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**COMMITTEE NAME:** *Program Standards Committee (PSC)*

**DATE OF FINAL REPORT:** *February 12, 2018*

**COMMITTEE ASSIGNMENT:**  *Council I*       *Council II*       *Council III*       *Executive Board*

**REPORT SUBMITTED BY:** *Angie Cyr, Chair; Amanda Douglas, Co-Vice Chair; Joyce Theard, Co-Vice Chair*

**COMMITTEE CHARGE(S):**

***Issue 2016 II-009 – PSC 3 – Recommendations from Issue 2014-II-005***

1. Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation;
2. Work on a project to recognize levels of performance of Program Standards enrollees that will demonstrate the progress of enrollees in a meaningful way and acknowledging the enrollees for taking the necessary incremental steps toward meeting the Program Standards. As part of this project:
  - a. Provide a Cost/Benefit Analysis for recognizing partial achievement of the Retail Program Standards;
  - b. Identify different approaches that could be used to recognize partial achievement of the Retail Program Standards that would not require additional resources to perform or administer; and
  - c. Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards.
3. Serve as a sounding board for FDA with respect to ideas generated during collaboration with the other entities such as the National Association of County and City Health Officials (NACCHO), Partnership for Food Protection (PFP), and Association of Food and Drug Officials (AFDO).

***Issue 2016 II-015 – CFSRP 2 – Reassign Charges to the Program Standards Committee***

Collaborate with the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to:

1. Continue review of all initiatives: existing, new or under development; involving the training, evaluation and/or certification of food safety inspection officers. This collaborative working relationship will ensure the sharing of information so as not to create any unnecessary redundancies in the creation of work product or assignment of tasks/responsibilities.
2. Review the results of the Partnership for Food Protection Training and Certification Workgroup recommendations for the nationally recognized Retail Food Curriculum based on the Retail Food Competency and Curriculum framework (Job Task Analysis) to determine if changes are needed in the Standard 2 curriculum. Identify any gaps and recommendations for change and review the time frame for completion of Standard 2 Steps 1 through 4 for new hires or staff newly assigned to the regulatory retail food protection program.
3. Continue to assess if any changes will be needed in Standard 2-Trained Regulatory Staff based on the current standard for review referenced in (1) above to provide better alignment with Standard 4 of the VNRFRPS.
4. Report back their findings and recommendations to the 2018 Biennial Meeting of the Conference for Food Protection.

***Issue 2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee***

1. Identify available resources related to foodborne illness training.
2. Assess any newly developed foodborne illness training courses or programs.
3. Maintain the document titled Crosswalk - Requirements for Foodborne Illness Training Programs Based on Standard 5 (Crosswalk) as a resource and content baseline for foodborne illness training.
4. Report back any findings and recommendations to each biennial meeting of the Conference for Food Protection.

***Issue 2016 II-020 – Reevaluation of FDA VNRFRP Standard 8***

**Evaluate Standard 8 of the FDA Voluntary National Retail Food Regulatory Program Standards, as follows:**

1. Review the "Description of Requirements" for "Staffing Level" to ensure they are accurate, reasonable, and attainable for jurisdictions of all sizes.
2. Report back their findings and recommendations to the 2018 Biennial Meeting of the Conference for Food Protection.

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**COMMITTEE WORK PLAN AND TIMELINE:**

The committee was formed in July, 2016. The first meeting was held in August, 2016 with the work of four subcommittees continuing through November, 2017. (See *Final 2016-2018 PSC Workplan* attached.)

**COMMITTEE ACTIVITIES:**

1. ***Dates of committee meetings or conference calls:***

- a. The full committee met three (3) times by conference call on August 22, 2016, May 4, 2017, and August 31, 2017. In between meetings, communication was done by email with subcommittee chairs and committee members.
- b. Meetings with the subcommittee co-chairs were held by conference call on September 15, 2016; February 8, 2017; and October 6, 2017.
- c. A conference call was held on August 22, 2016 with the FDA/CDC consultants to discuss their role on the committee.
- d. Issue 2016 II-009 subcommittee met twelve (12) times by conference call on October 26, 2016; November 17, 2016; December 15, 2016; January 19, 2017; February 16, 2017; March 16, 2017; April 20, 2017; May 18, 2017; June 15, 2017; July 19, 2017; September 21, 2017; and October 17, 2017.
- e. Issue 2016 II-015 subcommittee met three (3) times by conference call on January 20, 2017; March 30, 2017; and May 22, 2017.
- f. Issue 2016 II-018 subcommittee met six (6) times by conference call on October 21, 2016; December 5, 2016; January 30, 2017; February 27, 2017; June 8, 2017; and July 28, 2017. Mr. Roberson and Mr. Mack met by conference call and identified additional foodborne illness training resources on October 23, 2017.
- g. Issue 2016 II-020 subcommittee met eight (8) times by conference call on October 11, 2016; October 28, 2016; November 22, 2016; January 10, 2017; April 17, 2017; August 15, 2017; October 11, 2017; and October 23, 2017. Mr. Schaffer, Mr. Lawrence, and the FDA consultants met by conference call on October 19 and November 2, 2017 to conduct a detailed review of the subcommittee's data, discuss what the subcommittee is proposing proposal, and request FDA consultant feedback.

