**Conference for Food Protection**

**2018 Issue Form**

**Issue: 2018 II-015**

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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 is a brand new Issue.

**Title:**

PSC 4 - Amend VNRFRPS Standard 3, Inspections Based on HACCP Principles

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

Amend Standard 3 of the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) so that the Standard 4 quality assurance elements are referenced within Standard 3. This will help to minimize the need for an enrollee to update its Standard 3 policies in order to improve and maintain conformance with Standard 4.

**Public Health Significance:**

The Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) offer a systematic approach to, through a continuous improvement process, enhance retail food regulatory programs. The primary role of the CFP Program Standards Committee is to indirectly assist enrolled jurisdictions in making progress towards meeting the Standards. The Committee has identified that inclusion of information, such as the significance of connections between the "Description of Requirements" for the quality assurance elements outlined in Standard 4 and the regulatory program procedures/policies outlined in Standard 3, might aid with post self-assessment work plans to improve and/or maintain conformance with both of these VNRFRPS Standards.

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

that a letter be sent to the FDA requesting that the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Standard 3 - Inspection Program Based on HACCP Principles be amended as follows (language to be deleted is in strikethrough format; language to be added is underlined):

**1. Add an additional asterisk comment to Program Management, item 4:**

4) Develops and implements a program policy \*\*\* that requires:

a) On-site corrective actions\* as appropriate to the type of violation.

b) Discussion of long-term control\*\* of risk factor options, and

c) Follow-up activities.

\*\*\* Consideration of the elements outlined in Standard 4 will ensure a strong foundation for a quality and uniform inspection program.

**2. Correct misspellings of the word "policies" under Description of Requirement, items 5 and 6:**

5) Establishes and implements written ~~polices~~ policies addressing code variance requests related to risk factors and interventions.

6) Establishes written ~~polices~~ policies regarding the verification and validation of HACCP plans when a plan is required by the code.

A draft revision to Standard 3 is attached to Issue titled: "Report - Program Standards Committee (PSC)"; see content document titled: "Std 3 Proposed Changes"

**Submitter Information 1:**

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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.