

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - a) Differentiation between knowledge and application,
 - b) Emphasis on risk factors,
 - c) Ease of uniform assessment by regulators and industry,
 - d) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - e) 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.

Method 10: Recommend *eliminating* Section 2-102.11 within the Food Code as follows:

This method seeks to replace the Demonstration Section, in its entirety with reliance instead on the Duties Section as it might be performed by ANSI-ASTM accredited food handlers:

Allow the Duties Section of the Food Code (2-103.11) to substantiate demonstration of knowledge in lieu of the Demonstration Section (2-102.11). The distinction between knowledge and application is vague and difficult to articulate and this can lead to frustration between operators and regulators. Having one or more food handlers certificated through an ANSI-ASTM accredited program or equivalent and who comply with (A) through (O) of Section 2-103.11 by applying practical knowledge to the successful completion of tasks should adequately demonstrate knowledge of the PIC.

- Eliminate Section 2-102.11 (A). The number of times that an establishment has no priority violations is statistically insignificant. There is also the suspicion among regulators that a lack of priority violations could be accidental and not a true reflection of demonstration of knowledge.
- Eliminate Section 2-102.11 (B). The Food Code already requires the presence of a CFPM in Section 2-102.12 (A). The FDA Risk Factor Study correlates the presence of a CFPM with better control of risk factors and provides justification for the requirement in the Food Code to have at least one CFPM per establishment.
- Eliminate Section 2-102.11 (C). The Food Code already articulates the duties of a PIC in Section 2-103.11. In addition, the entirety of the risk based inspection identifies whether an establishment is controlling risk and, by extension, whether knowledge is being demonstrated through application. The current list of 17 questions found in 2-102.11 (C) could be moved to Annex 5 as guidelines for inspectors who wish to have dialogue with PICs.

Differentiation between knowledge and application:

Pro: Knowledge & application are given equal weight if measured on a consistent single scale.
The inspector or PIC could observe proper process to control food safety risks.

An ANSIT/ASTM 2659 accreditation does not take into account the thoroughness of the food handler program. It is based solely on setting relevant adult learning principles and then proving that they are being followed. Therefore, food handler programs, even under 2659 are not necessarily equivalent of fulfilling expectations of what a food handler should not to produce safe food.

This is an entry level (often 2 hour) training where the instructor also administers the exam. This Method substitutes application for demonstration

Con: Knowledge & application will be measured inconsistently if the reference scale is not equal.

Question in the Notes from the Team – “In the research, I read that ANSI-ASTM accredited food handler is an option (ie. Might be), however the remaining statements led me to believe that we

Commented [CD(1)]: As stated in the meeting on 5/2 – having trained food handlers does not translate into demonstrating knowledge by a Person in Charge if the PIC is not onsite. – Additional notes question whether the term Food Handler is the correct term in this instance, or if it should be PIC -

Commented [CD(2)]: agree

Commented [CD(3)]: This is an incorrect statement. 2-102.11 (B) in 2013 states that being a CFPM is only one of the potential ways to be 'IN' for this item. A PIC can demonstrate knowledge through having no priority violations AND correctly answering questions without possessing a CFPM certificate.

Commented [CD(4)]: I like the idea of moving 2-102.11 to the annex for a list of potential questions to use if needed.

are now going to require ANSI-ASTM accredited food handlers. CDC/FDA studies demonstrate the benefit for PICs to be CPFMs, does this include food handlers as well? Does the food safety training performed by many retailers with AMC not address this concern? By having food handlers carry certifications again demonstrate knowledge on test taking, but not through actual demonstration.

Emphasis on risk factors:

Pro: The duty list in 2-103.11 being met in addition to having no violations would demonstrate adequate control of risk factors.

Yes, via PIC responsibilities found in 2-103.11

Subsections A through O of 2-103.11 require PIC oversight to ensure that employees are engaged at practices aimed at controlling the 5 CDC risk factors.

Method 10 would rely solely on a food establishment's performance as being indicative of whether a PIC is knowledgeable.

Con: The lists in 2-102.11 & 2-103.11 do not exclusively emphasize the risk factors. A new, meshed list would be required to adequately address all risk factors comprehensively if the duty list was the sole criteria.

If a food safety risk were to present itself where there was no written protocol, the PIC may not have the necessary knowledge to make the best decision or corrective action.

