

**Conference for Food Protection  
2020 Issue Form**

**Issue: 2020 II-018**

**Council Recommendation:** Accepted as Submitted \_\_\_\_\_ Accepted as Amended \_\_\_\_\_ No Action \_\_\_\_\_

**Delegate Action:** Accepted \_\_\_\_\_ Rejected \_\_\_\_\_

*All information above the line is for conference use only.*

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**Issue History:**

This issue was submitted for consideration at a previous biennial meeting, see issue: 2016 II-020; new or additional information has been included or attached and the recommended solution has been revised.

**Title:**

PSC Issue #2 New assessment tool for Standard 8 Staffing Level Criteria

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

The Program Standards Committee has addressed the charges outlined in Issue 2018 II-018: Continue Revision of Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) Standard 8 Staffing Level Criteria. The Committee has proposed a recommendation that the FDA modify the Standard 8 "Staffing Level" criteria by including the proposed model assessment tool as a secondary option to assess compliance based on the findings of the 2018 - 2020 Program Standards Committee, Subcommittee #2.

**Public Health Significance:**

The VNRFRPS offer a systematic approach to, through a continuous improvement process, enhance retail food regulatory programs. The VNRFRPS define and provide a framework designed to accommodate both traditional and emerging approaches of regulatory programs operating within an integrated food safety system. The Program Standards Committee established a subcommittee to address the specific charges in Issue 2018 II-018. The subcommittee, with support from staff from Harris County Public Health, created a new proposed model assessment tool, ensured it to be statistically sound, and completed a pilot study among 19 jurisdictions to test the proposed model. The information collected provided the means to: (1) Improve the proposed model assessment tool that was initially created by the Standard 8 Subcommittee in Issue # 2016 II-020; (2) Validate the statistical soundness of the proposed model by confirming there was no relationship found between times and frequencies provided by "high" and "low" performing jurisdictions; (3) Determine if the proposed model assessment tool could be used in the real world setting by conducting a Pilot Study to assess the functionality of the model among varying jurisdictions; and (4) Utilize data from the study to recommend the proposed model assessment tool be included in the Standard 8 "Staffing Level" criteria as an alternative way to determine compliance.

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

*The Conference recommends that a letter be sent to FDA asking them to modify the "Description of Requirements" for "Staffing Level" in Standard 8 by including the proposed model assessment tool as an alternative option to assess compliance for the VNRFRPS.*

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**Supporting Attachments:**

- "PSC Issue #2 list of supporting attachments"

*It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.*

## PSC Issue #2 list of supporting attachments

- (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 – Proposed Model
- (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: 2018 Issue (see page 27 <http://www.foodprotect.org/media/biennialmeeting/council-ii-final-issue-recommendations-1.pdf>)
- (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: 2018 Program Standards Committee Final Report  
[http://www.foodprotect.org/issues/packets/2018Packet/issues/II\\_013.html](http://www.foodprotect.org/issues/packets/2018Packet/issues/II_013.html). See the Re-evaluation of VNRFRPS Standard 8 Subcommittee Report and supporting attachments for Standard 8.
- (3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 Summary
- (4) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 PowerPoint
- (5) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Voluntary National Retail Food Regulatory Program Standards – Standard 8 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (6) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 Re-Evaluation of Staffing Level Model Pilot Study Report