

**Conference for Food Protection
2016 Issue Form**

Issue: 2016 II-023

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:

Report - Food Protection Manager Certification Committee (FPMCC)

Issue you would like the Conference to consider:

Please acknowledge the final report and thank the 2014-2016 Food Protection Manager Certification Committee (FPMCC) members for their effort in addressing the charges from the 2014 Biennial Meeting of the Conference for Food Protection.

Public Health Significance:

Food establishments have fewer critical risk factors according to the CDC as stated in the endorsement letter to the Conference for Food Protection (dated April 5, 2006, and referenced on the Conference website) when food establishments employ managers who have a Food Protection Manager Certification in accordance with the Conference for Food Protection's Standards.

Recommended Solution: The Conference recommends...:

acknowledging the Food Protection Manager Certification Committee (FPMCC) final report with attachments, and extending thanks to the Committee members for their work.

The Conference further recommends that the FPMCC continue its work on unfinished Issues from the 2014 Biennial Meeting, including:

1. Issue II-012 - Continue work with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the Standards for Accreditation of Food Protection Manager Certification Programs in an up-to-date format; including, but not limited to, recommending language for items that could be made less prescriptive without a negative effect on security.
2. Issue II-015 - Determining the process and requirements for potential acceptance of the International Organization for Standardization/ International Electrotechnical Commission (ISO/IEC) 17024-2012 for food protection manager certification as an additional option to and without impact on the existing CFP Standards for Accreditation of Food Protection

Manger Certification Programs, with the input of standards development expertise from American National Standards Institute (ANSI).

3. Report back its findings and recommendations to the Executive Board and the 2018 Biennial Meeting of the Conference for Food Protection.

Submitter Information:

Name: Jeff Hawley, Chair
Organization: Food Protection Manager Certification Committee
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Telephone: 704-844-3098
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Content Documents:

- "Food Protection Manager Certification Committee (FPMCC) Roster"
- "Report: Food Protection Manager Certification Committee"
- "Standards for Accreditation of Food Protection Mgr Certification Programs"

Supporting Attachments:

- "Security Evaluation Workgroup Baseline & Summative Self-Report Findings"
- "CFP-ISO Standards Comparison Equivalency Report"

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.

Committee Name: Food Protection Manager Certification Committee

Last Name	First Name	Position (Chair/Member)	Constituency	Employer	City	State	Telephone	Email
Anderson	Hugh	Alternate	Certification Provider	Prometric	Baltimore	MD	(443) 455-6011	hugh.anderson@prometric.com
Bagwell	Cynthia	Voting Member	Food Service Industry	Taco Bell Corp/Yum Brands	Irvine	CA	(949) 863-3834	cbagwell@tacobell.com
Brainerd, Jr	Dana	Voting Member	Retail Food Industry	CVS/Caremark	Cumberland	RI	(401) 770-6194	dana.brainerd@cvscaremark.com
Carotenuto	Tony	Voting Member	Federal Regulator	Navy and Marine Corps Public Health Center	Portsmouth	VA	(757) 953-0712	anthony.carotenuto@med.navy.mil
Chapman	Bryan	Voting Member	Food Industry Support-Training	StateFoodSafety.com	Orem	UT	(801) 805-1872	bchapman@abovetraining.com
Chong	Korey	Alternate	Food Industry Support-Training	Premier Food Safety	Fullerton	CA	(714) 451-0075	korey@premierfoodsafety.com
Coleman	Gary	Voting Member	Food Industry Support	Consultant (UL-Retired)	Holden Beach	NC	(619) 627-5322	garycoleman@nc.rr.com
Connell	Kevin	Alternate	Retail Food Industry	Wawa	Wawa	PA	(610) 505-4964	kevin.c.connell@wawa.com
Corchado	Liz	Alternate	Certification Provider	Environmental Health Testing (National Registry)	Orlando	FL	(800) 446-0257	lcorchado@nrfsp.com
Crownover	David	Alternate	Certification Provider	National Restaurant Association Solutions	Chicago	IL	(312) 715-5396	dcrownover@restaurant.org
Douglas	Craig	Voting Member	Certification Provider	360training.com dba Learn2Serve.com	Austin	TX	(512) 539-2754	craig.douglas@360training.com
Dunleavy	Sean	Voting Member	State Regulator	Michigan Department of Agriculture	Lansing	MI	(517) 243-8895	dunleavys@michigan.gov
Gaither	Marlene	Voting Member	Local Regulator	Coconino County (AZ) Health Department	Flagstaff	AZ	(928) 679-8761	mgaiter@coconino.az.gov
Guzzle	Patrick	Voting Member	State Regulator	Idaho Department of Health and Welfare	Boise	ID	(208) 334-5936	plguzzle@gmail.com
Halbrook	Courtney	Voting Member	Food Service Industry	Brinker International	Dallas	TX	(972) 770-1291	courtney.halbrook@brinker.com
Hancock	Roger	ACAC Representative	ACAC	Recallinfolink	Boise	ID	(208) 284-1508	roger.hancock@recallinfolink.com

Committee Name: Food Protection Manager Certification Committee

Hawley	Jeff	Chair	Retail Food Industry	Harris Teeter, LLC	Matthews	NC	(704)-844-3098	jhawley@harristeeter.com
Hollenbeck	Christine	Vice Chair	Regulatory	National Environmental Health Association	Denver	CO	(303) 756-9090	chollenbeck@ymail.com
Jackson	Keith	Voting Member	Vending and Distribution Food Industry	Performance Food Group	Richmond	VA	(804) 484-7975	keithjackson@pfgc.com
Jensen	Joyce	ACAC Representative	ACAC	Lincoln-Lancaster Co. Health Dept	Lincoln	NE	(402) 441-8033	jjensen@lincoln.ne.gov
Kender	Linda	Voting Member	Academia	Johnson & Wales University CCA	Providence	RI	(401) 598-1278	lkender@jwu.edu
Krishna	Vijay	ANSI Representative	ANSI	American National Standards Institute	Washington	DC	(202) 331-3614	vkrishna@ansi.org
Lang	Jeff	Voting Member	Local Regulator	Lane County Environmental Health	Eugene	OR	(541) 682-3636	jeffrey.lang@co.lane.or.us
Louden	Kathy	Voting Member	Local Regulator	City of Minneapolis Environmental Health	Minneapolis	MN	(612) 673-3869	kathy.louden@minneapolismn.gov
Luebkekmann	Geoff	Voting Member	Food Service Industry	Florida Restaurant and Lodging Association	Tallahassee	FL	(850) 224-2250	gluebkekmann@frla.org
Lynch	Lawrence J.	Voting Member	Certification Provider	National Registry of Food Safety Professionals	Orlando	FL	(800) 446-0257	llynch@nrfsp.com
McMillion	Ryan	Voting Member	Certification Provider	Prometric	Baltimore	MD	(443) 455-6244	ryan.mcmillion@prometric.com
Neal	Jay	Voting Member	Academia	University of Houston	Houston	TX	(713) 743-2496	jneal@central.uh.edu
Paster	Tara	Voting Member	Food Industry Support-Training	Paster Training, Inc.	Gilbertsville	PA	(610) 970-1776	tara.paster@pastertraining.com
Piche	Kathleen	Voting Member	Certification Provider	National Restaurant Association	Chicago	IL	(312) 261-5348	kpiche@restaurant.org
Pilonetti	Therese	Voting Member	State Regulator	Colorado Dept of Public Health & Environment	Denver	CO	(303) 902-4372	therese.pilonetti@state.co.us
Prouse	Julie	Alternate	Academia	Texas AgriLife Extension Service	College Station	TX	(979) 458-2025	jprouse@tamu.edu

Committee Name: Food Protection Manager Certification Committee

Quam	Susan	Voting Member	Food Service Industry	Wisconsin Restaurant Association	Madison	WI	(608) 270-9950	squam@wirerestaurant.org
Radke	Vince	Advisor/Consultant	CDC	Centers for Disease Control	Atlanta	GA	(770) 488-4136	vradke@cdc.gov
Roughan	George	Voting Member	Food Industry Support-Training	TAP Series LLC	Thousand Oaks	CA	(805) 217-8605	gr@tapseries.com
Sarrocco-Smith	Davene	Voting Member	Local Regulator	Lake County General Health District	Painesville	OH	(440) 350-2543	dsarroccosmith@lcghd.org
Scott	Ken	Voting Member	Food Service Industry	Bojangles' Restaurants, Inc.	Charlotte	NC	(704) 527-2675	kscott@bojangles.com
Solter	Mike	Alternate	State Regulator	Alaska Dept of Environmental Conservation	Anchorage	AK	(907) 269-7629	michael.solter@alaska.gov
Steck	David	Alternate	Food Industry Support-Training	Serve It Up Safe!	Tampa	FL	(813) 781-8884	dave@serveitupsafe.com
Trevino	Tom	Alternate	Local Regulator	Salt Lake County Health Department	Murray	UT	(385) 468-3821	TTrevino@slco.org
Tryba	Casimir M.	Voting Member	Retail Food Industry	Big Y Foods, Inc.	Springfield	MA	(413) 504-4450	tryba@bigy.com
Williams	Laurie	Advisor/Consultant	FDA/CFSAN	FDA/CFSAN Office of Food Safety	College Park	MD	(240) 402-2938	Laurie.Williams@fda.hhs.gov
Wood	Sharon	Voting Member	Retail Food Industry	HEB Grocery Company	San Antonio	TX	(210) 938-6511	wood.sharon@heb.com

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: Food Protection Manager Certification Committee (FPMCC)

COUNCIL or EXECUTIVE BOARD ASSIGNMENT: Executive Board

DATE OF REPORT: January 30, 2016

SUBMITTED BY: Jeff Hawley, Chair

COMMITTEE CHARGE(s):

Issue: 2014 II-012

1. Continue working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the *Standards for Accreditation of Food Protection Manager Certification Programs* in an up-to-date format.
2. Evaluate the results of the exam security evaluation process and Standards revisions approved by the 2012 CFP Biennial Meeting to ensure that they are resulting in substantial improvement of exam security.
3. Report back to the Executive Board and the 2016 Biennial Meeting of the Conference for Food Protection.

Issue: 2014 II-015

The Food Protection Manager Certification Committee (FPMCC) determine the process and requirements for potential acceptance of the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17024-2012 for food protection manager certification as an additional option to and without impact on the existing CFP Standards for Accreditation of Food Protection Manger Certification Programs and report back its findings at the 2016 Biennial Meeting.

Constitutional Charge: Article XV, Section 6

The Food Protection Manager Certification Committee shall report to the Board. The Food Protection Manager Certification Committee shall work with the accreditation organization for food protection manager certification programs to:

- Subsection 1.** Establish and refine policies and standards to which certifiers must conform in order for them to be accredited;
- Subsection 2.** Provide Conference input into the development of accreditation standards for certifying organizations specific to food protection manager certification programs;
- Subsection 3.** Develop strategies for enhancing equivalence among food protection manager certificates issued by certifiers; and
- Subsection 4.** Promote universal acceptance of certificates issued by accredited certifiers.

COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

1. Progress on Overall Committee Activities:

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A. The Food Protection Manager Certification Committee (FPMCC) had face-to-face meetings October 15-16, 2014 in Kansas City, KS; April 1-2, 2015 in Milwaukee, WI; and October 21-22, 2015 in Dallas, TX. In addition, the Committee plans to meet April 15, 2016, prior to the 2016 biennial meeting. The Committee and workgroups had additional conference calls throughout the 2-year period.

B. The FPMCC formed 6 workgroups to address charges from the 2014 biennial meeting and conduct business of the Committee. These are the workgroups and their chairs:

1. Standards – Kate Piche (Certification Provider)
2. Standards Comparison – Christine Hollenbeck (Regulatory)
3. Bylaws – Sharon Wood (Retail Industry)
4. Logistics – Geoff Luebke (Food Service Industry)
5. Communications – George Roughan (Training Provider)
6. Security Evaluation – Bryan Chapman (Training Provider)

C. Progress on Issue #: 2014 II-012(1): Continue working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the Standards for Accreditation of Food Protection Manager Certification Programs in an up-to-date format.

The FPMCC Standards Workgroup is chaired by Kate Piche. This workgroup recommended editorial revisions to the CFP Standards. This included punctuation, italics, capitalization, and other non-substantive changes (See Content Attachment 1).

The Standards Workgroup was asked by Chair, Jeff Hawley and the Committee to review the Standards, and identify sections that can be made less prescriptive, and determine the security impact (positive, negative, or unknown) for each. The workgroup considered a lengthy list of items that could be considered as too specific, prescriptive, or otherwise lacking utility for effectiveness of the CFP Standards. The workgroup has developed a list of such items, and will continue this work during the next biennium.

D. Progress on Issue #: 2014 II-012(2): Evaluate the results of the exam security evaluation process and Standards revisions approved by the 2012 CFP Biennial Meeting to ensure that they are resulting in substantial improvement of exam security.

To evaluate the data and determine if the new security standards are effective, Dr. Donald Ford (ANSI) compared security data provided by certification providers before the new standards were in place, and data after the new security standards were implemented following the 2012 Biennial Meeting. Security data from July 1, 2009-June 30, 2010 was compared to data from July 1, 2013-June 30, 2014 (See Supporting Attachment 1). This is a summary of Dr. Ford's findings:

Goal 1: Enforce Proctor/Administrator Disciplinary Actions.

The percentage of test administrators/proctors who committed violations decreased from 2009-10 to 2013-14 from 5.72% to 4.4%. The most probable reason for

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reduction in violations was that all test administrators/proctors were retrained by the certification providers. Violations included:

- a. Failure to return exams/answer sheets on time
- b. Failure to return all materials, or to sign/seal return envelopes
- c. Failure to use a traceable shipping carrier
- d. Failure to follow proctor guidelines, including not being present the entire time or allowing test-takers to self-proctor
- e. Suspected/confirmed cheating or colluding with test takers

Goal 2: Reduce Exam Packaging and Shipping Irregularities (lost exams/answer sheets).

There was an increase in reported lost materials from 2009 to 2013: 0.01% to 0.02%. Percentage of lost exams/answer sheets has remained steady at 0.02% over the last 2 years.

Note: We may have reached a theoretical limit in preventing lost exams/answer sheets. Current safeguards are effective in the majority of cases, but zero losses appear to be unattainable under the current system of testing.

Goal 3: Reduce Test Site Irregularities.

Test Administration problems show a big increase: less than 0.5% to 3.19%, while test site problems remain small at 0.01%. The increase in test administration irregularities was probably due to better detection and reporting rather than an actual increase in incidents. Greater focus on test administration and test site irregularities is helping to uncover previously unreported problems.

Most Frequent Reasons for Test Site Irregularities in 2014

- a. Candidate demographic changes (wrong name or other personal information at registration)
- b. Exam was given in a restaurant during service or otherwise interrupted by outside noise
- c. Examinees were allowed to sit too close together
- d. Technical issue with online testing site hardware

Most Frequent Reasons for Test Administration Irregularities

- a. Failure to follow shipping policies for returning materials on time
- b. Failure to properly return all materials via traceable carrier
- c. Failure to follow policies and procedures for proctoring – partially unproctored or self-proctored exams
- d. Cheating or collusion: candidates were allowed to talk in a foreign language during the exam, proctor colluded in cheating, candidates shared notes during exam

Goal 4: Reduce Cheating and Test Administration Irregularities.

Confirmed/suspected cases of cheating went from 10 in 2009-10, to 16 in 2012-13, to 13 in 2013-14. Better detection, reporting and enforcement resulted in more confirmed cases initially. Percentage of test administration violations decreased from 0.24% in 2009-10 to 0.14% in 2013-14. This decrease is a result of better detection and enforcement.

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Most Frequent Corrective Actions Taken To Combat Cheating

- a. Use multiple versions of the exam at each administration
- b. Revoke proctor privileges for collusion
- c. Enforce spacing and other environmental guidelines
- d. Use biometrics to verify examinee identity
- e. Require examinees to retest when cheating is suspected
- f. Adopt better exam forensic analysis methods
- g. Increase exam session audits

Goal 5: Improve Test Quality Assurance (QA)

2009-10: Only 1 of 3 providers had a QA system installed, and it was incomplete.

2012-13: All 4 providers had QA system in place, but still implementing some features.

2013-14: QA system fully functional for all providers.

QA elements include:

- a. Document control
- b. Internal audit
- c. Management review
- d. Exam security plan
- e. External audit/certification

E. Progress on Security Improvements. After implementing the security measures from the Standards adopted in 2012, security of the test administration process has improved, and the number of breaches has dramatically decreased. Much progress has been made, but there is still room for improvement. More can be done to standardize test administration and minimum standards for test sites. Recommendations for best practices by certification providers have been implemented, and have led to measurable improvements in test administration security. Certification providers will continue with their efforts to make improvements in the following areas:

- 1) Proctors/Administrators:
 - a) Increase screening, selection and training standards
 - b) Continue to vigorously apply disciplinary actions against offenders
- 2) Shipping Irregularities:
 - a) Use traceable carriers only, especially those with high reputation for security and reliability
 - b) Continue to enforce rules for shipping
- 3) Test Sites/Administration:
 - a) Standardize test site requirements across all providers
 - b) Share best practices for administration
- 4) Test Cheating:
 - a) Share best practices for data forensics and cheating detection
 - b) Encourage test-takers to report cheating (whistleblower hotline)
- 5) QA System:

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- a) Fully implement all features for all providers
- b) Use it as preventive mechanism and early warning system

F. Issue #: 2014 II-015: The Food Protection Manager Certification Committee (FPMCC) determine the process and requirements for potential acceptance of the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17024-2012 for food protection manager certification as an additional option to and without impact on the existing CFP Standards for Accreditation of Food Protection Manger Certification Programs and report back its findings at the 2016 Biennial Meeting.

The Standards Comparison Workgroup did a line by line comparison of the CFP Standards and ISO 17024 to determine areas of “equivalencies”, and also identified items that would need further review to determine equivalency of the two standards (See Supporting Attachment 2). There was much discussion concerning unintended consequences, such as operational impacts and additional costs of implementation that must be considered in the comparison of CFP Standards and ISO 17024.

After much discussion consensus could not be reached, and the Committee made the decision to request a continuation of Charge #: 2014 II-015 to the next biennium. The Committee also realized that additional expertise in standards review and evaluation was necessary to help create a foundation for understanding and comparing CFP Standards and ISO 17024. Dr. Vijay Krishna (ANSI) offered to conduct a workshop on standards writing methodology and verifiability at the first meeting of the FPMCC in the 2016-18 biennium.

The FPMCC reports it has conducted an extensive but incomplete study comparing current CFP Manager Certification Standards and ISO 17024, and therefore recommends that Charge 2014 II-015 be continued for the 2016-18 biennium to permit completion of the comparison with the input of standards development expertise from ANSI, as such expertise will better enable the FPMCC to both resolve the comparison and provide support in ongoing improvement of the CFP Manager Certification Standards while completing work on Charge 2014 II-015.

Acknowledgements

The FPMCC would like to thank Big Y World Class Market, Florida Restaurant and Lodging Association, National Registry of Food Safety Professionals, National Restaurant Association, Performance Food Group, State Food Safety, and Wisconsin Restaurant Association for their sponsorship of our meetings.

The Chair would also like to recognize and thank Vice-Chair Christine Hollenbeck, and workgroup chairs Kate Piche, Sharon Wood, George Roughan, Christine Hollenbeck, Bryan Chapman and Geoff Luebke. They have been very diligent in fulfilling their responsibilities, and have enabled the committee to complete our assigned charges successfully.

And lastly, the Chair would like to recognize and thank the 2014-2016 FPMCC members, and the organizations/agencies they represent, which allowed them to participate on the Committee.

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Without the commitment and support of individuals and their organizations/agencies we would not have been able to complete our assigned charges.

2. Recommendations for consideration by Council:

- A. Thank the members of the 2014-2016 Food Protection Manager Certification Committee (FPMCC) for their hard work, and acknowledgement of this report.
- B. Approve revisions to the Standards for Accreditation of Food Protection Manager Certification Programs (see Content Attachment 1)
- C. That the following charges assigned to the Food Protection Manager Certification Committee (FPMCC) be continued for the 2016-18 biennium:
 - a. Issue 2014 II-012: working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the Standard for Accreditation of Food Protection Manager Certification Programs in an up-to-date format; including, but not limited to, recommending language for items that could be made less prescriptive without a negative effect on security.
 - b. Charge 2014 II-015: to permit completion of the comparison of ISO/IEC 17024-2012 to CFP Standards for Accreditation of Food Protection Manger Certification Programs, with the input of standards development expertise from American National Standards Institute (ANSI). ANSI expertise will better enable the FPMCC to both resolve the comparison, and provide support in ongoing improvement of the CFP Manager Certification Standards, while completing work on Charge 2014 II-015.
 - c. Report back findings and recommendations to the 2018 Biennial Meeting of the Conference for Food Protection.

CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

The FPMCC is submitting the following two Issues:

1. Report: Food Protection Manager Certification Committee (FPMCC)
2. FPMCC 2: Standards for Accreditation of Food Protection Manager Certification Programs - Revisions

Content Attachments:

1. Standards for Accreditation of Food Protection Manager Certification Programs (draft May 2015)

Supporting Attachments:

(Note: supporting attachments may not represent the views of the Conference for Food Protection)

1. Security Evaluation Workgroup Baseline & Summative Self-Report Findings 2013-14

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2. CFP-ISO Standards Comparison Equivalency Report

COMMITTEE MEMBER ROSTER (attached):

| Food Protection Manager Certification Committee Roster 2014-2016
|

Conference for Food Protection

Standards for Accreditation of Food Protection Manager Certification Programs

As Amended at the 2014 Biennial Meeting of the Conference for Food Protection

Preamble

The Conference for Food Protection, hereinafter referred to as the CFP, is an independent voluntary organization that has identified the essential components of a nationally recognized Food Protection Manager *Certification* Program and established a mechanism to determine if *certification organizations* meet these ~~standards~~ Standards. The CFP Standards for *Accreditation* of Food Protection Manager *Certification* Programs is intended for all *legal entities* that provide *certification* for this profession. The ~~standards~~ Standards have been developed after years of CFP's research into, and discussion about, Food Protection Manager *Certification* Programs.

All *certification organizations* attesting to the *competency* of Food Protection Managers, including *regulatory authorities* that administer and/or deliver *certification* programs, have a responsibility to the individuals desiring *certification*, to the employers of those individuals, and to the public. *Certification organizations* have as a primary purpose the evaluation of those individuals who wish to secure or maintain Food Protection Manager *Certification* in accordance with the criteria and ~~standards~~ Standards established through the CFP. *Certification organizations* issue *certificates* to individuals who meet the required level of *competency*.

The professionals involved in the credentialing process for *Certified Food Protection Managers* shall recognize that the justification for regulating entrance to the occupation of *Certified Food Protection Manager* is to:

- protect and promote food safety for the welfare of the public;
- ensure that the responsibility and liability for overseeing the protection of safety and welfare of the public lies with those governmental jurisdictions at the Federal, state and local levels having the power to set forth laws regulating entrance to and performance in this occupation;
- ensure that the rights of the public at large and of those members of the public who wish to enter this occupation shall be balanced in terms of fairness and due process in the form of a credentialing process for admitting qualified persons to perform in that occupation; and
- ensure that the *validity* of the credentialing process for *Certified Food Protection Manager* is dependent on unbiased application of all aspects of that process, requiring

careful determination of the competencies necessary to prevent foodborne illness, unbiased education and training for acquisition of those competencies, and fair assessment practices to ensure that individuals have achieved mastery of the competencies.

Therefore, professionals involved in the credentialing process for *Certified Food Protection Manager* accept responsibilities based on these considerations.

The CFP ~~standards~~ Standards are based on nationally recognized principles used by a variety of organizations providing *certification* programs for diverse professions and occupations. *Accreditation*, through the process recognized by CFP, indicates that the *certification organization* has been evaluated by a third party *accrediting organization* and found to meet or exceed all of the CFP's established ~~standards~~ Standards.

To earn *accreditation*, the *certification organization* shall meet the following CFP ~~standards~~ Standards and provide evidence of compliance through the documentation requested in the application. In addition, the *certification organization* shall agree to abide by *certification* policies and procedures which are specified by the CFP Food Protection Manager ~~Certification~~ Certification Committee, hereinafter referred to as the FPMC Committee, approved by the CFP, and implemented by the *accrediting organization*.

The *accrediting organization* shall verify and monitor continuing compliance with the CFP ~~standards~~ Standards through the entire *accreditation* period. The CFP FPMC Committee will work directly with the *accreditation organization* to enhance and maintain *certification* policies and procedures that meet the specific needs of Food Protection Managers while ensuring a valid, reliable and *legally defensible* evaluation of *certification* programs.

The American National Standards Institute (ANSI) was selected as the *accrediting organization* for the CFP Standards for *Accreditation* of Food Protection Manager *Certification* Programs and assumed its duties in January, 2003. The CFP FPMC Committee continues to work within the Conference structure to monitor the criteria and selection process for the organization serving as the accrediting body for Food Protection Manager *Certification* Programs.

The CFP strongly encourages regulatory authorities and other entities evaluating credentials for Food Protection Managers to recognize and endorse these ~~standards~~ Standards and the ~~accreditation~~ accreditation process. The CFP Standards for *Accreditation* of Food Protection Manager *Certification* Programs provides the framework for universal acceptance of individuals who have obtained their credentials from an *accredited certification program*. In the U.S Food and Drug Administration's Food Code, hereinafter referred to as the

FDA Food Code, Section 2-102.20 recognizes Food Protection Manager *certificates* issued by an *accredited certification program* as one means of meeting the FDA Food Code's "Demonstration of Knowledge" requirement in Section 2-102.11.

Please note that words that appear in italics are defined terms.

Modifications and Improvements

The FPMC Committee followed the Conference directive to use the 1996 conference working document, *Standards for Training, Testing and Certification of Food Protection Managers*, in the development of ~~aeereditation~~ accreditation standards. Extensive revision of this document was presented to CFP's 2012 Biennial Meeting of the Conferences for Food Protection under the title, *Standards for Accreditation of Food Protection Manager Certification Programs*.

The charge to the FPMC Committee from the 2010 Biennial Meeting of the Conference for Food Protection resulted in revisions to the ~~Standards~~ Standards to enhance the integrity of the entire examination process, which included identification and analysis of root causes of security violations and implementation of solutions.

The revision and reformatting of the document were made after a comprehensive FPMC Committee review of each section. This revision of the ~~Standards for~~ Standards for Accreditation of Food Protection Manager of Food Protection Manager Certification Programs Programs:

1. adds and improves definitions that are more precise and more consistent with terminology and definitions used in the *psychometric* community and by ~~aeereditation~~ accreditation organizations;
2. reorganizes ~~Standards~~ Standards to eliminate duplication and align with purpose;
3. modifies or creates ~~Standards~~ Standards to better address professional credibility and training of *test administrators/proctors*; handling of examination packages; shipping irregularities; location (site) irregularities; and breach of the *certification organization's test administrators/proctors* protocols and requirements;
4. uses "test administrator/proctor" in the ~~Standards~~ Standards to indicate duties for both "test administrator" and "proctor;" and
5. adds a standard for management systems.

Annex

The annex located at the back of the document is NOT part of the ~~standards~~ Standards, but provides information to guide those responsible for implementing or reviewing Food Protection Manager *Certification Programs*. The annex provides guidelines for specific responsibilities that ~~impact~~ affect the effective implementation of the Conference *Standards for Accreditation of Food Protection Manager Certification Programs*.