Lack of understanding to contributing factors and root causes along with corrective actions to a unique food safety risk factor may contribute to a food safety concern.

Ease of uniform assessment by regulators and industry:

Pro: Deletion of one of the lists increases uniformity of measure

Yes, ANSI-ASTM certificate can be verified and duties can be observed

Pro – Enforcement would be seamless as the enforcement of 2-102.12 and 2-103.11 is already in place and would simply continue since no additional requirements are being mandated.

Con – Inconsistencies that are already present in the enforcement of 2-102.12 and 2-103.11 would also continue.

Con: The lists must be aligned better to be a consistent gauge that address all risk factors.

: Without uniformity in food handler programs there cannot be uniformity in assessment

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Pro: A PIC that is in possession of a CFPM certificate and meets the demonstration of duties as shown on inspection results will not necessarily need verbal support.

Yes, via completion of duties specified in 2-1-3.11

checking for the presence of CFPM certificate as required by 2-102.12 requires very minimal conversation.

Con: If answering questions that are asked of operations not observed

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Pro:

Discussion - Moot question in this context because emphasis is on application over knowledge

Con: Immediate corrective action is not available. Violations of identified duties could be corrected onsite, but a CFPM certificate would need time to attend a course and pass an exam.

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Discussion:

This is the most favorable method **IF** the specified knowledge in section of 2-102.11 and the duties of the PIC listed in 2-103.11 were more similar. Comparing 2-102.11 side by side with 2-103.11 shows variability in specifications, wording, and the absence of some items that are not addressed in both code provisions. It is most reasonable for regulators to gauge and operators to demonstrate knowledge if the identified duties are met and/or questions are answered correctly references the same list of items if the establishment is not engaging in full operations during the inspection where observations can be made of duty demonstration. Aligning these list, however, may be outside of the scope of the subcommittee.

None. This method would eliminate the section from Food Code

My vote is No for this method 10

2016-2018 CFP
Demonstration of Knowledge Committee
Subcommittee Group 2

Meeting Number: 1
Thursday, February 16, 2017
@2:45 p.m. EDT

Conference Call:
Access Code:

Co-Chairs: Larry Sigler, Julie Hults

DoK Advisors: Jo DeFrancesco, Eric Moore

Subcommittee Members: Bridget Sweet, Rob Gilliland, Christine Sylvis, Sue Tyjewski, Dale Yamnik, Joe Smithwick

Scribe: Julie Hults

Agenda

1. Welcome, Call to Order	Julie	
2. Roll Call	Larry	
3. Conference for Food Protection, Inc. Antitrust Statement - reminder	Julie	
4. Review Subcommittee Charges	Larry	
5. Review Committee Survey Results	Julie	
6. Committee Discussion on alternate methods 1,6,7,8&9	Larry/Julie	
7. Next Meeting Date	Larry/Julie	
8. Action Items	Larry/Julie	

MEETING MINUTES:

1. Welcome and Call to order were done
2. Roll Call was taken
3. Antitrust reminder was given
4. Subcommittee Charges were reviewed
5. The Committee discussed alternate methods 1, 6,7,8,&9 keeping in mind the subcommittee charges and survey results. The results of the discussions were captured by updating the attached document "2016-2018 DoK Sub-Committee Group 2 Alternative Methods of Demonstrating Knowledge Assessment"

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - a) Differentiation between knowledge and application,
 - b) Emphasis on risk factors,
 - c) Ease of uniform assessment by regulators and industry,
 - d) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - e) 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.

Method 1: The person in charge can demonstrate Food Code knowledge through practical means such as showing how they take temperatures, calibrate a thermometer, mix or test sanitizer, showing a posted employee health policy or list of major food allergens, etc.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.

Con #2: May not be a method to accurately gauge knowledge

Emphasis on risk factors:

Pro #1: Really shows the ability to demonstrate knowledge

Ease of uniform assessment by regulators and industry:

Pro #2: Easy to assess

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Pro #3: Easier than responding to questions when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Additional committee notes:

Survey result: Include-13, Don't include-5 –Highest result for include

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - f) Differentiation between knowledge and application,
 - g) Emphasis on risk factors,
 - h) Ease of uniform assessment by regulators and industry,
 - i) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - j) 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.

Method 6: The PIC can show evidence of demonstration of knowledge through the use of job aides or other means.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.

