**Conference for Food Protection**

**2016 Issue Form**

**Issue: 2016 II-019**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Council Recommendation:** | Accepted as  Submitted |  | Accepted as Amended |  | No Action |  |
| **Delegate Action:** | Accepted |  | Rejected |  |  |  |

*All information above the line is for conference use only.*

**Issue History:**

This is a brand new Issue.

**Title:**

Clarification for Re-standardization in VNRFRPS Standard 2

**Issue you would like the Conference to consider:**

The Voluntary National Retail Food Regulatory Program Standards (Program Standards) establish best practices for regulatory programs that license and inspect foodservice and retail food establishments; when applied, the Program Standards are intended to enhance uniformity within and between regulatory agencies.

A major requirement in Standard 2 (Trained Regulatory Staff) is the standardization of at least 90% of the regulatory inspection staff. Standard 2 is specific in stating that continuing standardization (re-standardization) "shall be maintained by performing four joint inspections with the 'training standard' every three years," but lacks specific requirements related to the protocol or process to be used when conducting these joint inspections. The common assumption is that the process used for initial standardization shall also be used for re-standardization... but this is not stated in Standard 2.

In addition, the Program Standards Definition for a "training standard" lacks requirements for both continuing education and re-standardization. Again, the common assumption is that re-standardization of a "training standard" is required every three (3) years, with the same continuing education requirements as for regulatory inspection staff, and using the same process as that used for initial standardization of the "training standard"... but none of this is stated in the Definitions or in Standard 2.

**Public Health Significance:**

Non-specific language regarding continuing standardization in the Definitions and in Standard 2 requires every program manager who has achieved conformance with Standard 2 to make assumptions about how to effectively achieve re-standardization in his/her jurisdiction. In addition, a lack of stated requirements forces an auditor to also make assumptions about the requirements during a verification audit. Differing interpretations... and differing expectations... could result in a non-confirming audit. Moreover, specific requirements that might be acceptable by one auditor... could be rejected in a subsequent audit by a different auditor.

The absence of specific language regarding continuing standardization (re-standardization)... and the need to rely on unstated (and potentially differing) assumptions... could easily result in regulatory agencies being held to vastly different requirements in order to successfully pass a second (and subsequent) verification audit of Standard 2.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to the FDA recommending:

1) Clarification of continuing standardization (re-standardization) requirements in the Voluntary National Retail Food Regulatory Program Standards-January 2015 by insertion/deletion of the following language in the DEFINITIONS and in STANDARD 2 (only those paragraphs impacted are included below; language to be inserted is in underline format and language to be removed is in strikethrough format. Full text of Standard 2 and suggested edits is available in the attached content document titled: **VNRFRPS Standard 2 Revision - full text**):

**a) DEFINITIONS - Definition #29**

**Training Standard** - An individual who has successfully completed the following training elements AND standardization elements in Standard 2 and is recognized by the program manager as having the field experience and communication skills necessary to train new employees. The training and standardization elements include:

1. Satisfactory completion of the prerequisite curriculum;

2. Completion of a field training process similar to that contained in Appendix B-2;

3. Completion of a minimum of 25 independent inspections and satisfactory completion of the remaining course curriculum; ~~and~~

4. Successful completion of a standardization process based on a minimum of eight inspections that includes development of HACCP flow charts, completion of a risk control plan, and verification of a HACCP plan, similar to the FDA standardization procedures~~.~~;

5. Completion of a minimum of 20 contact hours of continuing education in food safety every three (3) years as outlined in Standard 2; and

6. Successful standardization renewal every three (3) years based on the same protocol and field inspection process as that used to achieve initial standardization.

**b) STANDARD 2, Trained Regulatory Staff (see attached content document titled: VNRFRPS Standard 2 Revision - full text)**

Requirement Summary, STEP 4: Food Safety Inspection Officer - Field Standardization

Continuing standardization (re-standardization) shall be maintained by performing four joint inspections with the "training standard" every three years; joint inspections shall be conducted using the same protocol, include the same field exercises, and apply the same scoring and assessment criteria used during initial standardization.

**Note:** If a jurisdiction updates their standardization protocol, or their scoring and assessment tools, the most recent version shall be used during re-standardization.

Should a jurisdiction fall short of having 90% of its retail food program inspection staff successfully complete the Program Standard 2 criteria within the 18 month time frame, or should a jurisdiction fail to meet all re-standardization requirements every three years, a written protocol must be established to provide a remedy so that the Standard can be met. This protocol would include a corrective action plan outlining how the situation will be corrected and the date when the correction will be achieved.

**Documentation**

The quality records needed for this standard include:

1. Certificates or proof of attendance from the successful completion of all the course elements identified in the Program Standard curriculum (Steps 1 and 3);
2. Documentation of field inspection reports for twenty-five each joint and independent inspections (Steps 2 and 3);
3. Certificates or other documentation of successful completion of a field training process similar to that presented in Appendix B-2. **NOTE:** The CFP Field Training Manual is available for the Conference for Food Protection web site: http://www.foodprotect.org/ and is located under the icon titled "Conference Developed Guides and Documents."
4. Certificates or other records showing proof of satisfactory standardization and/or re-standardization (Step 4);
5. Contact hour certificates or other records for continuing education (Step 5);
6. Signed documentation from the regulatory jurisdiction's food program supervisor or training officer that food inspection personnel attended and successful completed the training and education steps outlined in this Standard.
7. Date of hire records or assignment to the retail food program; and
8. Summary record of employees' compliance with the Standard.

2) Updating of any support material or documents related to Standard 2 and the Definitions of the Voluntary National Retail Food Regulatory Program Standards-January 2015 to reflect any language change.

**Submitter Information 1:**

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | Manuel Ramirez | | |
| Organization: | City of Berkeley, Division of Environmental Health | | |
| Address: | 2180 Milvia Street, 2nd Floor | | |
| City/State/Zip: | Berkeley, CA 94704 | | |
| Telephone: | 510-981-5261 |  |  |
| E-mail: | mramirez@cityofberkeley.info |  |  |

**Submitter Information 2:**

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | Vicki Everly | | |
| Organization: | City of Berkeley, Division of Environmental Health | | |
| Address: | 2180 Milvia Street, 2nd Floor | | |
| City/State/Zip: | Berkeley, CA 94704 | | |
| Telephone: | 510-501-0417 |  |  |
| E-mail: | veverly@cityofberkeley.info |  |  |

**Supporting Attachments:**

* "• VNRFRPS Standard 2 Revision - full text"

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.