Annex A provides guidance to regulatory authorities that incorporate Food Protection Manager *Certification* as part of their requirements to obtain or retain a permit to operate. The CFP ~~Standards for~~ Standards for Accreditation of Food Protection Manager of Food Protection Manager Certification Programs Programs is designed to be a set of voluntary unifying national standards providing a mechanism for the universal acceptance of food protection managers who obtain their *certificates* from an *accredited certification program*.

Over the past ~~25~~ twenty-five years, many regulatory authorities have developed their own Food Protection Manager *Certification Programs*. This has resulted in a variety of ~~standards~~ Standards for *certification* programs. The CFP national ~~standards~~ Standards for universal acceptance of

Certified Food Protection Managers provide regulatory authorities reliable and *legally defensible* criteria for evaluating *certification* programs. In addition, they eliminate duplication of testing and additional cost for the industry.

Regulatory authorities that may not be in a position to eliminate their existing programs are encouraged to recognize food protection managers certified in accordance with these ~~standards~~ Standards as fulfilling their program requirements. Annex A provides additional guidance, developed through the CFP, for the implementation of these regulatory *certification* programs.

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SECTION 1.0 - DEFINITIONS

1.0 Definitions.

- 1.1 Accreditation** means that an *accrediting organization* has reviewed a Food Protection Manager *Certification* Program and has verified that it meets ~~standards~~ Standards set by the CFP (a review of a *certification organization* by an independent organization using specific criteria, to verify compliance with the Food Protection Management *Certification* Program Standards).
- 1.2 Accrediting organization** means an independent organization that determines whether a Food Protection Manager *Certification* Program meets the ~~standards~~ Standards set by the CFP.
- 1.3 Accredited certification program** means a Food Protection Manager *Certification* Program that has been evaluated and listed by an *accrediting organization* accepted by the CFP and has met the CFP ~~standards~~ Standards for such programs.
- A. refers to the *certification* process and is a designation based upon an independent evaluation of factors such as the sponsor's mission; organizational structure; staff resources; revenue sources; policies; public information regarding program scope, *continued proficiency*, discipline, and grievance procedures; and examination development and administration.
- B. does not refer to training functions or educational programs.
- 1.4 Algorithm** means a set of procedures or rules pertaining to the selection of questions on an examination.
- 1.5 Certificate** means documentation issued by a *certification organization*, verifying that an individual has complied with the requirements of an *accredited certification program*.
- 1.6 Certification** means the process wherein a *certificate* is issued.
- 1.7 Certification organization** means an organization that provides a *certification* program and issues the *certificate*.
- 1.8 Certified Food Protection Manager** means a person who has demonstrated by means of a *food safety certification examination* to a *certification organization* that he/she has the ~~knowledge, skills and abilities~~ knowledge, skills and abilities (KSA's) required to protect the public from foodborne illness. Duties of such persons include but are not necessarily limited to:
- A. responsibility for identifying hazards in the day-to-day operation of a *food establishment* that provides food for human consumption;

- B. development or implementation of specific policies, procedures or standards aimed at preventing foodborne illness;
 - C. coordination of training, supervision or direction of food preparation activities, and responsibility for taking corrective action as needed to protect the health of the consumer; and
 - D. responsibility for completion of in-house self-inspection of daily operations on a periodic basis to see that policies and procedures concerning food safety are being followed.
- 1.9 Competency** means a defined combination of ~~knowledge, skills, and abilities~~ knowledge, skills and abilities (KSA's) required in the satisfactory performance of a job.
- 1.10 Competency examination** means an instrument that assesses whether an individual has attained at least a minimum level of *competency* that has been determined to be necessary to perform effectively and safely in a particular occupation or job. It shall be based on a thorough analysis of requirements for safe and effective performance.
- 1.11 Computer-adaptive testing** means a method of *computer-based testing* that uses *algorithms* based on the statistics of the examination questions to determine the *examinee's* proficiency by selecting *items* at various difficulty levels.
- 1.12 Computer-based testing** means an examination administered on a computer.
- 1.13 Continued proficiency** means a *certification organization's* process or program designed to assess continued *competence* and/or enhance the *competencies* of *Certified Food Protection Managers*.
- 1.14 Demographic data** means the statistical data of a population, especially the data concerning age, gender, ethnic distribution, geographic distribution, education, or other information that will describe the characteristics of the referenced group.
- 1.15 Educator**, in this instance, means a teacher in a secondary or post-secondary program leading to a degree or *certificate* in a course of study that includes *competencies* in prevention of foodborne illness.
- 1.16 Entry level performance** means carrying out job duties and tasks effectively at a level that does not pose a threat to public safety but not necessarily beyond that level. It requires safe performance of tasks expected of a worker who has had at least the minimal training (either in a formal school setting or on-the-job setting), but not long experience.
- 1.17 Equivalency** (in “equivalent examinations”) means that there is specific *psychometric* evidence that various forms of an examination cover the same content and their respective passing scores represent the same degree of competence.

- 1.18 Examination Booklet** means the paper version of the *food safety certification examination*.
- 1.19 Examination Developers** means the individuals involved in the process of creating the Food Safety ~~Certification~~ Certification Examination.
- 1.20 Examination forms** means alternate sets of examination questions (with at least 25% alternate questions) to assess the same *competencies*, conforming to the same *examination specifications*.
- 1.21 Examination specifications** means the description of the specific content areas of an examination, stipulating the number or proportion of *items* for each area of *competency* and the level of complexity of those *items*. The specifications are based on the *job analysis* and its verification.
- 1.22 Examination version** means an examination in which the exact set of *items* in an *examination form* is presented in another order, language, manner or medium.
- 1.23 Examinee** means a person who takes an examination.
- 1.24 Exposure Plan** means the policies and procedures in place to ensure that examination *items* are not exposed to *examinees* or other people that may result in an examination *item* being memorized and/or shared.-
- 1.25 Food establishment**
- A. Food establishment means an operation that stores, prepares, packages, serves, vends, or otherwise provides food for human consumption:
- 1) such as a restaurant, satellite or catered feeding location, catering operation if the operation provides food directly to a consumer or to a conveyance used to transport people, market, vending location, conveyance used to transport people, institution, or food bank; and
 - 2) that relinquishes possession of food to a consumer directly, or indirectly through a delivery service such as home delivery of grocery orders or restaurant takeout orders, or delivery service that is provided by common carriers.
- B. including:
- 1) an element of the operation such as a transportation vehicle or a central preparation facility that supplies a vending location or satellite feeding location unless the vending or feeding location is permitted by the *regulatory authority*; and
 - 2) an operation that is conducted in a mobile, stationary, temporary or permanent facility or location; where consumption is on or off the premises; and regardless of whether there is a charge for the food.
- C. not including:

- 1) an establishment that offers only prepackaged foods that are not potentially hazardous;
- 2) a produce stand that only offers whole, uncut fresh fruits and vegetables;
- 3) a food processing plant;
- 4) a kitchen in a private home if only food that is not potentially hazardous is prepared for sale or service at a function such as a religious or charitable organization's bake sale if allowed by law and if the consumer is informed by a clearly visible placard at sales or service locations ~~that~~ where the food is prepared in a kitchen that is not subject to regulation and inspection by the *regulatory authority*;
- 5) an area where food that is prepared as specified in Subparagraph ~~(e)-(iv)~~ (C) of this definition is sold or offered for human consumption;
- 6) a kitchen in a private home, such as a small family day-care provider; or a bed-and-breakfast operation that prepares and offers food to guests if the home is occupied, the number of available guest bedrooms does not exceed ~~6~~ six, breakfast is the only meal offered, the number of guests served does not exceed ~~18~~ eighteen, and the consumer is informed by statements contained in published advertisements, mailed brochures, and placards posted at the registration areas ~~that~~ where the food is prepared in a kitchen that is not regulated and inspected by the *regulatory authority*; or
- 7) a private home that receives catered or home-delivered food.

1.26 Food safety certification examination means an examination in food safety approved in accordance with the provisions of this program.

1.27 Instructor means an individual who teaches a course that includes *competencies* in prevention of foodborne illness.

1.28 Item means an examination question.

1.29 Item bank means all of the *items* that have been developed for the several forms of an examination. It includes all of the *items* available to create *examination forms*.

1.30 Item sequence means the presentation order of examination *items* in an examination.

1.31 Job analysis means the description of functions or tasks required for an individual to perform to entry level standards in a specific job or occupation, including information about the attributes required for that performance. It defines the performance dimension of a job and includes ~~knowledge, skills, and abilities~~ knowledge, skills and abilities (KSA's) necessary to carry out the tasks.

A **Tasks** are the individual functions, whether mental or physical, necessary to carry out an aspect of a specific job.

B. **Knowledge, skills, and abilities (KSAs)** include the information and other

attributes that the worker shall possess in order to perform effectively and safely. They include information and understanding as well as learned behaviors and natural attributes.

- 1.32 Legal entity** means an organization structured in a manner that allows it to function legally and be recognized as a responsible party within the legal system.
- 1.33 Legally defensible** means the ability to withstand a legal challenge to the appropriateness of the examination for the purpose for which it is used. The challenge may be made by actual or *potential examinees* or on behalf of the public. *Examinees'* challenges may pertain to perceived bias of the examination or inappropriately chosen content. Challenges on behalf of the public may claim that the examination does not provide adequate measures of an *examinee's* ~~knowledge, skills, and abilities~~ knowledge, skills and abilities (KSA's) required to protect the consumer from foodborne illness.
- 1.34 Overexposure** means the relative frequency in which an examination *item* which is presented across all computerized tests has undermined the integrity of the examinations. Whether a test *item* is overexposed or not is based upon the type of examination test *item* (pictorial vs. written) and its frequency of use.
- 1.35 Potential examinee** means a person capable of taking an examination.
- 1.36 Proctor** means a person under the supervision of a *test administrator*, ~~assisting who~~ assists by assuring that all aspects of an examination administration are being carried out with precision, with full attention to security and to the fair treatment of ~~examinees~~ examinees. *Proctors* have the responsibility and shall have the ability to observe *examinee* behaviors, accurately distribute and collect examination materials, and assist the *test administrator* as assigned. They shall have training or documented successful experience in monitoring procedures and shall affirm in writing an agreement to maintain examination security and to ensure that they have no conflict of interest. There must be at least one *proctor* for every 35 ~~examinees~~ examinees-. The *proctor* can also be a *test administrator*.
- 1.37 Psychometric** means scientific measurement or quantification of human qualities, traits, or behaviors.
- 1.38 Psychometrician** means a professional with specific education and training in development and analysis of examinations and other assessment techniques and in statistical methods. Qualifications may vary but usually include at least a bachelor's degree and a minimum of two formal courses in examination development and a minimum of two in statistical methods.
- 1.39 Regulatory authority** means a government agency that has been duly formed under the laws of that jurisdiction to administer and enforce the law.
- 1.40 Reliability** means the degree of consistency with which an examination measures the attributes, characteristics or behaviors that it was designed to measure.

- 1.41 Retail food industry** means those sectors of commerce that operate *food establishments*.
- 1.42 Test administrator** means the individual at the test site who has the ultimate responsibility for conducting a *food safety certification examination*. The *test administrator* can also be a *proctor*.
- 1.43 Test encryption and decoding** means the security aspects of a computer examination to prevent the examination from being read by unauthorized persons if downloaded or otherwise accessed without authorization. Encryption refers to how a computer examination is coded. Decoding refers to how the computer examination is translated back from the code.
- 1.44 Trainer**, in this instance, means a professional with appropriate expertise who conducts a course in food safety for *potential examinees* for *certification* as Food Protection Managers.
- 1.45 Validity** means the extent to which an examination score or other type of assessment measures the attributes that it was designed to measure. In this instance, does the examination produce scores that can help determine if *examinees* are competent to protect the public from foodborne illness in a *food establishment*.

SECTION 2.0 – PURPOSE OF CERTIFICATION ORGANIZATIONS

2.0 Purpose of *Certification Organizations*.

- 2.1 The *certification organization* shall have as a purpose the evaluation of those individuals who wish to secure or maintain Food Protection Manager *Certification* in accordance with the criteria and ~~standards~~ Standards established through the CFP, and the issuance of *certificates* to individuals who meet the required level of *competency*.
- 2.2 A *certification organization* responsible for attesting to the *competency* of Food Protection Managers has a responsibility to the individuals desiring *certification*, to the employers of those individuals, and to the public.
- 2.3 A *certification organization* for Food Protection Manager *Certification* Programs shall not be the *accrediting organization* nor ~~may~~ shall the *certification organization* have any conflict of interest with said *accrediting organization*.

SECTION 3.0 – STRUCTURE AND RESOURCES OF CERTIFICATION ORGANIZATIONS

3.0 Structure and Resources of *Certification Organizations*.

- 3.1 Structure of *certification organizations*.** The *certification organization* shall be incorporated as a *legal entity* (applies to the parent organization if the *certification organization* is a subsidiary of another organization).
- 3.2** A *certification organization* shall conform to all CFP ~~standards~~ Standards for *accreditation* and demonstrate that the relationship between the *certification organization* and any related association, organization or agency ensures the independence of the *certification* program and its related functions.
- 3.3** If a *certification organization* provides both education and *certification*, the *certification organization* shall administratively and financially separate any education and *certification* functions that are specific to Food Protection Manager *Certification* to ensure that the *certification* program is not compromised. This may be satisfied if the governing structure documents to the *accrediting organization* the distinct separation of the two functions, confirming that no undue influence is exercised over either the education or the *certification* process by virtue of the structure within the association, organization, agency or another entity.
- 3.4 Resources of *Certification Organizations*.** A *certification organization* shall conform to all CFP ~~standards~~ Standards for *accreditation* and demonstrate
- A. the availability of financial resources to effectively and thoroughly conduct regular and ongoing *certification* program activities.
 - B. that staff possesses the knowledge and skills necessary to conduct the *certification* program or has available and makes use of non-staff consultants and professionals to sufficiently supplement staff knowledge and skills.

SECTION 4.0 – FOOD SAFETY CERTIFICATION EXAMINATION DEVELOPMENT

4.0 *Food Safety Certification Examination Development.*

4.1 *Food safety certification examinations* administered by *accredited certification organizations* shall comply fully with all criteria set by the CFP and shall meet explicit and implicit ~~standards~~ Standards to protect the public from foodborne illness. The *accredited certification organization* shall provide a *food safety certification examination* that:

- A. conforms to all CFP Standards for ~~Aeereiditation~~ Accreditation of Food Protection Manager ~~Certification~~ Certification Programs;
- B. has been developed from an *item bank* of at least ~~1000~~ one thousand questions; and
- C. on a quarterly basis is provided in at least two new *examination forms* in the English language.

4.2 Each *certification organization* shall provide evidence that it meets the following professional requirements:

- A. ability to conduct or otherwise use a *legally defensible* and psychometrically valid *job analysis*;
- B. demonstrated experience in the development of psychometrically valid *competency examinations*;
- C. demonstrated capability to develop and implement thorough procedures for security of the *item bank*, printed, taped or computerized examinations, examination answer sheets, and *examinee* scores;
- D. data handling capabilities commensurate with the requirements for effective processing, reporting, and archiving of *examinee food safety certification examination* scores; and
- E. demonstrated evidence of an understanding of and willingness to abide by the principles of fairness and due process.

4.3 The *certification organization* shall provide complete information about the *food safety certification examination*, including ~~that~~ information related to procedures and personnel involved in all aspects of the examination development and analysis. The information required for *accreditation* will include but is not necessarily limited to:

- A. complete description of the scope and usage of the examination;
- B. *job analysis* task list, with ~~knowledge, skills, and abilities (KSAs)~~ knowledge, skills, and abilities (KSAs);
- C. *examination specifications*;

- D. the number of unduplicated *items* in the *item bank*;
- E. statistical performance of each *item* in the bank;
- F. number of *examination forms* and evidence of their *equivalence* to each other;
- G. description of method used to set passing score;
- H. copies of all logs, diaries, and personnel lists and descriptions kept as
f required in the development process;
- I. summary statistics for each *examination form*; and
- J. names, credentials, and *demographic* information for all persons involved in
the *job analysis*, *item* writing and review, and setting the passing score.

- 4.4 **Job Analysis.** The content *validity* of a *food safety certification examination* shall be based on a psychometrically valid *job analysis* developed by *psychometricians* and a demographically and technically representative group of individuals with significant experience in food safety. The representative group shall include but not necessarily be limited to persons with experience in the various commercial aspects of the *retail food industry*, persons with local, state or national regulatory experience in retail food safety, and persons with knowledge of the microbiology and epidemiology of foodborne illness, and shall be sufficiently diverse as to avoid cultural bias and ensure fairness in content according to all ~~federal~~ Federal requirements.
- 4.5 The *job analysis* shall provide a complete description of the ~~knowledge, skills, and abilities- (KSAs)~~ *knowledge, skills, and abilities (KSAs)* required to function competently in the occupation of *Certified Food Protection Manager*, with emphasis on those tasks most directly related to the *Certified Food Protection Manager's* role in the prevention of foodborne illness.
- 4.6 Detailed *food safety certification examination* specifications shall be derived from a valid study of the *job analysis* tasks and their accompanying ~~knowledge, skills, and abilities- (KSAs)~~ *knowledge, skills, and abilities (KSAs)* and shall be appropriate to all aspects of the *retail food industry*. The *job analysis* shall include consideration of scientific data concerning factors contributing to foodborne illness and its epidemiology. The *examination specifications*, consisting of percentage weights or number of *items* devoted to each content area, shall be available to *examinees* and to the public.
- 4.7 The *certification organization* or its contracted examination provider shall maintain a log and diary of the procedures and a list of the qualifications, identities, and *demographic data* of the persons who participated in development of the *job analysis* and of the *food safety certification examination specifications*. Those materials shall be provided to the *accrediting organization* on demand.
- 4.8 The *certification organization* is required to systematically evaluate practices in the *retail food industry* to ensure that the *job analysis* on which an examination is based remains appropriate for the development of *food safety certification examinations* on which the universal credential is awarded. The maximum length of use for any *job analysis* is five years from the date of validation.

- 4.9** *Psychometric Standards.* *Food safety certification examination* development, including setting the passing score, shall be based on the most recent edition of ~~*Standards for Educational and Psychological Testing*~~ Standards for Educational and Psychological Testing, developed jointly by the American Psychological Association, American Educational Research Association and National Council for Measurement in Education, and on all appropriate ~~federal~~ Federal requirements (for example, Americans with Disabilities Act). *Food safety certification examinations* shall be revised as needed to be in compliance with changes in the ~~*Standards for Educational and Psychological Testing*~~ Standards for Educational and Psychological Testing or in any of the ~~federal~~ Federal requirements.
- 4.10** The *food safety certification examination* development procedures shall ensure that the *competencies* assessed in the *accredited certification program* are those required for *competent entry level performance* in the role of *Certified Food Protection Manager*, as defined by law and industry standards, and that they focus on factors related to the prevention of foodborne illness in the *retail food industry*.
- 4.11** The *food safety certification examination* shall be based on psychometrically valid procedures to ensure the relative equivalence of scores from various *examination forms*. The *certification organization* shall provide evidence of such equivalence as public information.
- 4.12** The *food safety certification examination* shall be developed to be free from bias due to characteristics that have no bearing on the *competencies* being measured. Such characteristics as gender, ethnicity, race, socioeconomic status, age, and any other concerns unrelated to ability to apply the required *competencies* will not be allowed to create differences in *examinee* scores.
- 4.13** When the *food safety certification examination* is administered in a medium other than the common pencil-and-paper format, evidence shall be provided to ensure that all *competencies* are assessed in a reliable manner and that the *validity* of the examination is preserved. Evidence of comparability with other *examination forms* shall be provided.
- 4.14** When any form and/or *item bank* of the *food safety certification examination* is translated into a language other than that in which it is originally developed and validated, the developer of the examination shall provide evidence of content *equivalency* of the translated version with the original *examination form* and/or *item bank*. The developer shall provide a detailed description of the translation method(s), including the rationale for selecting the translation method(s), and shall demonstrate congruence of *items* and instructions with those of the *examination form* and/or *item bank* that was translated. To avoid potential problems in translation of terms specific or idiomatic to the *retail food industry*, translation should be accomplished with the consultation of food safety personnel competent in the languages of both the original and the translated version of the *food safety certification examination*.
- 4.15** Actual or potential conflicts of interest that might influence judgment or performance of *Examination Developers* shall be disclosed.

4.16 *Examination Developers* shall maintain a log and diary of the procedures and a list of the qualifications, identities, and *demographic data* of the persons who participated in *item* development, examination development, translations, setting the passing score, and the statistical analyses of the examination *items* and of the full examination. Those materials shall be provided to the *accrediting organization* on demand.

All examinations shall be delivered and administered in a format that ensures the security of the examination (i.e. in a secured environment with a *test administrator/proctor*.) Un-proctored examinations are not acceptable regardless of the mode of administration.

4.17 Examination Development Security. The *certification organization* will demonstrate that procedures are developed and implemented to ensure that individual *items*, *item banks*, *food safety certification examinations* presented in all media (printed, taped and computerized), test answer sheets and *examinee* scores are and remain secure. Demonstration shall include an overall examination security plan that covers each step in the examination development, culminating in the production of the examination.

4.18 Periodic Review. At least semiannually each *certification organization* shall report to the *accrediting organization*, providing a review of its *food safety certification examination(s)*. The report will include the following summary statistics for all examinations (for each examination used) administered during the preceding six months, as well as other information that may be reasonably requested by the *accrediting organization*:

- A. number of *food safety certification examinations* administered;
- B. mean;
- C. mode;
- D. standard deviation;
- E. range;
- F. *reliability* coefficient;
- G. number and percentage of *examinees* passing the examination; and
- H. the statistics describing the performance of each *item* used on *food safety certification examinations* administered during the six-month period.

4.19 Requirements for Examination Standardization. *Certification organizations* shall specify conditions and procedures for administering all *food safety certification examinations* in a standard manner to ensure that all *examinees* are provided with the opportunity to perform according to their level of ability and to ensure comparability of scores. *Examination Booklets* shall be of high quality printing to ensure ease of reading.

SECTION 5 – FOOD SAFETY CERTIFICATION EXAMINATION ADMINISTRATION

5.0 *Food Safety Certification Examination Administration.* All sections of these *Standards* apply to ~~Computer Based Testing (CBT)~~ Computer Based Testing (CBT) Administration except Section 5.1.

5.1 *Security for Examination Booklets.*

A. Securing *examination booklet*.

- 1) Each individual *examination booklet* shall be secured by using one of the following methods both prior to and after administration:
 - a. enclosing in a sealed tamper-resistant package;
 - b. shrink-wrapping;
 - c. sealing on all three open sides with each seal of sufficient size to cover at least one square inch of the front side and to overlap and cover the same amount of space on the back side of the *examination booklet*; or
 - d. using any other technology that ensures that only the *examinee* can view the contents of the *examination booklet*.
- 2) Only the *examinee* is allowed to break open the *examination booklet* packaging or seals.

B. Packaging by *certification organization*.

- 1) Each individual *examination booklet* shall be securely sealed before packing.
- 2) Secure tamper-resistant shipping material, such as Tyvek envelopes or similar materials that are designed to reveal any tampering or violation of the package's security, is required for all shipment of materials in all phases.
- 3) Packaging must include a packing list that contains:
 - a. *examination form* language(s) or version(s) enclosed; and
 - b. quantity of examinations enclosed.

C. Shipping to the *test administrator/proctor* from the *certification organization*.

- 1) Shipping shall be done by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.
- 2) A signature is required upon delivery.
- 3) Only an individual authorized by the *test administrator/proctor* may sign for the package.

D. Storage by *test administrator/proctor*.

The package(s) of *examination booklets* shall be secured at all times immediately upon delivery. Under no circumstances may *examination booklets*, *examinee* used answer sheets, or other examination materials be kept where other employees or the public has access.

E. Shipping to the *certification organization* from the *test administrator/proctor*

- 1) After examination administration, *examination booklets* and answer sheets shall remain in secure storage until returned to *certification organization*.
 - 2) The following shall be in tamper-resistant shipping material:
 - a. all used and unused *examination booklets* for each examination administration;
 - b. *examinees'* used answer sheets; and
 - c. all required *certification organization* forms.
 - 3) Shipping shall be done within two business days following the examination date by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.
- F. Handling unused *examination booklets* that have been held for up to ninety days. The *test administrator/proctor* will:
- 1) ensure that all *examination booklets* are accounted for;
 - 2) package *examination booklets* securely as described above; and
 - 3) ship to the certification organization securely packaged and according to these *Standards* and the *Certification Organization's* instructions.

5.2 Test Site Requirements.

Sites chosen for administering *food safety certification examinations* shall conform to all legal requirements for safety, health, and accessibility for all qualified *examinees*.

- A. Additionally, the accommodations, lighting, space, comfort, and work space for taking the examination shall reasonably allow *examinees* to perform at their highest level of ability.
- B. Requirements at each test site include, but are not limited to:
- 1) accessibility in accordance with the requirements of the Americans with Disabilities Act, shall be reasonably available for all qualified *examinees*, whether the examination administration occurs at the main examination location site, or at an alternative examination location site that meets the same location requirements as the main examination location site;
 - 2) conformity to all fire safety and occupancy requirements of the jurisdiction in which they are located;
 - 3) sufficient spacing between each *examinee* in the area in which the actual examination is conducted, or other appropriate and effective methods, to preclude any *examinee* from viewing another *examinee's* examination;
 - 4) acoustics allowing each *examinee* to hear instructions clearly, using an electronic audio system if necessary;
 - 5) lighting at each *examinee's* work space adequate for reading;
 - 6) ventilation and temperature appropriate for generally recognized health and comfort of *examinees*;
 - 7) use of private room(s) where only examination personnel and *examinees* are allowed access during the examination administration; and
 - 8) no further admittance into the test site once examination administration has begun.

5.3 Test Site Language Translation.

A *certification organization* shall have a published, written policy regarding test site language translation of *food safety certification examinations*. If a *certification organization* allows test site language translation of a *food safety certification examination* when an *examination version* is not available in the *examinees'* requested language, the *certification organization* shall have a published, formal application process available to all *potential examinees*. Procedures shall include but not be limited to:

- A. An application process for *potential examinees* that includes an evaluation and documentation component to determine the eligibility of the *potential examinee* for test site language translation,
- B. An application process for translators that includes clear and precise qualifications that shall include but not be limited to the following:
 - 1) being fluent in both languages;
 - 2) have a recognized skill in language translation;
 - 3) trained in the principles of objective examination administration;
 - 4) have no personal relationship with the *examinee* (may not be another *examinee*, may not be a relative or friend of the *examinee* and may not be a co-worker, employer, or an employee of the *examinee*);
 - 5) not being a *Certified Food Protection Manager* nor having any vested interest in Food Protection Manager ~~certification~~ *certification* or conflict of interest;
 - 6) provide references or other proof attesting to the translator's competencies and professional acumen; and
 - 7) agree in writing to maintain the security of the examination.
- C. A proctored environment where the translator and *examinee* are not a distraction to other *examinees*, and
- D. A proctored environment where the translator is not active as the *test administrator/proctor*.

5.4 Scoring.

- A. Only the *certification organization* may score the examination by methods approved by the *accrediting organization*. No official scoring is to be done at the test site.
- B. *Food safety certification examination* scores will not be released as being official until verified and approved by the *certification organization*.
- C. *Examinee* scores will be confidential, available only to the *examinee* and to persons or organizations approved in writing by the *examinee*.
- D. Score reports will be available to *examinees* in a time frame specified in the application, which will not exceed fifteen business days following the administration

of the *food safety certification examination*. If there is a delay due to problems in verification or authentication of scores, *examinees* will be so informed and an approximate date for release of the scores will be announced. The *certification organization* will have ongoing communication with *examinees* and with the *test administrator/proctor* until the scores are verified and released.