2. ***Overview of committee activities:***

***Progress on Overall Committee Activities:***

- a. The Program Standards Committee membership included recruitment efforts to gain academia and consumer representatives. In July 2016, the Executive Board approved a roster with a temporary waiver for Rance Baker from the National Environmental Health Association (NEHA) to serve as the consumer group representative. Any CFP members who expressed interest in the committee but who were not selected as voting members, were designated as "at large" members. These "at large" members have been included in all committee activities.
- b. The first full committee call was held on August 22, 2016. The committee chair and co vice-chairs presented the recommendation that the charges be worked on at a subcommittee level to stay ahead of the Executive Board's due dates and to complete the charges by October 2017. The committee members supported the recommendation. Four subcommittees were formed: (1) Issue 2016 II-009 Subcommittee with co-leads Andre Pierce (regulatory - local) and Joyce Theard (regulatory - local), (2) Issue II-015 Subcommittee with co-leads David Read (food industry support) and Rick Akin (regulatory – state), (3) Issue 2016 II-018 Subcommittee with co-leads Michael Roberson (retail food industry) and James Mack (regulatory – state), and (4) Issue 2016 II-020 Subcommittee with co-leads Michael Schaffer (regulatory – local) and David Lawrence (regulatory – local). Each committee member expressed their interest in serving on subcommittees.
- c. Meetings were held via conference call. A Program Standards Committee workgroup was created in FoodSHIELD along with four subcommittee teams to be able to easily share documents online. The full committee met three times (August 22, 2016 kick-off call; May 4, 2017, and August 31, 2017.) During the initial meeting, time was allocated to introduce new members to the historical perspective of the committee. Subcommittee updates were provided as part of the full committee calls. During the August 31, 2017 call, members were solicited to assist with a planning subcommittee for the Program Standards Session that will be held during the 2018 biennial meeting. The planning subcommittee will be led by Amanda Douglas. An agenda for the session has been developed and speakers have been recruited.

***Progress on Issue 2016 II-009 Subcommittee Activities:***

- a. The sub-committee spent most of their time working on Charge 1 of this issue. A Self-Assessment – Audit Verification Summary & Gap Analysis Audit Microsoft Excel workbook, created by the FDA, was reviewed in an effort to assist jurisdictions in monitoring and tracking their progress. However, due to time constraints we were unable to discuss the charges related to Cost Benefit/Analysis for recognizing partial achievement of the Standards and any additional burden placed on enrollees or FDA with the development of a system to uniformly recognize jurisdictions for partial achievement of the Standards. It is recommended that the PSC be assigned these charges for the next biennium. We also recommend that the attached Self-Assessment - Audit Verification Summary & Gap Analysis workbook be used with the VNRFRPS

Administrative Procedures.

- b. The sub-committee noted that the language across the VNRFRPS is not consistent and recommends during the next biennium that the PSC identify the inconsistencies.
- c. Sub-committee members were assigned to review the VNRFRPS and volunteer to lead a discussion of a standard during monthly meetings and assess if any changes were needed to enhance enrollment and implementation. The standards were reviewed with the following recommendations:

Standard 1 Regulatory Foundation:

Subcommittee members expressed a desire to recognize a jurisdiction for efforts made to achieve Standard 1 when control of the regulations was outside their control using the attached Self-Assessment - Audit Verification Summary & Gap Analysis document.

Standard 3 Inspection Program Based on HACCP Principles:

The subcommittee recommended referencing Standard 4 quality elements within this standard to minimize the risk of having to update Standard 3 policies later. Suggested language was added as a note: "Consideration of the elements outlined in Standard 4 will ensure a strong foundation for a quality and uniform inspection program". In addition, current language for Standard 3 has two misspellings of the word "policies" under Description of Requirement page 3-2 and numbers 5 and 6. (See attached *Std 3 Proposed Changes* document.)

Standard 5 Foodborne Illness and Food Defense Preparedness and Response

The subcommittee recommended future edits to align with CIFOR Guidelines.

Standard 6 Compliance and Enforcement:

The members reached a consensus to recommend consideration of a proposal to allow jurisdictions to assess the effectiveness of their compliance and enforcement program using an alternative sampling method that provides the same level of statistical confidence as the prescribed method. The proposal uses the same assessment methodology currently described in Standard 6. (See the following two attachments *Std 6 Proposed Changes* document and *Std 6 Instructions for Conducting a Self-Assessment* document.

