

Conference for Food Protection – Committee FINAL Report

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COMMITTEE NAME: Demonstration of Knowledge

DATE OF FINAL REPORT: November 13, 2017

COMMITTEE ASSIGNMENT: Council I Council II Council III Executive Board

REPORT SUBMITTED BY: Eric Moore and Joetta DeFrancesco, Co-Chairs

COMMITTEE CHARGE(S):

Issue # 2016 II-003

The Demonstration of Knowledge (DoK) Committee be re-created following the 2016 CFP Biennial Meeting to continue work originally assigned in Issue 2014-11-016 with the following charges:

1. Identify and evaluate the pros and cons of Alternative Methods to Demonstrating Knowledge, a document created by the 2014-2016 DoK Committee (Attachment to the DoK Committee Report). Although not limited to the following areas, the committee will assess the pros and cons of each alternative method in light of the following areas:
 - i. Differentiation between knowledge and application
 - ii. Emphasis on risk factors
 - iii. Ease of uniform assessment by regulators and industry
 - iv. Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier
 - v. What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge
2. Recommend alternative methods of demonstrating knowledge as new or amended Food Code language.
3. Report back committee outcomes and recommendations to the 2018 CFP Biennial Meeting.

COMMITTEE WORK PLAN AND TIMELINE:

1. Established committee roster and submitted to Council II Chair by 7/8/2016.
2. Established working group structure comprised of voting and at-large members, and two sub-committees.
3. Held monthly conference calls beginning in September 2016 where full DoK Committee membership was able to discuss charges and identify recommendations to complete committee charges.
4. Conducted on-line surveys with voting members for all committee decisions.
5. Compiled all survey feedback and completed committee charges for presentation at 2018 CFP Biennial Meeting.

COMMITTEE ACTIVITIES:

1. Dates of committee meetings or conference calls:

Full Committee Conference Call Dates			Subcommittee 1			Subcommittee 2		
9/22/16	10/27/16	11/17/16	2/10/17	4/6/17	4/17/17	2/16/17	4/12/17	5/4/17
12/15/16	2/16/17	3/16/17	4/25/17	5/2/17	5/16/17			
4/20/17	5/18/17	6/15/17	07/21/17	8/11/17				
7/27/17	8/17/17	9/21/17						
9/29/17	10/19/17							

2. Overview of committee activities:

- a. The first three meetings were spent reviewing the 2014-2016 Demonstration of Knowledge (DoK) Committee's work and the existing recommended Alternate Methods of Demonstrating Knowledge and having open dialog around the pros and cons of these recommendations (see [Hyperlink: http://www.foodprotect.org/biennial-meetings/2016-biennial-meeting/](http://www.foodprotect.org/biennial-meetings/2016-biennial-meeting/) **Council II Final Committee Reports, Demonstration of Knowledge Committee Parts 1, 2 and 3**). The committee developed an alternate method voting member survey which was completed and reviewed by the Committee Co-Chairs. The results of the initial survey were poor and did not have an acceptable representation of committee member constituency, thus requiring redistribution of the survey (see **Attachment: 2016 – 2018 DoK Committee and Subcommittee Work**). The second survey was then sent to only voting committee members, participation and results of this survey were reviewed and found to have an acceptable representation from committee constituency (see [Hyperlink: http://www.foodprotect.org/biennial-meetings/2016-biennial-meeting/](http://www.foodprotect.org/biennial-meetings/2016-biennial-meeting/) **Council II Final Committee Reports, Demonstration of Knowledge Committee Parts 1, 2 and 3**). The completion of this survey led to the formation of two sub-committees, each to focus specifically on half of the existing alternate method recommendations. Sub-Committee groups worked through Pros & Cons for each assigned alternate method to provide alternate language for the Food Code as identified in committee charges.
- b. The committee continued to meet monthly with a total of 14 full committee meetings via conference calls (see **Attachment: 2016-2018 DoK Committee and Subcommittee Work**). Two roster membership changes were required and approved by CFP Executive Board to ensure constituency balance among voting members. Sub-Committee groups 1 & 2 completed working on Charge 1 for each

assigned alternate methods, during this process both groups evaluated each method against areas identified in the charges to determine its relevancy or eliminate it from consideration (see **Attachment: 2016-2018 DoK Committee and Subcommittee Work**). Sub-Committee participation has been a challenge at times however the use of full committee voting members has been effectively leveraged to make up for this shortfall.