5.5 *Test Administrator/Proctor(s) Role.* *Test administrators/proctors* shall have successfully completed the *certification organization's* specific training in examination administration and security procedures. They shall provide written assurance of maintaining confidentiality of examination contents, of adhering to the *certification organization's* standards and ethics of secure examination administration, and of agreeing to abide by the *certification organization's* policies, procedures, and rules.

5.6 *Test Administrator/Proctor Requirements.* To serve as a *test administrator/proctor* for an accredited *certification organization* the qualified individual shall complete the *certification organization's*:

A. signed Application;

B. non-Disclosure Agreement (NDA);

C. training program for *test administrators/proctors*; and

D. conflict of Interest Disclosure Agreement (can be a part of the NDA).

5.7 *Test Administrator/Proctor Renewal.* *Test administrators/proctors* shall renew the training program for *test administrators/proctors* and Non-Disclosure Agreement with the *certification organization* every three (3) years.

5.8 *Instructor/Educator/Trainer as Test Administrator/Proctor.*

When a person acts as an *instructor/educator/trainer* and a *test administrator/proctor*, that person relinquishes the role of *instructor/educator/trainer* when acting in the role of *test administrator/proctor* and acts solely as a representative agent of the *certification organization*.

5.9 *Test Administrator/Proctor Responsibilities.*

A. Schedule examinations. *Food safety certification examinations* shall be scheduled far enough in advance to allow for timely shipment of supplies or pre-registration for computer-based examinations.

- B. Ensure no destruction of *examination booklet* materials or computer equipment;
- C. At all times:
 - 1) handle examination materials securely;
 - 2) ensure test site conformity;
 - 3) space *examinees* per protocol;
 - 4) ensure *examinees*' rights;
 - 5) ensure confidentiality of *examinees*' personal information;
 - 6) ensure standardized procedures are followed;
- D. Before the examination:
 - 1) check *examinees*' identification;
 - 2) check for and exclude unauthorized objects;
 - 3) distribute examination materials;
 - 4) read instructions to *examinees* verbatim;
 - 5) ensure *examinees* complete information section of answer sheet or online registration form.
- E. During the examination:
 - 1) supervise ~~assisting proctors~~ *proctors*;
 - 2) monitor *examinees* during examination;
 - 3) identify and document cheating incidents;
 - 4) check for and exclude unauthorized objects;
 - 6) identify and document environmental distractions.
- F. After the examination
 - 1) collect and return *examination booklets* and answer sheets to *certification organization* or close ~~computer based testing~~ *computer based testing* session;
 - 2) report possible security breaches and examination administration irregularities in compliance with the *certification organization's* policies.

5.10 The number of approved *proctors* assigned to a *test administrator* shall be sufficient to allow each *examinee* to be observed and supervised to ensure conformance to security requirements. There shall be no less than one *test administrator/proctor* for the first thirty-five *examinees*, plus one additional *test administrator* or *proctor* for each additional ~~35~~ thirty-five *examinees* or fraction thereof.

5.11 Examination Security.

- A. All aspects of *food safety certification examination* administration are to be conducted in a manner that maximizes the security of the examinations, in keeping with the public protection mandate of the CFP. This shall be accomplished in a manner that ensures fairness to all *examinees*.
- B. All *examinees* shall begin taking the examination at the same time. No *examinee* shall be admitted into the test site once examination administration has begun.

- C. Where reasonable accommodations shall be made for otherwise qualified *examinees* under provisions of the Americans with Disabilities Act, care shall be taken to ensure that security of the examination is maintained. Arrangements shall be such that the *food safety certification examination* contents are not revealed to any test administration personnel with any conflict of interest. A written affirmation to that effect and a written nondisclosure statement from the individual who was chosen to assist the otherwise qualified *examinee* shall be provided to the *certification organization*.

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5.12 The *certification organization* shall provide procedures to be followed in any instance where the security of a *food safety certification examination* is, or is suspected to be, breached.

- A. Included shall be specific procedures for handling and for reporting to the *certification organization*, any suspected or alleged:
 - 1) cheating incidents;
 - 2) lost or stolen examination materials;
 - 3) intentional or unintentional divulging of examination *items* by *examinees* or examination administration personnel; or
 - 4) any other incidents perceived to have damaged the security of the examination or any of its individual *items*.
- B. Corrective actions to guard against future security breaches shall be established and implemented.
- C. Documentation of corrective actions and their effectiveness shall be made available to the *accrediting organization*.

5.13 *Item and Examination Exposure.*

The *certification organization* shall have an *exposure plan* that:

- A. controls for *item* and examination exposure;
- B. accounts for the number of times an *examination item*, *examination form*, and *examination version* is administered;
- C. ensures that no *examination form* is retained by any *examination administration* personnel for more than ~~90~~ ninety days;
- D. at all times accounts for all copies of all used and unused *examination booklets*; and
- E. systematically and actively demonstrates that every used answer sheet, *examination booklet*, and any other examination materials and answer keys are accounted for to prevent, reduce, or eliminate examination exposure.

5.14 Certification Organization's Responsibility to Test Administrators/Proctors.

- A. The *certification organizations* shall specify the responsibilities of *test administrator/proctor*, set minimum criteria for approval of *test administrators/proctors*, and provide a training program to enable *potential examinees* to meet the approval criteria. Responsibilities, duties, qualifications and training of *test administrators/proctors* shall be directed toward assuring standardized, secure examination administration and fair and equitable treatment of *examinees*.
- B. The *certification organization* shall define and provide descriptions for the roles of *test administrators/proctors*, and *certification organization* personnel clearly indicating the responsibilities for these roles. The *certification organization* shall demonstrate how it ensures that all certification personnel, *as well as test administrators/proctors*, understand and practice the procedures identified for their roles.
- C. *Test administrator/proctor* training programs shall include:
 - 1) specific learning objectives for all of the activities of *test administrator/proctor*; and
 - 2) an assessment component that shall be passed before an *examinee* for *test administrator/proctor* will be approved.

5.15 Test Administrator/Proctor Agreements. The *certification organization* shall enter into a formal agreement with the *test administrator/proctor*. The formal agreement shall at a minimum address:

- A. provisions that relate to code of conduct;
- B. conflicts of interest; and
- C. consequences for breach of the agreement.

5.16 The *certification organization* shall assess and monitor the performance of *test administrators/proctors* in accordance with all documented procedures and agreements.

5.17 The *certification organization* is not permitted to hire, contract with, or use the services of any person or organization that claims directly or indirectly to guarantee passing any certification examination. *Instructors/educators/trainers* making such a claim, whether as an independent or as an employee of another organization making the claim, are not eligible to serve as *test administrators/proctors* for any *certification organization*.

In order to retain the integrity of the *certification* process, 5.17 is intended to provide *Certification Organizations* a method of evaluating individuals' and/or organizations' claims to guarantee passing any *certification examination* if they are performing the role of *instructor/educator/trainer* and *proctor/administrator*. This area of the Standard does not apply to training organizations and their employees not contracted to a *Certification Organization*.

- 5.18** Policies and procedures for taking corrective action(s) when any *test administrator* or *proctor* fails to meet job responsibilities shall be implemented and documented. *Test administrators/proctors* that have been dismissed by the *certification organization* for infraction of policies or rules, incompetence, ethical breaches, or compromise of examination security will be reported to the *accrediting organization*.
- 5.19** The *certification organization* shall provide documentation that verifies compliance with the 1:35 ratio (*test administrator/proctor: examinees*).
- 5.20 Examination Administration Manual.**
The *certification organization* shall provide each *test administrator/proctor* with a manual detailing the requirements for all aspects of the *food safety certification examination* administration process. The Examination Administration Manual shall include a standardized script for the paper examination *test administrator/proctor* to read to *examinees* before the examination commences. For computer based tests (CBT), standardized instructions shall be available for *examinees* to read.
- 5.21 Examination Scripts.** Separate scripts/instructions may be created for different delivery channels or *certification organizations*. *Certification organizations* may customize elements of the scripts to fit their particular processes, but each script shall contain the following:
- A. Introduction to the Examination Process
 - 1) composition of the examination (number of questions, multiple choice, etc.);
 - 2) time available to complete the examination;
 - 3) role of the *test administrator/proctor*;
 - 4) process for restroom breaks; and
 - 5) process for responding to *examinee* comments and questions.
 - B. Copyright and Legal Responsibilities
 - 1) description of what constitutes cheating on the examination;
 - 2) penalties for cheating; and
 - 3) penalties for copyright violations.
 - C. Examination Process
 - 1) maintaining test site security;
 - 2) description of examination components unique to the *certification organization* (*examination booklet*, answer sheet completion, computer process in testing centers, etc.);
 - 3) instructions for proper completion of personal information on answer sheets/online registration and *examination booklets*;
 - 4) instructions on properly recording answers on answer sheets or online; and
 - 5) instructions on post-examination administration process.

SECTION 6.0 – COMPUTER-BASED TESTING (CBT)

- 6.0 Computer-Based Test Development and Administration** All sections of these ~~Standards~~ Standards apply to ~~Computer-Based Testing~~ Computer Based Testing (CBT) Administration except Section 5.1.
- 6.1 Computer-Based Test Development.** *Examination specifications for computer-based testing* shall describe the method for development, including the *algorithms* used for test *item* selection, the *item* response theory model employed (if any), and examination *equivalency* issues.
- 6.2** *Items* shall be evaluated for suitability for computer delivery, be reviewed in the delivery medium, and be reviewed in the presentation delivery medium. Assumptions shall not be made that *items* written for delivery via a paper/pencil medium are suitable for computer delivery nor should it be assumed that computer test *items* are suitable for paper/pencil delivery.
- 6.3** When *examination forms* are computer-generated, whether in *Computer-Adaptive Testing* (CAT) or in a simple linear *algorithm*, the *algorithm* for *item* selection and the number of *items* in the *item bank* from which the examination is generated shall ensure that the *items* are protected from *overexposure*. *Item* usage statistics shall be provided for all available *items* in the pool.
- 6.4 Computer-Based Testing Administration.** Where examination environments differ (for example, touch screen versus mouse) evidence shall be provided to demonstrate equivalence of the *examinees'* scores.
- 6.5** Tutorials and/or practice tests shall be created to provide the *examinees* adequate opportunity to demonstrate familiarity and comfort with the computer test environment.
- 6.6** If the time available for computer delivery of an examination is limited, comparability of scoring outcomes with non-timed delivery of the exam shall be demonstrated. Data shall be gathered and continually analyzed to determine if scoring methods are comparable.
- 6.7** Evidence of security in the *computer-based testing* environment shall be provided. Factors affecting test security include, but are not limited to, *examinee* workspace, access to personal materials, level of *examinee* monitoring, and *test encryption and decoding*.
- 6.8** Documentation of precautions to protect *examination forms* and the *item bank* from unauthorized access shall be provided.
- 6.9** Policies and procedures regarding the recording and retention of the *item sequence* and *item* responses for each *examinee* shall be developed and followed. Computer examinations using a unique sequence of *items* for each *examinee* shall record the information necessary to recreate the sequence of *items* and *examinee* responses on the computer examination.

- 6.10** Systems and procedures shall be in place to address technical or operational problems in examination administration. For example, the examination delivery system shall have the capability to recover *examinee* data at the appropriate point in the testing session prior to test disruption. Policies regarding recovery for emergency situations (such as retesting) shall be developed.
- 6.11** **Due Process.** *Examinees* shall be provided with any information relevant to *computer-based testing* that may affect their performance or score. Examples of such information might include but not be limited to: time available to respond to *items*; ability to change responses; and instructions relating to specific types of *items*.

SECTION 7.0 – CERTIFICATION ORGANIZATION RESPONSIBILITIES TO POTENTIAL EXAMINEES, EXAMINEES AND THE PUBLIC

7.0 *A certification organization's Responsibilities to Examinees and the Public.*

7.1 **Responsibilities to Potential Examinees and/or Examinees for Certification.** A *certification organization* shall:

- A. not discriminate among *potential examinees* and *examinees* as to age, sex, race, religion, ethnic origin, disabilities or marital status and shall include a statement of non-discrimination in announcement of the *certification* program;
- B. make available to all *potential examinees* and *examinees* information regarding formalized procedures for attainment of *certification* and provide evidence to the *accrediting organization* of the implementation of the policy;
- C. have a formal policy for the periodic review of application and examination procedures to ensure that they are fair and equitable and shall give evidence to the ~~accreditation~~ accreditation organization of the implementation of the policy;
- D. provide evidence that competently proctored testing sites are readily accessible;
- E. provide evidence of uniformly prompt reporting of *food safety certification examination* results to *examinees*;
- F. provide evidence that *examinees* failing the *food safety certification examination* are given information on general areas of deficiency;
- G. provide evidence that each *examinee's food safety certification examination* results are held confidential; and
- H. have a formal policy on appeals procedures for *potential examinees* and *examinees* questioning eligibility or any part of the *accredited certification program*.

7.2 **Qualifications for Initial Certification.** To become a *Certified Food Protection Manager* an individual shall pass a *food safety certification examination* from an *accredited certification program* recognized by the CFP. The *certificate* shall be valid for no more than 5 five years.

7.3 **Individual Certification Certificates:**

- A. Each *certification organization* will maintain a secure system with appropriate backup or redundancy to provide verification of current validity of individual *certification certificates*.
- B. *Certificates* shall include, at a minimum:
 - 1) issue date/date examination was taken;
 - 2) length of time of *certification* validity;

- 3) name and *certification* mark of *certification organization*;
- 4) ANSI *accreditation* mark;
- 5) name of certified individual;
- 6) unique *certificate* number;
- 7) name of *certification*;
- 8) contact information for the *certification organization*; and
- 9) examination form identifier

C. Replacement or duplicate *certificates* issued through an *accredited certification organization* shall carry the same issue date, or date of examination, as the original *certificate*, and will be documented by the *certification organization*.

- 7.5 Discipline of Certificate Holders and Examinees.** A *certification organization* shall have formal *certification* policies and operating procedures including the sanction or revocation of the *certificate*. These procedures shall incorporate due process.
- 7.6 Continued Proficiency.** An *accredited certification program* shall include a process or program for assessing continued competence that includes an examination component at an interval of no more than five years. The outcome of the process or program shall demonstrate that the person has maintained the minimum competencies as determined by the current Job Task Analysis.
- 7.7 Responsibilities to the Public and to Employers of Certified Personnel.** A *certification organization* shall maintain a registry of individuals certified. Any title or credential awarded by the *certification organization* shall appropriately reflect the Food Protection Manager's daily food safety responsibilities and shall not be confusing to employers, consumers, related professions, and/or other interested parties.
- 7.8** Each *accredited certification program* shall have a published protocol for systematically investigating problems presented by users of the Program, including specific concerns about examination *items*, administration procedures, treatment of *examinees* and *potential examinees*, or other matters involving potential legal defensibility of the examination or program. The protocol will include a published time frame for reporting findings to the User.
- 7.9 Misrepresentation.** Only Food Protection Manager *Certification Programs* that conform to all requirements of *Standards for Accreditation of Food Protection Manager Certification Programs* and are accredited by the agent selected by the CFP as the *accrediting organization* for such programs are allowed to refer to themselves as being accredited. Those programs may not make any other reference to the CFP in their publications or promotional materials in any medium.

SECTION 8.0 – CERTIFICATION ORGANIZATION RESPONSIBILITIES TO THE ACCREDITING ORGANIZATION

8.0 *Certification Organization Responsibilities to the Accrediting Organization.*

8.1 **Application for Accreditation.** *A certification organizations seeking accreditation for development and/or administration of a certification program shall provide at least the following information, as well as other information that might be requested by the accrediting organization:*

- A. the name and complete ownership of the *legal entity*.
- B. the address, telephone/fax number(s) and other contact information of the *certification organization's* headquarters.
- C. the name, position, address and telephone/fax/e-mail information of the contact person for projects related to the CFP Standards for *Accreditation of Food Protection Manager Certification Programs*.
- D. such fiscal information as may be needed to establish evidence of ability to carry out obligations under these ~~standards~~ Standards.

8.2 **Summary Information.** *A certification organization shall:*

- A. provide evidence that the mechanism used to evaluate individual competence is objective, fair, and based on the knowledge and skills needed to function as a *Certified Food Protection Manager*;
- B. provide evidence that the evaluation mechanism is based on standards which establish *reliability* and *validity* for each form of the *food safety certification examination*;
- C. provide evidence that the pass/fail levels are established in a manner that is generally accepted in the *psychometric* community as being fair and reasonable;
- D. have a formal policy of periodic review of evaluation mechanisms and shall provide evidence that the policy is implemented to ensure relevance of the mechanism to knowledge and skills needed by a *Certified Food Protection Manager*;
- E. provide evidence that appropriate measures are taken to protect the security of all *food safety certification examinations*;
- F. publish a comprehensive summary or outline of the information, knowledge, or functions covered by the *food safety certification examination*;

- G make available general descriptive materials on the procedures used in examination construction and validation and the procedures of administration and reporting of results; and
- H compile at least semi-annually a summary of *certification* activities, including number of *examinees*, number tested, number passing, number failing, and number certified.

8.3 Responsibilities to the Accrediting Organization. The *certification organization* shall:

- A. make available upon request to the *accrediting organization* copies of all publications related to the *certification* program,
- B. advise the *accrediting organization* of any proposed changes in structure or activities of the *certification organization*,
- C. advise the *accrediting organization* of substantive change in *food safety certification examination* administration,
- D. advise the *accrediting organization* of any major changes in testing techniques or in the scope or objectives of the *food safety certification examination*,
- E. annually complete and submit to the *accrediting organization* information requested on the current status of the Food Protection Manager *Certification* Program and the *certification organization*,
- F. submit to the *accrediting organization* the report requirements information specified for the Food Protection Manager *Certification* Program, and
- G. be re-accredited by the *accrediting organization* at least every 5 five years.

SECTION 9.0 – MANAGEMENT SYSTEMS

9.0 Management Systems.

9.1. Each *certification organization* shall have a formal management system in place to facilitate continuous quality improvement and produce preventive and corrective actions. The management system shall contain the following three components.

A. Document control to include:

- 1) lists of all documents pertaining to the ~~certification organization~~ certification organization;
- 2) dates for documents approved for implementation by the ~~certification organization~~ certification organization;
- 3) the person(s) within the ~~certification organization~~ certification organization responsible for the documents; and
- 4) listing of individuals who have access to the documents.

B. Internal audits to include:

- 1) identification of critical activities;
- 2) data collection process and evaluation schedule;
- 3) audit methodology and evaluation process;
- 4) the person(s) authorized to perform audits; and
- 5) report audit findings and identify corrective action required.

C. A Management Review that includes:

- 1) a documented annual review of internal audit results;
- 2) a management group that conducts the review;
- 3) a review of the audit results to determine corrective actions needed;
- 4) a review of the audit results to determine preventive actions needed; and
- 5) the effectiveness of corrective and preventive actions taken.

ANNEX A

Guidelines for Regulatory Authorities Implementing Food Protection Manager Certification Programs

- A1. Each permitted *food establishment* should have a minimum of one designated *Certified Food Protection Manager* who is accountable for food safety.

Documentation of *certification of Certified Food Protection Manager(s)* should be maintained at each *food establishment* and shall be made available for inspection by the *regulatory authority* at all times.

- A2. A *Certified Food Protection Manager* is responsible for:

- 1) identifying hazards in the day-to-day operation of a *food establishment*;
- 2) developing or implementing specific policies, procedures or standards aimed at preventing foodborne illness;
- 3) coordinating training, supervising or directing food preparation activities and taking corrective action as needed to protect the health of the consumer; and
- 4) conducting in-house self-inspection of daily operations on a periodic basis to see that policies and procedures concerning food safety are being followed.

- A3. **Qualifications for Certification.** To become a *Certified Food Protection Manager*, an individual shall pass a *food safety certification examination* from an accredited *certification organization* recognized by the CFP. The CFP recognizes the importance and need for the provision of food safety training for all food employees and managers. The CFP recommends the content of food protection manager training be consistent with paragraph 2-102.11 (C) of the most recent FDA Food Code. The CFP promotes the information contained in the FDA Food Code as well as content outlines based on job tasks analyses, provided on the CFP website, which may be of value in developing or evaluating training.

- A4. Regulatory authorities should work with the *certification organization* on a mutually agreeable format, medium and time frame for the submission of score reports pertaining to the administration of *food safety certification examinations*.



Security Evaluation Work Group Baseline & Summative Self-Report Findings 2013-14



Donald J. Ford, Ph.D.
**Lead Assessor, ANSI Certificate Accreditation Program &
Lead Evaluator, Certified Professional Food Manager Program**

SEWG Background



- Work Group formed to address test security concerns involving the CPFM exam under ANSI CFP certification
- Dr. Ford, ANSI CAP Assessor, designed and conducted a 5 year evaluation study of past, current and future test security breaches and the impact of remedies that CFP implemented starting in 2011.
- Evaluation proceeded in three stages:
 1. Baseline study of the 2009-10 year to pilot test self-report data collection and establish a pre-assessment point from which to measure progress
 2. Interim study of the 2012-13 year to assess progress in addressing test security issues
 3. **Post-assessment of the 2013-14 year** and future years to measure progress and track trends in CPFM test security

Evaluation Methodology

Single Group Pre-Post Design



M = measurement (1 = Pre, 2 = Formative 3 = Post) I = Interventions

- Self-reporting via questionnaire
- Data aggregated and reported as single group only (no within-group comparisons)
- Time Periods:
 - Baseline (Pre) – July 2009 – June 2010
 - Pilot (Formative) – July 2012 – June 2013
 - **Post (Summative) - July 2013 – June 2014**
 - Trending – Annually after 2014 as part of ANSI surveillance

Summary of Evaluation Findings



- Small number of test security violations, but once is one too many
- About 4% of proctors/administrators are disciplinary problems, but numbers are declining
 - Better screening, selection, and discipline are working
 - 100% compliance on retraining achieved
- Test administration and shipping irregularities continue to be problematic
 - Better tracking and enforcement of existing rules needed
 - May be reaching theoretical limits of compliance, given current testing methods

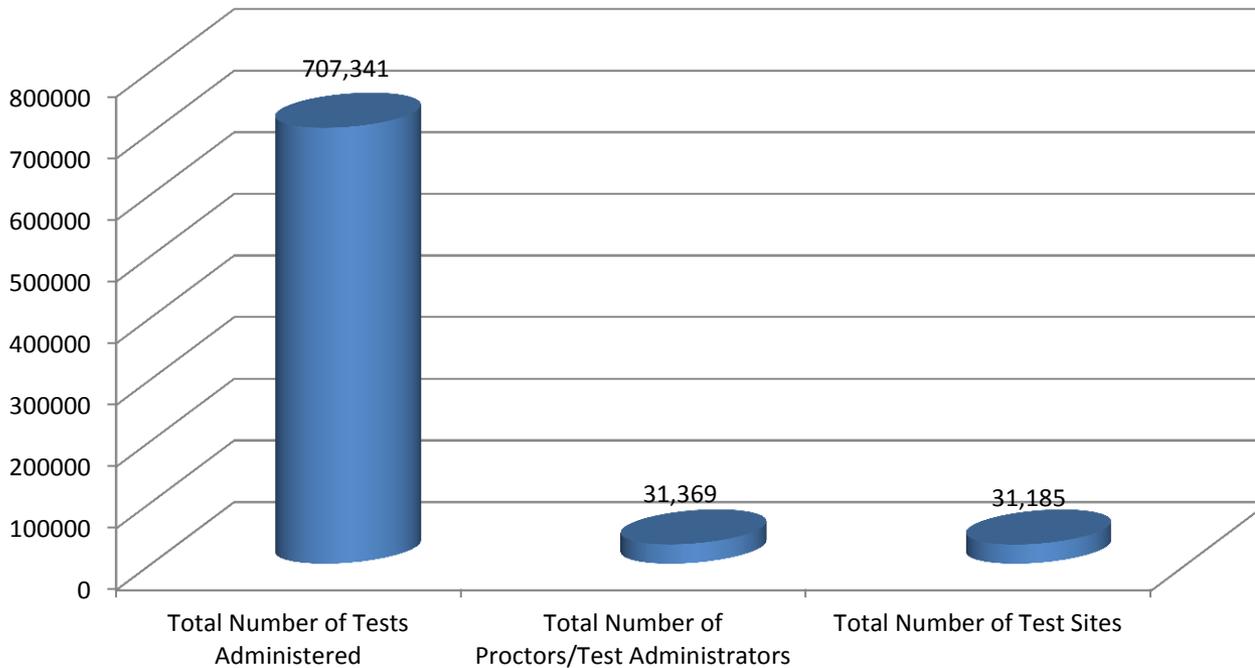
Summary of Evaluation Findings (cont'd)

- Significant efforts being made to prevent test security breaches
 - Best practices should be disseminated to all providers
- Management QA System fully implemented in 2012-13
- Continue to monitor test security as part of ANSI annual surveillance



CPFM is a Big Deal

Testing Volume - 2013-14

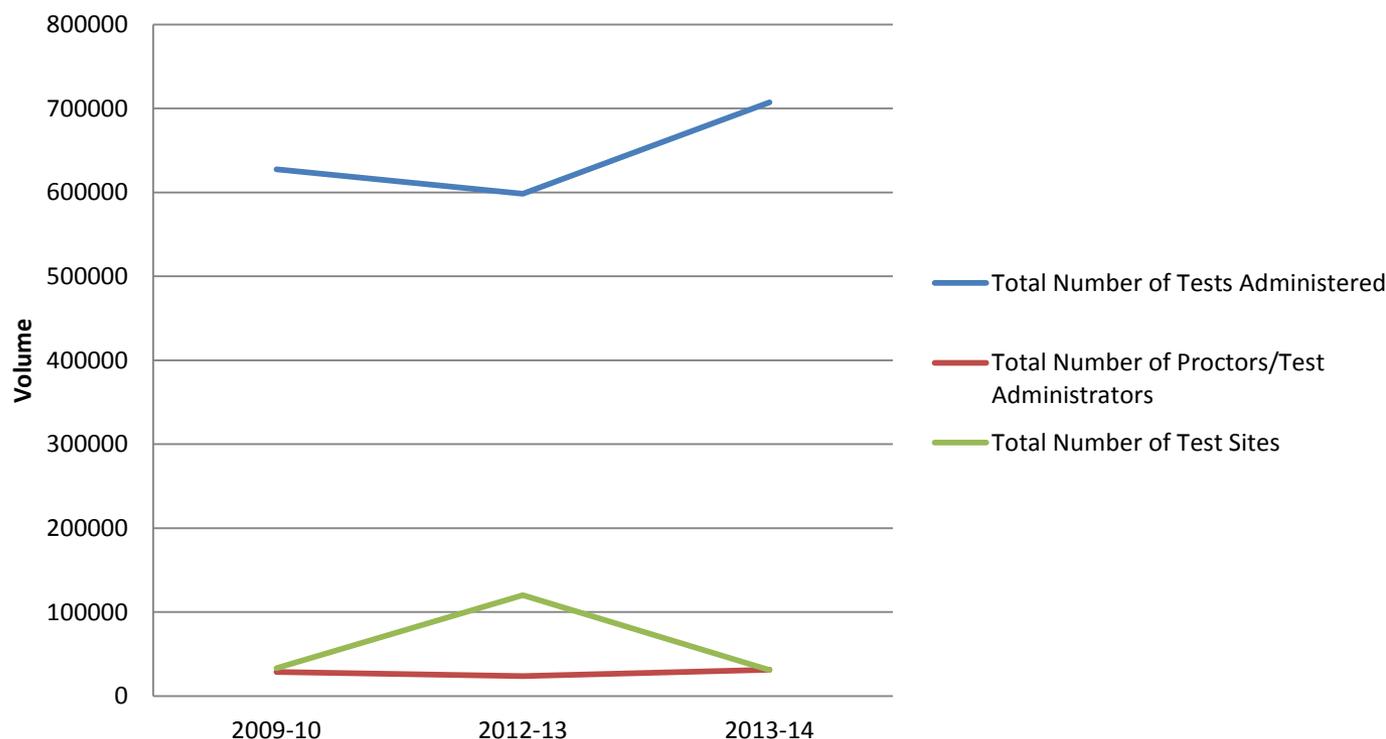


- Large numbers pose challenges for close policing

Testing Volume Trend: 2009-2014



Changes in Test Volume

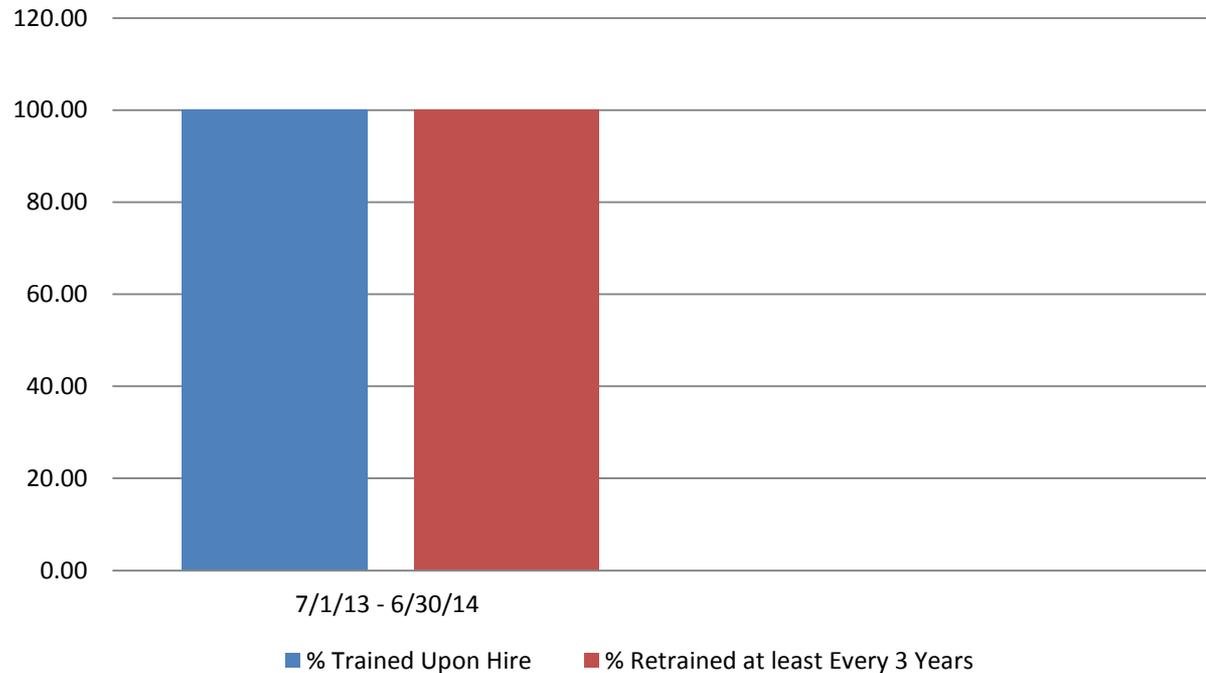


- Test Volume and Test Sites show no clear pattern; # of Proctors/Administrators shows little change.