The subcommittee recommends that the FDA develop a standardized key that links to the FDA Code references, so jurisdictions may make comparisons of their Code risk factors and intervention strategies. An example standardized key that was developed by Wake County, North Carolina is attached. (See attached *Standard Key Crosswalk to Code* document.)

- d. Other Considerations:

Subcommittee members reached a consensus to request that the FDA include plan review in an existing VNRFRPS. An issue has been submitted to address this topic for the next biennium.

The subcommittee recommends agencies use the Self-Assessment - Audit Verification Summary & Gap Analysis (SA) tool to assist with documenting partial compliance with the VNRFRPS. The committee recommends that the SA tool be marketed and posted on the CFP web site as a management tool.

The subcommittee recommends the FDA web site containing the "Listing of Jurisdictions Enrolled in the Voluntary National Retail Food Regulatory Program Standards" be edited to help identify/recognize jurisdictions with partial achievement of a standard. For example, an asterisk (\*) placed by an agency's name could denote partial achievement and a footnote that states the reason the jurisdiction cannot fully meet the particular standard.

The subcommittee recommends the FDA modify the Listing of Jurisdictions Enrolled in the Voluntary National Retail Food Regulatory Program Standards to allow jurisdictions to self-identify their interest in auditing a particular standard(s). The subcommittee also recommends that the FDA consider collaboration with NACCHO to identify auditors.

The subcommittee recommends referencing the Clearinghouse document whenever possible in the VNRFRPS to make it easier for the reader to find interpretations and facilitate implementation of the VNRFRPS.

#### Progress on Issue 2016 II-015 Subcommittee Activities:

- a. The Subcommittee gathered and reviewed background and training information from the Integrated Food Safety System (IFSS) National Curriculum Standard (NCS) developed by the International Food Protection Training Institute (IFPTI), the Food and Drug Administration (FDA) and the Partnership for Food Protection. The NCS is a competency-based training curriculum framework for regulatory food protection professionals that supports a core component of the IFSS: a competent workforce doing comparable work at the federal, state and local (including tribal and territorial) levels. The NCS consists of two primary components: A Competency Framework and a Curriculum Framework. Taken together, these Frameworks define the performance expectations of the food and feed regulatory profession in the United States. There has been a tremendous amount of work done to develop the NCS and a great deal more work is needed to complete development of

the competencies and performance indicators for all of the content areas housed in the Curriculum Framework. The attached *CFP Report on NCS background* describes the NCS and its components.

- b. This subcommittee compiled a list of articles published on the rationale and need for National Curriculum Standards for Food Safety Inspection Officers and shared with subcommittee members so they would have additional background information. (see attached CFSRP Background Information)
- c. This subcommittee reviewed work completed from previous CFP workgroups on these subjects. Issue uses the term Job Task Analysis (JTA), but the subcommittee recommends using the phrase “Competency and Curriculum framework” in place of JTA. At the April 2017 Executive Board Meeting, the Board approved the use of these terms in the charge with JTA in parenthesis.
- d. During the 2016 CFP biennial meeting, an issue to revise VNRFRPS Standard 4 – Uniform Inspection Program was submitted and approved. FDA has drafted a revision to the Standard, but there is no indication for the implementation date. In light of ongoing work on a National Curriculum Standard and with an upcoming implementation of a revised Standard 4, the Subcommittee determined it would be premature to suggest revisions to VNRFRPS Standard 2 – Trained Regulatory Staff at this time. This subcommittee recommends this charge be continued by the PSC during the next biennium to continue monitoring ongoing progress.

**Progress on Issue II-018 Subcommittee Activities:**

- a. Prior to the first meeting, subcommittee members were requested to begin work on the first task of our charge to “identify available resources related to foodborne illness training.” The following examples were provided:
  - i. Council to Improve Foodborne Outbreak Response (CIFOR) Guidelines for Foodborne Disease Outbreak Response, 2nd Edition: <http://cifor.us/products/>
  - ii International Association for Food Protection (IAFP) Procedures to Investigate Foodborne Illness, 6th Edition: <https://www.foodprotection.org/publications/other-publications/>
  - iii. Centers for Disease Control (CDC) Environmental Health Specialist (EHS) e-Learning on Environmental Assessment of Foodborne Illness Outbreaks: [https://www.cdc.gov/nceh/ehs/elearn/ea\\_fio/](https://www.cdc.gov/nceh/ehs/elearn/ea_fio/)
  - iv. FDA Food Related Emergency Exercise Bundle (FREE-B): <https://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295902.htm>

Members were also asked to review the Interdisciplinary Foodborne Illness Training Committee Report from the most recent CFP biennial meeting. The subcommittee discussed leveraging FoodSHIELD as a tool for data sharing with the subcommittee members. Adam Kramer of CDC also provided an overview of the Integrated Food Safety Centers of Excellence (CoE) as an additional resource for foodborne illness outbreak information.