Con #2: Does not demonstrate daily application of knowledge

Emphasis on risk factors:

Pro #1: Allows to demonstrate how to access resources as needed

Ease of uniform assessment by regulators and industry:

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Pro #2: Easier than responding to questions when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Additional committee notes:

Survey result: Include-11, Don't include-7

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - k) Differentiation between knowledge and application,
 - l) Emphasis on risk factors,
 - m) Ease of uniform assessment by regulators and industry,
 - n) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - o) 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.

Method 7: Change the Demonstration of Knowledge criteria. Instead of meeting one of the three options to be in compliance, change it to having to meet two of the three options to be in compliance.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations and by being a certified food manager.

Emphasis on risk factors:

Ease of uniform assessment by regulators and industry:

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Con #2: Questioning is difficult when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Additional committee notes:

Survey result: Include-9, Don't include-9

Clarification on proposed changes needed from FDA, if (B) is eliminated, it would affect this method.

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - p) Differentiation between knowledge and application,
 - q) Emphasis on risk factors,
 - r) Ease of uniform assessment by regulators and industry,
 - s) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - t) 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.

Method 8: The establishment has a food handler certificated program through an ANSI-ASTM program or equivalent and one or more employees is certificated through the program.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations and by being a certified food manager.

Emphasis on risk factors:

Con #2: Food handler certification programs may be short in length and not very thorough.

Ease of uniform assessment by regulators and industry:

Con #3: May not be allowed in some jurisdictions.

Con #4: Testing may be online and there may be challenges to verifying the validity of the test taker

Con #5: Difficult for small establishments to create a program

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Con #6: May not be available in languages needed.

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Additional committee notes:

Survey result: Include-10, Don't include-8

This is different from #5 in that this method speaks to the facility having a program vs certified food handlers

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - u) Differentiation between knowledge and application,
 - v) Emphasis on risk factors,
 - w) Ease of uniform assessment by regulators and industry,
 - x) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - y) 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.

Method 9: Change the code language in 2-102.11 (C) to: “Demonstrating food safety principles based on the specific food operation. The areas of knowledge include:..”.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.

Emphasis on risk factors:

Pro #1: Really shows the ability to demonstrate knowledge

Ease of uniform assessment by regulators and industry:

Con #2: May be too difficult if “principles” is interpreted to mean the reasoning behind the requirements

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Pro #2: Easier than responding to questions when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Additional committee notes:

Survey result: Include-12, Don't include-6- 2nd Highest result for “include” .

This method may be very similar to method #1, the full committee may wish to look at combining these methods.

2016-2018 CFP

Demonstration of Knowledge Committee

Subcommittee Group 2

Meeting Number: 2
 Wednesday, April 12th, 2017
 2:00 PM EDT

Conference Call: # 1-877-394-5901
Access Code: 2995496

Co-Chairs: Larry Sigler, Julie Hults

DoK Advisors: Jo DeFrancesco, Eric Moore

Subcommittee Members: Rob Gilliland, Christine Sylvis, Sue Tyjewski, Joe Smithwick, Bridget Sweet, Steve Voels, Julie Wagendorf

Scribe: Julie Hults

Agenda

9. Welcome, Call to Order	Julie	
10. Roll Call	Larry	
11. Conference for Food Protection, Inc. Antitrust Statement - reminder	Julie	
12. Review Subcommittee Charges	Larry	
13. Committee Discussion on corrective action and food code language for alternate methods 1,6,7,8&9	Larry/Julie	
14. Next Meeting Date if necessary	Larry/Julie	
15. Action Items	Larry/Julie	

Meeting Minutes;

1. Welcome was done
2. Roll Call. Present at meeting: Christine Sylvis, Larry Sigler, Jo DeFrancesco, Eric Moore, Larry Sigler, Julie Hults, Adam Kramer, and Jessica Otto.
3. Antitrust reminder given
4. A review of the committee and subcommittee history and charges was given by Eric Moore.
5. It was acknowledged that a quorum of members was not present and that no voting could occur
6. A discussion was held and ideas presented related to the alternate methods for demonstrating knowledge.
7. Representatives from the FDA agreed that for the charge, *Recommend alternative methods of demonstrating knowledge as new or amended Food Code language*, the language only needed to be conceptual and not word-for-word.
8. The FDA advisor relayed that when considering application of knowledge such as in methods 1, 6 and 9, 2-103.11 (duties) may be a more applicable code section. Care should be exercised in recommending any code language that refers to application of knowledge.
9. The FDA advisor relayed a reminder that for 2-102.11, compliance can be from A, B or C.

