The FPMCC exists to carry out charges assigned via the Conference Issue process and from the Conference Executive Board relating to food protection manager certification. The objective of this standing committee is to adopt sound, uniform accreditation standards and procedures that are accepted by the Conference while ensuring that the conference Standards for Accreditation for Food Protection Manager Certification programs and the accreditation process are administered in a fair and responsible manner.

**COMMITTEE CHARGE(S):**

The FPMCC exists to carry out charges assigned via the Conference Issue process and from the Conference Executive Board relating to food protection manager certification. The objective of this standing committee is to adopt sound, uniform accreditation standards and procedures that are accepted by the Conference while ensuring that the conference Standards for Accreditation for Food Protection Manager Certification programs and the accreditation process are administered in a fair and responsible manner.

**COMMITTEE WORK PLAN AND TIMELINE:**

The standing charge for this committee is stated above and work on this charge began with a conference call in September 2018. This initial call in September was used to welcome committee members and align on committee activities and outputs.

**COMMITTEE ACTIVITIES:**

1. **September 18, 2018** Conference Call
   October 23-24, 2018 Face to Face meeting – San Diego, CA
   March 26, 2019 Conference Call
   April 11 – 12, 2019 Face to Face meeting – Austin, TX
   September 9, 2019 Conference Call
   October 15 – 16 Face to Face meeting – Pittsburg, PA

2. **Overview of committee activities:** While there were no new charges for the FPMCC, the standing charges were completed as follows:

   - The Standards Workgroup of the FPMCC completed their work under the leadership of Kate Piche. The Workgroup did this through email assignments, meeting twice in person during the FPMCC face to face meetings and holding one web conference on July 31, 2019. The Standards for Accreditation of Food Protection Manager Certification Programs was reviewed, edited and discussed. Among the recommended changes will be changing the title word “Standards” to read “Standard”. If approved, this will have affects on other CFP references made to this document. (See Issue 1: Attachment III_CFP Food Protection Manager Certification Standards version 1.9.2020)
   - The Bylaws Workgroup of the FPMCC completed their work under the leadership of Jeff Hawley. The Workgroup had calls on 3/19, 4/3, 5/22 and 6/13. Additionally, they met in person on 4/11 during our FPMCC meeting. Most of the work was done by email correspondence. New language was added in Article VI, Sections 2 and 5. This Workgroup was also assigned the task of reviewing and making recommendations to the Board regarding the contract between CFP and ANSI. This work was completed, reviewed with the Committee and presented to the Board at the Fall Board meeting for actions and next steps. (See Issue 1: Attachment IV_Revised FPMCC Bylaws 2019)
   - The Communications Workgroup of the FPMCC was led by Tara Paster Cammarata. The focus of this Workgroup was to continue to build upon the informational PowerPoint deck that was approved last biennium to be posted on the CFP website. Four teams were formed as follows:
     - **Team 1:** Define and create illustrations for Certificate vs. Certification and Food Employee vs. Person-in-Charge
     - **Team 2:** FAQ review and update – (See below for Board Request)
     - **Team 3:** Information Sharing PowerPoint – (See below for Board Request)
     - **Team 4:** Information Outreach Plan: Abstract Submission – (See below for Board Request) – A CFP member survey was created and approved by the FPMCC for submission to the Board. The request is that this survey be distributed by Board leadership prior to the 2020 Biennial Meeting and data be collected to assist in better understanding educational outreach preferences of members. The FPMCC has a psychometrician on the committee that has offered to collect and analyze the data and report back to the Board as appropriate.
The survey is the first step prior to developing the Information Outreach Plan and this will be completed in the next biennium. The Information Outreach Plan will include various elements such as social media, links, blog, other organizations (interaction to leverage distribution channels).

A call with the Board leadership on recommended next steps will determine follow up actions. (See Issue 1: Attachment V_FPMCC Communication Outreach PowerPoint 10.24.19)

- The Logistics Workgroup of the FPMCC was lead by Geoff Luebkemann. The Workgroup conducted approximately 24 vendor calls during this biennium to plan and execute FPMCC meetings on 10-23-2018 (San Diego), 04-11-2019 (Austin), and 10-15-2019 (Pittsburgh). Additionally, Logistics produced meeting minutes for each of these meetings as well as conference call meetings conducted on 09-18-2018 and 09-09-2019. Lastly, on 10-15-2019 Logistics surveyed the FPMCC members present for the FPMCC 2019 Fall Meeting (Pittsburgh) to obtain feedback on FPMCC meeting planning, communication, and execution.

3. Charges COMPLETED and the rationale for each specific recommendation:
See above

4. Charges INCOMPLETE and to be continued to next biennium:
Not Applicable

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:
☐ No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.

1. To repost the Educational PowerPoint on the CFP website with newly added notes in the notes section of slides.
2. To review the revised FAQ document which was edited and updated and if approved, post on the CFP website.
3. Review a proposed CFP member survey and if approved, distribute prior to the upcoming 2020 Biennial meeting.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:
1. Issue #1: Report – Food Protection Manager Certification Committee
   List of content documents submitted with this Issue:
   (1) Committee Final Report (see attached PDF)
   (2) Committee Member Roster (see attached PDF)
   (3) CFP FPMCC Standards Version 1.9.2020 (see attached PDF)
   (4) FPMCC Bylaws 2019 (see attached PDF)

2. List of supporting attachments: ☐ No supporting attachments submitted
   • 2018 Fall Conference Call Minutes
   • 2018 Fall Meeting Minutes – San Diego
   • 2019 Spring Meeting Minutes - Austin
   • 2019 Fall Meeting Minutes – Pittsburgh
   • FPMCC CFP Communication Outreach PowerPoint 10.24.19
   • Revised FAQ for CFP Website 10.24.19

3. Committee Issue #2:
   FPMCC Standards for Accreditation of Food Protection Manager Certification

4. Committee Issue #3
   FPMCC - Bylaw Revisions
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Preamble

The Conference for Food Protection, hereinafter referred to as the CFP, is an independent voluntary organization that has identified the essential components of a nationally recognized Food Protection Manager Certification Program and established a mechanism to determine if certification organizations meet these Standards. The CFP Standards for Accreditation of Food Protection Manager Certification Programs are intended for all legal entities that provide certification for this profession. The Standards have been developed after years of CFP’s research into, and discussion about, Food Protection Manager Certification Programs.

All certification organizations attesting to the competency of Food Protection Managers, including regulatory authorities that administer and/or deliver certification programs, have a responsibility to the individuals desiring certification, to the employers of those individuals, and to the public. Certification organizations have as a primary purpose the evaluation of those individuals who wish to secure or maintain Food Protection Manager Certification in accordance with the criteria and Standards established through the CFP. Certification organizations issue certificates to individuals who meet the required level of competency.

The professionals involved in the credentialing process for Certified Food Protection Managers shall recognize that the justification for regulating entrance to the occupation of Certified Food Protection Manager is to:

- protect and promote food safety for the welfare of the public;
- ensure that the responsibility and liability for overseeing the protection of safety and welfare of the public lies with those governmental jurisdictions at the Federal, state and local levels having the power to set forth laws regulating entrance to and performance in this occupation;
- ensure that the rights of the public at large and of those members of the public who wish to enter this occupation shall be balanced in terms of fairness and due process in the form of a credentialing process for admitting qualified persons to perform in that occupation; and
- ensure that the validity of the credentialing process for Certified Food Protection Manager is dependent on unbiased application of all aspects of that process, requiring careful determination of the competencies necessary to prevent foodborne illness,
unbiased education and training for acquisition of those competencies, and fair assessment practices to ensure that individuals have achieved mastery of the competencies.

Therefore, professionals involved in the credentialing process for Certified Food Protection Manager accept responsibilities based on these considerations.

The CFP Standards are based on nationally recognized principles used by a variety of organizations providing certification programs for diverse professions and occupations. Accreditation, through the process recognized by CFP, indicates that the certification organization has been evaluated by a third-party accrediting organization and found to meet or exceed all of the CFP’s established Standards.

To earn accreditation, the certification organization shall meet the following CFP Standards and provide evidence of compliance through the documentation requested in the application. In addition, the certification organization shall agree to abide by certification policies and procedures, which are specified by the CFP Food Protection Manager Certification Committee, hereinafter referred to as the FPMC Committee, approved by the CFP, and implemented by the accrediting organization.

The accrediting organization shall verify and monitor continuing compliance with the CFP Standards through the entire accreditation period. The CFP FPMC Committee will work directly with the accreditation organization to enhance and maintain certification policies and procedures that meet the specific needs of Food Protection Managers while ensuring a valid, reliable and legally defensible evaluation of certification programs.

The American National Standards Institute (ANSI) was selected as the accrediting organization for the CFP Standards for Accreditation of Food Protection Manager Certification Programs and assumed its duties in January 2003. The CFP FPMC Committee continues to work within the Conference structure to monitor the criteria and selection process for the organization serving as the accrediting body for Food Protection Manager Certification Programs.

The CFP strongly encourages regulatory authorities and other entities evaluating credentials for Food Protection Managers to recognize and endorse these Standards and the accreditation process. The CFP Standards for Accreditation of Food Protection Manager Certification Programs provides the framework for universal acceptance of individuals who have obtained their credentials from an accredited certification program. In the U.S Food and Drug Administration’s Food Code, hereinafter referred to as the

FDA Food Code, Section 2-102.20 recognizes Food Protection Manager certificates issued by an accredited certification program as one means of meeting the FDA Food Code’s “Demonstration of Knowledge” requirement in Section 2-102.1, and as satisfying the requirement of section 2-102.12 for the Person in Charge to be a certified food protection manager.

Please note that words that appear in italics are defined terms.
Modifications and Improvements

The FPMC Committee followed the Conference directive to use the 1996 conference working document, Standards for Training, Testing and Certification of Food Protection Managers, in the development of accreditation standards. Extensive revision of this document was presented to CFP’s 2012 Biennial Meeting of the Conferences for Food Protection under the title, Standards for Accreditation of Food Protection Manager Certification Programs.

The charge to the FPMC Committee from the 2010 Biennial Meeting of the Conference for Food Protection resulted in revisions to the Standards to enhance the integrity of the entire examination process, which included identification and analysis of root causes of security violations and implementation of solutions.

The revision and reformating of the document were made after a comprehensive FPMC Committee review of each section. This revision of the Standards for Accreditation of Food Protection Manager Certification Programs:

1. adds and improves definitions that are more precise and more consistent with terminology and definitions used in the psychometric community and by accreditation organizations;
2. reorganizes Standards to eliminate duplication and align with purpose;
3. modifies or creates Standards to better address professional credibility and training of test administrators/proctors; handling of examination packages; shipping irregularities; location (site) irregularities; and breach of the certification organization’s test administrators/proctor’s protocols and requirements;
4. uses “test administrator/proctor” in the Standards to indicate duties for both “test administrator” and “proctor;” and
5. adds a standard for management systems.

Annexes

Annex A is the result of the deliberation and recommendations from the FPMCC from the 2016 Biennial Meeting of the Conference for Food Protection, and represents the process and requirements for CFP to recognize a certification body that is accredited by ANSI under the ISO/IEC 17024 STANDARD.

The annex located at the back of the document Annex B is NOT not part of the Standards, but provides information to guide those responsible for implementing or reviewing Food Protection Manager Certification Programs. The This annex provides guidelines for specific responsibilities that affect the effective implementation of the Conference Standards for Accreditation of Food Protection Manager Certification Programs.

Annex B A provides guidance to regulatory authorities that incorporate Food Protection Manager Certification as part of their requirements to obtain or retain a permit to operate. The CFP Standards for Accreditation of Food Protection Manager Certification Programs is designed to be a set of voluntary unifying national standards providing a mechanism for the universal acceptance of food protection managers who obtain their certificates from an accredited certification program.
Over the past twenty-five years, many regulatory authorities have developed their own Food Protection Manager Certification Programs. This has resulted in a variety of standards for certification programs. The CFP national Standards for universal acceptance of Certified Food Protection Managers provide regulatory authorities reliable and legally defensible criteria for evaluating certification programs. In addition, they eliminate duplication of testing and additional cost for the industry.

Regulatory authorities that may not be in a position to eliminate their existing programs are encouraged to recognize food protection managers certified in accordance with these Standards as fulfilling their program requirements. Annex A B provides additional guidance, developed through the CFP, for the implementation of these regulatory certification programs.
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SECTION 1.0 - DEFINITIONS

1.0  Definitions.

1.1  Accreditation means that an accrediting organization has reviewed a Food Protection Manager Certification Program and has verified that it meets Standards set by the CFP as set forth in this document. (a review of a certification organization by an independent organization using specific criteria, to verify compliance with the Food Protection Management Certification Program Standards).

1.2  Accrediting organization means an independent organization that determines whether a Food Protection Manager Certification Program meets the Standards set by the CFP.

1.3  Accredited certification program means a Food Protection Manager Certification Program that has been evaluated and listed by an accrediting organization as being in conformity with accepted by the CFP and has met the CFP Standards for such programs as set forth in this document. This does not refer to training functions or educational programs.

A.——refers to the certification process and is a designation based upon an independent evaluation of factors such as the sponsor’s mission; organizational structure; staff resources; revenue sources; policies; public information regarding program scope, continued proficiency, discipline, and grievance procedures; and examination development and administration.

B.——does not refer to training functions or educational programs.