- b. During the initial subcommittee meeting, an in-depth discussion centered on planning the review and assessment of the Crosswalk document. Subcommittee members were assigned specific sections for review and analysis, and provided a verbal report of their work during the January 30, 2017 conference call.
- c. On January 30, 2017, several additional resources were identified by the subcommittee members. These are not actual foodborne illness trainings so were not added to the Crosswalk document, but are useful articles related to foodborne illness:
  - i. Guidance for Retailers – Product Recalls, Food Marketing Institute (2012): <https://www.fmi.org/docs/default-source/food-safety/guidance-for-food-retail-product-recall.pdf?sfvrsn=2>
  - ii. Bloomberg Business – Outbreak, Can Chipotle Get Over Food Poisoning (December 28, 2015): <https://www.texture.com/magazines-issues-summaries/bloomberg-businessweek-magazine-december-28-2015-edition/>
  - iii. NoroCORE – Norovirus Collaborative for Outreach, Research, and Education: <https://norocore.ncsu.edu>
  - iv. IAFP Journal Compilation: Outbreaks Where Food Workers Have Been Implicated in the Spread of Foodborne Disease (2007 – 2010): <https://www.ncbi.nlm.nih.gov/pubmed/21067683>
- d. Additional resources related to foodborne illness training were identified on October 23, 2017 but due to time constraints, were not evaluated and added to the Crosswalk document. As part of the assigned PSC standing charges, the subcommittee recommends that the PSC evaluate these references for future inclusion in the Crosswalk document. They are:
  - i. IS-305: Environmental Health Training in Emergency Response (EHTER) Awareness: <https://training.fema.gov/is/>
  - ii. NEHA Certified Foodborne Outbreak Investigator Credential (CFOI): <http://neha.org/professional-development/credentials/certified-foodborne-outbreak-investigator-cfoi-credential>
  - iii. CoE Webinar Series: On October 17, 2017, the CoE announced an upcoming webinar for November 15 titled, “Using the CoEs as a Resource During Outbreak Investigations.” <https://www.coefoodsafetytools.org/AllCoEProducts.aspx> As part of the assigned PSC standing charges, the subcommittee recommends that the PSC work with the CDC to identify all CoE webinar resources that

**Progress on Issue 2016 II-020 – Reevaluation of FDA VNRFRP Standard 8 Subcommittee Activities:**

The subcommittee initially revisited the supporting documentation provided by the submitter of Issue #2016 II-020 and decided to conduct additional follow-up with enrolled jurisdictions who are listed on the FDA Registry of Enrolled Jurisdictions as meeting Standard 8 (following a self-assessment and with or without a verification audit). The subcommittee felt that the self-assessment documentation for the FTE/Inspection Ratio requirement would help to identify in what ways conformance with the requirement was being achieved. Unfortunately, efforts to obtain the actual self-assessment documentation from the few enrolled jurisdictions listed on the FDA website as meeting Standard 8 were not successful. Therefore, the subcommittee stopped seeking out this information. This finding initiated a series of survey-based activities, which are described below, in order to collect and analyze data from Retail Program Standards enrollees. The subcommittee quickly reached consensus that the current “Description of Requirements” for Standard 8 “Staffing Level” is neither reasonable nor attainable, even if the FTE/Inspection Ratio requirement was determined by the FDA to be accurate. The opinion of subcommittee members, who have been a part of the NACCHO Program Standards Mentorship program and/or use the Manufactured Food Regulatory Program Standards, is that the current Standard 8 “Staffing Level” criteria lacks scalability to jurisdictions of various sizes and with varying levels of resources. There have also been significant innovations currently used in both the food industry and regulatory agencies that were not around when the FDA developed the Standard 8 “Staffing Level” FTE/Inspection Ratio criteria.

The subcommittee, with support from staff with Harris County Public Health & Environmental Services, distributed a total of three surveys to enrolled jurisdictions who have made progress with the VNRFRPS except Standard 8. The intent was to:

- a. Help identify barriers to jurisdictions that have not met Standard 8 (including those beyond the current FTE/Inspection ratio);
- b. By comparing “highly performing” regulatory food program enrollees (those who have met six or more of the nine VNRFRPS) with enrollees who have met fewer than six of the VNRFRPS, develop an approach that maintains the goal of the VNRFRPS to measure “where we want to be” rather than “where we are”;
- c. Use data to drive and establish a more statistically sound logic model for the FTE/inspection ratio; and
- d. Devise a new formula to calculate Standard 8 “Staffing Level.” The proposed calculation/formula will be very much like the calculations in the Manufactured Food Regulatory Program Standards. The variables will be based on an enrollee’s inventory of establishments in each risk grouping. The constants will include the median inspection time based on survey data, a re-inspection rate, and a frequency of two (2) inspections each year (at least one every six months) for every food establishment [as prescribed in § 8-401.10(A) of the 2013 FDA Food Code].

