**Conference for Food Protection**

**2018 Issue Form**

**Issue: 2018 II-003**

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| **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 issue was submitted for consideration at a previous biennial meeting, see issue: 2016-II-025; new or additional information has been included or attached and the recommended solution has been revised.

**Title:**

Amend Food Code - Food Protection Manager to Provide Verifiable Training

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

We would like the CFP to amend its recommendation that it is mandatory for the person in charge (PIC) to hold a Food Protection Manager Certification (FPMC), and consider instead, requiring food safety training for all food handlers that is **verifiable**.

We agree there is a gap in general food safety knowledge in retail food establishments. We submit that the gap occurs when the food safety knowledge acquired by the Certified Food Protection Manager (CFPM) is not transferred to the front line food handlers. By amending the most current published edition of the Food Code section 2-103.11(M) to include **verifiable** training, there will be enforceable language to help ensure food handlers are properly trained. We believe that reaching the desired effect of reducing food borne illness as a greater chance of success when the CFPM must verify they have transferred their acquired food safety knowledge to the food handlers.

We agree with the proven justification that the presence of a single CFPM directly correlates to better control of risk factors. We propose sustained risk factor intervention occurs when food safety knowledge is provided to the front line food handlers through **verifiable** training. We are concerned that requiring PIC's to hold a FPMC does not provide the same incentive for the CFPM to share their food safety knowledge with all front line food handlers, as would the requirement for **verifiable** training.

Additionally, the significant costs associated with a mandatory requirement for all PIC's to hold a FPMC will put an undue financial, and operational burden on the retail food industry without significantly contributing to public health protection.

Consider the following example: A retail food establishment that operates for 24 hours a day for 7 days a week (24/7) will require 4 additional CFPM's to cover all shifts with a PIC that is a CFPM. The approximate cost to train one employee is $375.00 multiplied by the 4 PIC's needed to operate a 24/7 retail food establishment will cost an additional $1500 per store, an addition $15,000 for every 10 stores, and $150,000 per 100 stores. This is a conservative cost estimate and does not include re-certification, replacement of a CFPM no longer employed, or the additional fees from states that require a secondary certificate fee.

**Public Health Significance:**

Ensuring that all food handlers are properly trained in food safety will have a greater impact on protecting public health and successfully reduce the incidence of food borne illness.

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

that a letter be sent to the FDA requesting that the most current edition of the Food Code be amended as follows (language to be added is in underline format):

Section 2-203.11 (M)

(M) EMPLOYEES are properly trained in FOOD safety in a verifiable manner, including FOOD allergy awareness, as it relates to their assigned duties;Pf

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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.