1.4  Algorithm means a set of procedures or rules pertaining to the selection of questions on an examination.

1.5  Certificate means documentation issued by a certification organization, verifying that an individual has complied with the requirements of an accredited certification program.

1.6  Certification means the process wherein a certificate is issued.

1.7  Certification organization means an organization that provides a certification program and issues the certificate.

1.8  Certified Food Protection Manager means a person who has successfully passed an accredited food safety certification examination—accredited under these Standards, demonstrating that he/she has the knowledge, skills and abilities (KSA’s) required to protect the public from foodborne illness.
1.9 **Competency** means a defined combination of *knowledge, skills and abilities (KSA-s)* required in the satisfactory performance of a job.

1.10 **Competency examination** means an instrument that assesses whether an individual has attained at least a *the* minimum level of *competency* that has been determined to be necessary to perform effectively and safely in a particular occupation or job. It shall be based on a thorough analysis of requirements for safe and effective performance.

1.11 **Computer-adaptive testing (CAT)** means a method of *computer-based testing* that uses *algorithms* based on the statistics of the examination questions to select items at various difficulty levels to determine the *an examinee’s* proficiency by selecting items at various difficulty levels.

1.12 **Computer-based testing (CBT)** means an examination administered on a computer.

1.13 **Continued proficiency** means a *certification organization’s* process or program designed to assess continued *competence* and/or enhance the *competencies* of *Certified Food Protection Managers*.

1.14 **Demographic data, in this context**, means the statistical data of a population, especially the data concerning age, gender, ethnic distribution, geographic distribution, education, credentials, stakeholder representation, and other relevant or other information that will describe the characteristics of the referenced group.

1.15 **Educator, in this instance**, means a teacher in a secondary or post secondary program leading to a degree or certificate in a course of study that includes *competencies* in prevention of foodborne illness.

1.16 **Entry level performance** means carrying out job duties and tasks effectively at a level that does not pose a threat to public safety but not necessarily beyond that level. It requires safe performance of tasks expected of a worker who has had at least the minimal training (either in a formal school or on the job setting), but not long experience.

1.17 **Equivalency** (in “equivalent examinations”) means that there is specific *psychometric statistical evidence* demonstrates that the passing scores of various forms of an examination, assessing the same content, cover the same content and their respective passing scores represent the same degree of *examinee* competence.

1.18 **Examination Adaptation** means a process by which an examination is transformed from a source language and/or culture into a target language and/or culture.

1.19 **Examination Developers** means the individuals involved in the process of creating the Food Safety *Certification* Examination.
1.20 1.21 Examination forms means equivalent, alternate, and differing sets of items, compiled according to the same examination blueprint and examination questions (with at least 25% alternate questions) to assess the same competencies, conforming to the same examination specifications.

1.21 1.22 Examination Materials means all paper (ex. Examination booklet) or electronic versions and/or forms of the food safety certification examination and associated examination documents, materials necessary for creating, disseminating, retrieving, administering, and grading examination items and forms.

1.22 1.23 Examination specifications means the description of the specific content areas of an examination, stipulating the number or proportion of items for each area of measured competency, the total number of scored and unscored items, the amount of time allotted to complete the exam, and requirements for receiving a passing score, and the level of complexity of those items. The specifications are based on the job analysis and its verification.

1.23 1.24 Examination version means an examination in which the exact set of items in an examination form is presented in another order, language, manner, or medium.

1.24 1.25 Examinee means a person who takes an examination.

1.25 1.26 Exposure Plan means the policies and procedures in place to ensure that examination items and forms are not made available to such a degree that their discrimination value is diminished are not exposed to examinees or other people that may result in an examination item being memorized and/or shared.

1.26 1.27 Food establishment A. Food establishment means an operation that stores, prepares, packages, serves, vends, or otherwise provides food for human consumption as defined in the FDA Food Code 2017,

1) such as a restaurant, satellite or catered feeding location, catering operation if the operation provides food directly to a consumer or to a conveyance used to transport people, market, vending location, conveyance used to transport people, institution, or food bank; and

2) that relinquishes possession of food to a consumer directly, or indirectly through a delivery service such as home delivery of grocery orders or restaurant takeout orders, or delivery service that is provided by common carriers.

B. including:

1) an element of the operation such as a transportation vehicle or a central preparation facility that supplies a vending location or satellite feeding location unless the vending or feeding location is permitted by the regulatory authority; and

2) an operation that is conducted in a mobile, stationary, temporary or permanent facility or location; where consumption is on or off the premises; and regardless of whether there is a charge for the food not including an establishment that offers only prepackaged foods that are not potentially hazardous; a produce stand that only offers whole, uncut fresh fruits and vegetables;
3) a food processing plant; kitchen in a private home if only food that is not potentially hazardous is prepared for sale or service at a function such as a religious or charitable organization’s bake sale if allowed by law and if the consumer is informed by a clearly visible placard at sales or service locations where the food is prepared in a kitchen that is not subject to regulation and inspection by the regulatory authority;

4) an area where food that is prepared as specified in Subparagraph (C) of this definition is sold or offered for human consumption;

5) a kitchen in a private home, such as a small family day-care provider; or a bed-and-breakfast operation that prepares and offers food to guests if the home is occupied, the number of available guest bedrooms does not exceed six, breakfast is the only meal offered, the number of guests served does not exceed eighteen, and the consumer is informed by statements contained in published advertisements, mailed brochures, and placards posted at the registration areas where the food is prepared in a kitchen that is not regulated and inspected by the regulatory authority; or a private home that receives catered or home-delivered food.

1.27 1.28 Food safety certification examination means an examination in food safety approved in accordance with the provisions of this program.

1.28 1.29 Instructor means an individual who teaches a course that includes competencies in prevention of foodborne illness. May also be called “educator” or “trainer.”

1.29 1.30 Item means an examination question.

1.30 1.31 Item bank means all of the items that have been developed for the several forms of an examination. It includes all of the items available to create examination forms.

1.31 1.32 Item sequence means the presentation order of examination items in an examination.

1.32 1.33 Job Analysis means the description of functions or tasks required for an individual to perform to entry-level standards in a specific job or occupation, including information about the attributes required for that performance. It defines the performance dimension of a job and includes knowledge, skills and abilities (KSA-s) necessary to carry out the tasks.

A. Tasks are the individual functions, whether mental or physical, necessary to carry out an aspect of a specific job.

B. Knowledge, skills, and abilities (KSAs) include the information and other attributes that the worker shall possess in order to perform effectively and safely. They include information and understanding as well as learned behaviors and natural attributes.

1.33 1.34 Legal entity means an organization structured in a manner that allows it to function legally and be recognized as a responsible party within the legal system.
1.34 **Legally defensible** means the ability to withstand a legal challenge to the appropriateness of the examination for the purpose for which it is used. The challenge may be made by actual or potential examinees or on behalf of the public. Examinees’ challenges may pertain to perceived bias of the examination or inappropriately chosen content. Challenges on behalf of the public may claim that the examination does not provide adequate measures of an examinee’s knowledge, skills and abilities (KSA’s) required to protect the consumer from foodborne illness.

1.35 **Linear Examination Form** means a fixed examination form, in any delivery format, where the form does not change or adapt based on the examinee’s responses.

1.36 **Overexposure** means the relative frequency in which an examination item is presented across test forms to the extent that it may undermine the integrity of the examinations. Refers to an item that has been selected or viewed to such a degree that its discrimination value is diminished.

1.37 **Potential examinee** means a person capable of taking an examination. **Exam Candidate** means an individual who may be reasonably expected to take a food safety certification examination.

1.38 **Proctor** means a person under the supervision of a test administrator, who assists by assuring that all aspects of an examination administration are being carried out with precision, with full attention to security and to the fair treatment of examinees. Proctors have the responsibility and shall have the ability to observe examinee behaviors, accurately distribute and collect examination materials, and assist the test administrator as assigned. They shall have training or documented successful experience in monitoring procedures and shall affirm in writing an agreement to maintain examination security and to ensure that they have no conflict of interest. There must be at least one proctor for every 35 examinees. The proctor can also be a test administrator.

1.39 **Psychometric** means scientific measurement or quantification of human qualities, traits, or behaviors.

1.40 **Psychometrician** means a professional with specific education and training in development and analysis of examinations and other assessment techniques and in statistical methods. Psychometricians measure the validity, reliability, and fairness of an examination and are an integral part in the process of creating valid and reliable tests.

1.41 **Regulatory authority** means a government agency that has been duly formed under the laws of that jurisdiction to administer and enforce the law.

1.42 **Reliability** means the degree of consistency with which an examination measures the attributes, characteristics or behaviors that it was designed to measure.

1.43 **Retail food industry** means those sectors of commerce that operate food establishments.
1.44 **Test administrator** means the individual at the test site who has the ultimate responsibility for conducting a *food safety certification examination*. The *test administrator* can also be a *proctor*.

1.45 **Test encryption and decoding** means the security aspects of a computer examination to prevent the examination from being read by unauthorized persons if downloaded or otherwise accessed without authorization. Encryption refers to how a computer examination is coded. Decoding refers to how the computer examination is translated back from the code.

1.46 **Trainer**, in this instance, means a professional with appropriate expertise who conducts a course in food safety for *potential examinees* for certification as Food Protection Managers.

1.47 **Validity** means the extent to which an examination score or other type of assessment measures the attributes/competencies that it was designed to measure. In this instance, does the examination produce scores that can help determine if *examinees* are competent to protect the public from foodborne illness in a *food establishment*?
SECTION 2.0 – PURPOSE OF CERTIFICATION ORGANIZATIONS

2.0  Purpose of Certification Organizations.

2.1  The certification organization shall have as a purpose the evaluation of those individuals who wish to secure or maintain Food Protection Manager Certification in accordance with the criteria and Standards established through the CFP, and the issuance of certificates to individuals who meet the required level of competency.

2.2  A certification organization responsible for attesting to the competency of Food Protection Managers has a responsibility to the individuals desiring certification, to the employers of those individuals, and to the public.

2.3  A certification organization for Food Protection Manager Certification Programs shall not be the accrediting organization nor shall the certification organization have any conflict of interest with said accrediting organization.
SECTION 3.0 – STRUCTURE AND RESOURCES OF CERTIFICATION ORGANIZATIONS

3.0 Structure and Resources of Certification Organizations.

3.1 Structure of certification organizations. The certification organization shall be incorporated as a legal entity (applies to the parent organization if the certification organization is a subsidiary of another organization).

3.2 A certification organization shall conform to all CFP Standards for accreditation and demonstrate that the relationship between the certification organization and any related association, organization or agency ensures the independence of the certification program and its related functions.

3.3 If a certification organization provides both education and certification, the certification organization shall at a minimum, demonstrate that the education part of the organization has no undue influence the certification process. Additionally, the Certification Organization shall demonstrate that the certification process is not financially dependent on the associated education part of the organization. Administratively and financially separate any education and certification functions that are specific to Food Protection Manager Certification to ensure that the certification program is not compromised. This may be satisfied if the governing structure documents to the accreditng organization the distinct separation of the two functions, confirming that no undue influence is exercised over either the education or the certification process by virtue of the structure within the association, organization, agency or another entity.

3.4 Resources of Certification Organizations. A certification organization shall conform to all CFP Standards for accreditation and demonstrate

A. the availability of financial resources to effectively and thoroughly conduct regular and ongoing certification program activities.

B. that staff possesses the knowledge and skills necessary to conduct the certification program or has available and makes use of non-staff consultants and professionals to sufficiently supplement staff knowledge and skills. Its employees and any contracted professionals possess the skills and knowledge necessary to conduct the certification program activities.

C. that the roles and responsibilities of certification personnel are adequately defined.
SECTION 4.0 – FOOD SAFETY CERTIFICATION EXAMINATION DEVELOPMENT

4.0 Food Safety Certification Examination Development.

4.1 Food safety certification examinations administered by accredited certification organizations shall comply fully with all criteria set by the CFP and shall meet explicit and implicit Standards to protect the public from foodborne illness. The accredited certification organization shall provide a food safety certification examination that:

A. conforms to all CFP Standards for Accreditation of Food Protection Manager Certification Programs;

B. has been developed from secure item bank that is of adequate size and composition to assemble and support a valid, legally defensible examination and

For paper- or computer-based linear examination forms, the number of active items in any given content domain must be a minimum of three (3) times the number of items specified in the examination blueprint. For computer adaptive examination programs (Computer Adaptive Testing), the number of active items for each content domain must be a minimum of six (6) times the number of items specified in the examination blueprint.

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<th>Type of Form Assembly</th>
<th>Scaling Factor of Bank vs. Blueprint</th>
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<td>Linear Examination Forms (paper or computer-based)</td>
<td>Minimum of 3 times the number listed in the blueprint</td>
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<tr>
<td>Computer Adaptive Testing</td>
<td>Minimum of 6 times the number listed in the blueprint</td>
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C. Certification organizations must have a policy that supports the monitoring and controlling of item exposure rates, use of an appropriate and defensible number of concurrent, equivalent linear examination forms (for print-based or computer-based), or an item bank of sufficient size and composition to support and deliver computer adaptive testing.

4.2 The certification organization shall apply acceptable psychometric standards to:
   a. examination development, maintenance, and delivery;
   b. certification decisions;
   c. examination materials and data storage;
   d. reporting;
   e. resolution of complaints and appeals;
   f. impartiality; and
   g. examination security.