Goal One: Provide Regular Training for Proctors/Administrators



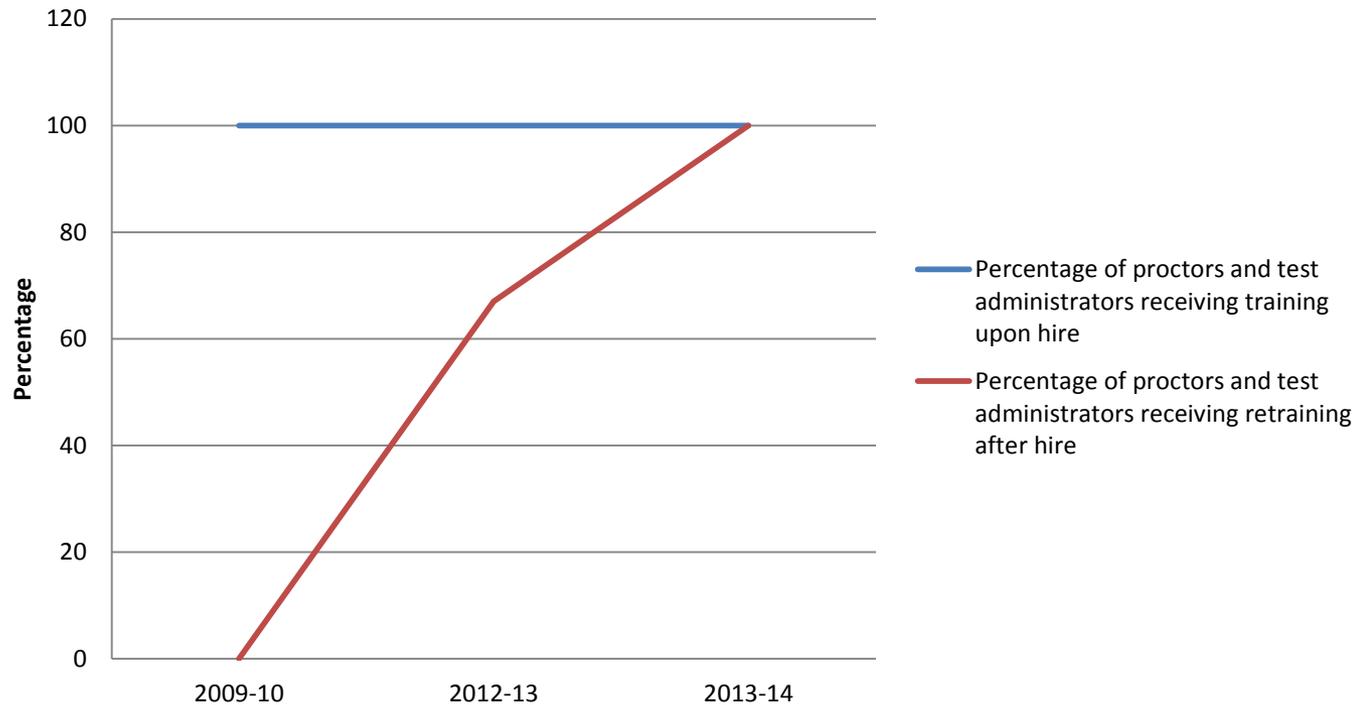
Proctor/Administrator Training - 2014



- Goal has been achieved with 100% compliance.

Change in Retraining: 2009-2014

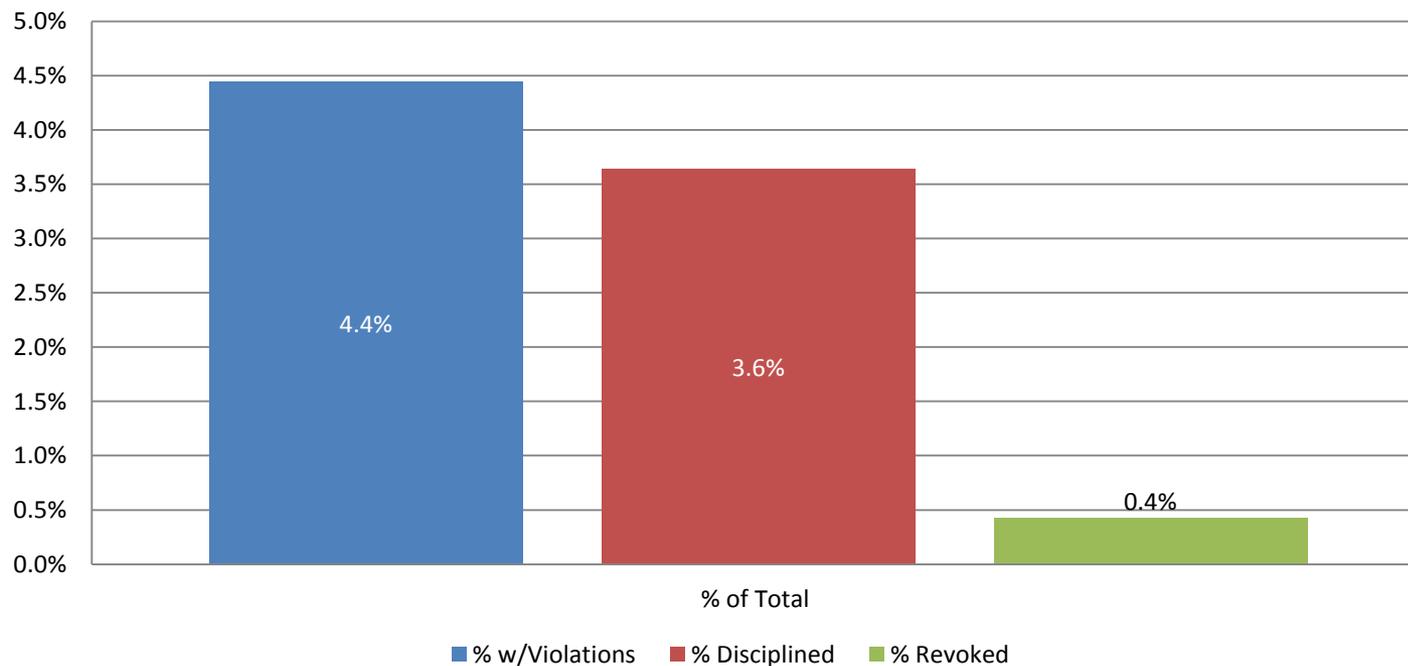
Proctor/Administrator Training - 2009-2014



■ All Retraining completed in 2014.

Goal One: Enforce Proctor/Administrator Disciplinary Actions

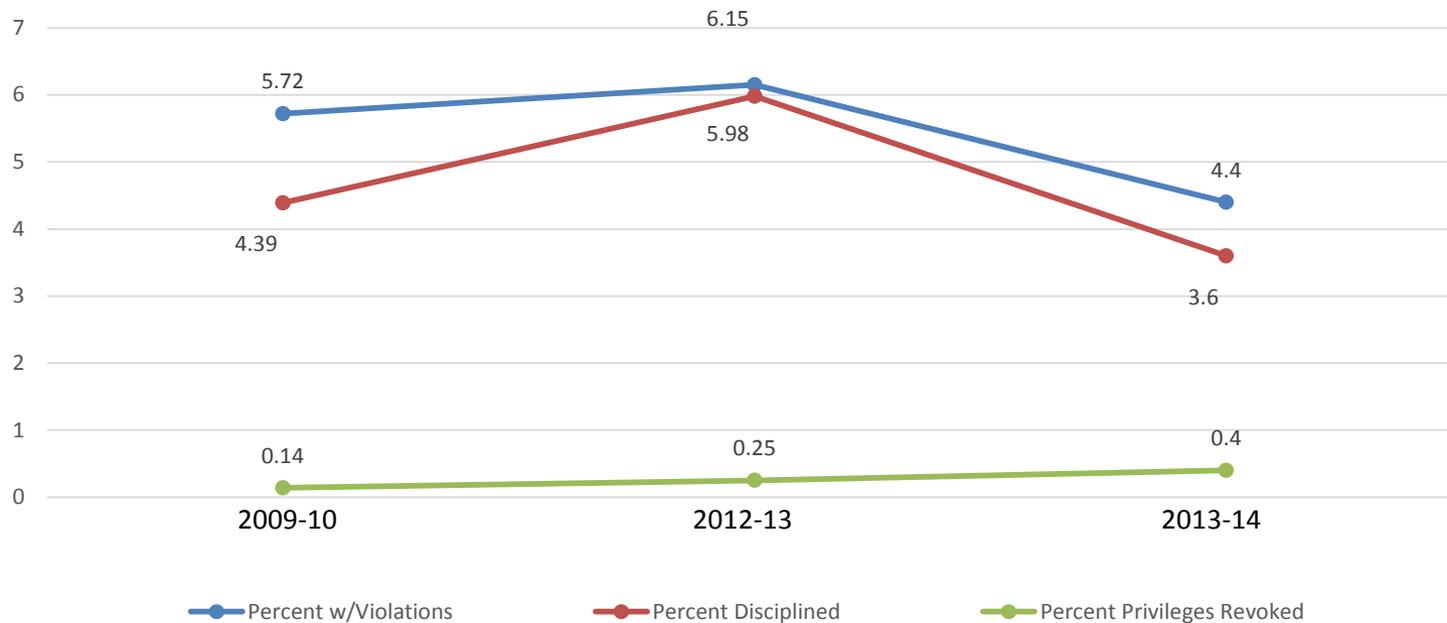
Percentage of Proctors w/ Disciplinary Issues - 2013-14



- In 2014, violations decreased while revocations increased, indicating greater enforcement.

Changes in Proctor/Administrator Disciplinary Actions: 2009-2014

Percentage of Proctors/Administrators w/ Disciplinary Issues: 2009-2014



- Disciplinary issues initially went up, then down, while revocations have steadily increased.

Primary Reasons for Violations - 2014

1. Failure to return exams/answer sheets on time
2. Failure to return all materials, or to sign/seal return envelopes
3. Failure to use a traceable shipping carrier
4. Failure to follow proctor guidelines, including not being present the whole time or allowing test-takers to self-proctor
5. Suspected/confirmed cheating or colluding with test takers

Most Common Disciplinary Actions

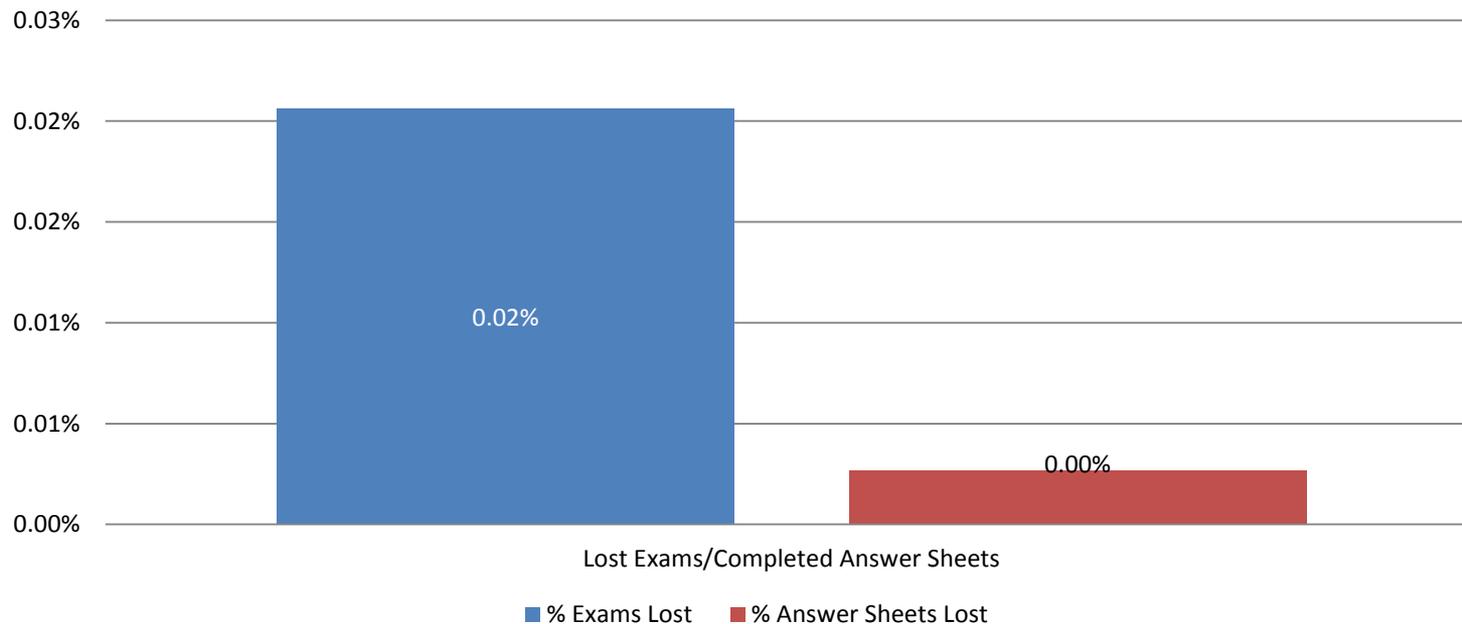
1. Warning for 1st offense, probation/suspension/revocation for repeated offenses
2. One year probation/suspension for second offense
3. Revocation of privileges for colluding in cheating; suspected examinees required to re-test

Most Frequent Reasons for Revocation/ Suspension of Proctors

1. Resignation from the position (about 100 cases)
2. Confirmed/suspected case of cheating with proctor/administrator collusion, such as providing answers/coaching or allowing examinees to discuss test or use notes during exam (about 30 cases)

Goal Two: Reduce Exam Packaging and Shipping Irregularities

Percentage of Lost Test Booklets/Answer Sheets - 2013-14



- In 2013-14, 2 out of 10,000 exams lost, the same rate as last year. Lost answer sheets are exceedingly rare.

Most Frequent Reasons for Lost Exams/ Answer Sheets: 2013-14

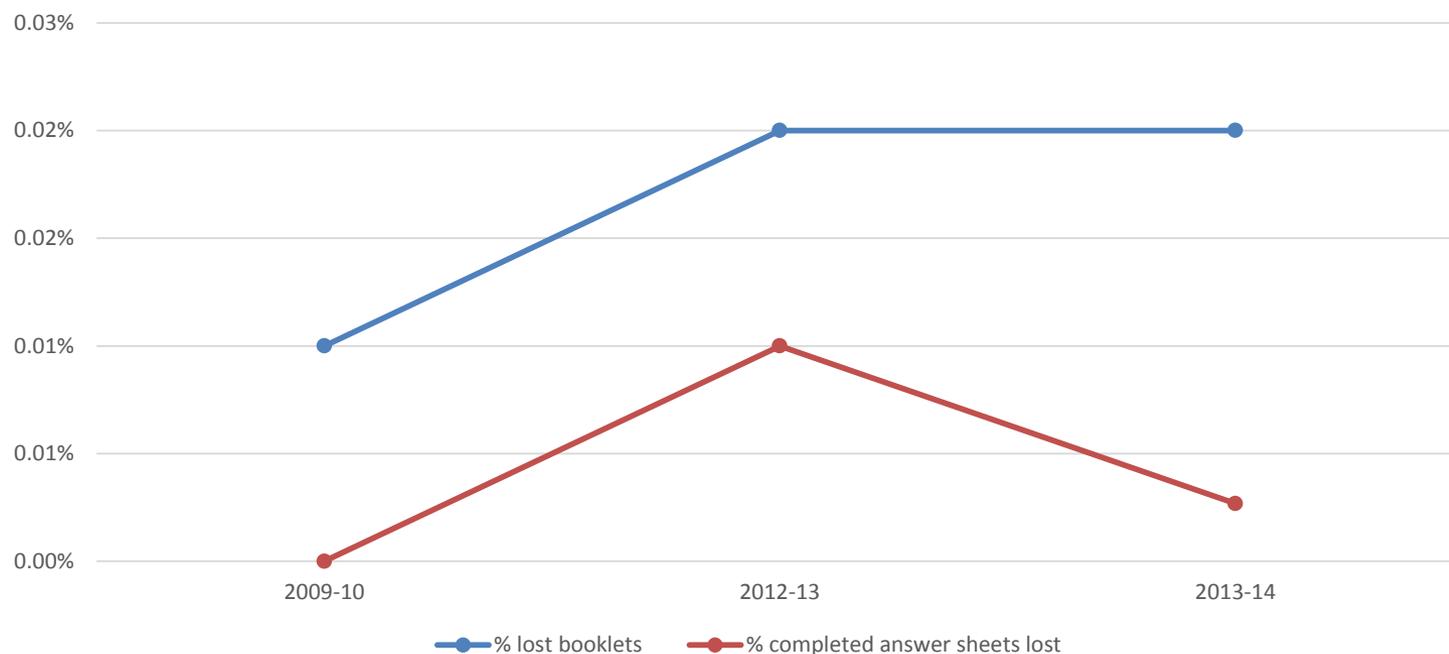
1. Proctors improperly disposed of unused exams – shredding or trashing
2. Carrier lost the package
 - Regular mail is not reliable
 - Even traceable carriers lose packages sometimes (19 answer sheets lost in 2013-14)
3. Proctors lost extra exams/answer sheets; presumed stolen



SEWG

Changes in Lost Materials: 2009-2014

Change in Lost Booklets/Answer Sheets as Percentage of all Test Administrations: 2009-2014

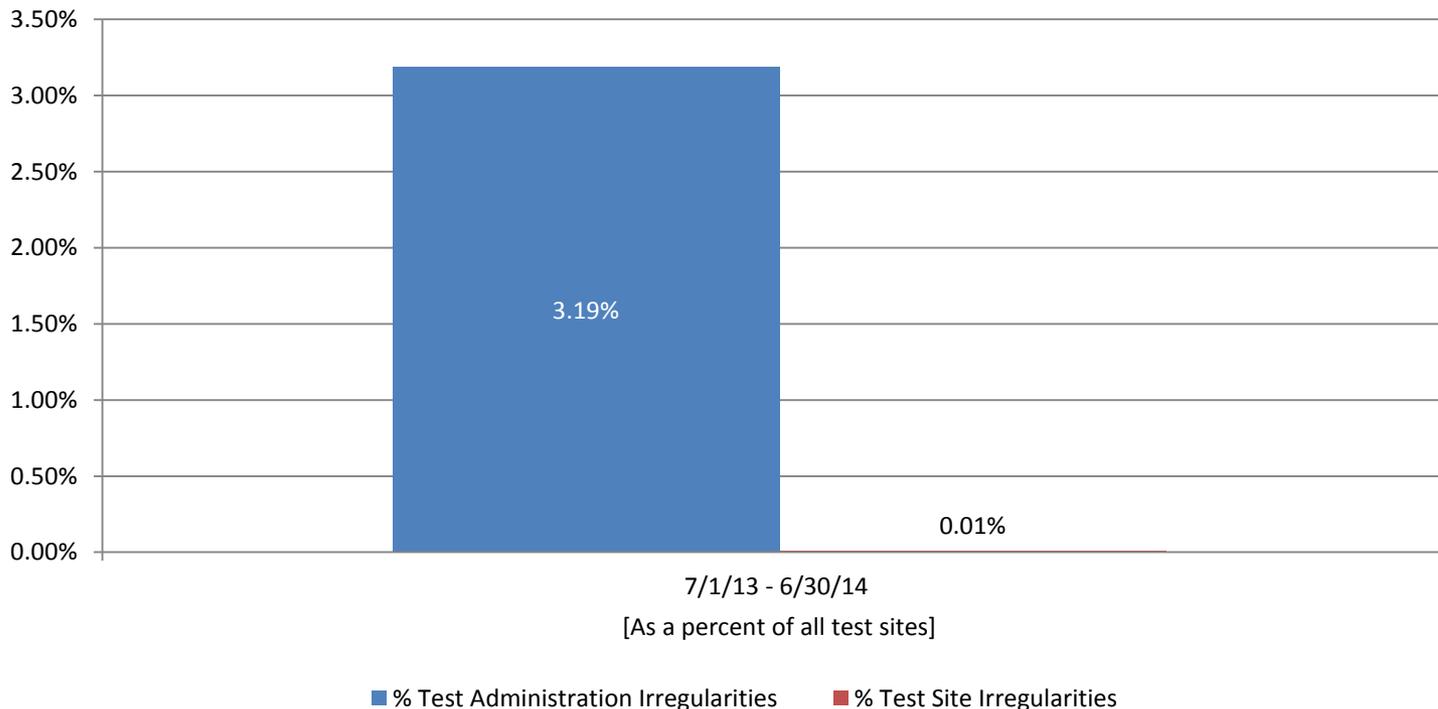


- Increase in reported lost materials from 2009 to 2013, steady to decreasing in 2013-14.

Goal Three: Reduce Test Site Irregularities

TESTING
DO NOT
DISTURB

Percentage of Test Site and Administration Irregularities - 2013-14



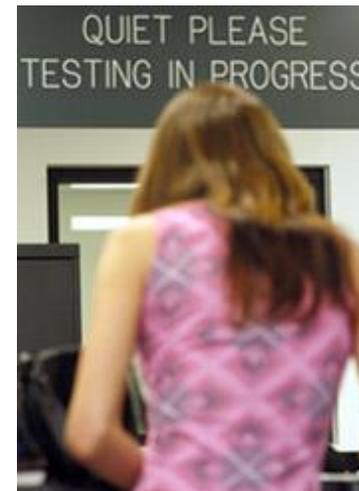
- In 2013-14, Test Administration problems show big increase, while test site problems remain small.

