

**Conference for Food Protection  
2020 Issue Form**

**Issue: 2020 II-027**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

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

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**Issue History:**

This is a brand new Issue.

**Title:**

PSC Issue #9 Amend Std 2 to increase the time for completion of Steps 1-4

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

The Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Standard 2: Trained Regulatory Staff requires that Steps 1 through 4 are completed within 18 months of hire or assignment to the retail food regulatory program. This timeframe can be difficult to meet and does not align with the time frame provided by Standard 2 - Training Program of the Manufactured Food Regulatory Program Standards (MFRPS).

**Public Health Significance:**

Standard 2 ensures that regulatory retail food program inspection staff shall have the knowledge, skills, and ability to adequately perform their required duties. The following is a schematic of a 5-step training and standardization process to achieve the required level of competency:

Step 1: Pre-Inspection Curriculum

Step 2: Initial Field Training and Experience

Step 3: Independent Inspections and Completion of All Curriculum Elements

Step 4: Food Safety Inspection Officer - Field Standardization

Step 5: Continuing Education and Training

Standard 2 requires that ninety percent of the regulatory retail food program inspection staff must have successfully completed the required elements of steps 1 through 4 within 18 months of hire or assignment to the retail food regulatory program.

In many regulatory jurisdictions, retail food inspection staff are generalists performing multiple environmental health functions. Upon hire or reassignment, staff must be trained in many disciplines including water, wastewater, air quality, on-site waste management, aquatic health, public accommodations, housing, and solid waste in addition to retail food.

Allowing for more time to steps 1-4 will make the retail food training requirements in Standard 2 more attainable.

One of the major hurdles for regulatory jurisdictions to meet the Standard 2 is the completion of a standardization process similar to the FDA standardization procedures. This process requires a Standardized Food Safety Inspection Officer who has been standardized by FDA to conduct standardization of inspection staff or to create State Standards to conduct standardization of inspection staff. Standardized Food Safety Inspection Officer are in short supply and high demand. In some states, local regulatory jurisdictions participate in VNRFRPS, but the state does not, and a Standardized Food Safety Inspection Officer is not available. In other states, travel is required for the Standardized Food Safety Inspection Officer to perform standardization for local regulatory jurisdictions resulting in financial concerns. Additionally, scheduling and conducting eight joint field inspections of food establishments is very time consuming. Allowing for more time to complete the field standardization process may not alleviate all obstacles, but it will make the requirement more attainable.

Many regulatory jurisdictions participate in both VNRFRPS and MFRPS. Standard 2 - Training Program of the MFRPS allows for 24 months to complete a basic food inspection training curriculum that consists of coursework and field training. Increasing the timeframe for VNRFRPS, Standard 2 to 24 months will align with the requirements of MFRPS, Standard 2.

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

The Conference recommends that a letter be sent to the FDA requesting the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Standard 2: Trained Regulatory Staff be amended to increase the timeframe for completion of Steps 1 - 4 to 24 months.

Amended language for VNRFRPS Standard 2:

***Description of Requirement***

Ninety percent (90 %) of the regulatory retail food program inspection staff (Food Safety Inspection

Officers - FSIO) shall have successfully completed the required elements of the 5-step training and

standardization process:

- Steps 1 through 4 within ~~48~~ 24 months of hire or assignment to the retail food regulatory program.
- Step 5 every 36 months after the initial ~~48~~ 24 months of training.

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**Supporting Attachments:**

- "PSC Issue #9 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 #9 list of supporting attachments

(1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report

(2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: VNRFRPS, Standard 2 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)

(3) Manufactured Food Regulatory Program Standards (see <https://www.fda.gov/MFRPS>)