The certification organization is responsible for defending its policies, procedures, processes, and decisions to the accrediting organization.
4.3 The certification organization shall provide complete information about the food safety certification examination, including information related to procedures and personnel involved in all aspects of the examination development and analysis. Actual or potential conflicts of interest that might influence judgment or performance of Examination Developers shall be disclosed. The information required for accreditation will include but is not necessarily limited to:

A complete description of the scope and usage of the examination;
B. job task analysis task list, with knowledge, skills, and abilities (KSAs);
C. examination specifications;
D. evidence that the number of active items in the item bank is (1) aligned with the weight specified in the examination blueprint, (2) appropriate for the format of the examination, with special consideration for computer-adaptive testing, and (3) meets the requirements of the item exposure plan;
E. statistical performance of each item in the bank;
F. number of examination forms and evidence of their equivalence to each other;
G. description of method used to set passing score;
H. copies of all logs, diaries, and personnel lists and descriptions kept as required in the development process;
I. appropriate summary statistics for each examination form, regardless of assembly or delivery method; and
J. names, credentials, and demographic information for all persons involved in the job task analysis, item writing and review, and setting the passing score.

4.4 Job Task Analysis. The content validity of a food safety certification examination shall be based on a psychometrically valid job task analysis. The job task analysis shall be developed by qualified individuals, including retail food industry and public health stakeholders and subject matter experts, developed by psychometricians and a demographically and technically representative group of individuals with significant experience in food safety. The representative group shall include but not necessarily be limited to persons with experience in the various commercial aspects of the retail food industry, persons with local, state or national regulatory experience in retail food safety, and persons with knowledge of the microbiology and epidemiology of foodborne illness, and shall be sufficiently diverse as to avoid cultural bias and ensure fairness in content according to all Federal requirements.

4.5 The job task analysis shall provide a complete description of the knowledge, skills, and abilities (KSAs) required to function competently in the occupation of Certified Food Protection Manager, with emphasis on those tasks most directly related to the Certified Food Protection Manager’s role in the prevention of foodborne illness and controlling foodborne pathogens.

4.6 Detailed food safety certification examination specifications shall be derived from a valid study of the job analysis tasks and their accompanying knowledge, skills, and abilities (KSAs) and shall be appropriate to all aspects of the retail food industry. The job analysis shall include consideration of scientific data concerning factors contributing to foodborne
illness and its epidemiology. The examination specifications, consisting of percentage weights or number of items devoted to each content area, shall be available to examinees and to the public. **The examination blueprint shall be derived from a valid study of the job task analysis. Examination specifications deriving from the exam blueprint shall be publicly available.**

4.7 The credential awarded upon passing a food safety certification examination is designed to be recognized nationwide and throughout the retail food industry. As such, the certification organization shall regularly evaluate practices in the retail food industry to ensure the job task analysis on which its examination is based remains appropriate and relevant. **Certification organization is required to systematically evaluate practices in the retail food industry to ensure that the job analysis on which an examination is based remains appropriate for the development of food safety certification examinations on which the universal credential is awarded.** The maximum length of use for any job task analysis is five years from the date of validation.

4.8 **Psychometric Standards.** Food safety certification examination development, including setting the passing score, shall be based on the most recent edition of Standards for Educational and Psychological Testing, developed jointly by the American Psychological Association, American Educational Research Association and National Council for Measurement in Education, and on all appropriate Federal requirements (for example, Americans with Disabilities Act). **Food safety certification examinations shall be revised as needed to be in compliance with** changes in the Standards for Educational and Psychological Testing or in any of the Federal requirements.

4.9 The food safety certification examination development procedures shall ensure that the competencies assessed in the accredited certification program are those required for competent entry level performance in the role of Certified Food Protection Manager, as defined by law and industry standards, and that they focus on factors related to the prevention of foodborne illness in the retail food industry.

4.10 The food safety certification examination shall be based on psychometrically valid procedures to ensure the relative equivalence of scores from various examination forms. **The certification organization shall ensure relative equivalence and reliability across its various examination forms and administration methodologies (e.g., paper-pencil, CBT).** The certification organization provide evidence of such equivalence as public information.

4.11 The food safety certification examination shall be developed to be as free from bias as possible. Certification organizations shall provide evidence that all examinations are evaluated for sensitivity and appropriateness with respect to a diverse population of examinees. Characteristics such as gender, ethnicity, race, socioeconomic status, age, or anything unrelated to the ability to apply the required competencies will not be allowed to influence examinee performance or scores.

4.12 When the food safety certification examination is administered in a medium other than the common pencil and paper format, evidence shall be provided to ensure that all competencies are assessed in a reliable manner and that the validity of the examination is preserved.
Evidence of comparability with other examination forms shall be provided.

4.12 4.13 When any food safety certification examination (forms, items, banks, etc.) is translated or adapted into another language, the certification organization shall demonstrate comparability between the source examination and the translated or adapted examination (example: forward/backward translation or review by bilingual SME). The certification organization is responsible for defending its translation/adaptation processes to the accrediting organization. To avoid potential problems in translation of industry-specific terminology, the certification organization shall work in consultation with a food safety subject matter expert (SME) who is fluent in both the original language and the target language and who does not pose a conflict of interest or examination security risk.

4.13 4.14 Examination Developers shall maintain a log and diary of the procedures and a list of the qualifications, identities, and demographic data of the persons who participated in item development, examination development, translations, setting the passing score, and the statistical analyses of the examination items and of the full examination. Those materials shall be provided to the accrediting organization on demand.

All examinations shall be delivered and administered in a format that ensures the security of the examination (i.e. in a secured environment with a test administrator/proctor). Un-proctored examinations are not acceptable regardless of the mode of administration.

4.14 4.15 Examination Development Security. The certification organization will demonstrate that procedures are developed and implemented to ensure that individual items, item banks, food safety certification examinations presented in all media (printed, taped and computerized), test answer sheets and examinee scores are and remain secure. Demonstration shall include an overall examination security plan that covers each step in the examination development, culminating in the production of the examination. The certification organization is required to demonstrate how its examination security plan covers each step in the examination development, administration, scoring, and maintenance.

All examinations shall be delivered and administered in a format that ensures the security of the examination (i.e. in a secured environment with a test administrator/proctor). Un-proctored examinations are not acceptable regardless of the mode of administration.

4.15 4.16 Periodic Review. At least semiannually, each certification organization shall report to the accrediting organization, providing a review of its food safety certification examination(s). The report will include at minimum the following summary information for all examinations (for each examination used) administered during the preceding six 12-months, as well as other information that may be reasonably requested by the accrediting organization.

A. number of food safety certification examinations administered;
B. mean, corresponding standard deviation, and range of candidate scores;
C. A measure of form-level reliability;
D. A measure of decision consistency;
E. Passing rates (both number and percentage of examinees that passed the examination in the given 12-month period); and
F. Summary statistics for all items used during the preceding 12-month period, which...
may be presented using classical test theory, item response theory, or similar models. Item statistics, including but not limited to a summary of item difficulty, discrimination, and exposure for all items presented during the reporting period.

G. For the purposes of clarity and identifying data trends, annual summary information may need to be presented in concise reports, such as semi-annual or quarterly, to the accrediting organization.

4.16 4.17 Requirements for Examination Standardization. Certification organizations shall specify conditions and procedures for administering all food safety certification examinations in a standard manner to ensure that all examinees are provided with the opportunity to perform according to their level of ability and to ensure comparability of scores. Examination booklets shall be of high quality printing to ensure ease of reading to provide examinees with a fair and equitable opportunity to demonstrate competency.
SECTION 5 – FOOD SAFETY CERTIFICATION EXAMINATION ADMINISTRATION

5.0 Food Safety Certification Examination Administration. All sections of these Standards apply to Computer Based Testing (CBT) Administration except Section 5.1.

5.1 Security for Examination Materials.
A. Policies and procedures shall be developed and documented by the certification organization to ensure the security of examination materials. At a minimum, security provisions shall address:
1) The type of test materials (i.e. electronic or paper);
2) The locations of the test materials (i.e. transportation, electronic delivery, disposal, storage, examination center (when applicable));
3) The steps in the examination process (e.g. development, administration, results reporting);
4) The threats arising from repeated use of examination materials

B. Packaging by certification organization.
1) Each individual examination booklet shall be securely sealed before packing.
2) Secure tamper-resistant shipping material, such as Tyvek envelopes or similar materials that are designed to reveal any tampering or violation of the package’s security, is required for all shipment of materials in all phases.
3) Packaging must include a packing list that contains:
   a. examination form language(s) or version(s) enclosed; and
   b. quantity of examinations enclosed.

C. Shipping to the test administrator/proctor from the certification organization.
1) Shipping shall be done by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.
2) A signature is required upon delivery.
3) Only an individual authorized by the test administrator/proctor may sign for the package.

D. Storage by test administrator/proctor.
The package(s) of examination booklets shall be secured at all times immediately upon delivery. Under no circumstances may examination booklets, examinee used answer sheets, or other examination materials be kept where other employees or the public has access.

E. Shipping to the certification organization from the test administrator/proctor
1) After examination administration, examination booklets and answer sheets shall remain in secure storage until returned to certification organization.
2) The following shall be in tamper-resistant shipping material:
a. all used and unused examination booklets for each examination administration;
b. examinees’ used answer sheets; and
c. all required certification organization forms.

3) Shipping shall be done within two business days following the examination date by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.

F. Handling unused examination booklets that have been held for up to ninety days. The test administrator/proctor will:
   1) ensure that all examination booklets are accounted for;
   2) package examination booklets securely as described above; and
   3) ship to the certification organization securely packaged and according to these Standards and the Certification Organization’s instructions.

5.2 Test Site Requirements.
Sites chosen for administering food safety certification examinations shall conform to all legal requirements for safety, health, and accessibility for all qualified examinees.

A. Additionally, the accommodations, lighting, space, comfort, and workspace for taking the examination shall reasonably allow examinees to perform at their highest level of ability.

B. Requirements at each test site include, but are not limited to:
   1) accessibility reasonable accommodation requests, in accordance with the requirements of the Americans with Disabilities Act, shall be reasonably available fulfilled for all qualified examinees, whether the examination administration occurs at the main examination location site, or at an alternative examination location site that meets the same location requirements as the main examination location site;
   2) conformity to all fire safety and occupancy requirements of the jurisdiction in which they are located;
   3) sufficient spacing between each examinee in the area in which the actual examination is conducted, or other appropriate and effective methods, to preclude any examinee from viewing another examinee’s examination;
   4) acoustics allowing each examinee to hear instructions clearly, using an electronic audio system if necessary;
   5) lighting at each examinee’s workspace adequate for reading;
   6) ventilation and temperature appropriate for generally recognized health and comfort of examinees;
   7) use of private room(s) where only examination personnel and examinees are allowed access during the examination administration; and
   8) no further admittance into the test site once examination administration has begun.
5.3 Test Site Language Translation.

A certification organization shall have a published, written policy regarding test site language translation of food safety certification examinations. If a certification organization allows test site language translation of a food safety certification examination when an examination version is not available in the examinees’ requested language, the certification organization shall have a published, formal application process available to all potential examinees. Procedures shall include but not be limited to:

A. An application process for potential examinees that includes an evaluation and documentation component to determine the eligibility of the potential examinee for test site language translation,

B. An application process for translators that includes clear and precise qualifications that shall include but not be limited to the following:
   1) being fluent in both languages;
   2) have a recognized skill in language translation;
   3) trained in the principles of objective examination administration;
   4) have no personal relationship with the examinee (may not be another examinee, may not be a relative or friend of the examinee and may not be a co-worker, employer, or an employee of the examinee);
   5) not being a Certified Food Protection Manager nor having any vested interest in Food Protection Manager certification or conflict of interest;
   6) provide references or other proof attesting to the translator’s competencies and professional acumen; and
   7) agree in writing to maintain the security of the examination.

C. A proctored environment where the translator and examinee are not a distraction to other examinees, and

D. A proctored environment where the translator is not active as the test administrator/proctor.

5.4 Scoring.

A. Only the certification organization may score the examination by methods approved by the accrediting organization. No official scoring is to be done at the test site.

B. Food safety certification examination scores will not be released as being official until verified and approved by the certification organization.

C. Examinee scores will be confidential, available only to the examinee, the Certification Organization, the Accrediting Organization, and to persons or organizations approved in writing by the examinee.

D. Score reports will be available to examinees in a time frame specified in the application, which will not exceed fifteen business days following the administration of the food safety certification examination. If there is a delay due to problems in
verification or authentication of scores, examinees and the test administrator/proctor will be so informed and an approximate date for release of the scores will be announced. The certification organization will have ongoing communication with examinees and with the test administrator/proctor until the scores are verified and released.

5.5 **Test Administrator/Proctor(s) Role.** Test administrators/proctors shall have successfully completed the certification organization’s specific training in examination administration and security procedures. They shall provide written assurance of maintaining confidentiality of examination contents, of adhering to the certification organization’s standards and ethics of secure examination administration, and of agreeing to abide by the certification organization’s policies, procedures, and rules.

5.6 **Test Administrator/Proctor Roles and Requirements.** To serve as a test administrator/proctor for an accredited certification organization the qualified individual shall complete the certification organization’s:

A. signed Application;

B. non-Disclosure Agreement (NDA);

C. training program for test administrators/proctors; and

D. conflict of Interest Disclosure Agreement (can be a part of the NDA).

5.7 **Test Administrator/Proctor Renewal.** Test administrators/proctors shall renew the training program for test administrators/proctors and Non-Disclosure Agreement with the certification organization a minimum of every three (3) years.