Most Frequent Reasons for Test Administration Irregularities

1. Failure to follow shipping policies for returning materials on time
2. Failure to properly return all materials via traceable carrier
3. Failure to follow policies and procedures for proctoring – partially unproctored or self-proctored exams
4. Cheating or collusion: candidates were allowed to talk in a foreign language during the exam, proctor colluded in cheating, candidates shared notes during exam

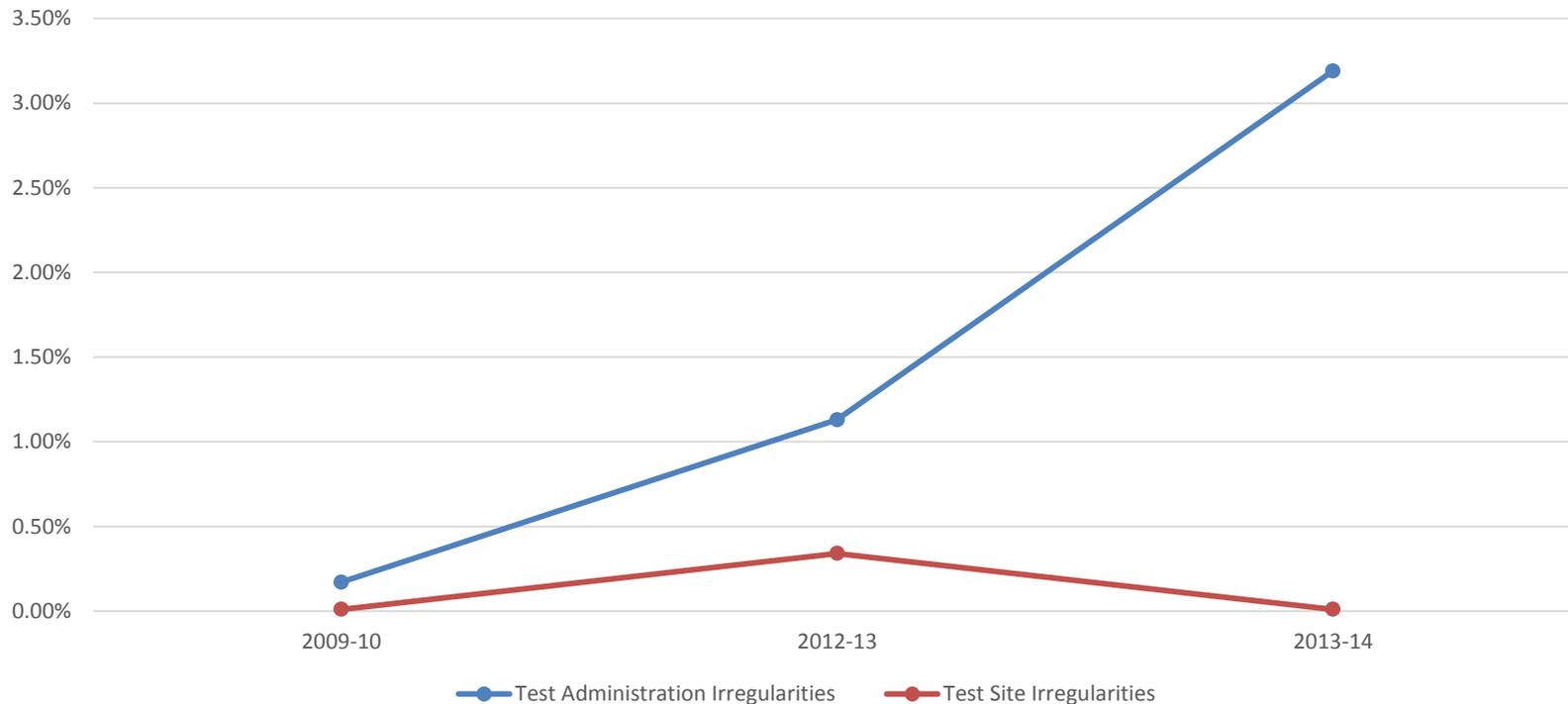
Most Frequent Reasons for Test Site Irregularities in 2014

1. Candidate demographic changes (wrong name or other personal information at registration)
2. Exam was given in a restaurant during service or otherwise interrupted by outside noise
3. Examinees were allowed to sit too close together
4. Technical issue with online testing site hardware



Changes in Test Irregularities as Percentage of all Test Locations

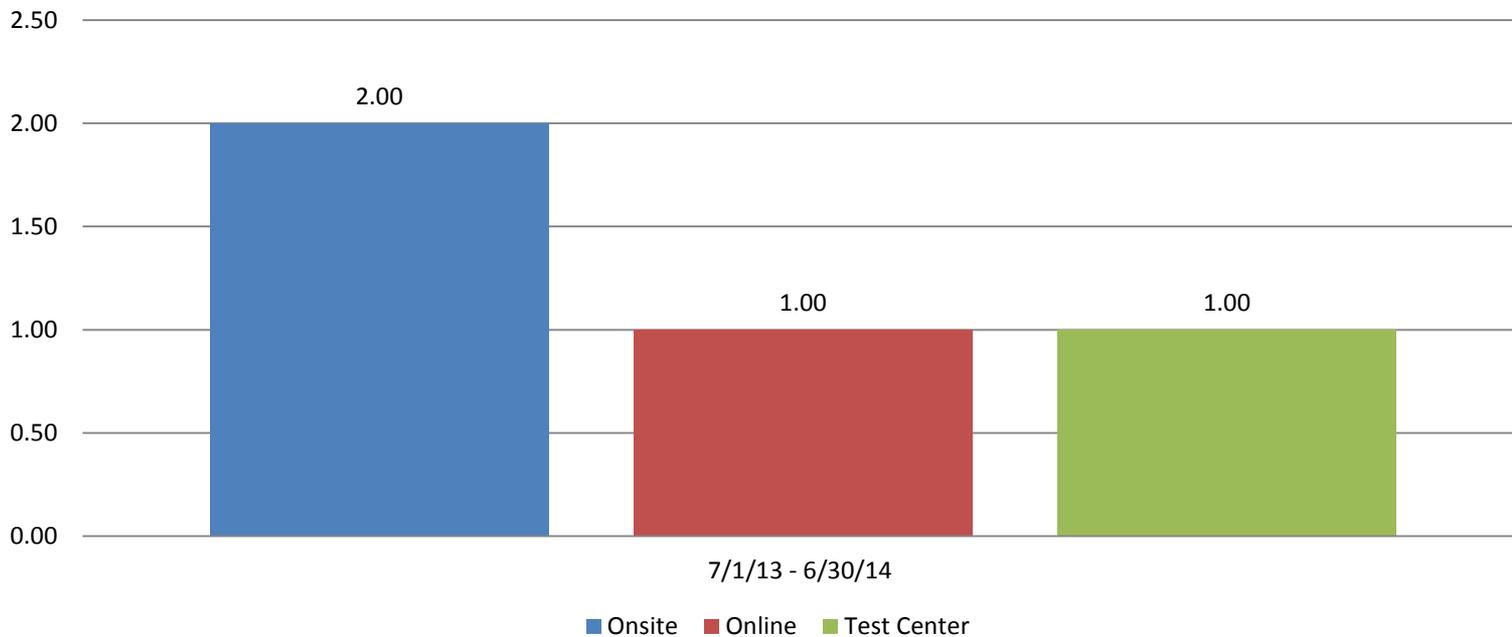
Percentage of Test Site and Administration Irregularities: 2009-14



- Increase in reported administration irregularities probably due to increased detection; test site problems decreasing.

Where Test Site Irregularities Occurred: 2013-14

Number of Test Site Irregularities by Location

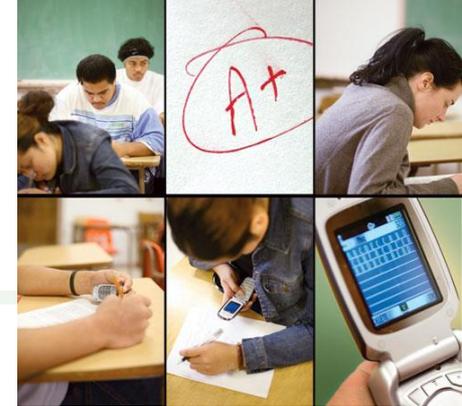


- Test site irregularities show decline across all sites.

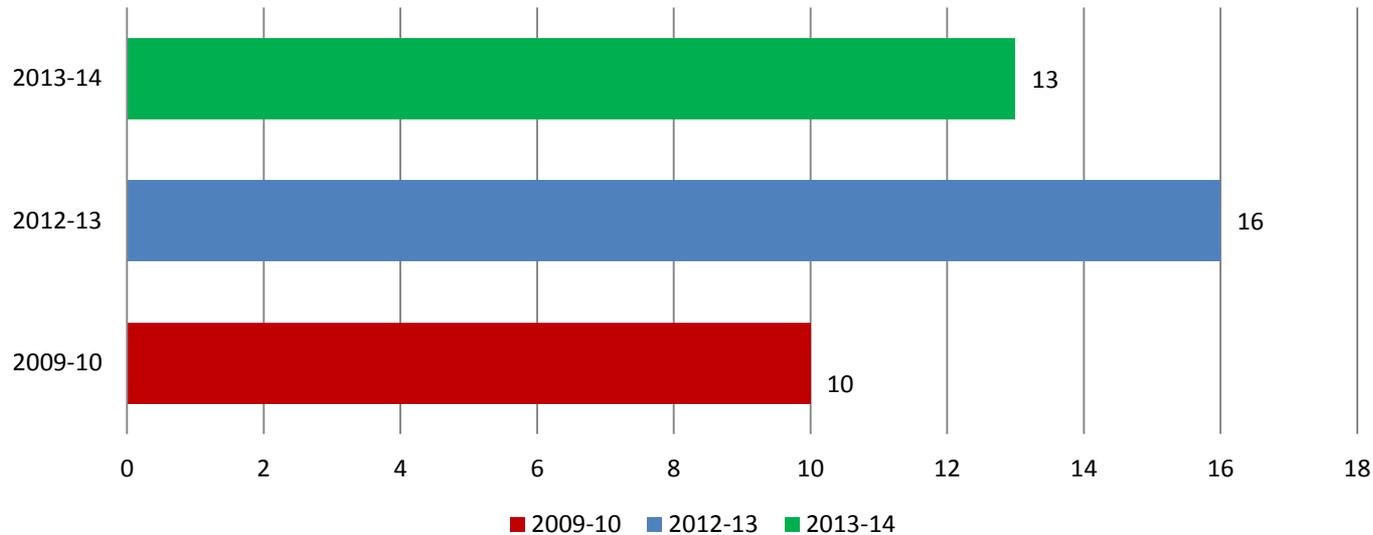
Reasons for Site Irregularities – 2014

1. Candidate registration information was wrong – name or other personal information incorrect
2. Exam material delivery problem – materials did not arrive on time or items were missing
3. Testing in a public or noisy venue (restaurant during dining service)
4. Technical issue with online testing hardware/network

Goal Four: Reduce Cheating and Test Administration Irregularities



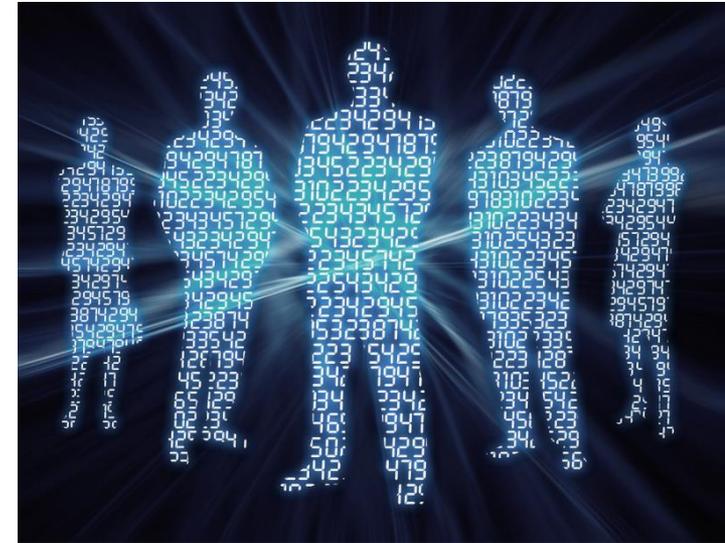
Trend:
Confirmed/ Suspected Cheating



- Trend was up initially, but down last year. Better detection and enforcement today.

Data Forensics Employed to Combat Cheating

1. Item Analysis (4)*
2. Pass Rate Analysis – compare by group/proctor (2)*
3. Item Difficulty (p-value) Analysis (1)*
4. Point Biserial Correlation (1)*
5. Online exam time Analysis (1)*
6. Incident Response Investigation (3)*



*Numbers in () indicate how many providers report using this.

Most Frequent Corrective Actions Taken To Combat Cheating

1. Use multiple versions of the exam at each administration (4)*
2. Revoke proctor privileges for collusion (3)*
3. Enforce spacing and other environmental guidelines (2)*
4. Use biometrics to verify examinee identify (1)*
5. Require examinees to retest when cheating is suspected (2)*
6. Adopt better exam forensic analysis methods (1)*
7. Increase exam session audits (1)*

*Numbers in () indicate how many providers report using this.

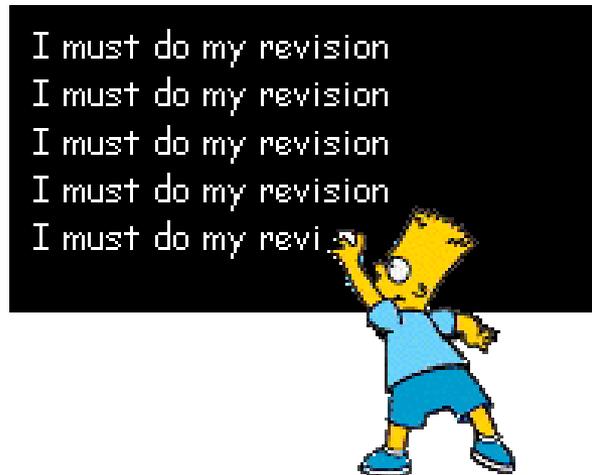
Test Versions and Revisions

Versions Employed:

- Minimum of 2 versions/administration
- Maximum of 8 versions used
- Avg = 4

Revision Frequency:

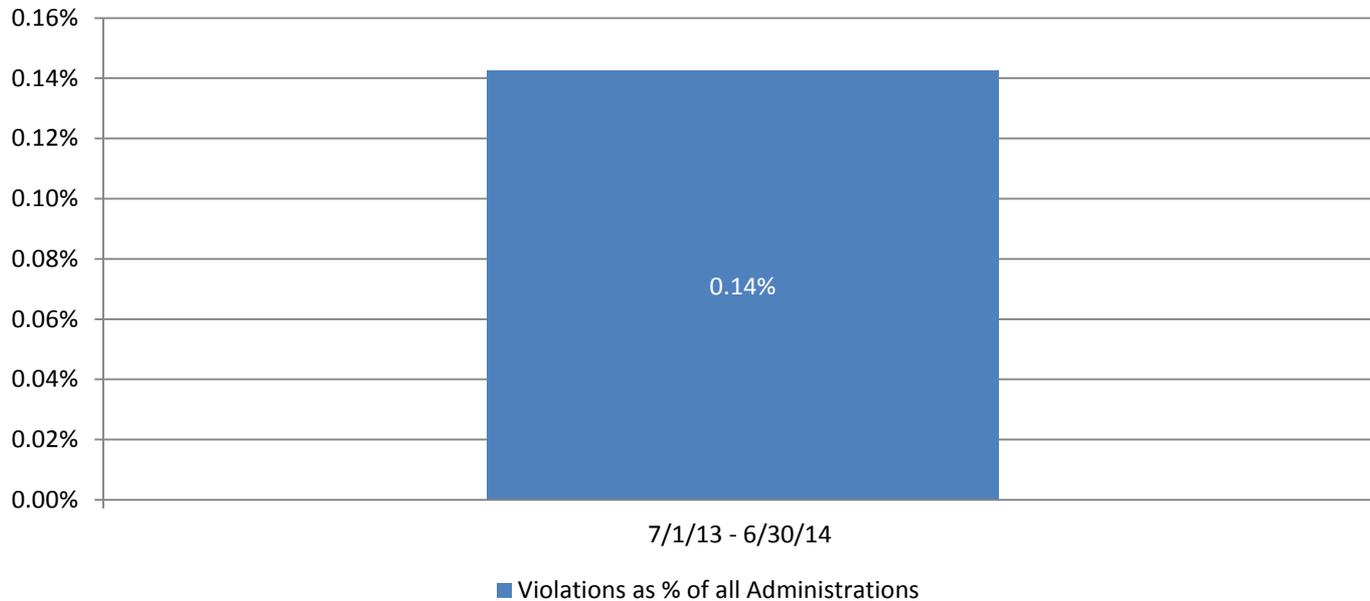
- Minimum of yearly
- Maximum of monthly
- Avg = quarterly



Test Administration Violations



Violations as Percentage of all Test Administrations



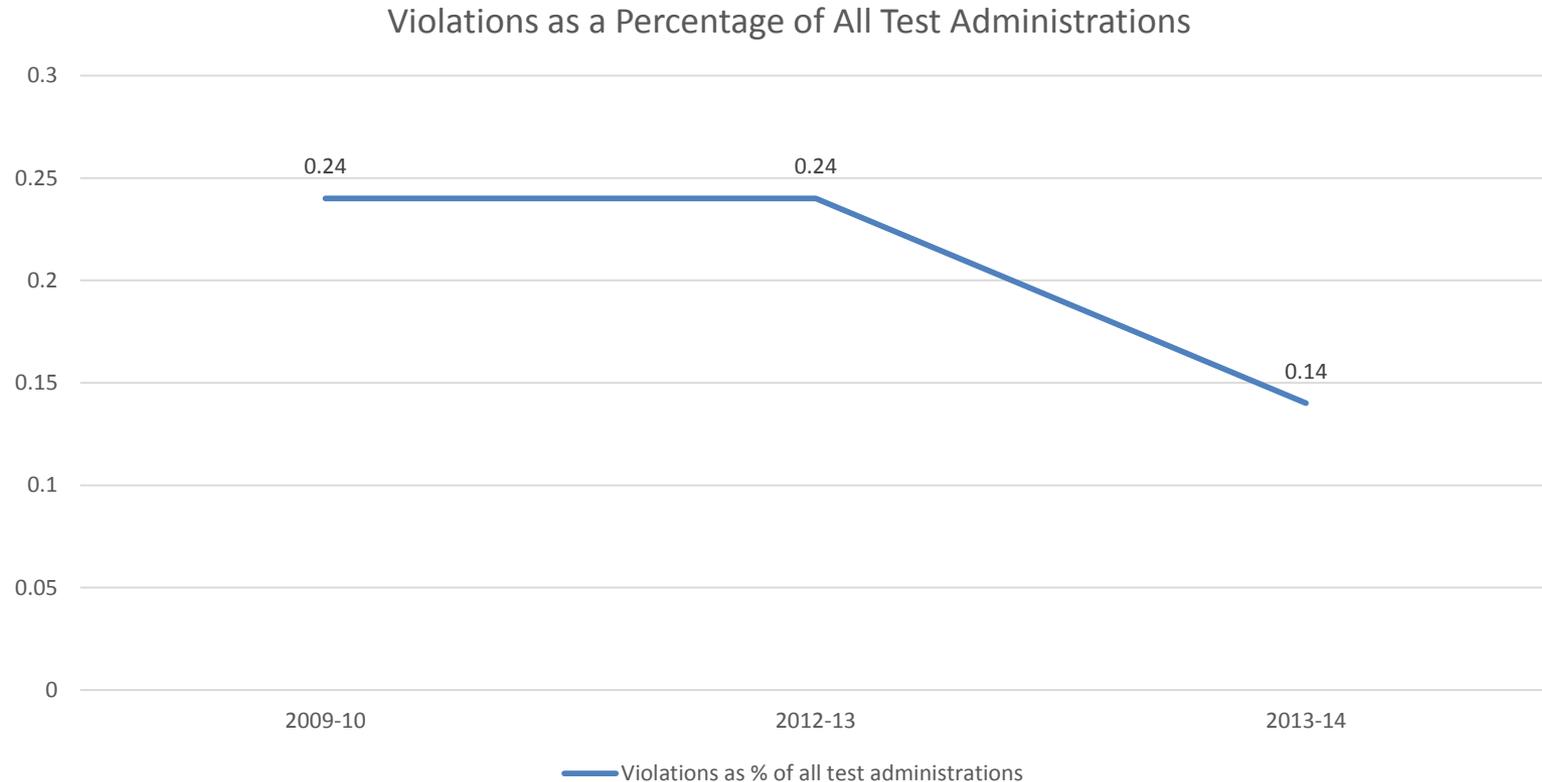
- One out of 1400 test administrations contains a violation, though most are minor.

Most Frequent Reasons for Test Administration Irregularities

1. Failure to return all test materials on time
2. More exam booklets opened than answer sheets
3. Failure to monitor examinees during entire exam
4. Self-administration of exam
5. Proctor collusion in cheating



Change in Percentage of Administration Violations: 2009-2014



- Decrease in percent of violations over last year shows progress.

Goal Five: Improve Test Quality Assurance



- 2009-10: Only 1 of 3 providers had QA system installed and it was incomplete
- 2012-13: All 4 providers had QA system in place, but still implementing some features
- 2013-14: QA system fully functional for all providers

This goal has been achieved by 100% of providers.

QA System Elements in Place -2014



- Document control (4)*
- Internal audit (3)*
- Management review (4)*
- Exam security plan (1)*
- External audit/certification (1)*

*Numbers in () indicate how many providers report having this in 2013-14.

Most Frequent Reasons for QA System Breaches



1. Failure to return test materials on time
2. Lost test booklets/completed answer sheets
3. Candidate demographic information missing/incorrect
4. Forensics uncovered possible cheating/collusion

Provider Perceptions of Test Security Breaches



- “After implementing all the changes [over the past 5 years], our quantity of breaches has dramatically decreased.”
- “We are a trusted test development and delivery provider to more than 400 organizations worldwide. On their behalf, we securely deliver an average of 10 million exams per year. We serve as an industry gatekeeper, ensuring that people legitimately earn the credentials they seek to achieve, and thereby guaranteeing a fair testing experience for all who come through our doors.”

Recommendations



■ Proctors/Administrators:

- Increase screening, selection and training standards
- Continue to vigorously apply disciplinary actions against offenders

■ Shipping Irregularities:

- Use traceable carriers only, especially those with high reputation for security and reliability
- Continue to enforce rules for shipping

Recommendations (cont'd)



- Test Sites/Administration:
 - Standardize test site requirements across all providers
 - Share best practices for administration
- Test Cheating:
 - Share best practices for data forensics and cheating detection
 - Encourage test-takers to report cheating (whistleblower hotline)
- QA System:
 - Fully implement all features for all providers
 - Use it as preventive mechanism and early warning system

Future Steps



- Present findings to key stakeholders
- Identify areas for further improvement
- Fine tune data collection methods as needed
- Include test security evaluation as part of ANSI annual surveillance and monitor trends

Thank you for the opportunity to work with CFP!
Don Ford 

1	CFP Standards for Accreditation of Food Protection Manager Certification Programs (2012) and CFP Required Documentation	ISO/IEC 17024:2012 International Standard: Conformity assessment – General requirements for bodies operating certification of persons and ISO Required Documentation	U of H Evaluation	Committee Evaluation	Demonstration of Compliance Substantially Equivalent?
2	2.0 Purpose of Certification				
3	3.3 If a certification organization provides both education and certification, the certification organization shall administratively and financially separate any education and certification functions that are specific to Food Protection Manager Certification to ensure that the certification program is not compromised. This may be satisfied if the governing structure documents to the accrediting organization the distinct separation of the two functions, confirming that no undue influence is exercised over either the education or the certification	4.3.1 The certification body shall document its structure, policies and procedures to manage impartiality and to ensure that the certification activities are undertaken impartially. The certification body shall have top management commitment to impartiality in certification activities. The certification body shall have a statement publicly accessible without request that it understands the importance of impartiality in carrying out its certification activities, manages conflict of interest and ensures the objectivity of its certification activities. 4.3.6 The certification body shall identify threats to its impartiality on an ongoing basis. This shall include those	YES	NO	CFP 3.3 has more precision in regards to the separation of educational and certification functions. The intent of ISO 4.3.1 and 4.3.6 are similar describing impartiality, influence and threats. This is management and impartiality. What about ISO 5.2? Structure of the Certification body in relation to training and 5.2.3?
4	process by virtue of the structure within the association, organization, agency or another entity.	threats that arise from its activities, from its related bodies, from its relationships, or from the relationships of its personnel. However, such relationships do not necessarily present a body with a threat to			
5	3.4 Resources of Certification Organizations. The certification organization shall conform to all CFP standards for accreditation and demonstrate	4.3.7 The certification body shall analyze, document and eliminate or minimize the potential conflict of interests arising from the certification of activities of persons. The certification body shall document and be able to demonstrate how it eliminates, minimizes or manages such threats. All potential sources of conflict of interest that are identified, whether they arise from within the certification body, such as assigning responsibilities to personnel, or from the activities of other persons, bodies or organizations, shall be covered. 4.3.8 Certification activities shall be	YES	NO	CFP 3.4 discusses conformity while ISO 9.2.6 discusses conformity when work is performed by a 3 rd party. This is not exactly the same intent. ISO 10.2.7 goes into detail to discuss non- conformity issues.

6		<p>6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality, impartiality and conflict of interests. NOTE Where permitted by law, an electronic signature is acceptable.</p> <p>6.1.8 When a certification body certifies a person it employs, the certification body shall adopt procedures to maintain impartiality.</p>				
7	4.0 Food Safety Certification Examination Development					
8	4.2 Each certification organization shall provide evidence that it meets the following professional requirements:					
9	4.2 B demonstrated experience in the development of psychometrically valid competency examinations;	<p>8.4a The certification body shall have documents to demonstrate that, in the development and review of the certification scheme, the following are included: the involvement of appropriate experts;</p>	YES	NO	<p>The terms used here are experience vs. appropriate experts. One could argue that if the experts are appropriate that they will have demonstrated the proper experience necessary in the development of the exams. The use of "demonstrated experience" and "appropriate experts" can be interchanged. Certification assessors working with ANSI understand the relationship of the language and</p>	
10	11	<p>7.4 Security</p> <p>7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.</p> <p>7.4.2 Security policies and procedures shall include provisions to ensure the security of</p>	YES	NO	<p>Security is an important issue for both organizations however, each group details different aspects. First, let's make sure that we understand that we're dealing with "standards" not groups. That said, "Demonstrating capability to develop..." is very</p>	

<p>10.2.4 Control of records The certification body shall establish procedures to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of its records related to the fulfillment of this International Standard. The certification body shall establish procedures for retaining records for a period consistent with its contractual and legal obligations. Access to these records shall be consistent with the confidentiality arrangements. NOTE For requirements for records on applicants, candidates and certified persons, see also 7.1.</p>	<p>YES</p>	<p>NO</p>	<p>CFP 4.2 D is specific to archiving exam scores while ISO 10.2.4 describes overall procedures for all record keeping including exam scores. First, let's make sure that we understand that we're dealing with "standards" not groups. That said, "Demonstrating capability to develop..." is very different from developing document policies and procedures as prescribed in 17024. ISO 17024 is very clear in the development of a documented management system that ensures the integrity of the entire certification process. For consumers there is the assurance that an individual taking that exam is certified by a program that has been documented and approved. The CFP standard remains weak</p>	
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<p>4.2 E demonstrated evidence of an understanding of and willingness to abide by the principles of fairness and due process.</p>	<p>8 Certification schemes</p>	<p>YES</p>	<p>NO</p> <p>These are essentially the same however, the wording is different. Terms such as demonstrate and document and implement are used respectively. I'm not sure the intent is the same for these two sections. The ISO Standard speaks specifically to the "fairness" of the exam, while the CFP Standard seems more directed to the overall process. Demonstrated evidence is, in of itself, a lower demonstration of performance than the specific</p>	
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13	<p>4.3 The certification organization shall provide complete information about the food safety certification examination, including that related to procedures and personnel involved in all aspects of the examination development and analysis. The information required for accreditation will include but is not necessarily limited to:</p>	<p>8.4 The certification body shall have documents to demonstrate that, in the development and review of the certification scheme, the following are included:</p> <ul style="list-style-type: none"> a) the involvement of appropriate experts; b) the use of an appropriate structure that fairly represents the interests of all parties significantly concerned, without any interest predominating; c) the identification and alignment of prerequisites, if applicable, with the competence requirements; d) the identification and alignment of the assessment mechanisms with the 	YES	NO	<p>While these clauses are similar, ISO details more information concerning the development of the certification scheme, the CFP document gives more specific direction in the following sub clauses.</p> <p>Again, ISO is more prescriptive in aligning measurement tools, industry experts, etc., as part of the policies and procedures. ANSI holds ISO accredited organizations to a higher standard in identifying subject</p>	
14		<ul style="list-style-type: none"> e) a job or practice analysis that is conducted and updated to: <ul style="list-style-type: none"> - identify the tasks for successful performance; - identify the required competence for each task; - identify prerequisites (if applicable); - confirm the assessment mechanisms and examination content; - identify the re-certification requirements and interval. <p>NOTE Where the certification scheme has been developed by an entity other than the certification body, the job or practice analysis might already be available as part of that work. In this case, the certification body can obtain details from the scheme</p>			<p>creation. The CFP standard remains open-ended and open to loose interpretation by both CBs and assessors.</p> <p>While, at face value, it may not seem like a weakness, it opens the door to less reputable firms achieving accreditation under CFP but delivering a program that may not effectively certify individuals.</p>	
15	<p>4.3 A complete description of the scope and usage of the examination;</p>	<p>8.2 A certification scheme shall contain the following elements:</p> <ul style="list-style-type: none"> a) scope of certification; b) job and task description; c) required competence; d) abilities (when applicable); e) prerequisites (when applicable); f) code of conduct (when applicable). <p>NOTE 1 A code of conduct describes the ethical or</p>	YES	NO	<p>Again, CFP states "complete descript" and the ISO document gives specific directives.</p> <p>The open-ended nature of the CFP requirements leaves the standard open for interpretation and risks.</p>	
16		<p>personal behavior required by the scheme.</p> <p>NOTE 2 Abilities can include physical capabilities such as vision, hearing and</p>				