ATTACHMENT

10. A discussion was held in relation to additional pros and cons and recommended new or amended Food Code language for the methods assigned to subcommittee 2. Notes from the discussion are in red font color on the attachment.
11. A discussion was held in relation to the area of the charge related to corrective action. It was suggested that the same statement be used for all methods:
Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).
12. A discussion was held regarding method 8 and the fact that 2-102.11 relates to the person in charge. The committee may want to consider a recommendation to remove this method.

Alternative Methods for Demonstrating Knowledge	
SUB-COMMITTEE CHARGES:	
<p>3. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:</p> <ul style="list-style-type: none"> z) Differentiation between knowledge and application, <ul style="list-style-type: none"> aa) Emphasis on risk factors, bb) Ease of uniform assessment by regulators and industry, cc) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier, dd) What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge <p>4. Recommend alternative methods of demonstrating knowledge as new or amended Food Code language.</p>	
<p>Method 1: The person in charge can demonstrate Food Code knowledge through practical means such as showing how they take temperatures, calibrate a thermometer, mix or test sanitizer, showing a posted employee health policy or list of major food allergens, etc.</p>	
<p>Differentiation between knowledge and application:</p> <p>Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.</p> <p>Con #2: May not be a method to accurately gauge knowledge</p> <p>Con #3: Demonstration is more of a food handler duty than that of the person in charge-managerial duty</p>	
<p>Emphasis on risk factors:</p> <p>Pro #1: Really shows the ability to demonstrate knowledge</p>	
<p>Ease of uniform assessment by regulators and industry:</p> <p>Pro #2: Easy to assess</p>	
<p>Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:</p> <p>Pro #3: Easier than responding to questions when there is a language barrier</p>	
<p>What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:</p> <p>Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).</p>	
<p>Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:</p> <p>Change C to “demonstrate/demonstrate practices”, as method 9</p>	
<p>Additional committee notes:</p> <p>Survey result: Include-13, Don’t include-5 –Highest result for include</p>	

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

3. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - ee) Differentiation between knowledge and application,
 - ff) Emphasis on risk factors,
 - gg) Ease of uniform assessment by regulators and industry,
 - hh) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - ii) What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge
4. Recommend alternative methods of demonstrating knowledge as new or amended Food Code language.

Method 6: The PIC can show evidence of demonstration of knowledge through the use of job aides or other means.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.

Con #2: Does not demonstrate daily application of knowledge

Con #3: If aids present but not used, does not demonstrate knowledge

Pro #1: If aids used, demonstrates application of knowledge

Emphasis on risk factors:

Pro #1: Allows to demonstrate how to access resources as needed

Ease of uniform assessment by regulators and industry:

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Pro #2: Easier than responding to questions when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Amend 2-102.11 C to responding to questions or demonstrating practices with the assistance of job aids.

Additional committee notes:

Survey result: Include-11, Don't include-7

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

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 - jj) Differentiation between knowledge and application,
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 - ll) Ease of uniform assessment by regulators and industry,
 - mm) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier,
 - nn) What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge
4. Recommend alternative methods of demonstrating knowledge as new or amended Food Code language.

Method 7: Change the Demonstration of Knowledge criteria. Instead of meeting one of the three options to be in compliance, change it to having to meet two of the three options to be in compliance.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations and by being a certified food manager.

Emphasis on risk factors:

Pro#1: An establishment can't just be a Certified Food Manager and comply with Demonstration of Knowledge

Ease of uniform assessment by regulators and industry:

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Con #2: Questioning is difficult when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Change to read in compliance with two or more of the methods.

Additional committee notes:

Survey result: Include-9, Don't include-9

Clarification on proposed changes needed from FDA, if (B) is eliminated, it would affect this method.

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

3. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - oo) Differentiation between knowledge and application,
 - pp) Emphasis on risk factors,
 - qq) Ease of uniform assessment by regulators and industry,
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4. Recommend alternative methods of demonstrating knowledge as new or amended Food Code language.

