions section. This could be confusing. If these terms are important, they should be easier to understand, more clearly presented and explained in more detail.

An argument has been made that the Code is not written for food establishment owners, operators and workers but they are the ones who must comply with its requirements. The easier the code is to understand, the easy it is to comply with.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA recommending that the 2013 Food Code be amended as follows:

1. Deleting the terms Priority, Priority Foundation and Core and replacing them with Priority 1, Priority 2, and Priority 3,
2. Keeping the definitions the same and using the indicators P1, P2, and P3.

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Attachments:

α "Three Tier Survey Results"

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.