17	4.3 B job analysis task list, with knowledge, skills, and abilities (KSAs);		NO	YES	The following CFP sub clauses give specific details that are not included in the ISO document. I would say yes here, that the intent is substantially equivalent to section 8.4 (e) of ISO The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to develop against a specific	
18	4.3 C examination specifications;		NO	NO	The following CFP sub clauses give specific details that are not included in the ISO document. Section 8.4 (e) of ISO covers "a job or practice analysis", "identify tasks", "required competence for each task", etc. Section 8.4 (e) of ISO covers "a job or practice analysis", "identify tasks", "required competence for each task", etc.	
19					The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to	
20	4.3 D The number of unduplicated items in the item bank;		NO	NO	The following CFP sub clauses give specific details that are not included in the ISO document. The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to	

21	4.3 E statistical performance of each item in the bank;		NO	NO	The following CFP sub clauses give specific details that are not included in the ISO document. I would say YES here. 4.3E of CFP seems equivalent to 9.3.5 in ISO. 9.3.5 in ISO addresses collecting and maintaining statistical data, although not as specific as CFP which requires this on every item in the bank. The CFP Standard is specific to	
22					managers. The more in-depth approach of 17024 allows CBs to develop against a specific scheme / scope.	
23	4.3 F number of examination forms and evidence of their equivalence to each other;		NO	NO	The following CFP sub clauses give specific details that are not included in the ISO document. The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to develop against a specific	
24	4.3 G description of method used to set passing score;		NO	NO	The following CFP sub clauses give specific details that are not included in the ISO document. The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to	
25	4.3 H copies of all logs, diaries, and personnel lists and descriptions kept as required in the development process;		NO	NO	The following CFP sub clauses give specific details that are not included in the ISO document.	
26					The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to	

27	<p>4.3 I summary statistics for each examination form; and</p>		NO	NO	<p>The following CFP sub clauses give specific details that are not included in the ISO document. I would say YES here as above based on equivalency to 9.3.5 in ISO</p> <p>The CFP Standard is specific to food safety and, because of the specificity, mandated development related to food managers. The more in-depth approach of 17024 allows CBs to develop against a specific</p>	
28	<p>4.3 J names, credentials, and demographic information for all persons involved in the job analysis, item writing and review, and setting the passing score.</p>	<p>8.4 The certification body shall have documents to demonstrate that, in the development and review of the certification scheme, the following are included:</p> <p>a) the involvement of appropriate experts;</p> <p>b) the use of an appropriate structure that fairly represents the interests of all parties significantly concerned, without any interest predominating;</p>	YES	NO	<p>CFP standard is much more prescriptive as to documentation of names, credentials, etc. Again, the specificity of 17024 leaves nothing to interpretation strengthening the value of the ISO standard.</p>	
29		<p>c) the identification and alignment of prerequisites, if applicable, with the competence requirements;</p> <p>f) the identification and alignment of the assessment mechanisms with the competence requirements;</p> <p>g) a job or practice analysis that is conducted and updated to:</p> <ul style="list-style-type: none"> - identify the tasks for successful performance; - identify the required competence for each task; - identify prerequisites (if applicable); - confirm the assessment mechanisms and examination content; - identify the re-certification requirements and interval. <p>NOTE Where the certification scheme has been developed by an entity other than the</p>				

30	4.4 Job Analysis. The content validity of a food safety certification examination shall be based on a psychometrically valid job analysis developed by psychometricians and a demographically and technically representative group of individuals with significant experience in food safety. The representative group shall include but not necessarily be	8.4b The certification body shall have documents to demonstrate that, in the development and review of the certification scheme, the following are included: the use of an appropriate structure that fairly represents the interests of all parties significantly concerned, without any interest predominating;	YES	NO	ISO 8.4b uses the term “all interested parties” while the CFP lists specific segments of the food industry. The ISO standard is designed to support accredited organizations that wish to certify people in other professions. The open approach but specificity of the
31	of the retail food industry, persons with local, state or national regulatory experience in retail food safety, and persons with knowledge of the microbiology and epidemiology of foodborne illness, and shall be sufficiently diverse as to avoid cultural bias and				That said, it is important here that the CFP standard remain prescriptive so it is not intended to certify individuals in other, unrelated or even related fields.
32	4.6 Detailed food safety certification examination specifications shall be derived from a valid study of the job analysis tasks and their accompanying knowledge, skills, and abilities (KSAs) and shall be appropriate to all aspects of the retail food industry. The job analysis shall include consideration of scientific data concerning factors contributing to foodborne illness and its epidemiology. The examination specifications, consisting of percentage weights or		NO	NO	This clause is food safety specific and is outside of the scope of the ISO document. Again, this clause must be specific because the CFP program is food only. However assessed organizations must provide even more robust information detailed throughout standard 8.4 in the ISO Standard. In fact the ISO standard holds
33	4.7 The certification organization or its contracted examination provider shall maintain a log and diary of the procedures and a list of the qualifications, identities, and demographic data of the persons who participated in development of the job analysis and of the food safety certification examination specifications. Those materials shall be provided to the	6.1.5 The certification body shall maintain up-to-date personnel records, including relevant information, e.g. qualifications, training, experience, professional affiliations, professional status, competence and known conflicts of interest.	NO	NO	The people who participate in exam development (4.7) are very different from those who work for the CB. In 6.1.5 ISO seeks to ensure that those who work within the CB have the qualifications to effectively and fairly manage a certification program. This is
34	4.9 Psychometric Standards. Food safety certification examination development, including setting the passing score, shall be based on the most recent edition of Standards for Educational and Psychological Testing, developed jointly by the American Psychological Association, American Educational		NO	NO	I agree that there is not an equivalent section in the ISO standard for CFP section 4.9, but I disagree with this statement. This clause (4.9) although it does mention “food safety certification” is not food safety specific. It intends to utilize best practices of

35	Education, and on all appropriate federal requirements (for example, Americans with Disabilities Act). Food safety certification examinations shall be revised as needed to be in compliance with changes in the Standards for Educational and Psychological Testing or in any of the federal requirements.			Educational Research Association, etc.) which are not food safety agencies. The ISO Standard does mandate demonstration of a criterion referenced passing score as well as overarching requirements for fairness. Again, because the CFP standard has been designed as industry- specific the need to be more prescriptive	
36	4.11 The food safety certification examination shall be based on psychometrically valid procedures to ensure the relative equivalence of scores from various examination forms. The certification organization shall provide	9.2.4 The certification body shall verify the methods for assessing candidates. This verification shall ensure that each assessment is fair and valid.	YES	NO Documents discuss the validity and verification however, CFP 4.11 discusses the relative equivalence of scores from various examination forms and the ISO document does not	
37				I would say NO here. 9.2.4 is more suited with the intent of 9.2.3 above which aligns with CFP 4.10. I do not think CFP 4.11 and ISO 9.2.4 are equivalent in intent at all. Equivalency is not the same as assessment methodology. Equivalency means that Sharon Wood and Larry Lynch take two different exams forms from the same CB; we have an equal opportunity to pass that exam. In this case we need to be sure that we have weighted the questions against specific criteria. The ISO standard does not presume a specific methodology is presumed so the CB must	

38	<p>4.13 When any form and/or item bank of the food safety certification examination is translated into a language other than that in which it is originally developed and validated, the developer of the examination shall provide evidence of content equivalency of the translated version with the original examination form and/or item bank. The developer shall provide a detailed description of the translation method(s), including the rationale for selecting the translation method(s), and shall demonstrate congruence of items and instructions with those of the examination form and/or item bank that was translated. To avoid potential problems in translation of terms specific or idiomatic to the retail food industry, translation should be accomplished with the consultation of <u>food safety personnel competent in the</u></p>		NO	NO	<p>The ISO document does not discuss exams being translated into languages other than that which it was originally developed. If you go back and read 9.3.1 you'll see that it is a determinant of equivalence and validity. Because the CFP standard is industry specific it has to have language specific to translation. However CBs who develop exam programs under 17024 must demonstrate equivalence across a wide variety of spectra including language.</p>	<p>The ISO document does not discuss exams being translated into languages other than that which it was originally developed. If you go back and read 9.3.1 you'll see that it is a determinant of equivalence and validity. Because the CFP standard is industry specific it has to have language specific to translation. However CBs who develop exam programs under 17024 must demonstrate equivalence across a wide variety of spectra including language.</p>
39	<p>4.14 Food safety certification examination developers shall maintain a log and diary of the procedures and a list of the qualifications, identities, and demographic data of the persons who participated in item development, examination development, translations, setting the</p>	<p>6.1.5 The certification body shall maintain up-to-date personnel records, including relevant information, e.g. qualifications, training, experience, professional affiliations, professional status, competence and known conflicts of interest.</p>	YES	NO	<p>CFP 4.14 and ISO 6.1.5 discuss record keeping of individuals who contributed to the development of the materials. CFP 4.14 also discusses the administering of the exams and that they must be proctored. ISO</p>	<p>CFP 4.14 and ISO 6.1.5 discuss record keeping of individuals who contributed to the development of the materials. CFP 4.14 also discusses the administering of the exams and that they must be proctored. ISO 9.3.3 vaguely refers to this in terms of</p>
40	<p>items and of the full examination. The materials shall be provided to the accrediting organization on demand. All examinations shall be delivered and administered in a format that ensures the security of the examination (i.e. in a secured environment with a test administrator/proctor.) Un-proctored examinations are not acceptable regardless of the mode of administration.</p>				<p>See 4.7/6.1,5 for part 1. For the second part, Herein lies one of the greatest misconceptions of the ISO Standard. If you look at 9.3.3 it becomes the responsibility of the CB to develop and demonstrate the secure conditions for administering the exam. A presumption has been promulgated that the exam cannot be administered by</p>	

41	<p>4.15 Examination Development Security. The certification organization will demonstrate that procedures are developed and implemented to ensure that individual items, item banks, food safety certification examinations presented in all media (printed, taped and computerized), test answer sheets and examinee scores are and remain secure. Demonstration shall include an overall examination security plan that covers each step in the examination development, culminating in the production of the examination.</p>	<p>7.4 Security 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur. 7.4.2 Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: e) the locations of the materials (e.g. transportation, electronic delivery, disposal, storage, examination centre); f) the nature of the materials (e.g. electronic paper test equipment);</p>	YES	NO	<p>Again, both documents stress the importance of security however; ISO 7.4.1 and ISO 7.4.2 include the provisions necessary for ensuring the security of examination materials. Once again, herein lies one of the greatest misconceptions of the ISO Standard. If you look at 9.3.3 it becomes the responsibility of the CB to develop and demonstrate the secure conditions for administering the exam. A presumption has been</p>	
42		<p>development, administration, results reporting); h) the threats arising from repeated use of examination materials. 7.4.3 Certification bodies shall prevent fraudulent examination practices by: g) requiring candidates to sign a non-disclosure agreement or other agreement indicating their commitment not to release confidential examination materials or participate in fraudulent test-taking practices; h) requiring an invigilator or examiner to be present; i) confirming the identity of the candidate; j) implementing procedures to prevent any unauthorized aids from being brought into the examination area;</p>			<p>security process.</p>	
43	<p>4.16 Periodic Review. At least semiannually each certification organization shall report to the accrediting organization, providing a review of its food safety certification examination(s). The report will include the following summary statistics for all examinations (for each examination used) administered during the preceding six months, as well as other information</p>	<p>8.5 The certification body shall ensure that the certification scheme is reviewed and validated on an on- going, systematic basis.</p>	YES	NO	<p>4.16 references a review by the accrediting organization. 8.5 mandates a reviewed internally by staff and a scheme committee That review would ultimately be reviewed by an accrediting body.</p>	

44	4.16 A number of food safety certification examinations administered;		NO	NO	These components are not included in the ISO document. Section 9.2.4 mandates the fairness of the exam. It must remain opened ended because the assessment methodology may be different. As a result, assessors would look at a variety of criteria that determine exam fairness and accuracy which is the ultimate outcome of measuring the various statistical outcomes of exam form analysis.	
45	4.16 B mean;		NO	NO	These components are not included in the ISO document.	
46	4.16 C mode;		NO	NO	These components are not included in the ISO document.	
47	4.16 D standard deviation;		NO	NO	These components are not included in the ISO document.	
48	4.16 E range;		NO	NO	These components are not included in the ISO document.	
49	4.16 F reliability coefficient;		NO	NO	These components are not included in the ISO document.	
50	4.16 G number and percentage of examinees passing the examination; and		NO	NO	These components are not included in the ISO document.	
51	4.16 H the statistics describing the performance of each item used on food safety certification examinations administered during the six month period		NO	NO	These components are not included in the ISO document.	
52	5.0 Food Safety Certification Examination Administration					

<p>5.0 Food Safety Certification Examination Administration . All sections of these Standards apply to Computer Based Testing (CBT) Administration except Section 5.1.</p>	<p>ISO 9.3.2 The certification body shall have procedures to ensure a consistent examination administration. ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.</p>	<p>NO</p>	<p>NO</p>	<p>CFP is certainly more prescriptive. This is good and bad. The prescription reduces variability, but also restricts the exam providers ability to set their own industry best practices, and competitive advantage. The exam providers should be able to input processes according to industry best practices as part of their accreditation process. This fosters innovation and better products and services. The onus would be on ANSI to regulate "best practices". The other side, however, is that it also is much more subjective in interpretation of "best practices". ISO 9.3.2 and 7.4.1 may apply Agree ISO 17024 provides procedures and guidelines for the framework of the exam administration, CFP provides very specific procedures for the</p>	
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54 5.1 Security for Examination Booklets.	7.4.2 Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: <ul style="list-style-type: none"> the locations of the materials (e.g. transportation, electronic delivery, disposal, storage, examination center); the nature of the materials (e.g. electronic, paper, test equipment); the steps in the examination process (e.g. development, administration, results reporting); the threats arising from repeated use of examination materials. 	NO	NO	CFP goes into great detail to discuss many specific aspects of security while the ISO document states that policies and procedures shall be in place regarding the location of materials, the nature of the materials, the steps of the process regardless of the format (electronic or paper) and reducing threats. Upon CFP having an established foundation for the various aspects of exam security, appears that the requirement for security policies and procedures would be met. This difference is again prescription vs. subjectivity, best practices, and processes of exam providers. When all is said and done, what is the point of all the exam security if a signature is not required to receive exams? The process here is not the same. One is very prescriptive and one relies on the processes of an organization.	CFP goes into great detail to discuss many specific aspects of security while the ISO document states that policies and procedures shall be in place regarding the location of materials, the nature of the materials, the steps of the process regardless of the format (electronic or paper) and reducing threats. Upon CFP having an established foundation for the various aspects of exam security, appears that the requirement for security policies and procedures would be met. This difference is again prescription vs. subjectivity, best practices, and processes of exam providers. When all is said and done, what is the point of all the exam security if a signature is not required to receive exams? The process here is not the same. One is very prescriptive and one relies on the processes of an organization. If CFP section 5.9 does not have ISO equivalent, then CFP section 5.1 does not have ISO equivalent. ISO does not have detailed security; CFP is precise on examination booklet
55 5.1A Securing Examination Booklets	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	One reviewer believed that since these are not 100% the same, than these are not equivalent.
56 5.1 A 1) Each individual <i>examination booklet</i> shall be secured by using one of the following methods both prior to and after administration:	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	One reviewer believed that since these are not 100% the same, than these are not equivalent.
57 5.1 A 1a.) Enclosing in a sealed tamper-resistant package;	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	One reviewer believed that since these are not 100% the same, than these are not equivalent.
58 5.1 A 1b.) Shrink-wrapping;	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	
59 5.1 A 1c.) Sealing on all three open sides with each seal of sufficient size to cover at least one square inch of the front side and to overlap and cover the same amount of space on the back side of the <i>examination booklet</i> ; or	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	

60	5.1 A 1d.) Using any other technology that ensures that only the examinee can view the contents of the <i>examination booklet</i> .	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
61	5.1 A 2) Only the examinee is allowed to break open the <i>examination booklet packaging or seals</i> .	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
62	5.1 B Packaging by <i>certification organization</i> .	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
63	5.1 B 1) Each individual <i>examination booklet</i> shall be securely sealed before packing.	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
64	5.1 B 2) Secure tamper-resistant shipping material, such as Tyvek envelopes or similar materials that are designed to reveal any tampering or violation of the package's security, is required for all shipment of materials in all phases.	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
65	5.1 B 3) Packaging must include a packing list that contains:	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
66	5.1 B 3a.) <i>Examination form</i> language(s) or version(s) enclosed; and	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
67	5.1 B 3b.) Quantity of examinations enclosed.	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
68	5.1 C Shipping to the <i>test administrator/proctor</i> from the <i>certification organization</i> .	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
69	5.1 C 1) Shipping shall be done by certifiable, traceable means, with tracking numbers so that the location can be <i>determined at any given time</i> .	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.
70	5.1 C 2) A signature is required upon delivery.		NO	NO	ISO does not specifically state that signatures are required. Nevertheless, this would not be of concern if is specified in our policies and procedures required in ISO 7.4.2.
71	5.1 C 3) Only an individual authorized by the <i>test administrator/proctor</i> may sign for the package.		NO	NO	ISO does not specifically state that signatures are required. Nevertheless, this would not be of concern if is specified in our policies and procedures required in ISO 7.4.2. ISO does not require a signature.

72	5.1 D Storage by <i>test administrator/proctor</i> . The package(s) of <i>examination booklets</i> shall be secured at all times immediately upon delivery. Under no circumstances may <i>examination booklets</i> , examinee used answer sheets, or other examination	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	
73	5.1 E Shipping to the <i>certification organization</i>	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
74	5.1 E 1) After examination administration, <i>examination booklets</i> and answer sheets shall remain in secure storage until returned to <i>certification organization</i> .	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	
75	5.1 E 2) The following shall be in tamper-resistant shipping material:	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
76	5.1 E 2a.) All used and unused <i>examination booklets</i> for each <i>examination administration</i> :	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
77	5.1 E 2b.) Examinees' used answer sheets; and	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
78	5.1 E 2c.) All required <i>certification organization</i> forms	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
79	5.1 E 3) Shipping shall be done within two business days following the examination date by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.	7.4.2	NO	NO	No time frames at all mentioned in ISO. Substantially UN-equivalent	
80	5.1 F Handling unused <i>examination booklets</i> that have been held for up to <i>ninety days</i> . The <i>test</i>	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
81	5.1 F 1) Ensure that all <i>examination booklets</i> are accounted for:	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
82	5.1 F 2) package <i>examination booklets</i> securely as described above; and	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent	
83	5.1 F 3) Ship to the certification organization securely packaged and according to these <i>Standards</i> and the <i>Certification Organization's</i> instructions	7.4.2	NO	NO	One reviewer believed that since these are not 100% the same, than these are not equivalent.	

84	<p>5.2 Test Site Requirements. Sites chosen for administering <i>food safety certification examinations</i> shall conform to all legal requirements for safety, health, and accessibility for all qualified examinees.</p>	<p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p> <p>9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.</p> <p><u>NOTE Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.</u></p> <p>9.3.4 When technical equipment is used in the examination process, the equipment shall be verified or calibrated where appropriate.</p> <p>9.3.5 Appropriate methodology and procedures (e.g. collecting and maintaining statistical data) shall be documented and implemented in order to reaffirm, at justified</p>	NO	NO	<p>The CFP document is concerned with the specific testing site while the ISO document looks at consistency, criteria for conditions, and calibration of equipment. The ISO document is more precise in details however, the intent is compatible. These do not appear to be the same. One deals with ADA and the actual site. The ISO standard is mainly about exam develop design and process. It seems like 9.3.3 is compatible but the others are not exactly compatible. This section is about exam design & results & has nothing to</p>	
85	<p>examinees to perform at their highest level of ability.</p>	<p><u>NOTE Conditions can include lighting, temperature,</u></p>				
86	<p>5.2 B 7) Use of private room(s) where only examination personnel and examinees are allowed access during the examination administration; and</p>		NO	NO	<p>This is not addressed in the ISO document. This is important for a consistent and maximized learning and testing experience.</p>	
87	<p>5.2 B 8) No further admittance into the test site once examination administration has begun</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	

88	<p>5.3 Test Site Language Translation. A <i>certification organization</i> shall have a published, written policy regarding test site language translation of <i>food safety certification examinations</i>. If a <i>certification organization</i> allows test site language translation of a <i>food safety certification examination</i> when an <i>examination version</i> is not available in the examinees' requested language, the <i>certification organization</i> shall have a published, formal application process available to all potential examinees. Procedures shall include but not be limited to:</p>	<p>9.2.5 The certification body shall verify and accommodate special needs, within reason and where the integrity of the assessment is not violated, taking into account national regulation [see 9.1.2 e)]. Also, 6.1.5 The certification body shall maintain up-to-date personnel records, including relevant information, e.g. qualifications, training, experience, professional affiliations, professional status, competence and known conflicts of interest. Also, 6.2.2.1 Examiners shall meet the requirements of the certification body. The selection and approval processes shall ensure that examiners: d) are fluent, both in writing and orally, in the language of examination: in circumstances where an interpreter or a translator is used, the certification body shall have procedures in place to ensure that it does not affect the validity of the examination;</p>			<p>ISO does not address translations "Special Needs" is defined as a physical disability, learning difficulties or behavioral problem. With this in mind, language translation is NOT a special need. CFP standard has specifics just for language translations.</p>
89	<p>5.3 A An application process for potential examinees that includes an evaluation and documentation component to determine the</p>		NO	NO	<p>This is not addressed in the ISO document.</p>
90	<p>eligibility of the potential examinee for test site language translation,</p>				
91	<p>5.3 B An application process for translators that includes clear and precise qualifications that shall include but not be limited to the following:</p>	<p>6.1.5 The certification body shall maintain up-to-date personnel records, including relevant information, e.g. qualifications, training, experience, professional affiliations, professional status, competence and known conflicts of interest.</p>	NO	NO	<p>This is not addressed in the ISO document.</p>
92	<p>5.3 B 1) being fluent in both languages;</p>		NO	NO	<p>This is not addressed in the ISO document.</p>
93	<p>5.3 B 2) Have a recognized skill in language translation;</p>		NO	NO	<p>This is not addressed in the ISO document.</p>
94	<p>5.3 B 3) Trained in the principles of objective examination administration;</p>		NO	NO	<p>This is not addressed in the ISO document.</p>

ISO 9.2.5 and 6.1.5 and 6.2.2.1 clearly covers all 5.3 items. It is disconcerting that ISO item 6.2.2.1 was not referenced for this section during the comparison process.

This item is covered by ISO 6.1.5 and in detail in 6.2.2.1

95	<p>5.3 B 4) Have no personal relationship with the examinee (may not be another examinee, may not be a relative or friend of the examinee and may not be a co-worker, employer, or an employee of the examinee);</p>	<p>4.3.6 The certification body shall identify threats to its impartiality on an ongoing basis. This shall include those threats that arise from its activities, from its related bodies, from its relationships, or from the relationships of its personnel. However, such relationships do not necessarily present a body with a threat to impartiality. NOTE 1 A relationship that threatens the impartiality of the body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding) and payment of a sales commission or other inducement for the referral of new applicants, etc. NOTE 2 Threats to impartiality can be either actual or</p>	YES	NO	<p>CFP 5.3.B.4 discusses impartiality between translators and examinees while ISO 4.3.6 discusses impartiality in general terms may include personnel. Relationship in the standard is between the Translator and the examinee NOT the certification body. Section does not apply.</p>	<p>ISO 4.3.6 adds further clarification of requirements to 9.2.5 and 6.1.5</p>
96		<p>perceived. NOTE 3 A related body is one which is linked to the certification body by common ownership, in whole or part, and has common members of the board of directors, contractual arrangements, common names, common staff, informal understanding or</p>				
97	<p>5.3 B 5) Not being a <i>Certified Food Protection Manager</i> nor having any vested interest in Food Protection Manager certification or conflict of interest;</p>	<p>9.4.4 The decision on certification of a candidate shall be made solely by the certification body on the basis of the information gathered during the certification process. Personnel who make the decision on certification shall not have participated in the examination or training of the candidate.</p>	YES	NO	<p>CFP 5.3.B.5 discusses vested interests between translators and examinees while ISO 9.4.4 discusses impartiality in general terms which may include personnel. Keep in mind, Translator might work for a college, business, or ethnic newspaper, etc.? ISO 9.4.4 does not apply because it is about the candidate who takes the exam NOT the translator</p>	
98	<p>5.3 B 6) Provide references or other proof attesting to the translator's competencies and professional acumen; and</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	

99	5.3 B 7) Agree in writing to maintain the security of the examination.	6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality, impartiality and conflict of interests.	NO	NO	ISO 6.1.7 requires all personnel to sign a document committing to comply with all rules set by the certification body.
100		Could be viewed differently if Translator is considered a member of the certification provider but how do you define that?			NO Keep in mind Translator might work for a College or business, or ethnic newspaper, etc.?
101	5.3 C A proctored environment where the translator and examinee are not a distraction to other examinees, and	9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. <u>NOTE Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.</u>	NO	NO	CFP 5.3.C.A discusses vested interests between translators and examinees while ISO 9.3.3 discusses criteria for conditions in general terms.
102	5.3 D A proctored environment where the translator is not active as the <i>test administrator/proctor</i> .	6.2.3.1 The certification body shall have a documented description of the responsibilities and qualifications of other personnel involved in the assessment process (e.g. invigilators).			These sub clauses are similar however, ISO 6.2.3.1 is a generality. ISO does not specify translator as "other personnel" or if even permitted to be used
103	5.4 Scoring.				
104		requirements have been met.			
105	5.4 B <i>Food safety certification examination</i> scores will not be released as being official until verified and approved by the <i>certification organization</i> .		NO	NO	This is not addressed in the ISO document.
106	5.4 C Examinee scores will be confidential, available only to the examinee and to persons or organizations approved in writing by the	6.1.6 Personnel acting on the certification body's behalf shall keep confidential all information obtained or created during the performance of the body's certification activities, except as required by law or where authorized		NO	This is not addressed.

