

Summary of Proposed Change to Standard 6 of the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS)

Scope of Proposed Change:

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.

Reasoning for the Proposed Change:

The current sampling methodology is restrictive for jurisdictions that prefer to evaluate shorter self-assessment period time frames. The current methodology limits many jurisdictions:

- a. The current method of determining the start point inspection may require jurisdictions to review inspections that were conducted prior to the current self-assessment period;
- b. The current method of determining the start point inspection may not represent a jurisdiction's entire self-assessment period. For example, if only the third most recent routine inspections are reviewed, these may only represent a "moment in time" of the self-assessment period. If all routine inspections conducted during the self-assessment period are available for review, a more comprehensive representation of the jurisdiction's work is available for review;
- c. The current method may inhibit a jurisdiction's ability to identify current potential gaps in compliance and enforcement activities. Without the ability to review more recent inspection reports, implemented intervention strategies may not be assessed during a self-assessment. On page AP-3 of the VNRFRPS 2015 Administrative Procedures, jurisdictions are encouraged to complete self-assessment updates to reflect the most current information on its program accomplishments. Limiting the Standard 6 review to the third most recent routine inspections decreases the ability for a jurisdiction to assess the most current information on its program accomplishments and creates disincentive to conducting self-assessment updates on Standard 6;
- d. The current method of selecting the third most recent inspection (start point inspection) and review of the establishment file to the current date is not consistently interpreted or implemented;
- e. The current method may not allow a jurisdiction to assess all aspects of their compliance and enforcement program. For instance, if none of the randomly selected files measure all compliance and enforcement activities, a jurisdiction may not have an opportunity to assess their entire compliance and enforcement process;
- f. The proposed change is more closely aligned with the Manufactured Food Regulatory Program Standards; and
- g. The current method requires jurisdictions that are enrolled in both the VNRFRPS and MFRPS are required to use different methods of assessing compliance and enforcement in each program area.