

# Conference for Food Protection - Committee FINAL Report

Template approved: 08/14/2013

**Committee Final Reports are considered *DRAFT* until deliberated and acknowledged by the assigned Council at the Biennial Meeting**

**COMMITTEE NAME:** Program Standards

**COUNCIL or EXECUTIVE BOARD ASSIGNMENT:** Council II

**DATE OF REPORT:** 11/15/2013 (Revised 2/13/2014)

**SUBMITTED BY:** David Lawrence, Chair

## **COMMITTEE CHARGE(s):**

Issue #: 2012 II-021

Charge:

1. Serve as a stakeholder group to provide input to an FDA internal working group to:
  - a. Collaborate on the development of an Administrative Procedures Document to support the Voluntary National Retail Food Regulatory Program Standards; and
  - b. Recommend additional changes or improvements to the Program Standards.
2. Explore, assess, and reevaluate Staffing Levels language within Standard No. 8 and recommend any changes.
3. Formulate resolutions to issues brought before the committee and report back at the 2014 CFP Biennial Meeting.

## **COMMITTEE ACTIVITIES AND RECOMMENDATIONS:**

### **1. Progress on Overall Committee Activities:**

- a. The Program Standards Committee met via conference call on a monthly basis. The membership consisted of a good mix of new members and those who had participated on the previous committee cycle. From September 2012 to present, the committee experienced membership changes, including the selection of a new chairperson in July 2013. During the initial meetings, time was allocated to introduce new members to the historical perspective of the committee. To facilitate work on the current charges, a familiarization of all members with the Program Standards was established by ensuring access to the FDA resources. Each member was asked to describe their respective organization's efforts towards the Program Standards. This information, along with committee-identified connections to other entities conducting activities related to the Program Standards, was utilized over the course of subsequent meetings to address the committee charges, direct committee projects, and outline recommendations for continuation charges.

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- i. There were committee members who have been/or are currently participating in the National Association of County and City Health Officials (NACCHO) Program Standards Mentorship Program. Additionally, some committee members participate on other CFP, Partnership of Food Protection (PFP), and Association of Food and Drug Officials (AFDO) committees and workgroups whose projects align with the Program Standards committee. In July 2013, members of the committee participated in a Program Standards workshop at the National Environmental Health Association (NEHA) Annual Education Conference. In August 2013, members whose local health departments were part of the NACCHO Program Standards Mentorship attended a wrap-up meeting. These connection points identified areas for potential collaboration including, but not limited to, the following:
  1. Identifying elements/standards that are confusing or hard to achieve;
  2. Providing feedback and suggestions to the FDA internal working group to improving the Program Standards;
  3. Developing, improving, or providing linkages to resources that will assist enrollees with the Program Standards (i.e., NACCHO website providing a Program Standards toolbox, extending access to FoodSHIELD to all Program Standards enrollees); and
  4. Identifying platforms through which enrollees can share resources and have user group discussions, peer assistance networks, and community of practice forums.
- ii. In August 2013, the FDA requested that the committee work with the CFP Executive Director on posting the following 2012 CFP approved (Issues 2012 II-020 and II-027) Standard 2 and 8 documents to the CFP website's guidance documents page:
  1. Conference for Food Protection (CFP) Field Training Manual for Regulatory Retail Food Safety Inspection Officers (5-31-13 CFP Update);
  2. Standard 8 Staffing Level (FTE to Inspection Ratio) Assessment Workbook (Excel); and
  3. Standard 8 Staffing Level (FTE to Inspection Ratio) Assessment Workbook Instruction Guide

## **b. The disposition of each assigned committee charge is as follows:**

- i. Charge 1(a) – Serve as a stakeholder group to provide input to an FDA internal working group to collaborate on the development of an Administrative Procedures Document to support the Voluntary National Retail Food Regulatory Program Standards. Outcomes:
  1. The committee reviewed and discussed the three 2012 CFP recommendations for Issue 2012 II-022 and agreed that FDA was instructed to amend Standard 9 and develop the Administrative Procedures document as an addendum with consultation of the Program Standards Committee but without further action by the Conference. It was understood that the FDA included attachments with