Method 8: The establishment has a food handler certificated program through an ANSI-ASTM program or equivalent and one or more employees is certificated through the program.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations and by being a certified food manager.

Con: 2-102.11 pertains strictly to the person in charge

Emphasis on risk factors:

Con #2: Food handler certification programs may be short in length and not very thorough.

Ease of uniform assessment by regulators and industry:

Con #3: May not be allowed in some jurisdictions.

Con #4: Testing may be online and there may be challenges to verifying the validity of the test taker

Con #5: Difficult for small establishments to create a program

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Con #6: May not be available in languages needed.

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Add alternative method and rework references to person in charge

Additional committee notes:

Survey result: Include-10, Don't include-8

This is different from #5 in that this method speaks to the facility having a program vs certified food handlers

Alternative Methods for Demonstrating Knowledge

SUB-COMMITTEE CHARGES:

3. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas:
 - tt) Differentiation between knowledge and application,
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 - xx) What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge
4. Recommend alternative methods of demonstrating knowledge as new or amended Food Code language.

Method 9: Change the code language in 2-102.11 (C) to: “Demonstrating food safety principles based on the specific food operation. The areas of knowledge include:..”.

Differentiation between knowledge and application:

Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.

Emphasis on risk factors:

Pro #1: Really shows the ability to demonstrate knowledge

Ease of uniform assessment by regulators and industry:

Con #2: May be too difficult if “principles” is interpreted to mean the reasoning behind the requirements

Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier:

Pro #2: Easier than responding to questions when there is a language barrier

What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge:

Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).

Recommend alternative methods of demonstrating knowledge as new or amended Food Code language:

Removing responding to questions and add *Demonstrating food safety principles based on the specific food operation. The areas of knowledge include:..*”.

Additional committee notes:

Survey result: Include-12, Don't include-6- 2nd Highest result for “include” . This method may be very similar to method #1, the full committee may wish to look at combining these methods.

2016-2018 CFP Demonstration of Knowledge Committee Subcommittee Group 2

Meeting Number: 3
Thursday, May 4th, 2017
2:00 PM EDT

Conference Call: # 1-877-394-5901
Access Code: 2995496

Co-Chairs: Larry Sigler, Julie Hults

DoK Advisors: Jo DeFrancesco, Eric Moore

Subcommittee Members: Rob Gilliland, Christine Sylvis, Sue Tyjewski, Joe Smithwick
Bridget Sweet, Steve Voels, Julie Wagendorf

Scribe: Julie Hults

Agenda

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4. Review Subcommittee Charges	Larry	
5. Committee Discussion alternate methods 1,6,7,8&9	Larry/Julie	
6. Committee Discussion on recommendations to full committee	Larry/Julie	
7. Next Meeting Date if necessary	Larry/Julie	
8. Action Items	Larry/Julie	

Minutes:

1. Welcome was done
2. Roll Call. A quorum was not present
3. Antitrust reminder given
4. Charges were reviewed
5. The subcommittee members present had no further input on the assigned alternate methods. The CDC representative relayed that a study not yet published showed that looking at % of food handlers trained shows improvement, but even if 100% of food handlers trained, having a CFM alone has more impact.
6. Recommendations can be made after voting
7. As a quorum was not present, it was decided that the subcommittee would attempt to gain additional feedback and take a vote using a method other than conference call.

Alternative Methods for Demonstrating Knowledge	
SUB-COMMITTEE CHARGES:	
1. Although not limited to the following areas, the sub-committee will assess the pros and cons of each alternative method in light of the following areas: <ol style="list-style-type: none"> a) Differentiation between knowledge and application, b) Emphasis on risk factors, c) Ease of uniform assessment by regulators and industry, d) Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier, e) 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.	
Method 1: The person in charge can demonstrate Food Code knowledge through practical means such as showing how they take temperatures, calibrate a thermometer, mix or test sanitizer, showing a posted employee health policy or list of major food allergens, etc.	
Differentiation between knowledge and application: Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager. Con #2: May not be a method to accurately gauge knowledge Con #3: Demonstration is more of a food handler duty than that of the person in charge- managerial duty	
Emphasis on risk factors: Pro #1: Really shows the ability to demonstrate knowledge	
Ease of uniform assessment by regulators and industry: Pro #2: Easy to assess	
Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier: Pro #3: Easier than responding to questions when there is a language barrier	
What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge: Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).	
Recommend alternative methods of demonstrating knowledge as new or amended Food Code language: Change C to “demonstrate/demonstrate practices”, as method 9	
Additional committee notes: Survey result: Include-13, Don't include-5 –Highest result for include	