ISO 9.3.3 further clarifies 9.2.5, 6.1.5 and 4.3.6

ISO does cover confidentiality in 6.1.6 and 6.1.7

107	5.4 D Score reports will be available to examinees in a time frame specified in the application, which will not exceed fifteen business days following the administration of the <i>food safety certification examination</i> . If there is a delay due to problems in verification or authentication of scores, examinees will be so informed and an approximate date for release of the scores will be announced. The <i>certification organization</i> will have ongoing communication with examinees and with the test		NO	NO	This is not addressed in the ISO document.	This is not covered by ISO and the CFP statement should be added.
108	5.5 Test Administrator/Proctor(s) Role. Test administrators/proctors shall have successfully completed the <i>certification organization's</i> specific training in examination administration and security procedures. They	6.1.4 Documented instructions shall be provided to personnel describing their duties and responsibilities. These instructions shall be kept up-to-date. 6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to		YES	These sub clauses are equivalent. YES, but "Ethics" are missing from ISO.	
109	shall provide written assurance of maintaining confidentiality of examination contents, of adhering to the <i>certification organization's</i> standards and ethics of secure examination administration, and of agreeing to abide by the <i>certification organization's</i> policies, procedures and rules.	comply with the rules defined by the certification body, including those relating to confidentiality, impartiality and conflict of interests.				
110	5.6 B non-Disclosure Agreement (NDA);	6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality, impartiality			These sub clauses are equivalent.	
111	5.6 C Training program for test administrators/proctors ; and	6.1.3 The certification body shall define the competence requirements for personnel involved in the certification process. Personnel shall have competence for their specific tasks and responsibilities			These sub clauses are equivalent. This seems unnecessary to have in such detail. It should be sufficient to have a training program requirement and that each provider formulates their best process and strategy for accomplishing that. ANSI could then verify. ISO 6.1.3 applies not ISO 6.1.7	

112	<p>5.7 Test Administrator/Proctor(s) Renewal. <i>Test administrators/proctors shall renew the training program for test administrators/proctors and Non-Disclosure Agreement with the certification organization every three (3) years.</i></p>		NO	NO	<p>This seems a little illogical. A certification is good for 5 years, but the training for a proctor good for three? Part of the longevity and continued accreditation for providers is to have good processes in place, which ANSI will validate and review.</p>	<p>Further, the FDA Food Codes changes every 4 years. This 3 year requirement seem arbitrary. That the certification body have another valid criteria is reasonable.</p>
113	<p>5.8 Instructor/Educator/Trainer as Test Administrator/Proctor. When a person acts as an <i>instructor/educator/trainer</i> and a <i>test administrator/proctor</i>, that person relinquishes</p>	<p>6.1.8 When a certification body certifies a person it employs, the certification body shall adopt procedures to maintain impartiality.</p>	NO	NO	<p>These clauses are similar however, they are not equivalent. The overall intent is the same.</p>	
114	<p>the role of <i>instructor/educator/trainer</i> when acting in the role of <i>test administrator/proctor</i> and acts solely as a representative agent of the <i>certification organization</i>.</p>	<p>9.4.4 The decision on certification of a candidate shall be made solely by the certification body on the basis of the information gathered during the certification process. Personnel who make the decision on certification shall not have participated in the examination or training of the candidate. 5.2.3 Offering training and certification for persons within the same legal entity constitutes a threat to impartiality. A certification body that is part of a legal entity offering training shall: h) demonstrate that</p>			<p>The intent is very different; separation versus non-separation of trainer from proctor. ISO sections 9.4.4, 6.2.2.3 and 5.2.3 may apply. Also, an "examiner" by definition ISO 3.10 "person competent to conduct and score an examination, where the examination requires professional judgment." A Test Administrator/ Proctor cannot</p>	
115	<p>5.9 Test Administrator/Proctor Responsibilities. If section 5.9 of CFP standard does Not have ISO equivalent, then I do not believe that</p>	<p>If CFP Standard 5.1 is believed to have an ISO equivalent, then the closest ISO equivalents for some of the items in this section would be ISO sections 7.4.2, 7.4.3, 9.3.2, 9.3.3. Something to think about.</p>				<p>NOT CLEAR????????????????</p>
116	<p>section 5.1 of CFP standards has an ISO equivalent either. Consistency in what is considered "Equivalent" & apply to apple comparison of the 2 standards</p>					
117	<p>5.9 A Schedule examinations. <i>Food safety certification examinations shall be scheduled far enough in advance to allow for timely shipment of supplies or pre-registration for computer-based examinations.</i></p>		NO	NO	<p>This is not addressed in the ISO document.</p>	

118	5.9 B Ensure no destruction of <i>examination booklet</i> materials or computer equipment;	7.4.2 Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: a) the locations of the materials (e.g. transportation, electronic delivery, disposal, storage, examination center); b) the nature of the materials (e.g. electronic, paper, test equipment); c) the steps in the examination process (e.g. development, administration, results reporting); d) the threats arising from repeated use of examination materials	NO	NO	This is not addressed in the ISO document. ISO 7.4.2 a-d may apply	7.4.2 covers examination material security and FCP 5.9B, 5.9C, 5.9C1
119	5.9 C At all times:		NO	NO	This is not addressed in the ISO document.	
120	5.9 C 1) Handle examination materials securely;		NO	NO	This is not addressed in the ISO document. ISO 7.4.2 a may apply	
121						
122	5.9 C 2) Ensure test site conformity;	9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. Note: Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.	NO	NO	This is not addressed in the ISO document. ISO 9.3.3 may apply	ISO 9.3.3 covers CFP 5.9C2, 5.9C3
123	5.9 C 3) Space examinees per protocol;	9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. Note: Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.	NO	NO	This is not addressed in the ISO document. These seem more like internal processes that each provider should incorporate individually. ISO 9.3.3 may apply	

124	5.9 C 4) Ensure examinees' rights;	6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality, impartiality and conflict of interests.	NO	NO	This is not addressed in the ISO document.	ISO 6.1.7 covers 5.9C4 and 5.9C5.
125	5.9 C 5) Ensure confidentiality of examinees' personal information;		NO	NO	This is not addressed in the ISO document.	
126	5.9 C 6) Ensure standardized procedures are followed;		NO	NO	This is not addressed in the ISO document.	Yes, ISO requires the certification body to provide their policies and procedures for ensuring standardized procedures are followed. Each certification body must demonstrate how their policies and procedures meet this standard.
127	5.9 D Before the examination:		NO	NO	This is not addressed in the ISO document.	Yes, ISO requires the certification body to provide their policies and procedures before the examination. Each certification body must demonstrate
128	5.9 D 1) Check examinees' identification;	7.4.3 c Certification bodies shall prevent fraudulent examination practices by: c) confirming the identity of	NO	YES	This is not addressed in the ISO document.	Not sure how 7.4.3c could not be seen as specifically covering 5.9D1
129		the candidate			SO 7.4.3 c may apply	
130	5.9 D 2) Check for and exclude unauthorized objects;	7.4.3 d & e Certification bodies shall prevent fraudulent examination practices by: d) implementing procedures to prevent any unauthorized aids from being brought into the examination area: e) preventing candidates from gaining access to unauthorized aids during the examination.	NO	YES	This is not addressed in the ISO document. ISO 7.4.3 d & e may apply	Not sure how 7.4.3d & e cannot be seen as specifically covering 5.9D2. unauthorized objects = unauthorised aids.
131	5.9 D 3) Distribute examination materials;	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	NO	NO	This is not addressed in the ISO document. ISO 9.3.2 may apply.	

132	5.9 D 4) Read instructions to examinees verbatim;		NO	NO	This is not addressed in the ISO document.	CFP 5.9 D4 should be added.
133	5.9 D 5) Ensure examinees complete information section of answer sheet or online registration form.	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	NO	NO	This is not addressed in the ISO document.	5.9 D5 This seems to be an obvious requirement to the process and would be covered by 9.3.2.
134	5.9 E During the examination:	9.3.2 The certification body shall have procedures to ensure a consistent examination administration. 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. Note: Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.	NO		This is not addressed in the ISO document. ISO 9.3.2 and 9.3.3 may apply	
135	5.9 E 1) Supervise proctors;		NO	NO	This is not addressed in the ISO document.	Yes, ISO requires the certification body to provide their policies and procedures
136	5.9 E 2) Monitor examinees during examination;		NO	NO	This is not addressed in the ISO document.	Yes, ISO requires the certification body to provide their policies and procedures
137						
138	5.9 E 3) Identify and document cheating incidents;		NO	NO	This is not addressed in the ISO document.	Yes, ISO requires the certification body to provide their policies and procedures for identifying and documenting cheating
139	5.9 E 4) Check for and exclude unauthorized objects;	7.4.3 d & e Certification bodies shall prevent fraudulent examination practices by: d) implementing procedures to prevent any unauthorized aids from being brought into the examination area: e) preventing candidates from gaining access to unauthorized aids during the examination	NO	YES	This is not addressed in the ISO document. ISO 7.4.3 d & e may apply.	Same as 5.9 D 2) Check for and exclude unauthorized objects; and covered by 7.4.3d & unauthorized objects = unauthorised aids.
140	5.9 E 6) Identify and document environmental distractions.	9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. Note: Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.	NO	NO	This is not addressed in the ISO document.	9.3.3 "...shall be established, documented and monitored..."
141	5.9 F After the examination	7.1.1 The certification body shall maintain records. ...particularly with respect to	NO	NO	This is not addressed in the ISO document.	ISO 7.1.1 covers 5.9F

142	5.9 F 1) Collect and return <i>examination booklets</i> and answer sheets to <i>certification organization</i> or close computer based testing session;	7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security	NO	NO	This is not addressed in the ISO document.	ISO 7.4.1 covers both 5.9 F1 and 5.9F2
143	5.9 F 2) Report possible security breaches and examination administration irregularities in compliance with the <i>certification organization's</i> policies.		NO	NO	This is not addressed in the ISO document.	
144	5.10 The number of approved <i>proctors</i> assigned to a <i>test administrator</i> shall be sufficient to allow each examinee to be observed and supervised to ensure	9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. Note: Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.	NO	NO	This is not addressed in the ISO document.	The current CFP statement is out of date. Where a single proctor can monitor 35 examinees taking a paper test where there is nothing on the table but the booklet and pencil, adequately monitoring 35 computer stations is much more problematic and the number of examinees per proctor most likely should be lowered. ISO 9.3.3 allows for this and any future modifications that might be needed to adequately secure the examination process.
145	conformance to security requirements. There shall be no less than one <i>test administrator/proctor</i> for the first thirty-five examinees, plus one additional <i>test administrator</i> or <i>proctor</i> for each additional 35 examinees or fraction					
146	5.11 Examination Security.					
147	5.11 A All aspects of <i>food safety certification examination</i> administration are to be conducted in a manner that maximizes the security of the examinations, in keeping with the public protection mandate of the CFP. This shall be accomplished in a manner that ensures fairness to all examinees.	7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur. 7.4.2 Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: the locations of the materials (e.g. transportation, electronic delivery, disposal,		NO	This comparison is similar to previous sub clauses concerning security. Both entities are concerned with security issues and while the CFP document is specific in terms of food safety criteria, ISO 7.4 gives more specific direction concerning security than the CFP document. Disagree with that statement. Demonstration is NOT "Substantially Equivalent"	ISO 7.4.1, 7.4.2, 9.3.2, and 9.3.3 clearly cover the intent of 5.11A

148		<p>materials.</p> <p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p> <p>9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. Note: Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.</p>			
149	<p>5.11 B All examinees shall begin taking the examination at the same time. No examinee shall be admitted into the test site once examination administration has begun.</p>	<p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p>	<p>NO</p>	<p>This is not addressed in the ISO document.</p>	<p>Though again somewhat of an obvious security procedure requiring 5.11B be stated would have value.</p>
150	<p>5.11 C Where reasonable accommodations shall be made for otherwise qualified examinees under provisions of the Americans with Disabilities Act, care shall be taken to ensure that security of the examination is maintained. Arrangements shall be such that the <i>food safety certification examination</i> contents are not revealed to any test administration personnel with any conflict of interest. A written affirmation to that effect and a written nondisclosure statement from the individual who was chosen to assist the otherwise qualified examinee shall be provided to the <i>certification organization</i>.</p>	<p>4.3.1 The certification body shall document its structure, policies and procedures to manage impartiality and to ensure that the certification activities are undertaken impartially. The certification body shall have top management commitment to impartiality in certification activities. The certification body shall have a statement publicly accessible without request that it understands the importance of impartiality in carrying out its certification activities, manages conflict of interest and ensures the objectivity of its certification activities.</p> <p>4.3.2 The certification body shall act impartially in relation to its applicants, candidates and certified persons.</p>	<p>YES</p>	<p>The intent of these clauses are similar.</p>	<p>Adhering to the Americans with Disabilities Act is USA law and is a requirement. ADA would have to be a part of any USA accredited program and is covered by ISO 4.3.1, 4.3.2 and 7.4.1.</p>
151					

152	5.12 The <i>certification organization</i> shall provide procedures to be followed in any instance where the security of a <i>food safety certification examination</i> is, or is suspected to be, breached.	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO		This is not addressed in the ISO document. ISO 7.4.1 may apply; not as detailed as CFP.
153	5.12 A Included shall be specific procedures for handling and for reporting to the <i>certification organization</i> , any suspected or alleged:	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO	NO	This is not addressed in the ISO document. ISO 7.4.1 may apply; not as detailed as CFP.
154	5.12 A 1) cheating incidents;	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO	NO	This is not addressed in the ISO document. ISO 7.4.1 may apply; not as detailed as CFP.
155	5.12 A 2) Lost or stolen examination materials;	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO	NO	This is not addressed in the ISO document.
156	5.12 A 3) Intentional or unintentional divulging of examination <i>items</i> by examinees or examination administration personnel; or	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO	NO	This is not addressed in the ISO document. ISO 7.4.1 may apply; not as detailed as CFP.
157	5.12 A 4) Any other incidents perceived to have damaged the security of the	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure	NO	NO	This is not addressed in the ISO document.
158	examination or any of its individual <i>items</i> .	security throughout the entire certification process and shall have measures in place to take corrective actions when security			ISO 7.4.1 may apply; not as detailed as CFP.

Lacking the term Food Safety Certification Examination. This issue is covered by 7.4.1

7.4.1 not being so prescribed covers CFP items 5.12A, 5.12A1, 5.12A2, 5.12A3, 5.12A4, and is flexible so that any other not prescribed security issues would also have to be dealt with. Further, having this flexibly allows for future security measure requirements by the accrediting agency without needing to seek an update the standards.

159	5.12 B Corrective actions to guard against future security breaches shall be established and implemented.	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO	YES	This is not addressed in the ISO document. ISO 7.4.1 may apply.	Same logic as the statement for the 5.12A group.
160	5.12 C Documentation of corrective actions and their effectiveness shall be made available to the <i>accrediting organization</i> .		NO	NO		
161	5.13 Item and Examination Exposure. The <i>certification organization</i> shall have an <i>exposure plan</i> that:	ISO 7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur.	NO	NO	This is not addressed in the ISO document.	Same logic as the statement for the 5.12A group.
162	5.13 A Controls for <i>item</i> and examination exposure;		NO	NO	This is not addressed in the ISO document.	
163	5.13 B Accounts for the number of times an <i>examination item</i> , <i>examination form</i> , and <i>examination version</i> is administered;		NO	NO	This is not addressed in the ISO document.	
164	5.13 C Ensures that no <i>examination form</i> is retained by any <i>examination administration</i> personnel for more than <i>90 days</i>		NO	NO	This is not addressed in the ISO document.	
165	5.13 D At all times accounts for all copies of all used and unused <i>examination booklets</i> ; and		NO	NO	This is not addressed in the ISO document.	
166						
167	5.13 E Systematically and actively demonstrates that every used answer sheet, <i>examination booklet</i> , and any other examination materials and answer keys are accounted for to prevent, reduce, or eliminate examination		NO	NO	This is not addressed in the ISO document.	
168	5.14 Certification Organization's Responsibility to Test Administrators/Proctors.					

169	<p>5.14 A The <i>certification organization</i> shall specify the responsibilities of <i>test administrator/proctor</i>, set minimum criteria for approval of <i>test administrators/proctors</i>, and provide a training program to enable applicants to meet the approval criteria. Responsibilities, duties, qualifications and training of <i>test administrators/proctors</i> shall be directed toward assuring standardized, secure examination administration and fair and equitable treatment of examinees.</p>	<p>6.1.3 The certification body shall define the competence requirements for personnel involved in the certification process. Personnel shall have competence for their specific tasks and responsibilities.</p> <p>6.1.4 Documented instructions shall be provided to personnel describing their duties and responsibilities. These instructions shall be kept up-to-date.</p>	NO	NO	<p>This is not addressed in the ISO document.</p> <p>ISO 6.1.3 and 6.1.4 may apply; nothing about providing a training program is in these sections.</p>	<p>Specifying training and test would be appropriate.</p>
170	<p>5.14 B The <i>certification organization</i> shall define and provide descriptions for the roles of <i>test administrators/proctors</i>, and <i>certification organization</i> personnel clearly indicating the responsibilities for these roles.</p>	<p>6.1.4 Documented instructions shall be provided to personnel describing their duties and responsibilities. These instructions shall be kept up-to-date. Also, add 6.1.5 The certification body shall maintain up-to-date personnel records, including relevant information, e.g. qualifications, training, experience,</p>		NO	<p>These sub clauses are comparable however; the CFP asks the certification organization to demonstrate how it ensures that test administrators/proctors understand</p>	<p>ISO 6.1.3 better covers this issue than 6.1.4. If, "Personnel shall have competence for their specific tasks and responsibilities" there has to be a mechanism to demonstrate that. This is further covered by 6.1.5.</p>
171	<p>The <i>certification organization</i> shall demonstrate how it ensures that all certification personnel, as well as <i>test administrators/proctors</i>, understand and practice the procedures identified for their</p>				<p>their roles and responsibilities.</p>	
172	<p>5.14 C <i>Test administrator/proctor</i> training programs shall include:</p>					
173	<p>5.14 C 1) Specific learning objectives for all of the activities of <i>test administrator/proctor</i>; and</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	<p>Same as 5.14A</p>
174	<p>5.14 C 2) An assessment component that shall be passed before an examinee for <i>test administrator/proctor</i> will be approved.</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	<p>Same as 5.14A</p>
175	<p>5.15 Test Administrator/Proctor Agreements. The <i>certification organization</i> shall enter into a formal agreement with the <i>test administrator/proctor</i>. The formal agreement shall at a minimum address:</p>	<p>6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality, impartiality and conflict of interests.</p>			<p>One could interpret ISO 6.1.7 which requires personnel to sign a document committing themselves to comply with the rules as a formal agreement suggested in CFP 5.15</p> <p>ISO is not specific, too loosely worded.</p>	<p>6.1.7 requires a signed document that the applicant comply with the rules. These rules are an extension of security and are a significant element of the ISO standards. Demonstration of 5.15 items would be required by the accrediting agency under ISO.</p>

176	5.15 A Provisions that relate to code of conduct;		NO		This is not addressed in the ISO document.	
177	5.15 B Conflicts of interest; and	6.1.7 The certification body shall require its personnel to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality, impartiality	NO	YES	This is not addressed in the ISO document. YES	
178		4.3.7 The certification body shall analyze, document and eliminate or minimize the potential conflict of interests arising from the certification of activities of persons. The certification body shall document and be able to demonstrate how it eliminates, minimizes or manages such threats. All potential sources of conflict of interest that are identified, whether they arise from within				
179	5.15 C Consequences for breach of the agreement.		NO	NO	This is not addressed in the ISO document.	If required to sign to comply with rules it is logical that consequences for not complying would have to be stated.
180	5.17 The <i>certification organization</i> is not permitted to hire, contract with, or use the services of any person or organization that claims directly or indirectly to guarantee passing any certification examination. <i>Instructors/educators/trainers</i> making such a claim, whether as an independent or as an employee of another organization making the claim, are not eligible to serve as <i>test administrators/proctors</i> for any certification		NO	NO	This is not addressed in the ISO document. This is quite unclear. There is nothing wrong with the guarantee of passing an exam, so long that the actual guarantee context is correct. If a training provider lets you take their course or online training as many times as it takes to pass the exam	The current CFP statement on this issue needs to be included to more clearly define this issue.
181	<i>organization</i> .				then this is the business of the training provider not the exam provider. Guaranteeing can lead to past problems that lead to the tightening of the CFP Standards.	

182	5.18 Policies and procedures for taking corrective action(s) when any <i>test administrator</i> or <i>proctor</i> fails to meet job responsibilities shall be implemented and documented. <i>Test administrators/proctors</i> that have been dismissed by the <i>certification organization</i> for infraction of policies or rules, incompetence, ethical breaches, or compromise of examination security will	6.2.2.2 The certification body shall monitor the performance of the examiners and the reliability of the examiners' judgments. Where deficiencies are found, corrective actions shall be taken.	YES	NO	These sub clauses are comparable. Not comparable. An "examiner" by definition 3.10 "person competent to conduct and score an examination, where the examination requires professional judgment.
183	5.19 The <i>certification organization</i> shall provide documentation that verifies compliance with the 1:35 ratio (<i>test administrator/proctor</i> : examinees).		NO	NO	This is not addressed in the ISO document.
184	5.20 Examination Administration Manual. The <i>certification organization</i> shall provide each <i>test administrator/proctor</i> with a manual detailing the requirements for all aspects of the <i>food safety certification examination</i> administration process. The Examination	6.1.4 Documented instructions shall be provided to personnel describing their duties and responsibilities. These instructions shall be kept up-to-date. 9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	NO	NO	This is not addressed in the ISO document. ISO 6.1.4 and 9.3.2 may apply; elements are missing ISO is too vague.
185	Administration Manual shall include a standardized script for the paper examination <i>test administrator/proctor</i> or read to examinees before the examination commences. For computer based tests (CBT), standardized instructions shall be available for				
186	5.21 Examination Scripts. Separate scripts/instructions may be created for different delivery channels or <i>certification organizations</i> . <i>Certification organizations</i> may customize elements of the scripts to fit their particular processes, but each script shall contain the following:	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	YES	NO	These sub clauses are comparable. ISO 9.3.2 may apply.
187	5.21 A Introduction to the Examination Process	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	NO	NO	This is not addressed in the ISO document. ISO 9.3.2 may apply. ISO is too vague.
188	5.21 A 1) Composition of the examination (number of questions, multiple choice, etc.);	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	NO	NO	This is not addressed in the ISO document. ISO 9.3.2 may apply. ISO is too vague.

189	5.21 A 2) Time available to complete the examination;	9.3.2 The certification body shall have procedures to ensure a consistent examination administration 9.3.3 Criteria for conditions for administering	NO	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section.
190		examinations shall be established, documented and monitored.			ISO 9.3.2 may apply. ISO is too vague.
191	5.21 A 3) Role of the test administrator/proctor ;	9.3.2 The certification body shall have procedures to ensure a consistent examination administration 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply. ISO is too vague.
192	5.21 A 4) Process for restroom breaks; and	9.3.2 The certification body shall have procedures to ensure a consistent examination administration 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply. ISO is too vague.
193	5.21 A 5) Process for responding to examinee comments and questions.	9.3.2 The certification body shall have procedures to ensure a consistent examination administration 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply. ISO is too vague.
194	5.21 B Copyright and Legal Responsibilities	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply.
195					ISO is too vague.
196	5.21 B 1) Description of what constitutes cheating on the examination;	9.3.2 The certification body shall have procedures to ensure a consistent examination administration. 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. One reviewer thinks this is not correct because, the CFP section is about the Examination Script Content. No ISO sections cover impropriety in any manner implied or otherwise.

197	5.21 B 2) Penalties for cheating; and	9.3.2 The certification body shall have procedures to ensure a consistent examination administration 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply. One reviewer thinks this is not correct because, the CFP section is about the Examination Script Content. No ISO sections cover impropriety in any manner implied or otherwise.
198	5.21 B 3) Penalties for copyright violations.	9.3.2 The certification body shall have procedures to ensure a consistent examination administration. 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply.
199					One reviewer thinks this is not correct, because, the CFP section is about the Examination Script Content. No ISO sections cover impropriety in any manner implied or otherwise. Ramifications too costly.
200	5.21 C Examination Process	9.3.2 The certification body shall have procedures to ensure a consistent examination administration. 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.2 may apply. The CFP section is about the Examination Script Content. ISO has no
201	5.21 C 1) Maintaining test site security;	7.4.1 The certification body shall develop and document policies and procedures necessary to ensure security throughout the entire certification process and shall have measures in place to take corrective actions when security breaches occur. 7.4.2 Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: the locations of the materials (e.g. transportation, electronic delivery, disposal, storage, examination center);	YES	NO	As mentioned above, security issues are addressed in the CFP document however, ISO 7.4 includes more scenarios. ISO scenarios are for examination materials NOT test site security therefore it does not apply. ISO section is about maintaining test site security. This section is the "Examination Script" which ISO does not require.

202		the nature of the materials (e.g. electronic, paper, test equipment); the steps in the examination process (e.g. development, administration, results reporting); 9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored. May be more				
203	5.21 C 2) Description of examination components unique to the <i>certification organization</i> (<i>examination booklet</i> , <i>answer sheet completion</i> , <i>computer process in testing centers</i> , etc.);	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. One reviewer disagrees because this is Maintaining test site security in the "Examination	
204	5.21 C 3) Instructions for proper completion of personal information on answer sheets/online registration and <i>examination booklets</i> ;	9.3.2 The certification body shall have procedures to ensure a consistent examination administration.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. One reviewer disagrees, because this is Maintaining test site security in the "Examination	
205	5.21 C 4) Instructions on properly recording answers on answer sheets or online; and	9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.	YES	NO	These sub clauses are comparable however the CFP document is more specific than ISO in this section. ISO 9.3.3 is about conditions not examination itself. Don't think it applies. One reviewer disagrees, because this is in the "Examination Script" which ISO	
206						
207	5.21 C 5) Instructions on post-examination administration process.		YES	NO	These sub clauses are comparable however the CFP document is more specific than	
208	6.0 Computer-Based Testing (CBT)					

209	6.0 Computer-Based Test Development and Administration. All sections of these <i>Standards</i> apply to Computer Based Testing (CBT) Administration except Section 5.1.	9.2.1 The certification body shall implement the specific assessment methods and mechanisms as defined in the certification scheme.	NO	Yes	This is not addressed in the ISO document. The intent is substantially equivalent. Just because ISO does not speak specifically to computer based testing does not mean it does not allow for computer based testing. ISO section 9.3.3 speaks to having requirements for the administration of examinations and ISO section 9.3.4 speaks to technical equipment used in the examination process needing to	
210	6.1 Computer-Based Test Development.	9.3.4 When technical equipment is used in the examination process, the equipment	NO	YES	This is not addressed in the ISO document.	
211	<i>based testing</i> shall describe the method for development, including the <i>algorithms</i> used for test <i>item</i> selection, the <i>item</i> response theory model employed (if any), and examination <i>equivalency</i> issues.	calibrated where appropriate. 9.3.5 Appropriate methodology and procedures (e.g. collecting and maintaining statistical data) shall be documented and implemented in order to reaffirm, at justified defined intervals, the fairness, validity, reliability and general performance of each examination, and that all identified deficiencies are corrected.			ISO document is very vague and does not specifically address computerized testing but does generalize requirements for the examination process to be the same regardless of how it is administered and references that specific assessment methods and mechanisms as defined in the certification scheme. As stated above, just because ISO does not speak to use of computer administered tests directly does not mean they prohibit it. Within ISO it broadly requires there to be criteria in place to ensure that	
212	6.2 <i>Items</i> shall be evaluated for suitability for computer delivery, be reviewed in the delivery medium, and be reviewed in the presentation delivery medium. Assumptions shall not be made that <i>items</i> written for delivery via a paper/pencil medium are suitable for computer delivery nor should it be assumed that computer test <i>items</i> are suitable for paper/pencil delivery.	9.3.1 Examinations shall be designed to assess competence based on, and consistent with, the scheme, by written, oral, practical, observational or other reliable and objective means. The design of examination requirements shall ensure the comparability of results of each single examination, both in content and difficulty, including the validity of fail/pass decisions. 9.3.2 The certification body shall have	NO	YES	This is not addressed in the ISO document. ISO document (9.3.1) does not speak to computerized test questions but it does generally speak to the examination design be able to ensure comparability of results and 9.3.2 speaks to ensuring a consistent examination administration.	This is not addressed in the ISO document. ISO document (9.3.1) does not speak to computerized test questions but it does generally speak to the examination design be able to ensure comparability of results and 9.3.2 speaks to ensuring a consistent examination administration.