Since efforts to obtain the actual self-assessment documentation from enrolled jurisdictions listed on the FDA website as meeting Standard 8 were not successful, there was a shift to consider similar criteria in Standard 8 of the Manufactured Food Regulatory Program Standards. Why not consider a model that looks at inspection time spent by food establishment risk categorization and considers technological advancements in industry, efficiency improvements within local and state food regulatory programs, methods to conduct risk assessment categorization of food establishments, and policies for establishing inspection frequency based on risk categorization (as listed in the description of requirements for Standard 3 of the Retail Program Standards)?

- a. First, with support of staff at Harris County Public Health and Environmental Services, the subcommittee collected and analyzed raw data from enrolled jurisdictions on average inspection times as it related to risk categorizations for food establishments in their inventory. To address any concern about the quality of inspections, the subcommittee identified enrollees who have met six (6) or more of the nine (9) Retail Program Standards as being “highly performing” and most likely to have quality inspection activities. The subcommittee collected 12 data sets from local and state health departments across the country. This information was organized into line graphs that depict, excluding two outliers, the average inspection time spent for inspection for the most common food establishment risk categorization approaches (3 and 4 risk categories). See Standard 8 - Average Inspection Time by Risk Categorization. Additionally, there was developed an initial model that incorporated the data to easily calculate the number of employees needed to meet our proposed criteria. See Standard 8 - Proposed Model Without Outliers and Standard 8 – Productive Hours Calculation Without Outliers. In order to do regression modeling and other types of statistical analysis, the subcommittee needed at least 18 more data sets.
- b. A second survey was conducted and included all Retail Program Standards enrollees. There were 148 respondents from the over 750 enrollees, with 101 enrollees providing sufficient data on total staff, staffing in terms of full-time equivalents (FTEs), number of establishments in their inventory, how establishments are grouped by risk (risk categorization), inspection frequency according to risk, and average inspection time for each risk assignment. When the second survey analysis was presented to the subcommittee, the CDC consultant recommended use of median inspection time and a comparison of the data from the first survey of “highly performing” enrollees to the second survey data to address a concern about quality of inspections. No relative standard deviation was found between enrollees who meet six (s) or more of the nine (9) Standards and those who meet fewer Standards. See Standard 8 – FTE to Inspection Ratio Calculation (Using Median Inspection Time by Risk Categorization) and Standard 8 - Report Data Analysis Update.

- c. To be more consistent with what Standard 8 considers as “inspection activities” and with the calculation used in Standard 8 of the Manufactured Food Regulatory Program Standards, the subcommittee conducted a follow-up survey with the 101 enrollees requesting the rate at which, in terms of percentage of total inspections, foodborne illness complaint inspections/environmental assessments and follow-up inspections are conducted; and average travel time. See Standard 8 – Survey Responses for Median Frequency Other Inspection Types & Travel Time. As a demonstration of how the proposed model may work, Mr. Schaffer used data specific to Texas Department of State Health Services to provide a comparison of the Inspection/FTE Ratio result based on the current calculation and the proposed calculation. See Standard 8 – Sample Comparison of Current to Proposed Inspection to FTE Calculation.

3. **Charges COMPLETED and the rationale for each specific recommendation:**

- a. Issue 2016 II-009 – PSC 3 – Recommendations from Issue 2014-II-005 Charge 1: Areas were identified where the VNRFRRPS can be changed or improved to enhance enrollment and implementation. The VNRFRRPS were reviewed and the following recommendations were made to enhance enrollment and implementation:

Standard 3 - the members recommended referencing Standard 4 quality elements to minimize the risk of having to update Standard 3 policies later. Suggested language was added as a note and corrections of two misspellings were addressed.

Standard 5 - recommended any future edits align with CIFOR Guidelines.

Standard 6 – the members recommended a proposal to allow jurisdictions to assess the effectiveness of their compliance and enforcement program using an alternative sampling method that provides the same level of statistical confidence as the prescribed method. The proposal uses the same assessment methodology currently described in Standard 6. In addition, the subcommittee recommended a standardized key that links to the FDA Code references, so jurisdictions may make comparisons of their Code risk factors and intervention strategies.

Other considerations:

Members expressed a desire to explore the option to have the PSC include plan review in an existing standard to facilitate construction that supports a reduction in the occurrence of risk factors.

The members recommend the FDA modify the Listing of Jurisdictions Enrolled in the Voluntary National Retail Food Regulatory Program Standards to allow jurisdictions to self-identify their interest in auditing specific standard(s). Consider collaboration with NACCHO to identify auditors.