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- Issue 2012 II-022 to allow the Conference to visualize the changes and accept the concept at the time of Council II discussion.
2. The FDA requested that they be allowed to make additional editorial changes (i.e., formatting, spelling, and punctuation) to Standard 9 without the need to submit an issue as long as there is no change to the intent of the Standard 9 or its requirements in the 2013 version of the Program Standards. The committee concurred as long as the FDA includes clear identification of when editorial changes have been made to avoid possible confusion regarding different versions of Standard 9.
  3. The committee provided feedback on the Administrative Procedures document to the FDA representatives during conference calls and through a compilation of email responses to suggest language for one section of the document.
  4. Upon finalization of the Administrative Procedures document in September 2013, and in accordance with recommendation #3 of Issue 2012 II-022, (3. During development of administrative procedures document, FDA consult the CFP Program Standards Committee for input on its content and format and on the placement of such a document as an addendum to the Standards) Standard 9 was updated. The FDA is working to post the updated version of the Program Standards on the FDA website.
- ii. Charge 1(b) – Serve as a stakeholder to provide input to an FDA internal workgroup to recommend additional changes or improvements to the Program Standards. Outcomes:
1. In January 2013, the FDA requested the committee’s general feedback on the use and implementation of the individual Standards and whether changes are needed to the requirements of one or more of the Standards. Using a Standard review template, the committee accomplished individual Standard reviews. From February 2013 to present, the committee has used the information from the Standards review project to define continuation charges for the 2016 CFP biennial meeting. A Standard review addressed the following subjective criteria:
    - a. Resources associated with the Standard (i.e., FDA Resource Disk, CFP website postings);
    - b. Areas of the Standard in need of more resources;
    - c. Areas of the Standard in need of improvement for adding clarity (i.e., difficult, unclear language); and
    - d. Components of the Standard that could be supplemented by a platform for sharing of sample tools, templates, policy documents, etc.
- iii. Charge 2 – Explore, assess, and reevaluate Staffing Levels language within Standard 8 and recommend any changes. Outcomes:
1. The committee reviewed the Staffing Level section of Standard 8 and the Clearinghouse Workgroup’s documentation of the validated process

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used to prescribe the range of 280 – 320 inspections for one full-time equivalent (FTE) devoted to a food safety program. The committee reached consensus that the current language pertaining to staffing level does not need to be readdressed at this time.

- iv. Charge 3 – Formulate resolutions to issues brought before the committee and report back to the Conference at the 2014 CFP Biennial Meeting. Outcome:
  - 1. To date, there have been no issues presented to this committee for resolution.
  - 2. There were committee members who concurrently served on the CFP Certification of Food Safety Regulatory Professionals Committee. These members were prepared to serve as liaisons between the two committees if any request was made regarding the Program Standards.

## 2. Recommendations for consideration by Council:

- a. At the 2012 CFP Biennial Meeting, the Conference recommended that the CFP Executive Board consider making the Program Standards Committee a standing CFP committee (Issue 2012 II-021). The Program Standards Committee recommends being re-created as a standing committee following the 2014 CFP Biennial Meeting with the following charges:
  - i. Serve as a stakeholder group to provide input to an FDA internal Program Standards working group to:
    - 1. Recommend additional changes or improvements to the Voluntary National Retail Food Regulatory Program Standards; and
    - 2. Research a methodology and develop a tool to recognize levels of performance of Program Standards enrollees that will demonstrate the progress of enrollees in a meaningful way and to acknowledge the enrollees for taking the necessary incremental steps toward meeting the Program Standards.
  - ii. Collaborate with other entities such as National Association of County and City Officials (NACCHO), Partner for Food Protection (PFP), Association of Food and Drug Officials (AFDO) that are working on aligned Program Standards activities to:
    - 1. Develop, improve, and/or provide linkages to resources that will assist enrollees with the Voluntary National Retail Food Regulatory Program Standards; and
    - 2. Identify platforms through which enrollees can share resources and have user group discussions, peer assistance networks, and community of practice forums; and
  - iii. Formulate resolutions to issues brought before the committee and report back at the 2016 CFP Biennial Meeting.
- b. The Program Standards Committee recommends that Council II, upon acknowledging this final report, recognize the significant contributions made by

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Nicole Grisham to the CFP during her tenure as chair of the committee prior to her resignation in June 2013.

## CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. The following issues will be submitted:
  - a) Report – Program Standards Committee – requesting the Conference to acknowledge the 2012-2014 Program Standards Committee final report
  - b) Program Standards 2 - Proposed Changes to CFP Governing Documents -  
At the 2012 CFP Biennial Meeting, the Conference recommended that the CFP Executive Board consider making the Program Standards Committee a standing CFP committee (Issue 2012 II-021). The Program Standards Committee recommends being re-created as a “standing committee” following the 2014 CFP Biennial Meeting. The Program Standards Committee is proposing changes to the CFP Constitution & Bylaws and CFP Biennial Conference Procedures for inclusion in those two documents the necessary language to identify the Program Standards Committee as a standing committee and the committee’s purpose/function.
  - c) Program Standards 3 - Re-create Program Standards Committee -  
Recommendation is made to re-create the Program Standards Committee with the following continuation charges:
    - i. Serve as a stakeholder group to provide input to an FDA internal Program Standards working group to:
      1. Recommend additional changes or improvements to the Voluntary National Retail Food Regulatory Program Standards; and
      2. Research a methodology and develop a tool to recognize levels of performance of Program Standards enrollees that will demonstrate the progress of enrollees in a meaningful way and to acknowledge the enrollees for taking the necessary incremental steps toward meeting the Program Standards.
    - ii. Collaborate with other entities such as NACCHO, PFP, AFDO that are working on aligned Program Standards activities to:
      1. Develop, improve, and/or provide linkages to resources that will assist enrollees with the Voluntary National Retail Food Regulatory Program Standards; and
      2. Identify platforms through which enrollees can share resources and have user group discussions, peer assistance networks, and community of practice forums; and
    - iii. Formulate resolutions to issues brought before the committee and report back at the 2016 CFP Biennial Meeting.

## List of Attachments:

COMMITTEE MEMBER ROSTER (attached): 2012 – 2014 Program Standards Committee Membership Roster