

**Conference for Food Protection  
2020 Issue Form**

**Issue: 2020 II-026**

**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: 2018 II-019 and 2016 II-015; new or additional information has been included or attached and the recommended solution has been revised.

**Title:**

PSC Issue #8 Amend Standard 2 to include additional "pre" and "post" topics

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

Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Program Standard 2, Trained Regulatory Staff Appendix B-1, Coursework for Food Safety Inspection Officers (FSIO) is lacking courses on the following topics: environmental hazards, integrated food safety systems, jurisdiction, labeling, pest control, plumbing, professionalism, recalls, traceability, and transportation.

**Public Health Significance:**

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. New coursework was developed as part of a cooperative agreement between the International Food Protection Training Institute (IFPTI) and the FDA. Standard 2 identifies public health principles as a required competency for individuals conducting regulatory inspections. As per the B8 Environmental Hazards IFPTI course profile, the course includes information that will assist an FSIO in developing knowledge, skills, and abilities related to environmental hazards as sources of contamination, and associated control methods.

Standard 2 identifies communication as a required competency for individuals conducting regulatory inspections. As per the B12 Integrated Food Safety System IFPTI course profile, the course includes information that will assist an FSIO in discussion of integrated food safety system foundations, stakeholders, mutual reliance, and program standards.

Standard 2 identifies statutes, regulations, and ordinances as a required competency for individuals conducting regulatory inspections. As per the B15 Jurisdiction IFPTI course profile, the course includes information that will assist an FSIO in gaining introductory knowledge, skills, and abilities related to various regulatory agencies and their authority over feed and food. The topics covered in this course include foundations, law, crossing

boundaries, inter-agency agreements. The student will be able to describe which agencies have authority to conduct specific regulatory activities.

Standard 2 identifies basics of inspection as a required competency for individuals conducting regulatory inspections. As per the B16 Labeling IFPTI course profile, the course includes information that will assist an FSIO in gaining introductory knowledge of labeling laws and regulations and components of feed and food labels. While conducting inspections, trained inspection staff will routinely encounter product labels and may need to interpret labeling for determination of compliance.

Pest Control is another key public health principle and required competency for individuals conducting regulatory inspections. As per the B19 Pest Control IFPTI course profile, the course includes information that will assist an FSIO in explaining how pest activity can impact food safety, discussing pests of significance to human and animal health, discussing the importance of facility design for pest control, describing sanitation practices for pest control, and discussing how pest management is used to control pests. While conducting inspections, trained inspection staff will need to rely on knowledge of how integrated pest management impacts food safety.

Adequate assessment of plumbing is also part of inspection basics. As per the B20 Plumbing IFPTI course profile, the course provides information on plumbing controls used in commercial food establishments to protect the potable water supply from contamination, citing contemporary examples where illness and injury could have been prevented with properly maintained plumbing devices. The course includes photos and diagrams that illustrate the function of plumbing devices that an inspector will be evaluating during inspections. The material also identifies the differences between public and private water supplies and how these differences inform the questions that should be asked by the regulator during an inspection.

Knowledge of professionalism standards also supports the required competency of communication for individuals conducting regulatory inspections. As per the B22 Professionalism IFPTI course profile, the course includes information that will assist an FSIO in communicating effectively, demonstrating professional conduct and avoiding the appearance of misconduct.

Knowledge of prevailing statutes, regulations and ordinances also includes recall procedures. As per the B24 Recalls IFPTI course profile, the course is an introduction to the process of removing products from commerce when they are adulterated or misbranded. It addresses important distinctions, such as the difference between product recalls and market withdrawals. B24 Recalls also covers the disposition of food products, assessing risk, documentation, and how to coordinate with other jurisdictions, state agencies and the FDA.

Standard 2 indicates that an understanding of food microbiology and epidemiology is required for regulators. As per the B27 Traceability IFPTI course profile, the course serves as a primer for tracking human and animal foods through the supply chain. The traceback processes and necessary documentation are clearly defined, and the rationale is provided for when and why a traceback is conducted. B27 Traceability builds on material presented in the Foodborne Illness Investigations series.

As per the B28 Transportation IFPTI course profile, the course introduces material pertaining to preventing contamination of food during transport. It addresses transportation

methods, security and product safety along the chain of custody. The course cites contemporary examples, such as a Salmonella enteritidis outbreak in Minnesota. B28 Transportation also includes information on pest control, HACCP and temperature control as it relates to transporting food. Regulators must consider the impact of a compromised supply chain on the flow of food.

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

That a letter be sent to the FDA requesting the following coursework be added as they are important topics that are not currently covered in the Standard 2 curriculum and are necessary for a new Food Safety Inspection Officer's baseline knowledge. :

(1.) The addition of coursework on environmental hazards, such as the International Food Protection Training Institute Course B8 Environmental Hazards (CC8024W) to the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(2.) The addition of coursework on integrated food safety system, such as the International Food Protection Training Institute Course B12 Integrated Food Safety System (CC8018W) to the "post" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(3.) The addition of coursework on jurisdictional authority, such as the International Food Protection Training Institute Course B15 Jurisdiction (CC8037W) to the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(4.) The addition of coursework on labeling, such as the International Food Protection Training Institute Course B16 Labeling (CC8038W) to the "post" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(5.) The addition of coursework on pest control, such as the International Food Protection Training Institute Course B19 Pest Control to the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(6.) The addition of coursework on plumbing, such as the International Food Protection Training Institute Course B20 Plumbing (Course under development-upgrade from CC8001W) to the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(7.) The addition of coursework on professionalism, such as the International Food Protection Training Institute Course B22 Professionalism (CC8025W) to the "pre" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(8.) The addition of coursework on recalls, such as the International Food Protection Training Institute Course B24 Recalls (CC8041W) to the "post" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards;

(9.) The addition of coursework on traceability, such as the International Food Protection Training Institute Course B27 Traceability (CC8042W) to the "post" curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards; and

(10.) The addition of coursework on transportation, such as the International Food Protection Training Institute Course B28 Transportation (CC8036W) to the "post"

curriculum for Standard 2 in the Voluntary National Retail Food Regulatory Program Standards.

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**Supporting Attachments:**

- "PSC Issue #8 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.*