5.8 **Instructor/Educator/Trainer as Test Administrator/Proctor.** When a person acts as an instructor/educator/trainer and a test administrator/proctor, that person relinquishes the role of instructor/educator/trainer when acting in the role of test administrator/proctor.

5.9 **Test Administrator/Proctor Responsibilities.** Test Administrators/proctors shall utilize documented procedures provided by the certification body to ensure a consistent examination administration. These include, but are not limited to:

A. Schedule examinations. Food safety certification examinations shall be scheduled far enough in advance to allow for timely shipment of supplies or pre-registration for computer-based examinations.

B. The certification organization’s criteria for conditions for administering examinations shall be followed. Conditions can include, but are not limited to: lighting, temperature, separation of candidates, noise, candidate verification and
safety, test administrator/proctor conduct and examination materials security throughout examination process, etc.

C. Report possible security breaches and examination administration irregularities in compliance with the certification organization’s policies.

5.10 The number of approved proctors assigned to a test administrator shall be sufficient to allow each examinee to be observed and supervised to ensure conformance to security requirements. The certification organization shall develop and justify to the accrediting organization, through documented policies, the ratio of test administrator/proctor to examinees.

5.11 Examination Security.
A. All aspects of food safety certification examination administration are to be conducted in a manner that maximizes the security of the examinations, in keeping with the public protection mandate of the CFP. This shall be accomplished in a manner that ensures fairness to all examinees.

B. All examinees shall begin taking the examination at the same time. No examinee shall be admitted into the test site once examination administration has begun.

C. Where reasonable accommodation shall be provided for otherwise qualified examinees under provisions of the Americans with Disabilities Act, care shall be taken to ensure that security of the examination is maintained. Individuals assisting in providing accommodation (Assistants) shall disclose in writing any actual or potential conflict of interest prior to assisting in any exam administration. The certification organization shall address any identified conflicts of interest and maintain a signed nondisclosure agreement with Assistants. Arrangements shall be such that the food safety certification examination contents are not revealed to any test administration personnel with any conflict of interest. A written affirmation to that effect and a written nondisclosure statement from the individual who was chosen to assist the otherwise qualified examinee shall be provided to the certification organization.

5.12 The certification organization shall provide procedures to be followed in any instance where the security of a food safety certification examination is, or is suspected to be, breached.

A. Included shall be, at a minimum, specific procedures for handling and for reporting to the certification organization, any suspected or alleged:
   1) cheating incidents;
   2) lost or stolen examination materials;
   3) intentional or unintentional divulging of examination items by examinees or examination administration personnel; or
   4) any other incidents perceived to have damaged the security of the examination or any of its individual items.

B. Corrective actions to guard against future security breaches shall be established and
implemented.
C. Documentation of corrective actions and their effectiveness shall be made available to the accredit ing organization.

5.13 Item and Examination Exposure. The certification organization shall have an exposure plan that:

A. controls for item and examination exposure;
B. accounts for the number of times an examination item, examination form, and examination version is administered;
C. ensures that no examination form is retained by any examination administration personnel for more than ninety days;
D. at all times accounts for all copies of all used and unused examination booklets; and
E. systematically and actively demonstrates that every used answer sheet, examination booklet, and any other examination materials and answer keys are accounted for to prevent, reduce, or eliminate examination exposure.

5.14 Certification Organization’s Responsibility to Test Administrators/Proctors.
A. The certification organizations shall specify the responsibilities of test administrator/proctor, set minimum criteria for approval of test administrators/proctors, and provide a training program to enable potential examinees to meet the approval criteria. Responsibilities, duties, qualifications and training of test administrators/proctors shall be directed toward assuring standardized, secure examination administration and fair and equitable treatment of examinees.

B. The certification organization shall define and provide descriptions for the roles of test administrators/proctors, and certification organization personnel clearly indicating the responsibilities for these roles. The certification organization shall demonstrate how it ensures that all certification personnel, as well as test administrators/proctors, understand and practice the procedures identified for their roles.

C. Test administrator/proctor training programs shall include:
1) specific learning objectives for all of the activities of test administrator/proctor; and
2) an assessment component that shall be passed before an examinee applicant for test administrator/proctor will be approved.

5.15 Certification Organization Test Administrator/Proctor Agreements. The certification organization shall enter into a formal agreement with the test administrator/proctor. The formal agreement shall at a minimum address:

A. provisions that relate to code of conduct;
B. conflicts of interest; and

C. consequences for breach of the agreement.

5.16 The certification organization shall assess and monitor the performance of test administrators/proctors in accordance with all documented procedures and agreements.

5.17 The certification organization is not permitted to hire, contract with, or use the services of any person or organization that claims directly or indirectly to guarantee passing any certification examination. Instructors/educators/trainers making such a claim, whether as an independently or as an employee of another organization making the claim, are not eligible to serve as test administrators/proctors for any certification organization.

In order to retain the integrity of the certification process, 5.17 is intended to provide Certification Organizations a method of evaluating individuals’ and/or organizations’ claims to guarantee passing any certification examination if they are performing the role of instructor/educator/trainer and proctor/administrator. This area of the Standard does not apply to training organizations and their employees not contracted to a Certification Organization.

5.18 Policies and procedures for taking corrective action(s) when any test administrator or proctor fails to meet job responsibilities shall be implemented and documented. Test administrators/proctors that have been dismissed by the certification organization for infraction of policies or rules, incompetence, ethical breaches, or compromise of examination security will be reported to the accrediting organization.

5.19 Examination Administration Manual. The certification organization shall provide each test administrator/proctor with a manual detailing the requirements for all aspects of the food safety certification examination administration process. The Examination Administration Manual shall include a standardized script for the paper examination test administrator/proctor to read to examinees before the examination commences. For computer—based tests (CBT), standardized instructions shall be available for examinees to read.

5.20 Examination Scripts. Separate scripts/instructions may be created for different delivery channels or certification organizations. Certification organizations may customize elements of the scripts to fit their particular processes, but each script shall contain the following:

A. Introduction to the Examination Process
   1) composition of the examination (number of questions, multiple choice, etc.);
   2) time available to complete the examination;
   3) role of the test administrator/proctor;
   4) process for restroom breaks; and
   5) process for responding to examinee comments and questions.
B. Copyright and Legal Responsibilities
   1) description of what constitutes cheating on the examination;
   2) penalties for cheating; and
   3) penalties for copyright violations.

C. Examination Process
   1) maintaining test site security;
   2) description of examination components unique to the *certification organization* (examination booklet, answer sheet completion, computer process in testing centers, etc.);
   3) instructions for proper completion of personal information on answer sheets/online registration and examination booklets;
   4) instructions on properly recording answers on answer sheets or online; and
   5) instructions on post-examination administration process.
SECTION 6.0 – COMPUTER-BASED TESTING (CBT)

6.0 Computer-Based Test Development and Administration All sections of these Standards apply to Computer Based Testing (CBT) Administration except Section 5.1.

6.1 Computer-Based Test Development. Examination specifications for computer-based testing shall describe the method for development, including the algorithms used for test item selection, the item response theory model employed (if any), and examination equivalency issues.

6.2 Items shall be evaluated for suitability for computer delivery, be reviewed in the delivery medium, and be reviewed in the presentation delivery medium. Assumptions shall not be made that items written for delivery via a paper/pencil medium are suitable for computer delivery nor should it be assumed that computer test items are suitable for paper/pencil delivery.

6.3 When examination forms are computer-generated, whether in Computer-Adaptive Testing (CAT) or in a simple linear algorithm, the algorithm for item selection and the number of items in the item bank from which the examination is generated shall ensure that the items are protected from overexposure. Item usage statistics shall be provided for all available items in the pool.

6.4 Computer-Based Testing Administration. Where examination environments differ (for example, touch screen versus mouse) evidence shall be provided to demonstrate equivalence of the examinees’ scores.

6.5 Tutorials and/or practice tests shall be created to provide the examinees adequate opportunity to demonstrate familiarity and comfort with the computer test environment.

6.6 If the time available for computer delivery of an examination is limited, comparability of scoring outcomes with non-timed delivery of the exam shall be demonstrated. Data shall be gathered and continually analyzed to determine if scoring methods are comparable.

6.7 Evidence of security in the computer-based testing environment shall be provided. Factors affecting test security include, but are not limited to, examinee workspace, access to personal materials, level of examinee monitoring, and test encryption and decoding.

6.8 Documentation of precautions to protect examination forms and the item bank from unauthorized access shall be provided.

6.9 Policies and procedures regarding the recording and retention of the item sequence and item responses for each examinee shall be developed and followed. Computer examinations using a unique sequence of items for each examinee shall record the information necessary to recreate the sequence of items and examinee responses on the computer examination.
6.10 Systems and procedures shall be in place to address technical or operational problems in examination administration. For example, the examination delivery system shall have the capability to recover *examinee* data at the appropriate point in the testing session prior to test disruption. Policies regarding recovery for emergency situations (such as retesting) shall be developed.

6.11 **Due Process.** Examinees shall be provided with any information relevant to *computer-based testing* that may affect their performance or score. Examples of such information might include but not be limited to: time available to respond to *items*; ability to change responses; and instructions relating to specific types of *items*. 
SECTION 7.0 – CERTIFICATION ORGANIZATION RESPONSIBILITIES TO POTENTIAL EXAMINEES, EXAMINEES AND THE PUBLIC

7.0 A certification organization’s Responsibilities to Examinees and the Public.

7.1 Responsibilities to Potential Examinees and/or Examinees for Certification. A certification organization shall develop and implement policies, which address the following:

A. an overview to exam candidates of the process to potential examinees and examinees to by which one obtains certification;

B. a notice to potential examinees and examinees exam candidates of non-discrimination.

C. protocols for the periodic review of examination policies and procedures to ensure fairness;

D. procedures for uniformly and prompt reporting of food safety certification examination results to examinees;

E. procedures for providing examinees failing the food safety certification examination with information on general areas of deficiency;

F. protocols that assure the confidentiality of each examinee’s food safety certification examination results; and

G. appeals procedures for potential examinees and examinees exam candidates questioning eligibility or regarding any part of the accredited certification program.

7.2 Qualifications for Initial Certification. To become a Certified Food Protection Manager an individual shall pass a food safety certification examination from an accredited certification program recognized by the CFP. The certificate shall be valid for no more than five years.

7.3 Individual Certification Certificates:

A. Each certification organization will maintain a secure system with appropriate backup or redundancy to provide verification of current verify validity of individual certification certificates.

B. Certificates shall include, at a minimum:

1) issue date/date examination was taken;
2) length of time of certification validity;
3) name and certification mark of certification organization;
4) ANSI accrediting organization accreditation mark;
5) name of certified individual;
6) unique certificate number;
7) name of certification;
8) contact information for the certification organization; and
9) examination form identifier

C. Replacement or duplicate certificates issued through an accredited certification organization shall carry the same issue date, or date of examination, as the original certificate, and will be documented by the certification organization.

7.4 Discipline of Certificate Holders and Examinees. A certification organization shall have formal certification policies and operating procedures including the sanction or revocation of the certificate. These procedures shall incorporate due process.

7.5 Continued Proficiency. An accredited certification program shall include a process or program for assessing continued competence that includes an examination component at an interval of no more than five years. The outcome of the process or program shall demonstrate that the person has maintained the minimum competencies as determined by the current job task analysis.

7.6 Responsibilities to the Public and to Employers of Certified Personnel. A certification organization shall maintain a registry of individuals certified. Any title, or credential, or certificate awarded by the certification organization shall appropriately reflect the Food Protection Manager’s daily food safety responsibilities and shall not be confusing to employers, consumers, related professions, and/or other interested parties. be relevant to the retail food industry and role of Food Protection Manager and not designed to mislead or intentionally confuse examinees and other stakeholders.

7.7 Each accredited certification program certification organization shall have a published protocol procedure for systematically investigating problems presented by users of the Program, including specific concerns about examination items, administration procedures, treatment of examinees and potential examinees, or other matters involving potential legal defensibility of the examination or program. The protocol will include a published timeframe for reporting findings to the User addressing complaints and appeals. Such procedures shall include a stated timeframe for response from the certification organization.

7.8 Misrepresentation. Only Food Protection Manager Certification Programs certification organizations that conform to all requirements of the Standard of Standards for Accreditation of Food Protection Manager Certification Programs and are accredited by the agent selected by the CFP as the accrediting organization for such programs are allowed to refer to themselves as being accredited. Those programs may not make any other reference to the CFP in their publications or promotional materials in any medium.
SECTION 8.0 – CERTIFICATION ORGANIZATION RESPONSIBILITIES TO THE ACCREDITING ORGANIZATION

8.0 Certification Organization Responsibilities to the Accrediting Organization.

8.1 Application for Accreditation. A certification organization seeking accreditation for development and/or administration of a certification program shall provide at least the following information, as well as other information that might be requested by the accrediting organization:

A. the name and complete ownership structure of the legal entity.

B. the address, telephone/fax number(s) and other contact information of the certification organization’s headquarters.

C. the name, position, address and telephone/fax/e-mail information of the contact person for projects related to the CFP Standards for Accreditation of Food Protection Manager Certification Programs.