The subcommittee recommended referencing the Clearinghouse document whenever possible to make it easier for the reader to find interpretations and facilitate implementation of the Program Standards.

- b. Issue 2016 II-009 – PSC 3 – Recommendations from Issue 2014-II-005 Charge 2 b: Identify different approaches that could be used to recognize partial achievement of the VNRFRRPS that would not require additional resources to perform or administer. Different approaches were identified that could be used to recognize partial achievement of the VNRFRRPS that would not require additional resources to perform or administer.
- i. Subcommittee members expressed a desire to recognize a jurisdiction for efforts made to achieve Standard 1 when control of the regulations was outside their control. Partial credit was recommended as an option to allow jurisdictions to show progress but not to meet the Standard.
  - ii. The committee recommends agencies use a Self-Assessment (SA) tool to assist with documenting partial completion. The SA tool could be marketed and posted on the CFP web site as a management tool.
  - iii. The committee recommends the FDA web site of the Listing of Jurisdictions Enrolled in the Voluntary National Retail Food Regulatory Program Standards (PS) be edited to help identify/recognize jurisdictions with partial achievement of a standard. For example, an asterisk (\*) placed by an agency's name could denote partial achievement and a footnote that states the reason the jurisdiction cannot fully meet the particular standard.

- c. Issue 2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee Charge 1 - Identify available resources related to foodborne illness training has been completed as of the date of this report. The following six (6) new foodborne illness outbreak resource materials were identified by this committee. The materials are not training programs but have been identified as resources that may be useful for review by those conducting foodborne outbreak investigations:
- i. CIFOR Guidelines for Foodborne Disease Outbreak Response, 2nd Edition <http://cifor.us/products/>
  - ii. IAFP Procedures to Investigate Foodborne Illness, 6th Edition <https://www.foodprotection.org/publications/other-publications/>
  - iii. Guidance for Retailers – Product Recalls, Food Marketing Institute (2012) <https://www.fmi.org/docs/default-source/food-safety/guidance-for-food-retail-product-recall.pdf?sfvrsn=2>
  - iv. Bloomberg Business – Outbreak, Can Chipotle Get Over Food Poisoning (December 28, 2015) <https://www.texture.com/magazines-issues-summaries/bloomberg-businessweek-magazine-december-28-2015-edition/>
  - v. NoroCORE – Norovirus Collaborative for Outreach, Research, and Education: <https://norocore.ncsu.edu>
  - vi. IAFP Journal Compilation: Outbreaks Where Food Workers Have Been Implicated in the Spread of Foodborne Disease (2007 – 2010) <https://www.ncbi.nlm.nih.gov/pubmed/21067683>

- d. Issue 2016 II-018-IFITC 2 Reassign Charges to Program Standards Committee Charge 2 - Assess any newly developed foodborne illness training courses or programs: The following five (5) new foodborne illness outbreak resource materials were identified by this committee, but are recommended to be included in the Crosswalk document by the PSC in the next biennium.
- i. CDC EHS e-Learning on Environmental Assessment of Foodborne Illness Outbreaks  
[https://www.cdc.gov/nceh/ehs/elearn/ea\\_fio/](https://www.cdc.gov/nceh/ehs/elearn/ea_fio/)
  - ii. FDA Food Related Emergency Exercise Bundle (FREE-B)  
<https://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295902.htm>
  - iii. IS-305: Environmental Health Training in Emergency Response (EHTER) Awareness Level  
<https://training.fema.gov/is/>
  - iv. NEHA Certified Foodborne Outbreak Investigator Credential (CFOI) <http://neha.org/professional-development/credentials/certified-foodborne-outbreak-investigator-cfoi-credential>
  - v. Integrated Food Safety Center of Excellence (CoE) Webinar Series  
<https://www.coefoodsafetytools.org/AllCoEProducts.aspx>
- e. Issue 2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee Charge 3 - Maintain the document titled Crosswalk - Requirements for Foodborne Illness Training Programs Based on Standard 5 as a resource and content baseline for foodborne illness training: The Crosswalk document was reviewed to make sure that the references for the identified trainings were accurate. The document was updated to accurately reflect the references as they pertain to Standard 5 of the VNRFRPS.
- f. Issue 2016 II-020 - Reevaluation of FDA VNRFRP Standard 8 Charge 1 was to review the “Description of Requirements” for “Staffing Level” to ensure they are accurate, reasonable, and attainable for jurisdictions of all sizes. This charge has been completed. The subcommittee feels that the current Standard 8 “Staffing Level” criteria lacks scalability to jurisdictions of various sizes and with varying levels of resources. There have also been significant innovations currently used in both the food industry and regulatory agencies that were not around when the FDA developed the VNRFRPS 8 “Staffing Level” FTE/Inspection Ratio criteria. The committee developed an initial model that incorporated survey data from enrolled jurisdictions on average inspection times as it relates to risk categorizations for food establishments in their inventory. See Standard 8 – Proposed Model Without Outliers and Standard 8 – Productive Hours Calculation Without Outliers. This proposed model is similar to the calculations in the attached Manufactured Food Regulatory Program Standards – Appendix 8.2. The variables will be based on an enrollee’s inventory of establishments in each risk grouping. The constants will include the median inspection time based on survey data, a re-inspection rate, and a frequency of two (2) inspections each year (at least one every six months) for every food establishment [as prescribed in § 8-401.10(A) of the 2013 FDA Food Code]. The subcommittee recommends that the PSC continue to collaborate with the FDA internal VNRFRPS working group on modifying the “Description of Requirements” for “Staffing Level” in Standard 8 of the VNRFRPS and the CFP guidance document titled “Standard 8 Staffing Level Assessment Workbook” to incorporate the outcomes of the work that was done on Charges 1 and 2. The findings of the 2016-2018 PSC, VNRFRP Standard 8 subcommittee should be used as the foundation to establish a more statistically sound logic model for the FTE/inspection ratio and provide the new calculation/formula to be used by a VNRFRPS enrollee to assess the Standard 8 “Staffing Level”.
- f. Issue 2016 II-020 – Reevaluation of FDA VNRFRP Standard 8 Charge 2 - The subcommittee recommends using supporting data gathered from the three surveys that were conducted by the subcommittee to propose a revision to the Standard 8 “Staffing Level” FTE/Inspection Ratio criteria. The intent of the recommendation is not to weaken the Standard but to provide more practical measures of performance of the enrollee against the Standard. Since efforts to obtain the actual self-assessment documentation from enrolled jurisdictions listed on the FDA website as meeting Standard 8 were not successful, there was a shift to consider similar criteria in Standard 8 of the Manufactured Food Regulatory Program Standards (MFRPS). The MFRPS model looks at inspection time spent by food establishment risk categorization, considers technological advancements in industry, efficiency improvements within local and state food regulatory programs, methods to conduct risk assessment categorization of food establishments, and policies for establishing inspection frequency based on risk categorization (as listed in the description of requirements for Standard 3 of the Retail Program Standards).

