Issue: 2020 II-025

Council Recommendation:	Accepted as Submitted	_____	Accepted as Amended	_____	No Action	_____
Delegate Action:	Accepted	_____	Rejected	_____		

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Issue History:

This is a brand new Issue.

Title:

PSC Issue #7 Amend Std 2 curriculum to replace select courses with updates

Issue you would like the Conference to consider:

FD252 Allergen Management, FDA 35 Basic Food Law for State Regulators, FDA36 Public Health Principles, MIC13 Aseptic Sampling, MIC15 Cleaning and Sanitizing, of the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Program Standard 2, Trained Regulatory Staff Appendix B-1, Coursework for Food Safety Inspection Officers (FSIO) all have outdated content and require replacement with upgraded course content that provides more relevant and up-to-date information.

Public Health Significance:

The updated course content was developed as part of a cooperative agreement between the International Food Protection Training Institute (IFPTI) and the FDA. In Standard 2, Trained Regulatory Staff, the VNRFRPS describe the training process for an FSIO to obtain the knowledge, skills and ability to adequately perform their duties. Standard 2 identifies allergen management as a required competency for individuals conducting regulatory inspections. As per the B2 Allergens IFPTI course profile, the course includes information that will assist an FSIO in discussing the control of allergens in relation to food safety, labeling requirements, and Food Safety Modernization Act (FSMA).

Standard 2 identifies statutes, regulation, and ordinances as a required competency for individuals conducting regulatory inspections. As per the B17 Laws, Regulations, Policies, and Procedures IFPTI course profile, the course includes information that will assist an FSIO in discussing foundations, constitution, law, regulation, policy, procedures, and guidance.

Standard 2 indicates that an understanding of public health principles is a required competency for individuals conducting regulatory inspections. FDA36 Public Health Principles covers this subject matter but is directed at public health professionals in a variety of program areas. As per the B23 Public Health Principles IFPTI course profile, the course is updated and focused more specifically on food protection professionals. B23

includes contemporary examples, such as the bovine spongiform encephalopathy (BSE) outbreak in the United Kingdom and the E. coli O157:H7 outbreak in the United States during 1993. These examples are used to describe subsequent changes in public policy and describe the methodology for disease mitigation.

Standard 2 identifies food microbiology and epidemiology as required competencies for individuals conducting regulatory inspections, including the collection of samples during foodborne illness investigations. As per the B25 Sampling IFPTI course profile, the course covers the same material as MIC13, but also includes a subtitled video demonstration of protocols for collecting aseptic samples. Additionally, the course describes the methods and rationale for collecting and documenting samples that are legally and scientifically defensible, including chain of custody.

Standard 2 identifies food microbiology as a required competency for individuals conducting regulatory inspections. As per the B26 Sanitation Practices IFPTI course profile, the course covers the same material as MIC15 but expands on that content to include construction materials, establishment layout and other principles relevant to sanitary engineering. It addresses the distinction between cleaning and sanitizing, barriers to accomplishing both activities, the limitations and thresholds for different methods.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting the replacement of the following courses with committee suggested courses as they contain material that is a significant upgrade in course content and provide more relevant and up-to-date information:

(1) the replacement of FD252 Allergen Management in Standard 2, Trained Regulatory Staff, "post" curriculum with coursework such as the International Food Protection Training Institute course B2 Allergens (CC8029W);

(2) the replacement of FDA35 Basic Food Law for State Regulators in Standard 2, Trained Regulatory Staff, "pre" curriculum with coursework such as the International Food Protection Training Institute course B17 Laws, Regulations, Policies, and Procedures (CC8039W);

(3) the replacement of FDA36 Public Health Principles with an updated course, such as the International Food Protection Training Institute Course B23 Public Health Principles (CC8026W) in the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(4) the replacement of MIC13 Aseptic Sampling with an updated course, such as the International Food Protection Training Institute Course B25 Sampling (CC8035W) in the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards; and

(5) the replacement of MIC15, "Cleaning & Sanitizing," with an updated course, such as the International Food Protection Training Institute Course B26 Sanitation Practices (CC8032W) in the "pre-requisite" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards.

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Supporting Attachments:
- "PSC Issue #7 list of supporting attachments"

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