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<p>Method 6: The PIC can show evidence of demonstration of knowledge through the use of job aides or other means.</p>
<p>Differentiation between knowledge and application: Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager. Con #2: Does not demonstrate daily application of knowledge Con #3: If aids present but not used, does not demonstrate knowledge Pro #1: If aids used, demonstrates application of knowledge</p>
<p>Emphasis on risk factors: Pro #1: Allows to demonstrate how to access resources as needed</p>
<p>Ease of uniform assessment by regulators and industry:</p>
<p>Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier: Pro #2: Easier than responding to questions when there is a language barrier</p>
<p>What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge: Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).</p>
<p>Recommend alternative methods of demonstrating knowledge as new or amended Food Code language: Amend 2-102.11 C to responding to questions or demonstrating practices with the assistance of job aids.</p>
<p>Additional committee notes: Survey result: Include-11, Don't include-7</p>

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<p>Method 7: Change the Demonstration of Knowledge criteria. Instead of meeting one of the three options to be in compliance, change it to having to meet two of the three options to be in compliance.</p>
<p>Differentiation between knowledge and application: Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations and by being a certified food manager.</p>
<p>Emphasis on risk factors: Pro#1: An establishment can't just be a Certified Food Manager and comply with Demonstration of Knowledge</p>
<p>Ease of uniform assessment by regulators and industry:</p>
<p>Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier: Con #2: Questioning is difficult when there is a language barrier</p>
<p>What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge: Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).</p>
<p>Recommend alternative methods of demonstrating knowledge as new or amended Food Code language: Change to read in compliance with two or more of the methods.</p>
<p>Additional committee notes: Survey result: Include-9, Don't include-9 Clarification on proposed changes needed from FDA, if (B) is eliminated, it would affect this method.</p>

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<p>Method 8: The establishment has a food handler certificated program through an ANSI-ASTM program or equivalent and one or more employees is certificated through the program.</p>
<p>Differentiation between knowledge and application: Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations and by being a certified food manager. Con: 2-102.11 pertains strictly to the person in charge</p>
<p>Emphasis on risk factors: Con #2: Food handler certification programs may be short in length and not very thorough.</p>
<p>Ease of uniform assessment by regulators and industry: Con #3: May not be allowed in some jurisdictions. Con #4: Testing may be online and there may be challenges to verifying the validity of the test taker Con #5: Difficult for small establishments to create a program</p>
<p>Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier: Con #6: May not be available in languages needed.</p>
<p>What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge: Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).</p>
<p>Recommend alternative methods of demonstrating knowledge as new or amended Food Code language: Add alternative method and rework references to person in charge</p>
<p>Additional committee notes: Survey result: Include-10, Don't include-8 This is different from #5 in that this method speaks to the facility having a program vs certified food handlers</p>

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Method 9: Change the code language in 2-102.11 (C) to: “Demonstrating food safety principles based on the specific food operation. The areas of knowledge include:..”.
Differentiation between knowledge and application: Con #1: If (A) and (B) are still included, may not be able to demonstrate knowledge but can still comply with section by not having any priority violations or by being a certified food manager.
Emphasis on risk factors: Pro #1: Really shows the ability to demonstrate knowledge
Ease of uniform assessment by regulators and industry: Con #2: May be too difficult if “principles” is interpreted to mean the reasoning behind the requirements
Enabling the Person in Charge to demonstrate knowledge even when there is a language barrier: Pro #2: Easier than responding to questions when there is a language barrier
What corrective action should be taken when there is not a demonstration of knowledge from the Person in Charge: Con: It may be difficult to have prescriptive corrective action for DOK. Suggestions would be education, resources and follow-up inspections provided by the Authority Having Jurisdiction (AHJ).
Recommend alternative methods of demonstrating knowledge as new or amended Food Code language: <i>Removing responding to questions and add Demonstrating food safety principles based on the specific food operation. The areas of knowledge include:..”.</i>
Additional committee notes: Survey result: Include-12, Don't include-6- 2 nd Highest result for “include” . This method may be very similar to method #1,the full committee may wish to look at combining these methods.