The proposed calculation/formula will be very much like the calculations in the MFRPS. (See Manufactured Food Regulatory Program Standards – Appendix 8.2, Standard 8 - Proposed Model Without Outliers and Standard 8 – Productive Hours Calculation Without Outliers. The variables will be based on an enrollee’s inventory of establishments in each risk grouping. The constants will include the median inspection time based on survey data, a re-inspection rate, and a frequency of two (2) inspections each year (at least one every six months) for every food establishment [as prescribed in § 8-401.10(A) of the 2013 FDA Food Code].

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

- a. Provide a Cost/Benefit Analysis for recognizing partial achievement of the Retail Program Standards. This charge is still

- pending. The PSC asks for clarification from the FDA on the cost/benefit analysis to continue this charge in the next biennium.
- b. Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards. The sub-committee was unable to adequately complete this task to uniformly recognize jurisdictions. It was acknowledged there is a burden to find auditors.
  - c. Collaborate with the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to continue review of all initiatives: existing, new or under development; involving the training, evaluation and/or certification of food safety inspection officers. This collaborative working relationship will ensure the sharing of information so not to create any unnecessary redundancy in the creation of work products or assignment of tasks/responsibilities. The PSC will need to continue this since the progress on this work is continuing at the national level.
  - d. Collaborate with the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to review the results of the partnership for the Food Protection Training and Certification Workgroup recommendations for the nationally recognized Retail Food Curriculum based on the Retail Food Job Task Analysis (JTA) to determine if changes are needed in the Standard 2 curriculum. Identify any gaps, provide recommendations for change, and review the time frame for completion of Standard 2, Steps 1 through 4, for new hires or staff newly assigned to a regulatory retail food protection program.
  - e. Collaborate with the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to continue to assess if any changes are needed in Standard 2 – Trained Regulatory Staff based on the current standard for review referenced in (1) above to provide better alignment with Standard 4 of the VNRFRPS. Since the work on the national level is ongoing, the PSC will need to continue work on this charge.
  - f. Recommend that the Program Standards Committee and the FDA internal Program Standards working group continue to collaborate on modifying the Standard 8 “Staffing Level” criteria using a new calculation/ formula based on the findings of the 2016 – 2018 Program Standards Committee, Standard 8 Subcommittee.

**COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:**

*X 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: Report –Program Standards Committee (PSC)**

**a. List of content documents submitted with this Issue:**

- (1) Program Standards Committee-2018\_final\_report
- (2) 2016-2018 PSC Committee Roster
- (3) Final 2016-2018 PSC Workplan
- (4) Std 6 Summary of Proposed Changes
- (5) Std 6 Proposed Changes
- (6) Std 6 Instructions for Conducting a Self-Assessment
- (7) Standard Key Crosswalk to Code
- (8) Std 3 Proposed Changes
- (9) Crosswalk – Requirements for Foodborne Illness Training update

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

- (1) 2016 II-009 subcommittee report
- (2) 2016 II-015 subcommittee report
- (3) 2016 II-018 subcommittee report
- (4) Re-evaluation of VNRFRPS Standard 8 Subcommittee Report (Revised 1.5.2018)
- (5) Self-Assessment – Audit Verification Summary & Gap Analysis Audit
- (6) NCS Background Information
- (7) CFSRP Background Information
- (8) Voluntary National Retail Food Regulatory Program Standards – Standard 8
- (9) Standard 8 - Average Inspection Time by Risk Categorization
- (10) Standard 8 – FTE to Inspection Ratio Calculator (Using Median Inspection...)
- (11) Standard 8 – Productive Hours Calculation Without Outliers

- (12) Standard 8 - Report Data Analysis Update
- (13) Standard 8 – Sample Comparison of Current to Proposed Inspections to FTE
- (14) Standard 8 – Survey Responses for Median Frequency Other Inspection Types..
- (15) Standard 8 – Proposed Model Without Outliers
- (16) Manufactured Food Regulatory Program Standards Appendix 8.2

2. **Issue: PSC 2 - Areas where the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) can be changed or improved to enhance enrollment and implementation**

**NOTE:** listed documents are attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents related to this Issue:**

- (1) Attachment title: Std 6 Summary of Proposed Changes
- (2) Attachment title: Standard Key Crosswalk to Code

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

- (1) Attachment title: Issue 2016 II-009 subcommittee report
- (2) Attachment title: Self-Assessment – Audit Verification Summary & Gap Analysis Audit

3. **Issue: PSC 3 – Recommendations to Continue Revision of Standard 8 of the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) Staffing Level Criteria** Recommendation that the 2018 – 2020 Program Standards Committee and the FDA continue to work on changing the Standard 8 “Staffing Level” criteria using a new calculation/formula based on the findings of the 2016-2018 Program Standard Committee, Standard 8 Subcommittee.

**NOTE:** listed documents are attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents related to this Issue:**

- (1) None submitted.

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

- (1) Attachment title: Re-evaluation of VNRFRPS Standard 8 Subcommittee Report
- (2) Attachment title: Voluntary National Retail Food Regulatory Program Standards – Standard 8
- (3) Attachment title: Standard 8 - Average Inspection Time by Risk Categorization
- (4) Attachment title: Standard 8 – FTE to Inspection Ratio Calculator (Using Median Inspection Time by Risk Categorization)
- (5) Attachment title: Standard 8 – Productive Hours Calculation Without Outliers
- (6) Attachment title: Standard 8 - Report Data Analysis Update
- (7) Attachment title: Standard 8 – Proposed Model Without Outliers
- (8) Attachment title: Standard 8 – Survey Responses for Median Frequency Other Inspection Types & Travel Time
- (9) Attachment title: Manufactured Food Regulatory Program Standards, Appendix 8.2

4. **Issue: PSC 4– Amendment of Voluntary National Retail Food Regulatory Program Standard 3**

**NOTE:** listed document is attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents related to this Issue:**

- (1) Attachment title: Std 3 Proposed Changes

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

5. **Issue: PSC 5 – Amendment of Retail Program Standard 6**

**NOTE:** listed documents are attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents related to this Issue:**

- (1) Attachment title: Std 6 Proposed Changes
- (2) Attachment title: Std 6 Summary of Proposed Changes
- (3) Attachment title: Std 6 Instructions for Conducting a Self-Assessment

b. List of supporting attachments: X *No supporting attachments submitted*

6. **Issue: PSC 6– Posting of Self-Assessment Tool on CFP Website**

**NOTE:** listed documents are attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents submitted with this Issue: None**

b. **List of supporting attachments:**

(1) Attachment title: Self-Assessment – Audit Verification Summary & Gap Analysis Audit

7. **Issue: PSC 7 – Recommendations for the training of food safety regulatory professionals**

**NOTE:** listed documents are attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents submitted with this Issue:**

(1) None submitted

b. **List of supporting attachments:**

(1) Attachment title: Issue 2016 II-015 subcommittee report

(2) Attachment title: NCS Background Information

(3) Attachment title: CFSRP Background Information

8. **Issue: PSC 8 – Approval and Posting of the updated Crosswalk**

**NOTE:** listed documents are attached to the Issue titled: Report – Program Standards Committee (PSC)

a. **List of content documents related to this Issue:**

(1) Attachment title: Crosswalk- Requirements for Foodborne Illness Training Programs update

b. **List of supporting attachments:**

(1) Attachment title: Issue II-018 subcommittee report