3. The full committee has reviewed and discussed the recommendations of the subcommittees and combined remaining two methods due to the similarity of the intent of all of the Alternative Methods to Demonstrating Knowledge (see **Attachment: 2016-2018 DoK Committee and Subcommittee Work**). **Charges COMPLETED and the rationale for each specific recommendation:**

- a. **Charge 1 has been completed.** The full committee met and discussed the work of the 2014-2016 committee to determine the initial course of action for the 2018 biennium. After clarification of the information from the previous committee's work, the full committee reviewed current 2-102.11 Demonstration of Knowledge requirements, set forth in the 2013 Food Code, and contrasted them with 2-102.12 Certified Food Protection Manager and 2-103.11 Duties of the Person in Charge for clarification purposes.

To ensure completion of committee charges two working subcommittees were formed and charged to assess each of the Alternative Methods of Demonstrating Knowledge identified by the original 2014-2016 Demonstration of Knowledge Committee. Each subcommittee worked on five of the ten Alternative Methods and assessed each option based on the charges outlined in part 1 and 2 of the 2016 – 2018 Demonstration of Knowledge Committee's charges. After the subcommittees worked to assess and evaluate methods they narrowed the number of suggested Alternative Methods from ten to six and then they worked on proposed language for each method. The methods removed from consideration could be combined with other methods due to duplication of concepts or did not differentiate between knowledge and application, focus on risk factors, could not be easily assessed by regulators if there is a language barrier or a corrective action for noncompliance could not be determined.

With the subcommittees work completed; the full DoK committee met and discussed combining the Alternate Methods of Demonstrating Knowledge into a single method. During discussion one voting member voiced concern of combining the Alternative Methods of Demonstrating Knowledge. However, the voting members of the committee reached consensus and agreed to combine the Alternative Methods of Demonstrating Knowledge resulting in Issue 2.

- b. **Charges 2 and 3 have been completed.** The Committee has devised a recommendation to amend Section 2-102.11 of the FDA Food Code by adding a new paragraph (D) to Section 2-102-11 to include one additional alternative method for the Person in Charge to demonstrate knowledge as follows:

"The PIC can demonstrate food safety knowledge as it relates to the specific food operation through the use of job aids and other practical means such as showing how they take temperatures, calibrate a thermometer, mix or test sanitizer, and in general being in compliance with section 2-103.11 as verified during the current inspection." The Committee also recommends that this new paragraph be assigned the Priority Foundation (Pf) designation.

Rationale: This recommendation provides an opportunity for the PIC to display knowledge through displaying the ability to perform tasks associated with the safe food practices related to the operation of the specific establishment. It also provides the PIC the opportunity to display knowledge through use of job aids related to the operation of the establishment. This is vitally important in cases where there may be a language barrier.

Issue #2: DOK 2 – Amend Food Code for Demonstration of Knowledge

4. **Charges INCOMPLETE and to be continued to next biennium:**

- a. None

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:

- No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.**

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. **Issue #1: Report – Demonstration of Knowledge (DOK) Committee.** A request for acknowledgment of final committee report, thanking the committee members for all their work, and recommending that the Conference disband the committee because all assigned charges have been completed.

List of content documents submitted with this Issue:

- (1) 2016 – 2018 Demonstration of Knowledge Committee Member Roster
(2) 2016 – 2018 Demonstration of Knowledge Committee Final Report

List of supporting attachments: **No supporting attachments submitted**

- (1) Attachment I: Part 1 2016-2018 Demonstration of Knowledge Committee and Subcommittee Work
(2) Attachment II: Part 2 2016-2018 Demonstration of Knowledge Committee and Subcommittee Work
(3) Attachment III: Part 3 2016-2018 Demonstration of Knowledge Committee and Subcommittee Work
(4) Attachment IV: Part 4 2016-2018 Demonstration of Knowledge Committee and Subcommittee Work
(5) Attachment V: Part 5 2016-2018 Demonstration of Knowledge Committee and Subcommittee Work

2. **Issue #2: DOK 2 – Amend Food Code for Demonstration of Knowledge:** Recommends alternative methods of demonstrating knowledge as new or amended Food Code language.

Recommended language: That a letter be sent to the FDA requesting that the most recent edition of the Food Code be amended by adding

Conference for Food Protection – Committee FINAL Report

a new paragraph (D) to Section 2-102-11 as follows (underline format used for new language):

- (A) Complying with this Code by having no violations of Priority Items during the current inspection; ^{Pf}
- (B) Being a Certified Food Protection Manager who has shown proficiency of required information through passing a test that is part of an accredited program; ^{Pf}
- (C) Responding correctly to the inspector's questions as they relate to the specific food operation. The areas of knowledge include (see C (1) – (17)); ^{Pf} or
- (D) The PIC can demonstrate food safety knowledge as it relates to the specific food operation through the use of job aids and other practical means such as showing how they take temperatures, calibrate a thermometer, mix or test sanitizer, and in general being in compliance with section 2-103.11 as verified during the current inspection. ^{Pf}