D. such fiscal information as may be needed to establish evidence of ability to carry out obligations under these Standards.

8.2 Summary Information. A certification organization shall:

A. provide evidence that the mechanism used to evaluate individual competence is objective, fair, and based on the knowledge and skills needed to function as a Certified Food Protection Manager;

B. provide evidence that the evaluation mechanism is based on standards which establish reliability and validity for each form of the food safety certification examination;

C. provide evidence that the pass/fail levels are established in a manner that is generally accepted in the psychometric community as being fair and reasonable;

D. have a formal policy of periodic review of evaluation mechanisms and shall provide evidence that the policy is implemented to ensure relevance of the mechanism to knowledge and skills needed by a Certified Food Protection Manager;

E. provide evidence that appropriate measures are taken to protect the security of all food safety certification examinations;

F. publish a comprehensive summary or outline of the information, knowledge, or functions covered by the food safety certification examination;
G. make available general descriptive materials on the procedures used in examination construction and validation and the procedures of administration and reporting of results; and

H. compile at least semi-annually a summary of certification activities, including number of examinees, number tested, number passing, number failing, and number certified.

8.3 Responsibilities to the Accrediting Organization. The certification organization shall:

A. make available upon request to the accrediting organization copies of all publications related to the certification program,

B. advise notify the accrediting organization of any proposed changes in structure or activities of the certification organization,

C. advise the accrediting organization of substantive change in food safety certification examination administration,

D. advise the accrediting organization of any major changes in testing techniques or in the scope or objectives of the food safety certification examination,

E. annually complete and submit to the accrediting organization information requested on the current status of the Food Protection Manager Certification Program and the certification organization,

F. submit to the accrediting organization the report requirements information specified for the Food Protection Manager Certification Program, and

G. be re-accredited by the accrediting organization at least every five years.
SECTION 9.0 – MANAGEMENT SYSTEMS

9.0 Management Systems.

9.1. Each certification organization shall have a formal management system in place to facilitate continuous quality improvement and produce preventive and corrective actions. The management system shall contain the following three components.

A. Document control to include:
   1) lists of all documents pertaining to the certification organization;
   2) dates for documents approved for implementation by the certification organization;
   3) the person(s) within the certification organization responsible for the documents; and
   4) listing of individuals who have access to the documents.

B. Internal audits to include:
   1) identification of critical activities;
   2) data collection process and evaluation schedule;
   3) audit methodology and evaluation process;
   4) the person(s) authorized to perform audits; and
   5) report audit findings and identify corrective action required.

C. A Management Review that includes:
   1) a documented annual review of internal audit results;
   2) a management group that conducts the review;
   3) a review of the audit results to determine corrective actions needed;
   4) a review of the audit results to determine preventive actions needed; and
   5) the effectiveness of corrective and preventive actions taken.
ANNEX A

Conference for Food Protection

Conference for Food Protection Requirements for Certification Organizations to Provide Food Protection Manager Certifications using the ISO/IEC 17024 Personnel Certification Standard

Preamble/History

The Conference for Food Protection (“CFP”), is an independent voluntary organization that promotes food safety and consumer protection and includes in its responsibilities the establishment and maintenance of the Standards for Accreditation of Food Protection Manager Certification Programs (“CFP STANDARD”).

Starting in 2012 CFP began consideration of the ISO/IEC 17024, Conformity assessment – General requirements for bodies operating certification of persons (“ISO 17024 STANDARD”) as an alternative accreditation standard for certification bodies accredited or seeking accreditation under the existing CFP food Protection manager standards.

As an outcome of the 2016 Biennial Meeting of the Conference for Food Protection, the following charge was given to the Food Protection Manager Certification Committee (“FPMCC”):

Determining the process and requirements for potential acceptance of the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17024-2012 for food protection manager certification as an additional option to and without impact on the existing CFP Standards for Accreditation of Food Protection Manager Certification Programs, with the input of standards development expertise from American National Standards Institute (ANSI).

This document is the result of the deliberation and recommendations from the FPMCC and represents the process and requirements for CFP to recognize a certification body that is accredited by ANSI under the ISO 17024 STANDARD.

The requirements described in this document shall be applied in conjunction with the ISO/IEC 17024 standard (International Organization for Standardization/International Electrotechnical Commission). All clauses of ISO/IEC 17024 standard continue to apply. This document provides supporting criteria to that standard for certification bodies that want to be recognized by the CFP.

SECTION 1.0 – CONFERENCE FOR FOOD PROTECTION ACCEPTANCE OF ISO/IEC 17024 ACCREDITED PROGRAMS

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies. A) ISO/IEC 17024 Standard, B) FDA Food Code.
A1.0 Conference for Food Protection acceptance of ISO/IEC 17024 accredited Food Protection Manager Certification programs.

A1.1 Wherein, the Conference for Food Protection (‘‘CFP’’) maintains the Standards for Accreditation of Food Protection Manager Certification Programs (‘‘CFP Standard’’);

A1.2 And, the CFP recognizes ISO/IEC 17024, Conformity assessment – General requirements for bodies operating certification of persons (‘‘ISO/IEC 17024 Standard’’) as an alternative personnel certification standard to the CFP Standard;

A1.3 And, that the recognition of ISO/IEC 17024 Standard does not impact the CFP Standard;

A1.4 And, that the CFP recognizes that certification organizations accredited under either the CFP Standard or ISO/IEC 17024 Standard may offer Food Protection Manager Certifications;

A1.5 So long as organizations seeking accreditation to provide Food Protection Manager Certifications using the ISO/IEC 17024 Standard abide by the requirements listed herein.

SECTION 2.0 – DEFINITIONS

A2.0 Definitions

A2.1 For definitions please refer to FDA Food Code, section 1-201.10.

SECTION 3.0 – SCHEME

A3.0 Scheme

A3.1 Purpose. The Purpose of the ISO 17024 Standard, as it relates to the CFP Food Protection Manager Certification is to ensure that:

‘‘…the competencies assessed in the accredited certification program are those required for competent entry level performance in the role of Certified Food Protection Manager, as defined by (United States) law and industry standards, and that they focus on factors related to the prevention of foodborne illness in the retail food industry,’’ (CFP Standard Section 4.10).

A3.2 A food protection manager as addressed in FDA Food Code, section 2-102.12 and FDA Food Code, section 2-102.20.

A3.3 A Certified Food Protection Manager may work in a ‘‘food establishment’’ as defined in FDA Food Code, section 1-201.10.

A3.4 Scope. The Food Protection Manager Certification is based on the FDA Food Code. Certification organizations must update their programs to the latest FDA Food Code version within five (5) years of its release.

A3.5 Geographic Limitations.

A. The scope of this personnel certification is based on the United States FDA Food Code; therefore it is inherently for individuals working in the United States or those who utilize its FDA Food Code;

B. So long as an applicant outside of the United States is certified through an accredited program adhering to the requirements set forth in this document, the CFP recognizes that certification as a Food Protection Manager Certification.

A3.6 Job Task Analysis. Certification organizations must complete a job task analysis using the requirements defined in CFP Standard, section 4.4-4.76.

SECTION 4.0 – PRE-REQUISITES

A4.0 Pre-requisites

A4.1 There are no training or other pre-requisites for Food Protection Manager Certification candidates.
SECTION 5.0 – TRANSLATOR/TRANSLATION REQUIREMENTS

A5.0 Translator/Translation Requirements
A5.1 Application Process. In the event a personnel certificate candidate requires an onsite translator, the application process for translators must include clear and precise qualifications for those translators.
A5.2 Test Site Language Translation. Certification organizations must follow the requirements set forth in CFP STANDARD, section 5.3.

SECTION 6.0 – REPRESENTATION

A6.0 Representation
A6.1 Certificates. All certificates delivered upon the successful passing of a certification exam accredited under the ISO 17024 Standard must include the Conference for Food Protection logo and the ANSI accreditation mark.

SECTION 7.0 – DOCUMENT REFERENCES

A7.0 The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies:

7.2 B. CFP Standard.
———C. ISO 17024.
ANNEX AB

Guidelines for Regulatory Authorities Implementing Food Protection Manager Certification Programs

AB1. Each permitted food establishment should have a minimum of one designated Certified Food Protection Manager who is accountable for food safety.

Documentation of certification of Certified Food Protection Manager(s) should be maintained at each food establishment and shall be made available for inspection by the regulatory authority at all times.

AB2. A Certified Food Protection Manager is responsible for:

1) identifying hazards in the day-to-day operation of a food establishment;

2) developing or implementing specific policies, procedures or standards aimed at preventing foodborne illness;

3) coordinating training, supervising or directing food preparation activities and taking corrective action as needed to protect the health of the consumer; and

4) conducting in-house self-inspection of daily operations on a periodic basis to see that policies and procedures concerning food safety are being followed.

AB3. Qualifications for Certification. To become a Certified Food Protection Manager, an individual shall pass a food safety certification examination from an accredited certification organization recognized by the CFP. The CFP recognizes the importance and need for the provision of food safety training for all food employees and managers. The CFP recommends the content of food protection manager training be consistent with paragraph 2-102.11 (C) of the most recent FDA Food Code. The CFP promotes the information contained in the FDA Food Code as well as content outlines based on job tasks analyses, provided on the CFP website, which may be of value in developing or evaluating training.

AB4. Regulatory authorities should work with the certification organization on a mutually agreeable format, medium and time frame for the submission of score reports pertaining to the administration of food safety certification examinations.
Preamble

The Food Protection Manager Certification Committee, hereinafter referred to as the Committee, of the Conference for Food Protection, hereinafter referred to as the Conference, exists to carry out charges assigned via the Conference Issue process and from the Conference Executive Board, hereinafter referred to as the Board, relating to food protection manager certification and operates within the objectives stated in the Constitution and Bylaws of the Conference.

Article I. Name.

The Name of the Committee is Food Protection Manager Certification Committee.

Article II. Objectives.

Section 1. Systematically identify and address issues concerning Food Protection Manager Certification Programs.

Section 2. Adopt sound, uniform accreditation standards and procedures that are accepted by the Conference.

Section 3. Promote uniformity among all jurisdictions that subscribe to the principles of the Conference by obtaining their recognition and adoption of the Conference Standards for Accreditation of Food Protection Manager Certification Programs.

Section 4. Promote strategies to enhance equivalence among food protection manager certificates issued by certifying organizations.

Section 5. Establish and refine policies and standards to which certifying organizations shall conform.

Article III. Organization and Operation.

Section 1. The Committee is a standing committee within the Conference.

Section 2. The Committee shall consider all Issues charged to the Committee and shall work to develop consensus. The Board may submit charges to the Committee at any time. The Committee is to deliberate the charges expeditiously, or within the time frame determined by the Board or the Committee Chair.

Section 3. The Committee shall use the protocol established in these Bylaws to address its charges.
Section 4. All Committee recommendations shall be submitted as Issues to the Conference for deliberation. The Committee shall follow the protocol for Issue submission as established by the Conference.

Section 5. All Issues, intellectual properties, and/or inventions created by the Committee and approved by the Assembly of Delegates become the property of the Conference.

Article IV. Quorum

A quorum to conduct Committee meetings and conference calls shall be the presence or participation of one more than half of the filled Committee positions. A Committee quorum shall be considered a sufficient number for voting on issues under deliberation. The decisions resulting from a quorum vote shall be deemed representative of the Committee.

Article V. Composition of Organizational Components and Eligibility Requirements for Serving in Official Capacities.

Section 1. The Committee shall be chaired by a Chair and Vice-Chair. Prior to each biennial Conference meeting, the incoming Chair and Vice-Chair shall be selected by the outgoing committee. The Chair, Vice-Chair and committee members shall be approved by the Board.

The Chair and Vice-Chair shall not be selected from the same constituency affiliation.

Section 2. The Committee Chair and Vice-Chair shall serve until the conclusion of the next biennial Conference meeting.

Section 3. The Committee Chair and Vice-Chair may serve consecutive terms with approval of the Board.

Article VI. Committee Structure and Representation.

Section 1. To be eligible to serve on the Committee as a voting member or non-voting alternate, individuals must commit in writing to active participation and be approved by the Conference Chair and the Board.

Section 2. The Committee Chair and Vice-Chair will select committee members and alternates from the list of volunteers from the most recent biennial meeting or recruit volunteers as appropriate to balance the committee as delineated in these Bylaws. In the event of a Committee vacancy with no designated alternate in that constituency, the Chair will first recruit from the remaining list of volunteers provided during the initial Committee selection process.
Section 3. The composition of voting members of the Committee is a balanced representation of industry, regulatory, academia, certification organizations, training providers, and consumers. The Committee membership representation shall consist of a maximum of thirty (30) full votes from the following constituencies:

Subsection 1. Nine (9) representatives from regulatory agencies with food safety responsibilities:

a. Two (2) from State regulatory agencies;

b. Two (2) from local regulatory agencies;

c. Two (2) from federal government agencies; and

d. Three (3) “At Large” appointments;

Subsection 2. Nine (9) industry representatives:

a. Three (3) from the foodservice (restaurant) industry;

b. Three (3) from the retail food store industry; and

c. Three (3) “At Large” appointments. (*At large selections may include professional or trade organizations that directly represent the restaurant, retail food, institutional foodservice, and food vending segments of the industry, and whose mission incorporates a public health protection component.)

