

**Conference for Food Protection
2018 Issue Form**

Issue: 2018 II-021

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:

Amend VNRFRPS – Standard 4 – Uniform Inspection Program

Issue you would like the Conference to consider:

A recommendation is being made to amend Voluntary National Retail Food Regulatory Program Standard (VNRFRPS) No. 4 to be more consistent with requirements for large and small programs.

Public Health Significance:

Program Standard 4 was updated at the 2016 Conference for Food Protection to include some changes that were discussed in a pilot program. The updated statistical measures for compliance with Standard 4 present some inconsistencies between small jurisdictions of less than 10 inspectors and large jurisdictions of 10 or more.

The 20 Quality Elements found in Program Standard #4 vary greatly in the difficulty of meeting these elements. For example, Quality Element #7 requires correct compliance status to be determined for each risk factor and food code intervention, and Quality Element #16 requires proper code citation for all risk factors and public health interventions. For a small jurisdiction, these more difficult quality elements are balanced against easier to achieve elements, like providing identification and submitting paperwork in timely fashion. However, in a large jurisdiction, Standard 4 can only be achieved if 75% of employees are able to document compliance status or provide proper code citation perfectly on an inspection. This conflicts with reasonable requirements of other standards, such as Standard 2, which allows for a level of disagreement on documenting compliance. Requiring this 75% across each element for large jurisdictions holds them to a different standard than small jurisdictions and will result in large jurisdictions unable to meet this standard at the same rate as small jurisdictions.

Additionally, the audit requirements for Standard 4 do not contain specific information on how many Quality Assurance (QA) assessments must be reviewed by the auditor. Precedent has been set in other standards, including Standard 2 and Standard 6, to use a random sample of files for spot checking during the audit. However, these same

instructions are not present in Standard 4, which could lead to an auditor reviewing QA records for hundreds of employees in large jurisdictions. This requirement to check randomized files should be consistent across all program standards.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA recommending the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Program Standard No. 4 - Uniform Inspection Program, be amended to require large and small jurisdictions to have the same statistical compliance requirements, as well as amend audit requirements to include randomized selection of files to be reviewed.

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