213	<p>6.3 When <i>examination forms</i> are computer-generated, whether in <i>Computer-Adaptive Testing (CAT)</i> or in a simple linear <i>algorithm</i>, the <i>algorithm</i> for <i>item</i> selection and the number of <i>items</i> in the <i>item bank</i> from which the examination is generated shall ensure that the <i>items</i> are protected from <i>overexposure</i>. <i>Item</i> usage statistics shall be provided for all available <i>items</i> in the pool.</p>	<p>7.4.2 Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: the locations of the materials (e.g. transportation, electronic delivery, disposal, storage, examination centre); the nature of the materials (e.g. electronic, paper, test equipment); the steps in the examination process (e.g. development, administration, results reporting); the threats arising from repeated use of examination materials.</p>	NO	YES	<p>This is not addressed in the ISO document. ISO Section 7.4.2 broadly speaks to having procedures in place to guard against security threats arising from the repeated use of examinations. Whereas CFP speaks directly to the use of linear algorithms to safeguard against security threats from overexposure of exam materials.</p>	<p>This is not addressed in the ISO document. ISO Section 7.4.2 broadly speaks to having procedures in place to guard against security threats arising from the repeated use of examinations. Whereas CFP speaks directly to the use of linear algorithms to safeguard against security threats from overexposure of exam materials.</p>
214	<p>6.4 Computer-Based Testing Administration. Where examination environments differ (for example, touch screen versus mouse) evidence shall be provided to demonstrate equivalence of the examinees' scores.</p>		NO	YES	<p>This is not addressed in the ISO document. ISO generally speaks in Section 9.3.1 to ensuring that the design of the examination be such to ensure comparability of the</p>	<p>This is not addressed in the ISO document. ISO generally speaks in Section 9.3.1 to ensuring that the design of the examination be such to ensure comparability of the scores.</p>
215	<p>6.5 Tutorials and/or practice tests shall be created to provide the examinees adequate opportunity to demonstrate familiarity and comfort with the computer test environment.</p>	<p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p>	NO	NO	<p>This is not addressed in the ISO document. This is not mentioned in the ISO document. However, ISO does speak in Section 9.3.2 to having procedures to ensure consistent</p>	<p>This is not addressed in the ISO document. This is not mentioned in the ISO document. However, ISO does speak in Section 9.3.2 to having procedures to ensure consistent examination</p>
216					<p>administration. CFP speaks to the use of Tutorials and practice tests to familiarize examinees with the environment with the purpose of ensuring a consistent</p>	<p>administration. CFP speaks to the use of Tutorials and practice tests to familiarize examinees with the environment with the purpose of ensuring a consistent examination</p>
217	<p>6.6 If the time available for computer delivery of an examination is limited, comparability of scoring outcomes with non-timed delivery of the exam shall be demonstrated. Data shall be gathered</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>
218	<p>6.9 Policies and procedures regarding the recording and retention of the <i>item sequence</i> and <i>item</i> responses for each examinee shall be developed and followed. Computer examinations using a unique sequence of <i>items</i> for each examinee shall record the information necessary to recreate the sequence of <i>items</i> and examinee responses on the computer examination.</p>	<p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p>	NO	YES	<p>This is not addressed in the ISO document. The intent is substantially equivalent. Just because ISO does not speak specifically to item sequence for computer based tests does not mean the intent is not equivalent. ISO Section 9.3.2 broadly speaks to having procedures in place to</p>	<p>This is not addressed in the ISO document. The intent is substantially equivalent. Just because ISO does not speak specifically to item sequence for computer based tests does not mean the intent is not equivalent. ISO Section 9.3.2 broadly speaks to having procedures in place to ensure consistent exam administration.</p>

219	<p>6.10 Systems and procedures shall be in place to address technical or operational problems in examination administration. For example, the examination deliver system shall have the capability to recover examinee data at the appropriate point in the testing session prior to test disruption. Policies regarding recover for emergency situations (such as retesting) shall be developed.</p>	<p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p> <p>9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.</p> <p>NOTE Conditions can include lighting, temperature, separation of candidates, noise, candidate safety, etc.</p> <p>9.3.4 When technical equipment is used in the examination process, the equipment shall be verified or calibrated where appropriate.</p> <p>9.3.5 Appropriate methodology and procedures (e.g. collecting and maintaining statistical data) shall be documented and implemented in order to reaffirm, at justified defined intervals, the fairness, validity, reliability and general performance of each</p>	NO	YES	<p>This is not addressed in the ISO document.</p> <p>The intent is substantially equivalent. ISO 9.3.2-9.3.5 broadly speaks to examination criteria which include having procedures in place to ensure consistent exam administration. This may include procedures to address technical or operational problems.</p>	<p>This is not addressed in the ISO document.</p> <p>The intent is substantially equivalent. ISO 9.3.2-9.3.5 broadly speaks to examination criteria which include having procedures in place to ensure consistent exam administration. This may include procedures to address technical or operational problems.</p>
220	<p>6.11 Due Process. Examinees shall be provided with any information relevant to <i>computer-based testing</i> that may affect their performance or score. Examples of such information might include but not be limited to: time available to respond to <i>items</i>; ability to change responses; and instructions relating to specific types of</p>	<p>9.3.2 The certification body shall have procedures to ensure a consistent examination administration.</p> <p>9.3.3 Criteria for conditions for administering examinations shall be established, documented and monitored.</p>	NO	YES	<p>This is not addressed in the ISO document.</p> <p>ISO 9.3.2 & 9.3.3 broadly speak to having criteria in place for exam administration and criteria for conditions for administering examinations. The intent seems to be equivalent.</p>	<p>This is not addressed in the ISO document.</p> <p>ISO 9.3.2 & 9.3.3 broadly speak to having criteria in place for exam administration and criteria for conditions for administering examinations. The intent seems to be equivalent.</p>
221	Section 7.0 Certification Organization Responsibilities to Examinees and the Public					
222	7.0 A certification organization's Responsibilities to Examinees and the Public.					
223	7.1 Responsibilities to Applicants for Certification . A certification organization shall:					
224	<p>7.1 E Provide evidence of uniformly prompt reporting of <i>food safety certification examination</i> results to applicants:</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>
225	<p>7.1 F Provide evidence that applicants failing the <i>food safety certification examination</i> are given information on general areas of deficiency:</p>		NO	NO	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>
226	7.3 Individual Certification Certificates:					
227		<p>arrangements.</p> <p>NOTE For requirements for records on applicants, candidates and certified</p> <p>##### see also 7.1</p>				

228	7.3 B Certificates shall include, at a minimum:				
229	7.3 B 4) ANSI accreditation mark;		NO	NO	This is not addressed in the ISO document. This is not addressed in the ISO document.
230	7.3 B 7) Name of certification ;		NO	NO	This is not addressed in the ISO document. This is not addressed in the ISO document.
231	7.3 B 8) Contact information for the certification organization ; and		NO	NO	This is not addressed in the ISO document. This is not addressed in the ISO document.
232	7.3 C Replacement or duplicate certificates issued through an accredited certification organization shall carry the same issue date, or date of examination, as the original certificate , and will be documented by the certification		NO	NO	ISO also states that ownership of the certification is retained by the certifying body. ISO also states that ownership of the certification is retained by the certifying body.
233	7.4 THIS IS MISSING FROM THE OFFICIAL DOCUMENT				
234	7.5 Discipline of Certificate Holders and Applicants. A certification organization shall have formal certification policies and operating procedures including the suspension or	9.5.1 The certification body shall have a policy and (a) documented procedure(s) for suspension or withdrawal of the certification, or reduction of the scope of certification, which shall specify the subsequent actions	NO	YES	These sub clauses are similar however the terminology is different. CFP requests a formal policy while refers only to policy. Is the formality of this significant?
235	7.9 Misrepresentation. Only Food Protection Manager Certification Programs that conform to all requirements of Standards for Accreditation of Food Protection Manager Certification Programs and are accredited by the agent selected by the CFP as the accrediting organization for such programs are allowed to refer to themselves as being accredited. Those programs may not make any other		NO	NO	This is not addressed in the ISO document. This is not addressed in the ISO document.
236	8.0 Certification Organization Responsibilities to the Accrediting Organization				
237	8.1 Application for Accreditation. A certification organization seeking accreditation for development and/or administration of a certification program shall provide at least the following information, as well as other information				
238	8.1 A the name and complete ownership of the legal entity.	4.1 Legal and contractual matters The certification body shall be a legal entity, or a defined	YES	NO	These clauses are equivalent. Don't agree they are not equivalent. These clauses are equivalent. Don't agree they are not equivalent.

239		part of a legal entity, such that it can be held legally responsible for its certification activities. A governmental certification body is deemed to be a legal entity on the basis of its governmental status.			ISO states there must be a legal entity where CFP asks for the name and complete ownership. Potentially can see how ownership is different than focusing on the legal entity	ISO states there must be a legal entity where CFP asks for the name and complete ownership. Potentially can see how ownership is different than focusing on the legal entity aspect.
240	8.1 B	The address, telephone/fax number(s) and other contact information of the certification organization's	NO	NO	This is not addressed in the ISO document.	This is not addressed in the ISO document.
241	8.1 C	The name, position, address and telephone/fax/e-mail information of the contact person for projects related to the CFP Standards for Accreditation of Food Protection Manager Certification	NO	NO	This is not addressed in the ISO document.	This is not addressed in the ISO document.
242	8.2 Summary Information.	A certification organization shall:				
243	8.2 A	Provide evidence that the mechanism used to evaluate individual competence is objective, fair, and based on the knowledge and skills needed to function as a Certified Food Protection Manager ;	YES	NO	These sub clauses are similar if the consideration is accepting ISO as an equivalent standard. However; when considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous	These sub clauses are similar if the consideration is accepting ISO as an equivalent standard. However; when considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous details concerning the
244		parts within the same legal entity. The party/parties or individuals responsible for the following shall be identified: policies and procedures relating to the operation of the certification body; implementation of the policies and procedures; finances of the certification body; resources for certification activities; development and maintenance of the certification schemes; assessment activities; decisions on certification, including the granting, maintaining, recertifying, expanding, reducing, suspending or withdrawing of the certification; contractual arrangements.			These sections are not similar. ISO is referring to certification body where CFP is referring to competency of Food Protection Manager. ISO 3.6 is a better match "competence: ability to apply knowledge and skills to achieve results". But this section is very vague and general. Agree that ISO 3.6 is a better match but is not as explicit as what is in the CFP Standards. Also there is great significance to the fact that the CFP Standards focus on a specific job: Food Protection Manager versus ISO which could be anything including a completely different standard of food safety	These sections are not similar. ISO is referring to certification body where CFP is referring to competency of Food Protection Manager. ISO 3.6 is a better match "competence: ability to apply knowledge and skills to achieve results". But this section is very vague and general. Agree that ISO 3.6 is a better match but is not as explicit as what is in the CFP Standards. Also there is great significance to the fact that the CFP Standards focus on a specific job: Food Protection Manager versus ISO which could be anything including a completely different standard of food safety knowledge.

<p>8.2 B Provide evidence that the evaluation mechanism is based on standards which establish <i>reliability</i> and <i>validity</i> for each form of the <i>food safety certification examination</i> ;</p>	<p>7.2.2 The certification body shall make publicly available without request information regarding the scope of the certification scheme and a general description of the certification process.</p>	<p>YES</p>	<p>NO</p>	<p>These sub clauses are similar if the consideration is accepting ISO as an equivalent standard. However; when considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous details concerning the</p>	<p>These sub clauses are similar if the consideration is accepting ISO as an equivalent standard. However; when considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous details concerning the examination reliability and validity.</p>
				<p>Disagree, these sections are not similar. ISO talks about making documents public where CFP demands evidence that mechanism is reliable, valid and complies with standard. Agree there is a significant difference between the specificity in the CFP standards and ISO is too vague to be certain these are sufficiently equivalent.</p>	<p>Disagree, these sections are not similar. ISO talks about making documents public where CFP demands evidence that mechanism is reliable, valid and complies with standard. Agree there is a significant difference between the specificity in the CFP standards and ISO is too vague to be certain these are sufficiently equivalent.</p>
<p>8.2 C Provide evidence that the pass/fail levels are established in a manner that is generally accepted in the <i>psychometric</i> community as being fair and reasonable;</p>		<p>NO</p>	<p>NO</p>	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>
<p>8.2 D Have a formal policy of periodic review of evaluation mechanisms and shall provide evidence that the policy is implemented to ensure relevance of the mechanism to knowledge and skills needed by a <i>Certified Food Protection Manager</i> ;</p>	<p>8.5 The certification body shall ensure that the certification scheme is reviewed and validated on an on- going, systematic basis.</p>	<p>NO</p>	<p>NO</p>	<p>This is not directly addressed in the ISO document. 8.5 is not talking about the periodic review of the evaluation mechanism but of the certification scheme. When you look to see what is included in the certification scheme there is not a direct requirement that specifically addresses having a policy of periodic review of evaluation mechanisms and skills of a</p>	<p>This is not directly addressed in the ISO document. 8.5 is not talking about the periodic review of the evaluation mechanism but of the certification scheme. When you look to see what is included in the certification scheme there is not a direct requirement that specifically addresses having a policy of periodic review of evaluation mechanisms and providing evidence that the policy is implemented to ensure the relevance and skills of a</p>
				<p>CFPM. ISO 8.5 would relate more to CFP standard 4.8</p>	<p>CFPM. ISO 8.5 would relate more to CFP standard 4.8</p>

<p>8.2 E Provide evidence that appropriate measures are taken to protect the security of all <i>food safety certification examinations</i> :</p>	<p>10.1 General The certification body shall establish, document, implement and maintain a management system that is capable of supporting and demonstrating the consistent achievement of the requirements of this International Standard. In addition to meeting the requirements of Clauses 4 to 9, the certification body shall implement a management system in accordance with either option A or option B, as follows: option A: a general management system which fulfills the requirements of 10.2; or option B: a body that has established and maintains a management system, in accordance with the requirements of ISO</p>	<p>NO</p>	<p>NO</p>	<p>ISO 10.1 comes closer to requiring the certification organization to provide evidence to the accrediting body that appropriate measures to protect exam security are in place. This comparison is similar to previous sub clauses concerning security. Both entities are concerned with security issues and while the CFP document is specific in terms of food safety criteria, ISO 7.4 gives more specific direction concerning security that the CFP document.</p>	<p>ISO 10.1 comes closer to requiring the certification organization to provide evidence to the accrediting body that appropriate measures to protect exam security are in place. This comparison is similar to previous sub clauses concerning security. Both entities are concerned with security issues and while the CFP document is specific in terms of food safety criteria, ISO 7.4 gives more specific direction concerning security that the CFP document.</p>
<p>8.2 F Publish a comprehensive summary or outline of the information, knowledge, or functions covered by the <i>food safety certification examination</i> :</p>		<p>NO</p>	<p>NO</p>	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>
<p>8.2 G Make available general descriptive materials on the procedures used in examination construction and validation and the procedures of administration and reporting of results; and</p>	<p>9.1.1 Upon application, the certification body shall make available an overview of the certification process in accordance with the certification scheme. As a minimum, the overview shall include the requirements for assessment process, the applicant's rights, the duties of a certified person and the fees.</p>	<p>NO</p>	<p>NO</p>	<p>CFP is more specific to exam. ISO more general to entire certification scheme process.</p>	<p>CFP is more specific to exam. ISO more general to entire certification scheme process.</p>
<p>8.2 H Compile at least semi-annually a summary of <i>certification activities</i>, including number of applicants, number tested, number passing, number failing</p>		<p>NO</p>	<p>NO</p>	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>
<p>8.3 Responsibilities to the Accrediting Organization . The <i>certification organization shall</i>:</p>					
<p>8.3 A Make available upon request to the <i>accrediting organization</i> copies of all publications related to the <i>certification</i> program,</p>	<p>7.2.2 The certification body shall make publicly available without request information regarding the scope of the certification scheme and a general description of the certification process.</p>	<p>MAYBE</p>	<p>NO</p>	<p>The intent is similar but the specifics are not equivalent. We would like ANSI to weigh in on this. ISO states it should make it public. Not sure why any of these documents would be made public. CFP mandates these documents must be made available to accrediting</p>	<p>The intent is similar but the specifics are not equivalent. We would like ANSI to weigh in on this. ISO states it should make it public. Not sure why any of these documents would be made public. CFP mandates these documents must be made available to accrediting organization. These two sections are not equivalent.</p>

<p>8.3 B Advise the <i>accrediting organization</i> of any proposed changes in structure or activities of the <i>certification organization</i> ,</p>	<p>10.2.3 Control of documents The certification body shall establish procedures to control the documents (internal and external) that relate to the fulfillment of this International Standard. The procedures shall define the controls needed to: c) ensure that changes and the current</p>	<p>NO</p>	<p>NO</p>	<p>These clauses are not equivalent and we were not able to locate anything in the ISO Standards that is similar. There is a significant difference between notifying the accreditation agency before you do something versus after the</p>	<p>These clauses are not equivalent and we were not able to locate anything in the ISO Standards that is similar. There is a significant difference between notifying the accreditation agency before you do something versus after the fact and only as part of your annual documentation.</p>
<p>8.3 C Advise the <i>accrediting organization</i> of substantive change in <i>food safety certification examination</i> administration,</p>		<p>NO</p>			
<p>8.3 D Advise the <i>accrediting organization</i> of any major changes in testing techniques or in the scope or objectives of the <i>food safety certification examination</i> ,</p>	<p>10.2.3 Control of documents The certification body shall establish procedures to control the documents (internal and external) that relate to the fulfillment of this International Standard. The procedures shall define the controls needed to: approve documents for adequacy prior to issue; review and update as necessary and re-approve documents; ensure that changes and the current revision status of documents are identified; ensure that relevant versions of applicable documents are provided at points of use; ensure that documents remain legible and readily identifiable; ensure that documents of external origin are identified and their distribution controlled; prevent the unintended use of obsolete documents and</p>	<p>NO</p>	<p>NO</p>	<p>These clauses are not equivalent and we were not able to locate anything in the ISO Standards that is similar. There is a significant difference between notifying the accreditation agency before you do something versus after the fact and then only as part of your annual documentation.</p>	<p>These clauses are not equivalent and we were not able to locate anything in the ISO Standards that is similar. There is a significant difference between notifying the accreditation agency before you do something versus after the fact and then only as part of your annual documentation.</p>
	<p>apply suitable identification if they are retained for any purpose. NOTE Documentation can be in any form or type of medium.</p>				
<p>8.3 E Annually complete and submit to the <i>accrediting organization</i> information requested on the current status of the Food Protection Manager <i>Certification</i> Program and the <i>certification organization</i> ,</p>		<p>NO</p>	<p>NO</p>	<p>This is not addressed in the ISO document. This CFP section is vague and not quite sure what information the accrediting organization would request. I would think it is referring to irregularities or non-</p>	<p>This is not addressed in the ISO document. This CFP section is vague and not quite sure what information the accrediting organization would request. I would think it is referring to irregularities or non- conformities.</p>
<p>8.3 F Submit to the <i>accrediting organization</i> the report requirements information specified for the Food Protection Manager <i>Certification</i></p>		<p>NO</p>	<p>NO</p>	<p>This is not addressed in the ISO document.</p>	<p>This is not addressed in the ISO document.</p>

<p>8.3 G Be re-accredited by the <i>accrediting organization</i> at least every 5 years.</p>		NO	NO	This is not addressed in the ISO document.	This is not addressed in the ISO document.
9.0 Management Systems					
	<p><u>ISO Documentation Requirement</u></p> <ul style="list-style-type: none"> • Management System policies • Objectives 				
<p>9.1 A. Document control to include:</p> <ol style="list-style-type: none"> 1) lists of all documents pertaining to the certification organization; 2) dates for documents approved for implementation by the certification organization; 3) the person(s) within the certification organization responsible for the documents; and 4) listing of individuals who have access to the documents. <p><u>CFP Documentation Requirement</u></p> <ul style="list-style-type: none"> • List of documents • List of authorized individuals with access 	<p>10.2.2 Applicable requirements of this International Standard shall be documented. The certification body shall ensure that the management system documentation is provided to all relevant personnel.</p> <p>10.2.3 Control of documents The certification body shall establish procedures to control the documents (internal and external) that relate to the fulfillment of this International Standard. The procedures shall define the controls needed to:</p> <ol style="list-style-type: none"> a) approve documents for adequacy prior to issue; b) review and update as necessary and re-approve documents; c) ensure that changes and the current revision status of documents are identified; d) ensure that relevant versions of applicable documents are provided at points of use; e) ensure that documents remain legible 	Partially	Partially	<p>Yes, CFP's 9.1 A 2. meets ISO 10.2.3 (a) requiring documents to system shall be approved. And, CFP's 9.1 A (3) meets ISO's 10.2.1 in that an authorized person is appointed for document control.</p> <p>No, ISO's 10.2.2 and 10.2.3 does not meet CFP's 9.1 A (4) because there is no requirement for a list of individuals who have document access.</p> <p>No, CFP's 9.1 A does not show how the documents are to be controlled; whereas, ISO's 10.2.3 defines the requirements for (b) reviewing, updating, and re-approving documents, (c) ensuring changes and current revision status are identified, (d) ensuring relevant versions are at point of use, (e) documents legible and identifiable, (f) external document distribution controlled (g) control of obsolete documents</p>	<p>Yes, CFP's 9.1 A 2. meets ISO 10.2.3 (a) requiring documents to system shall be approved. And, CFP's 9.1 A (3) meets ISO's 10.2.1 in that an authorized person is appointed for document control.</p> <p>No, ISO's 10.2.2 and 10.2.3 does not meet CFP's 9.1 A (4) because there is no requirement for a list of individuals who have document access.</p> <p>No, CFP's 9.1 A does not show how the documents are to be controlled; whereas, ISO's 10.2.3 defines the requirements for (b) reviewing, updating, and re-approving documents, (c) ensuring changes and current revision status are identified, (d) ensuring relevant versions are at point of use, (e) documents legible and identifiable, (f) external document distribution controlled (g) control of obsolete documents</p>
	<p><u>ISO Documentation Requirement</u></p> <ul style="list-style-type: none"> • Procedure for document control 			<p>In the instance of considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous tasks of the certification body in some areas but not in others. Agree sections are similar. ISO more specific and stricter for certification body. CFP section is very vague and general, lacks any specifics</p>	<p>In the instance of considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous tasks of the certification body in some areas but not in others. Agree sections are similar. ISO more specific and stricter for certification body. CFP section is very vague and general, lacks any specifics</p>

	<p>Standard and has proven stability.</p> <p>10.2.6.4 The certification body shall ensure that:</p> <p>a) internal audits are conducted by competent personnel, knowledgeable in the certification process, auditing and the requirements of this International Standard;</p> <p>b) auditors do not audit their own work;</p> <p>c) personnel responsible for the area audited are informed of the outcome of the audit;</p> <p>d) any actions resulting from internal audits are taken in a timely and appropriate manner;</p> <p>e) any opportunities for improvement are identified.</p> <p><u>ISO Documentation Requirement</u></p> <ul style="list-style-type: none"> • Procedures for internal audits • Report of audit results 		<p>performing internal audits.</p> <p>Maybe, CFP's 9.1.B (4) meets ISO's 10.2.6.4 (a).</p> <p>Both standards require authorized / competent individuals to conduct the audits; however, ISO has additional requirements for auditors. ISO 10.2.6.4 states that (b) auditors shall not audit their own work, and (c) personnel of the area being audited are informed of audit results.</p> <p>Maybe, CFP's 9.1.B (5) meets ISO's 10.2.6.4 (d, e) in that actions taken as a result of the audit are identified (corrective actions); however, ISO adds to this requirement a time limit for these actions and opportunities for improvement to be identified.</p> <p>In the instance of considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous</p>	<p>performing internal audits.</p> <p>Maybe, CFP's 9.1.B (4) meets ISO's 10.2.6.4 (a).</p> <p>Both standards require authorized / competent individuals to conduct the audits; however, ISO has additional requirements for auditors. ISO 10.2.6.4 states that (b) auditors shall not audit their own work, and (c) personnel of the area being audited are informed of audit results.</p> <p>Maybe, CFP's 9.1.B (5) meets ISO's 10.2.6.4 (d, e) in that actions taken as a result of the audit are identified (corrective actions); however, ISO adds to this requirement a time limit for these actions and opportunities for improvement to be identified.</p> <p>In the instance of considering replacing the CFP Standards with ISO, the ISO document requires more specific rigorous tasks of the certification body in some areas but not in others.</p>
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<p>9.1 C. Management Review that includes:</p> <ol style="list-style-type: none"> 1) a documented annual review of internal audit results; 2) a management group that conducts the review; 3) a review of the audit results to determine corrective actions needed; 4) a review of the audit results to determine preventive actions needed; and 5) the effectiveness of corrective and preventive actions taken. <p><u>CFP Documentation Requirement</u></p> <ul style="list-style-type: none"> • Results of Management Review 	<p>10.2.5 Management Review</p> <p>10.2.5.1 The certification body's top management shall establish procedure to review its management system at planned intervals, in order to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives related to the fulfillment of this International Standard. These reviews shall be conducted at least once every 12 months and shall be documented.</p> <p>10.2.5.2 Review input</p> <p>The input to the management review shall include information related to the following:</p> <ol style="list-style-type: none"> a) results of internal and external audits (e.g. accreditation body assessment); b) feedback from applicants, candidates, certified persons and interested parties related to the fulfillment of this International Standard; c) safeguarding impartiality; d) the status of preventive and correctives actions; e) follow-up actions from previous management reviews; f) the fulfillment of objectives; g) changes that could affect the 			<p>Maybe, CFP's 9.1.C (1) meets ISO's 10.2.5.1</p> <p>Both standards require a management review to be conducted annually, and include corrective and preventive actions from results of audits as input to the review; however, ISO has several additional requirements. ISO's 10.5.2 also requires input to the review from:</p> <ol style="list-style-type: none"> (a) external audits in addition to the internal audits, (b) applicant feedback, (c) information regarding safeguarding impartiality, (d) follow-up actions from previous management reviews, (e) fulfillment of determined objectives, (f) any changes affecting system, and (g) complaints. <p>Maybe, CFP's 9.1.C (5) meets ISO's 10.2.5.3 (a)</p>	<p>Maybe, CFP's 9.1.C (1) meets ISO's 10.2.5.1</p> <p>Both standards require a management review to be conducted annually, and include corrective and preventive actions from results of audits as input to the review; however, ISO has several additional requirements. ISO's 10.5.2 also requires input to the review from:</p> <ol style="list-style-type: none"> (a) external audits in addition to the internal audits, (b) applicant feedback, (c) information regarding safeguarding impartiality, (d) follow-up actions from previous management reviews, (e) fulfillment of determined objectives, (f) any changes affecting system, and (g) complaints. <p>Maybe, CFP's 9.1.C (5) meets ISO's 10.2.5.3 (a)</p> <p>The output / outcome from the management review for CFP is the effectiveness of corrective and preventive actions taken, and ISO's output from the review is the</p>
	<p>10.2.5.3 Review output</p> <p>The output from the management review shall include as a minimum decisions and actions related to the following:</p> <ol style="list-style-type: none"> a) improvement of the effectiveness of the management system and its processes; b) improvement of the certification services related to the fulfillment of this International Standard; c) resource needs. <p><u>ISO Documentation Requirement</u></p>			<p>processes, not just the effectiveness achieved from actions taken of correcting and preventing nonconformities.</p>	<p>processes, not just the effectiveness achieved from actions taken of correcting and preventing nonconformities.</p>