Subsection 3. Five (5) total votes for certification organizations that are accredited by the Conference’s accreditation process. Although there is no limit to the number of accredited certification organizations, this constituency shall have a maximum of five (5) votes.

Subsection 4. Three (3) Food Protection Manager training providers;

Subsection 5. Two (2) representatives from academia; and

Subsection 6. Two (2) consumer/independent representatives/public members.

Section 4. Committee members will serve a two (2) year term, concurrent with the cycle of the biennial Conference meeting. Committee members are eligible to serve for consecutive terms contingent upon an assessment by the Committee Chair and Vice-Chair to ensure a balance between members who have previously served on the Committee and new members.
Section 5. Up to two (2) non-voting alternates will be included on the Committee roster each for industry, regulatory, academia, training providers, and consumers to best represent the category of each constituency. Each certification organization participating on the Committee may designate one (1) alternate from their own organization. In the event a Committee member resigns or is no longer able to serve the remainder of their term, the Chair shall select an alternate from the affected constituency to fill the open seat.

Section 6. The incoming Chair of the Committee shall make every effort to retain at least 50% of the Committee membership for a continuing term. This retention is recommended due to the complexity of issues, the need to retain continuity of Committee functions, and the short time frame between biennial Conference meetings.

Section 7. In the event a Committee member changes constituency during their term, the Chair may consider them for any open seat on the Committee which needs representation from their constituency or consider any open alternate position. If the Chair determines that there are no appropriate openings available, the Committee member will be asked to resign from the committee.

Article VII. Committee Organization, Operation, and Meetings

Section 1. The Committee shall receive its direction from the Board. The Board shall assign the Committee its charges as approved during the biennial Conference meeting. The Board may assign additional charges to the Committee to ensure that the Conference Standards for Accreditation of Food Protection Manager Certification Programs and accreditation process are administered in a fair and responsible manner.

Section 2. The Committee shall meet in-person at least annually and at the biennial Conference meeting. All Committee meetings are open to anyone to attend. In addition to meetings, the Committee shall schedule conference calls, as deemed appropriate, for addressing issues under deliberation. In the event that sensitive, financial or proprietary information is under consideration by the Committee, the Chair shall have the option to conduct an executive session until the confidential portion of the proceedings has been concluded.

Section 3. In addition to the charges received from the Board, Committee members may submit Issues and alternative recommendations to the Committee for discussion. Issues and recommendations introduced by Committee members shall be submitted using the Conference format.

Section 4. Presentations for in-person Committee meetings shall be submitted to the Committee Chair and Vice-Chair for review at least 2-weeks prior to meeting dates.
Section 5. Voting.

Subsection 1. A consensus building decision process will be used. When Committee members are asked to vote, each member will be able to express one of three positions.

- A thumb up indicates agreement with the issue on the floor
- A thumb sideways means the position on the floor is not the member’s optimal solution, but they can accept the position
- A thumb down indicates that a member does not agree with the issue on the floor and would like an alternative recommendation considered.

The Committee Chair shall provide an opportunity for the dissenting member(s) to express the alternative position(s). After discussion of these alternative positions, the Chair will call for a final vote from the Committee.

Subsection 2. Except for certification organizations, all voting Committee members and alternates designated for that meeting shall have one (1) vote.

Subsection 3. All certification organizations accredited by the Conference’s accreditation process participating on the Committee shall not to exceed a total of five (5) votes.
- If more than five (5) certification organizations volunteer to participate on the Committee, the five (5) votes allocated to certification organizations shall be fractionalized (evenly divided).
- The voting fraction shall be determined when the final committee membership is approved by the Board and shall remain in effect until the next biennial Conference meeting.
- Each certification organization shall be allowed no more than one (1) vote or one (1) voting fraction at any meeting.

Subsection 4. The Vice-Chair may voice positions on issues and may vote on all matters before the Committee.

Subsection 5. The Chair is a non-voting member of the Committee; however, in the event of a tie, the Chair may vote as the tie-breaker.

Section 6. Committee funding. The Board may allocate funds to the Committee for its charges. These funds may be used to contract the services of outside experts to assist the Committee, attend meetings with potential accreditation entities, and other miscellaneous expenses that the Committee must incur, e.g., use of meeting rooms. Funding shall not be allocated to cover an individual Committee member’s
travel or per diem expenses to attend meetings. Committee funding may be used only as directed by the Board.

Article VIII. Duties of the Committee Chair

Section 1. The Chair and Vice Chair, with the approval of the Board shall select Committee members in accordance with these Bylaws.

Section 2. The Chair, with concurrence of two-thirds (2/3) of the voting members of the Committee may appoint non-voting Ex-Officio consultants and advisors to the Committee in accordance with these Bylaws.

Section 3. The Chair shall preside at all meetings of the Committee, except as provided in these Bylaws.

Section 4. The Chair shall coordinate the arrangement of meetings and conference calls and ensure that meeting dates and locations are posted in advance on the Conference web site.

Section 5. The Chair shall be responsible for distributing to Committee members and other meeting participants an agenda for the meeting or conference call. This agenda may be distributed by email, fax, mail, or other suitable means.

Section 6. The Chair may assign a Committee member, using a rotation basis or other appropriate means among all Committee members, to take minutes during designated meetings and conference calls.

Section 7. The Chair shall be responsible for distributing minutes of all Committee meetings or conference calls in a timely manner, usually within three weeks of the event.

Section 8. The Chair may designate ad hoc workgroups to conduct research, study proposals, and develop procedures or recommendations related to complex issues and/or charges to address the charges of the Board and complete the duties of the Committee.

Article IX. Duties of the Committee Vice-Chair

Section 1. In the event the Chair is unable to perform the duties of the Chair, the Vice-Chair shall act as Chair.

Section 2. When acting as Chair, the Vice-Chair shall perform all the necessary duties for the Committee as outlined in these Bylaws.

Section 3. The Vice-Chair shall perform all duties assigned by the Chair.

Article X. Duties of Committee Members/Alternates
Section 1. Committee members shall have the responsibility to notify the Committee Chair of their inability to attend a meeting or participate on a conference call at least fifteen (15) days prior to the scheduled meeting or conference call. For any committee member that is unable to attend a scheduled meeting or conference call, an alternate will be assigned. Selection of the designated alternate will be agreed upon by the Committee Chair and the absent member and chosen to best represent the constituency of the absent member. This designated alternate may vote on issues before the committee only during the specified meeting or conference call.

Section 2. Committee members and alternates shall have the responsibility to review for comment standards, reports, recommendations, issues or other Committee documents distributed within the time frames designated by the Committee.

Section 3. Committee members and alternates shall have the responsibility to complete work assignments within time frames designated by the Committee.

Section 4. Committee members and alternates shall have the responsibility to notify the Committee Chair or the Chair’s designee of their inability to complete a work assignment.

Section 5. Committee members that do not participate for three (3) consecutive meetings and/or conference calls shall have their continued participation as Committee member assessed by the Committee Chair and evaluated by the Committee. The Committee member may be subject to being removed from their membership position. Removal of a Committee member for failure to perform duties as specified in these Bylaws, shall require the concurrence of two-thirds (2/3) of the voting members of the Committee.

Article XI. Committee Advisors, Subject Matter Experts, Paid Consultants and Conference Appointments

Section 1. Federal participants (FDA/USDA/CDC) may appoint an advisor and an alternate to serve as non-voting ex-officio members of the Committee. The alternate may act in the advisor’s place if the advisor is unable to attend.

Section 2. The Conference Chair, at the request of the Committee Chair, with approval of the Executive Board, may appoint a psychometrician advisor to serve as a non-voting ex officio member of the Committee.

Section 3. The Chair and Vice-Chair may invite, with approval from the Committee, subject matter experts, external to the Committee, to participate in meetings and conference calls, or to work with an ad hoc workgroup, if it is determined that such individuals would provide additional information, insight, clarification,
guidance or other assistance to the Committee, for a specified purpose. These subject matter experts will be non-voting guests in meetings and conference calls.

Section 4. The Committee may contract the services of a paid consultant for issues beyond the scope of the Committee’s expertise, if deemed necessary or if charged by the Board. Contractual obligations for paid consultant services shall have the concurrence of two-thirds (2/3) of the voting members of the Committee and be approved by the Board.

Section 5. Conference appointments to the ANSI-CFP Accreditation Committee (ACAC) shall serve as non-voting ex-officio members of the Committee.

Article XII. Workgroups

Section 1. Workgroups shall report to the Committee Chair and Vice-Chair as determined by the Committee Chair.

Section 2. Each workgroup shall select a group leader who is responsible to report group activities to the Committee Chair and Vice-Chair.

Section 3. Workgroups shall provide written reports and recommendations to the full Committee for deliberation.

Article XIII. Committee Reports

Section 1. The Committee Chair shall be responsible for preparing written or oral reports to the Board detailing the activities and expenditures of the Committee. Written reports of the Committee’s activities shall be submitted as required by the Conference procedures.

Section 2. The Committee Chair shall coordinate the development of a final report of the Committee activities to Council II with recommended actions. The final report shall be done as part of an Issue submission and shall comply with all Conference procedures.

Section 3. The Committee Chair, Vice-Chair, or designee as specified in writing to the Council II Chair, shall be in attendance when Council II meets during the Conference meeting to present and discuss the Committee’s report and any Issues submitted by the Committee.

Article XIV. Amendments

The Food Protection Manager Certification Committee Bylaws may be altered, amended, or repealed by two-thirds (2/3) vote of the Committee and final concurrence from the Board, and then submitted as an Issue during the next biennial meeting.
MINUTES OF THE MEETING

CONFERENCE CALL AGENDA

I. Roll Call
Vice Chair Sharon Wood called the meeting to order at 1:05 PM EST, roll was called and a quorum established. Vice Chair Wood referenced the anti-trust policy, and reminded the FPMCC members of the gravity of this issue. Members may access the statement in its entirety on the CFP website at CFP antitrust policy.

II. Introduction of Chair and Vice Chair
Chair Sean Dunleavy and Vice Chair Sharon Wood welcomed returning and new members and introduced themselves.

III. Review of Standing Charges for Food Protection Manager Certification Committee – Chair Dunleavy
Chair Dunleavy reviewed the FPMCC charges for the 2018-20 biennium and advised no additional charges have been assigned by the CFP Executive Board. A priority for this cycle will be consideration and development of a “normative document” and its utility.

Member George Roughan advised he may not make the Fall meeting and may ask Ryan McMillion to present an agenda item. The Committee was invited to add agenda items for the Fall Meeting; none were offered.

Vice Chair Wood presented an overview of the methodology and focus for the Committee’s work this cycle, including an overview of the topics to be discussed such as orientation, past activity, consideration of focus and accomplishments for this biennium, the potential for some self-appointed goals, and the committee workgroup process.

Chair Dunleavy added work on the normative document would be a priority for the committee this biennium.

Cynthia Woodley requested that the ANSI re-accreditation application process be discussed.

A member asked that training and “remote location” CFPM delivery be discussed.

Vice Chair Wood advised that academic constituents are needed for the FPMCC and requested input.

IV. Review of proposed Agenda for Upcoming Face to Face meeting in San Diego – Vice Chair Wood
Vice Chair Wood presented expectations for committee activity this cycle, including an overview of the topics to be discussed such as orientation, past activity, consideration of focus and accomplishments for this biennium, the potential for some self-appointed goals, and the committee workgroup process.

Chair Dunleavy added work on the normative document would be a priority for the committee this biennium.

Cynthia Woodley requested that the ANSI re-accreditation application process be discussed.

A member asked that training and “remote location” CFPM delivery be discussed.

Vice Chair Wood advised that academic constituents are needed for the FPMCC and requested input.

V. Meeting in San Diego details
Geoff Luebkemann requested that anyone planning to attend the Fall Meeting and not staying at the HQ hotel advise him by email (gluebkemann@fria.org) for planning purposes.

VI. Adjourn
Chair Dunleavy adjourned the meeting at 1:30 PM EST.
TUESDAY 10/23/2018

Attendance – Voting Members Present, Present by Phone (P), or Absent

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Attendance – Alternates, Consultants, Others Interested Present or Present by Phone (P)

Alternates present, not activated
Mark Conley (National Restaurant Association), Michael Baker (National Registry of Food Safety Professionals), Emilee Follett (P) (StateFoodSafety) Harry Klein (Prometric), Renee Beckham (Regulatory – Local)

Consultants present
Beth Wittry (CDC), Laurie Williams (FDA), Julie Albrecht (ACAC), Katie Calder (ANSI, alt for Vijay Krishna)

Other Interested Parties present
Larry Lynch (National Registry), Thomas Larson (StateFoodSafety)

FOOD PROTECTION MANAGER CERTIFICATION COMMITTEE (FPMCC) MEETING AGENDA

1. Welcome & Introductions
2. CFP Anti-trust Statement, housekeeping
3. Orientation & Standards Workshop
4. Committee Administration
   a. Standing committee, reports to Executive Board
   b. Purpose of Committee
   c. Constituencies
      • Academia
      • Certification Providers
      • Consumer/Independent
      • Industry (Food Service, Retail)
      • Regulatory (Local, State, Federal)
      • Training Providers
   d. Voting, non-voting, alternates
   e. Advisors/consultants (ACAC, ANSI, FDA/USDA, Psychometrician) (non-voting)
   f. Meeting procedures
   g. Voting procedures
5. Review of Committee Bylaws
6. Review of FPMC Standards
7. Charges from CFP
8. ANSI-ACAC Report
9. Workgroup formation and tasking
10. Next “live” meeting - Spring 2019 (April, TBD)
1. **Welcome & Introductions, roll call, housekeeping**
   Chair Sean Dunleavy convened the meeting at 8:30 AM, members were welcomed and introduced themselves. Roll was called, a quorum of 20/30 voting members established, and 29 people total were in attendance.

2. **CFP Anti-trust statement** was read by Chair Dunleavey.

3. **Minutes of Sept. 18, 2018 conference call** were approved as corrected.

   **MOTION**
   Paster moved, Dela Cruz seconded that:
   The minutes of Sept 18, 2018 be approved with one typo corrected. Motion passed unanimously.

4. **FPMCC Orientation & Standards Workshop**
   Patrick Guzzle presented CFP orientation and an overview of the FPMCC and its work.

5. **FPMCC Committee Administration, Committee Bylaws review, and 2018-20 Charge**
   Vice Chair Sharon Wood reviewed the 2018-20 FPMCC charge; forecast the work of the current biennium, reviewed the FPMCC member composition and described the various stakeholder constituencies; the FPMCC Bylaws; and conveyed the expectation that members embrace the responsibility and obligation to engage and participate in the work of this FPMCC.

   2018-20 FPMCC Charge
   The Food Protection Manager Certification Committee 2018-20 is charged:
   To carry out charges assigned via the Conference Issue process and from the Conference Executive Board relating to food protection manager certification and to adopt sound, uniform accreditation standards and procedures that are accepted by the Conference while ensuring that the Conference Standards for Accreditation for Food Protection Manager Certification programs and the accreditation process are administered in a fair and responsible manner.

6. **Food Protection Manager Certification Standards review**
   Vice Chair Sharon Wood reviewed the history and importance of the FPMC Standards, their purpose and importance, and the work FPMCC workgroups produced in support of these during the 2016-18 cycle, including the study of ISO Standard 17024 for harmonization with existing FPMC Standards.

   2016-18 Workgroup Chair Bryan Chapman reviewed the concept of a “normative document” that was developed last biennium.

   2016-18 Communications Workgroup Chair Tara Paster described the communications workgroup activity, and thanked Co-Chair Ryan McMillion for his efforts, and Cynthia Woodley for her edits.

   2016-18 Standards Workgroup Chair Kate Piche presented a review of the FPMC Standards and previous Committee work related thereto.

7. **American National Standards Institute (ANSI) and ANSI-CFP Certification Accrediting Committee (ACAC) reports**
   Katie Calder, ANSI representative (alternate for Vijay Krishna) is ANSI Senior Director of Accreditation Services and reported: her role and responsibilities with ANSI; that as ANSI celebrates its 100th anniversary in 2018 it is undergoing a “digital evolution;” that ANSI is the official US member body to the International Standards Organization (ISO), holds several permanent roles with ISO, and works extensively with federal agency members; ANSI’s role in accreditations and conformity assessment and the diversity of these undertakings; the differentiation between “certificate” and “certification” and self- second- and third-party demonstrations of standards conformance; revisions to the ANSI ISO 17011 accreditation process; the ANSI certifying body accreditation application process; ACAC roles, members, and the contract between CFP and ANSI; that the FPMC Standards pre-date the existence of ISO 17024 and ANSI involvement in food safety; and ANSI 2019 initiatives.
8. Workgroup Formation and Tasking
Workgroup Chairs and participants from the 2016-18 biennium recapped their activities and framed the work for the current biennium. These Workgroups were formed and action items assigned:

Standards Workgroup – Kate Piche, Chair
Members: Emily Follett, Susan Algeo, Liz Corchado-Torres, Hector Dela Cruz, Michael Baker, Sue Tyjewski, Beth Wittry
1) Review ANSI’s application for accreditation for alignment with the FPMC Standards.
2) Review the “Normative Document” relative to FPMC Standards, ANSI application for accreditation, and alignment with any FPMC Standards revisions.

Bylaws Workgroup – Jeff Hawley, Chair
Members: Liz Corchado-Torres, Patrick Guzzle, Susan Quam, Hector Dela Cruz, DeBrena Hilton, Dawn Borwegen, Justin Daniel, Courtney Halbrook, Susan Algeo, Sharon Wood, K. Calder/V. Krishna, Sima Hussein
1) Review the current CFP-ANSI contract and:
   a) consider whether it meets CFP needs, addresses rules of engagement for the parties, and establishes service expectations, and produce related recommendations for improvement.
   b) consider adding a clause that establishes coordination and alignment of ANSI accreditation application updates and the FPMC Standards.
   c) ensure current version of the FPMC Bylaws are posted on FPMCC web page.

Communications Workgroup – Tara Paster, Chair
Members: Terri Smith, Shana Davis, Laurie Williams, Bryan Chapman, Renee Beckham, Harry Klein, Gina Kramer, Mark Conley, Ryan McMillion, Patrick Guzzle
1) Develop communication that clearly differentiates “food handler certificate” and “food protection manager certification,” support correct characterization of these in regulators’ information, and:
   a) create clarity in the differentiation of “ANSI accredited certification bodies” and “training providers,” recommend methods to communicate that.
   b) create clarity in the differentiation of “food manager certification” and “food handler training,” and recommend methods to communicate same.
2) Review and update the “Regulatory Outreach” powerpoint presentation, and
   a) complete the speaker’s notes for each slide, create user instructions.
3) Develop a communication marketing/outreach plan that includes
   a) a social media strategy.
   b) methods to best engage and educate regulatory and industry stakeholders on the CFP; the FPMC; the differentiation among training, certificate and certification activity.
   c) leveraging meetings of FDA Regionals, NACCHO, NEHA, AFDO and similar conferences; direct outreach to industry, health departments, and professional stakeholder groups.
   d) a promotion and distribution plan for the “Regulatory Outreach” powerpoint presentation.
4) Review and revise FPMCC web page FAQs (circa 2005) for relevance and accuracy.

Logistics Workgroup – Geoff Luebkemann, Courtney Halbrook, Co-Chairs
1) Plan and support meetings for remainder of the 2018-20 biennium.

FPMCC - all
1) Provide feedback to the CFP Executive Board on its position statement re: ServSafe and National Registry as separate entities, for the sole purpose of judging the statement to be clear or unclear, without debate or discussion on the merits of the statement, and without revision thereto.

9. Next “live” meeting - Spring 2019
Tentatively scheduled April 11-12, 2019, at a location to be determined.

MOTION
Chapman moved, and Corchado seconded that:
The FPMCC adjourn, and the Workgroups meet during the remainder of the Fall Meeting time. Motion passed unanimously.
THURSDAY 04/11/2019

Attendance – Voting Members  Present, Present by Phone (P), or Absent

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ATTENDANCE – ALTERNATES, CONSULTANTS, OTHER INTERESTED PARTIES

Alternates present and activated
- Michael Baker (for Corchado); Renee Beckham (for Straughn); Emilee Follett (for Chapman); Harry Klein (for McMillion); Bridget Sweet (for Vacant – Academic)

Alternates present, not activated
- Mark Conley; Jason Fine; Melissa Smith;

Consultants present
- Vijay Krishna (04/11 only); Laurie Williams; Cynthia Woodley

Other Interested Parties present
- Tom Larsen (State Food Safety)

I. Welcome and opening
Meeting called to order 8:30 AM; intros, roll call, anti-trust, sponsor thank-yous, quorum established. – Sharon.

Sponsor recognition:
1. Susan Quam  Wisconsin Restaurant Association
2. Kate Piche  National Restaurant Association
3. Larry Lynch  National Registry of Food Safety Professionals
4. Ryan McMillion  Prometric
5. Tom Anderson  360 Training
6. Emilee Follett  State Food Safety
7. The Florida Restaurant and Lodging Association
II. Review and Approval of Fall 2018 FPMCC meeting minutes

**MOTION**

Hawley moved, Dela Cruz seconded that:
The minutes of Sept 18, 2018 be approved with one typo corrected. Motion passed unanimously.

III. Executive Board meeting updates – Sharon Wood reported for David Lawrence:
Next Executive Board meeting is Aug 13, 14 at Diversey headquarters; the 2022 Biennial Meeting location is Houston, TX; Vicki Everly was announced as the new CFP Executive Assistant, succeeding Aggie Hale. Nomenclature for CFP is under study and consideration being given to “Congress for Food Protection.” Wood presented the FPMCC interim report to the Executive Board. New media (apps, social, etc) are under review for use by CFP to help promote the mission and general understanding of CFP activity.

IV. ANSI Updates – Vijay Krishna

Krishna reported on history and evolution of ANSI: over the last 100 years, over 200 professional societies have participated in developing ANSI standards in their respective industries; ANSI is the U.S. representative to ISO, which has over 120 member countries and covers over 30,000 standards.

Krishna further reported on ANSI’s relationship with CFP: the CFP develops the FPMC standards, and ANSI audits and affirms conformity with the letter and intent of those standards; provides annual training to approximately 350 assessors across all content areas; in 2019 FPMC audits will be made against the 2018 revision of the associated standards, in addition to ISO 17024 plus the associated normative documents (the application for audit is under development); some FPMC providers will be dually audited and accredited. The history of harmonization and application of both FPMCC Standards and ISO 17024 was explained, along with the benefit of unifying assessment / reducing duplication in compliance auditing.

On May 29-30, 2019, ANSI will host an open workshop for understanding CFP FPMC accreditation at its Washington, DC, offices. The target audience is currently accredited organizations, those contemplating accreditation, and the various members of that organization that participate in the accreditation process.

Piche noted new items in the application appear to have been added and asked for explanation on the inclusion and benefit of those; Krishna responded that the 2018 Standards change invited an opportunity to revise the application and assure the appropriate evidence is being collected; in summary the changes were due to both the Standards change and the opportunity for ANSI to continually improve the process; development of the normative documents questions for the application are anticipated to follow.

Wood recognized Jeff Hawley, who explained the CFP process for benefit of newer members.

ACAC updates – no ACAC information was presented.

V. Workgroup Break-out time

Overviews – Wood called on each workgroup chair for a brief overview of their purpose and work for benefit of newer committee participants, then the workgroups convened.

VI. Workgroup reports, work product review, deadlines

A. Standards – Piche

Piche reported three task areas were assigned to the workgroup:

1 - “guidance document” discussion revealed it would have no requirement for conformity, and consensus was that the accrediting org is the appropriate entity to formulate any guidance and the ANSI CFP Workshop will fill some of that need.
2 - ISO 17024 “normative document” – the workgroup recommended that this be added as a stand-alone Appendix B to the Standards

3 – Look at the Standards as relates to “remote proctoring,” provide recommendations related thereto to the FPMCC.

**MOTION**

Piche moved, Dela Cruz seconded that:
The ISO 17024 normative document be added to the FPMC Standards as a new Appendix A and be required for compliance with the FPMC Standards, and the current Appendix A be relabeled Appendix B. Motion passed with unanimous consent.

- The workgroup reviewed the ANSI application for accreditation, based on the 2018 changes to the Standards and ANSI continual improvement opportunities: some semantic changes to application questions were developed with consensus support; the matter of application questions regarding “alternate non-traditional proctoring” was discussed and Krishna offered characteristics on how this would be acceptably deployed and recommends not creating specific additions to the Standards for this type of proctoring; Anderson suggested there is a need to assess whether the current Standards are sufficient to address alternate, non-traditional proctoring; Woodley suggested consideration of reference adoption of standards currently under development by NCTA-NTPA regarding non-traditional proctoring; discussion ensued regarding a number of questions – derived directly from the Standards – that bear opportunity for improved clarity and potential for improvement; the workgroup will follow those opportunities and continue developing recommendations to the Committee.

**B. Communications – Pater**
The workgroup was tasked with developing communication tools and content for public dissemination to foster understanding among the regulatory and industry communities of the work and mission of the CFP, and formed 4 teams:

1) Food Handler vs. Food Manager – a document was developed to describe and clarify these two roles and their differences; the Committee reviewed the content and developed consensus on the final version.

2) FAQs document – last updated in 2005, the team focused on making these brief and less technical; the Committee reviewed the content and developed consensus on the final version.

3) User guide document for the “FPMC explainer powerpoint” – after deliberation and feedback, the team decided to eliminate this document and incorporate the relevant content directly into the previously developed “FPMC explainer powerpoint.”

4) Information Outreach Plan – need to catalog organizations, events, conferences, and meetings where the target audience that would benefit from these communications tools gather; this plan will incorporate social, links, blogs, and the direct communication channels of relevant organizations; need to develop communication tools for the target audiences.

Wood recessed the Committee at 4:30 PM to allow additional workgroup time.
FRIDAY 04/12/2019

Attendance – Voting Members Present, Present by Phone (P), or Absent

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ATTENDANCE – ALTERNATES, CONSULTANTS, OTHER INTERESTED PARTIES

Alternates present and activated
Michael Baker (for Corchado); Renee Beckham (for Straughn); Emilee Follett (for Chapman); Harry Klein (for McMillion); Bridget Sweet (for Vacant – Academic)

Alternates present, not activated
Mark Conley; Jason Fine; Melissa Smith;

Consultants present
Laurie Williams; Cynthia Woodley

Other Interested Parties present
Tom Larsen (State Food Safety)

Wood reconvened the Committee at 830 AM; attendance taken; a quorum established.

C. Bylaws – Hawley
Hawley explained the Committee composition, the role of alternates and the importance of their attendance to remain informed and ready to serve as needed.

Hawley explained two proposed Bylaw revisions, to Sections 2 and 5, both of which codify and clarify current operating practice.

The recommended revisions proposed:
Article VI, Section 2 - (underlined section is new text)
The Committee Chair and Vice-Chair will select committee members and alternates from the list of volunteers from the most recent biennial meeting […]

Article VI, Section 5 - (underlined section is new text)
In the event a Committee member resigns or is no longer able to serve the remainder of their term the Chair shall select an alternate from the affected constituency to fill the open seat.
MOTION

Hawley moved, Sweet seconded that:
The FPMCC Bylaws be revised as follows in underlined text:

- Article VI, Section 2 - (underlined section is new text)
  The Committee Chair and Vice-Chair will select committee members and alternates from the
  list of volunteers from the most recent biennial meeting […]
- Article VI, Section 5 - (underlined section is new text)
  In the event a Committee member resigns or is no longer able to serve the remainder of their term
  the Chair shall select an alternate from the affected constituency to fill the open seat.

Motion passed with unanimous consent.

Hawley then explained the current Bylaws certification organization fractionalized voting formula,
and recommended this be revised. Discussion ensued regarding capping the certification
organization members at the current 5, and if additional providers become accredited, then the 5
voting attendees be selected for each meeting.

Anderson suggested that the certification organization voting members could be capped at a
percentage of the voting memberships, and / or establish term limits for the certification
organization voting members. He further suggested the constituency vote weighting be capped.
Additional discussion ensued.

MOTION

Hawley moved, Hilton seconded that:
the Bylaw Workgroup be authorized to develop language to cap voting certification organization
members at 9. Motion passed, with one sideways (Roughan) based on the importance that
certification organizations not be limited in their voice.

Discussion ensued regarding meeting attendance, regulator commitment and challenges to
attendance, use of technology to facilitate meetings and help for travel-challenged regulators,
obstacles for regulators to access technology (i.e., federal prohibitions on certain web
applications). More discussion will be raised at future meetings.

Hawley advised the Executive Board requested the FPMCC review the ANSI contract, executed
in 2002, for recommendations. Among the topics to review: deliverables and reporting
expectations (currently scant); expiration date; performance review function (none currently
exists); ANSI attendance at FPMCC meetings (none currently exists); provision for an alternate to
the primary ANSI attendee (none currently exists); any other expectations to consider.

Discussion took place and a number of recommendations were generated for reporting to the
CFP Executive Board.

Hawley then raised the matter of nominating a successor to ACAC representative Joyce Jensen,
whose term expires in 2020, and encouraged the Committee to immediately begin considering
candidates due to the difficulties presented by experience requirements and avoiding conflicts of
interests. It was suggested that nominee qualifications be communicated to the FPMCC members
for dissemination and recruiting purposes.

Hawley then covered items in the CFP Master Calendar:
- June 5, 2019 Council application deadline
- Nov. 1, 2019 FPMCC Final report deadline; Committee Issues submission deadline
- Dec. 31, 2019 Issue submission deadline

D. Logistics – Luebkemann
- Logistics was asked to save Oct. 15 & 16, 2019, for the FPMCC Fall meeting
- Discussion ensued regarding meeting logistics, i.e., is F&B important, whether the current schedule pattern (Tuesday all day, Wednesday half day) meets the FPMCC needs.
- the members expressed desire to allocate workgroup break out time during meetings
- volunteers were sought to complete a meeting logistics survey: Daniel, Hilton, Beckham, Anderson, Smith M, Wood, Roughan, Woodley, Paster, Williams, Dawn, Gina, Hawley

VII. Committee Housekeeping
These items were covered in other sections of the agenda.

Wood adjourned the meeting at 10:25 AM, encouraging the workgroups to use that time as needed.
Thursday 8:30 a.m. Meeting Call to Order

I. Welcome and opening procedures
   A. Chair welcome and comments
   B. Committee member and guest introductions
   C. Reading of the CFP Anti-trust Statement
   D. Attendance, quorum, and alternate activations
   E. Review of Bylaws requirements for membership and voting alternates – Sharon Wood

II. Review and approval of FPMCC Fall 2018 Meeting minutes – Geoff Luebkemann

III. Board Meeting Update – Notes from David Lawrence

IV. ANSI, ACAC Updates – Vijay Krishna

V. Workgroup Breakout Sessions – 2 hours

VI. Workgroup reports, work product review, deadlines
    A. Standards
    B. Communications

Friday 8:30 Meeting Call to Order

Continue Workgroup reports, work product review, deadlines
    C. Bylaws
    D. Logistics

VII. Committee housekeeping
    A. Member roster review, vacancies, contact info verification
    B. CFP 2020 Biennial Meeting Reports and Deadlines
    C. Fall 2019 meeting dates

Adjournment
TUESDAY 10/15/2019

Attendance – Voting Members Present or Absent

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ATTENDANCE – ALTERNATES, CONSULTANTS, OTHER INTERESTED PARTIES

Alternates present and activated
Renee Beckham (for Hilton)

Alternates present, not activated
Michael Baker, Mark Conley, Jason Fine, Samantha Montalbano

Consultants present
Vijay Krishna (04/11 only), Laurie Williams; Beth Wittry, Cynthia Woodley

Other Interested Parties present
None.

I. Welcome and opening procedures
Meeting called to order at 8:30 AM by Chair Sean Dunleavy and Vice Chair Sharon Wood. Member introductions were made, roll called, and the CFP anti-trust statement was read and explained. A quorum of 15 voting members of 28 filled seats was established.

Meeting Sponsors recognized for their generous support:
1. Wisconsin Restaurant Association, Susan Quam
2. National Restaurant Association, Kate Piche
3. National Registry of Food Safety Professionals, Larry Lynch
4. Prometric, Ryan McMillion
5. 360 Training, Tom Anderson
6. State Food Safety, Bryan Chapman
7. The Florida Restaurant and Lodging Association
II. Review and Approval of Spring 2019 FPMCC meeting minutes

MOTION

HAWLEY moved, PASTER CAMMARATA seconded that:
The minutes of the Spring 2018 minutes be approved. Motion passed unanimously.

III. Executive Board updates – Chair Sean Dunleavey

Hawley was recognized and reported he presented suggested revisions to the ANSI contract to the Executive Board. These will be available in the Executive Board minutes, which will be posted to the CFP website soon. The CFP Biennial Meeting begins March 30, 2020 in Denver, and the FPMCC will meet onsite at that time for its last meeting of the cycle.

It was also reported that the FPMCC must nominate to the Executive Board an ACAC representative to succeed Joyce Jensen, as well as leaders for FPMCC 2020-22.

Wood asked the FPMCC members to consider persons for Chair and Vice Chairs for the 2020-22 biennium. Dunleavey declined to be considered, and Wood stated she would accept consideration.

IV. ANSI, ACAC Updates

ANSI – Krishna

Krishna provided an overview of ANSI, including its activities in approving standards as American National Standard (ANS) and explained ANSI’s role as the U.S. member body to the International Organization for Standardization (ISO). Krishna explained how ANSI was created, and that it performs work typically undertaken by government bodies outside the US. ANSI maintains over 10,000 US standards and works with over 30,000 international standards.

Krishna updated the committee about ANSI National Accreditation Board (ANAB), a wholly owned subsidiary of ANSI, All accreditation services previously offered by ANSI including the CFP program are now offered through ANAB. WorkCred in an ANSI affiliate whose mission is to strengthen workforce by improving the credentialing system. Additional information about ANAB and WorkCred are available at www.anab.org and www.workcred.org respectively.

Krishna provided details about the publication of the application for meeting CFP Normative Requirements for certification bodies applying under ISO/IEC 17024 and CFP-PR-817: ANSI-CFP accreditation under the ISO 17024 pathway. This document is available on the ANSI website at https://www.ansi.org/Accreditation/credentialing/personnel-certification/food-protection-manager/DocumentDetail?DRId=20927.

Lastly, ANSI offered a workshop on the CFP 2018 standard in Washington, D.C. on May 29-30, 2019. Approximately 15 participants attended the workshop

ACAC – no ACAC representative present

Jeff Hawley reported that Sheri Morris, PA Dept. of Agriculture, is willing to serve as ACAC representative, which will be further discussed later in the meeting.

V. Workgroup Break-out time

Wood tasked the workgroups to break out and finalize work products.

VI. ACAC Representative for FPMCC 2020-22 – Hawley

[covered earlier and later]

VII. Workgroup reports, work product review, deadlines
A. Standards – Piche
Piche thanked the members for their extensive participation and input and presented the workgroup’s proposed revisions. The FPMCC reviewed each, provided comment and discussion, and expressed consensus support for the revisions as submitted. Upon final approval of the revised Standard content, the entire document will be reviewed for proper formatting.

MOTION
CORCHADO moved, QUAM seconded that:
The Standard workgroup revisions be accepted as presented. Motion passed unanimously.

B. Bylaws - Hawley
Jeff Hawley reviewed the FPMCC Bylaw revisions previously approved by the FPMCC at the 2019 Spring Meeting Austin. No additional revisions were proposed by the FPMCC. Additional Bylaw revisions could be necessitated by any associated, subsequent changes to the CFP-ANSI contract.

Hawley additionally reported on proposed revisions to the CFP-ANSI contract - which has been in effect without revision since May 15, 2002 - undertaken by request of the Executive Board. Hawley was asked to lead that review, and presented at the August 2019 CFP Executive Board meeting. The revisions were developed in consultation with ANSI representative Katie Calder, and accepted by the Executive Board with minor edits. The Executive Board will next seek outside legal review of the proposed revised contract for sufficiency and efficacy.

In the revised contract, the term “ANSI” is replaced by “ANSI National Accreditation Board (ANAB)”, a wholly owned subsidiary of ANSI.

C. Communications – Tara Paster Cammarata
Paster Cammarata provided an overview of four elements to the workgroup’s Outreach Plan:
1) CFP FAQs and an integrated Food Handler - Food Manager Comparison Chart
2) CFP Communication Outreach PowerPoint 2019
3) Workgroup sub-team content areas
4) Targeting elements of the Outreach Plan:
   a) organizations to contact
   b) specific communication channels to deploy
   c) need for a CFP statement of authority to replicate and disseminate the outreach material
   d) a survey tool to shape the tactical aspects of the Outreach Plan

The documents were reviewed at length, in depth, and finalized with comments and edits from the FPMCC. Some recommended revisions may require CFP Executive Board approval which Sharon Wood will pursue.

MOTION
LUEBKEMANN moved, ROUGHAN seconded that:
The documents and elements of the Outreach Plan prepared by the Communications Workgroup and finalized by consensus of the FPMCC, be transmitted to the Executive Board for approval and execution. Motion passed unanimously.

D. Logistics
The Logistics Workgroup planned and executed the Fall Meeting Pittsburgh, and circulated a survey to FPMCC members to further refine and improve meetings. Results will be compiled and reported to the FPMCC.

Vice Chair Wood recessed the meeting at 4:30 PM, to reconvene October 15, 2019 at 8:30 AM.
WEDNESDAY 10/16/2019

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ATTENDANCE – ALTERNATES, CONSULTANTS, OTHER INTERESTED PARTIES

Alternates present and activated
Renee Beckham (for Hilton)

Alternates present, not activated
Michael Baker, Mark Conley

Consultants present
Laurie Williams

Other Interested Parties present

Vice Chair Wood reconvened the FPMCC at 8:35 AM. Roll was called and a quorum of 15 voting members of 28 filled seats established.

Communications – Tara Paster Cammarata
Wood recognized Tara Paster Cammarata to continue workshopping the Communication Workgroup Outreach Plan. The FPMCC reviewed and provided comments on a survey document that Paster Cammarata produced overnight, to be used to gauge CFP members’ communication preferences. The FPMCC provided comments and suggestions, and the survey document was accepted by consensus as edited. Paster Cammarata will circulate the final product.

ACAC representative
Wood returned the FPMCC to discussion of ACAC representation, and directed the members attention to the resume of Sheri Morris, PA Dept. of Agriculture. Jeff Hawley explained Morris’ background and qualifications and advised she expressed willingness to serve.

MOTION

HAWLEY moved, PASTER CAMMARATA seconded that:
Sheri Morris be nominated to the Executive Board for approval as ACAC representative. Motion passed with unanimous consent.

Discussion then moved to selecting FPMCC leaders for the 2020-22 biennium. Nominations were made from the floor that Sharon Wood be selected Chair, and Susan Quam Vice Chair. In Chair Dunleavey’s absence, Wood passed the gavel to past Chair Jeff Hawley and the candidates left the room. No additional nominations were advanced, and discussion closed.
MOTION

HAWLEY moved, HALBROOK seconded that:
Sharon Wood be nominated to the Executive Board for FPMCC 2020-22 Chair and Susan Quam for FPMCC 2020-22 Vice Chair. Motion passed unanimously.

The candidates returned to the room and were congratulated on their nominations.

VIII. Committee Housekeeping and Final Comments

Wood recognized Hawley to review deadlines and dates for reports and issues submission leading into the 2020 Biennial Meeting, which are posted on the CFP website (browse foodprotect.org, click conference administration, click calendar). Vice Chair Wood is authorized to prepare the necessary FPMCC documents and reports for submission, and will circulate them to the FPMCC members for informational purposes.

A final meeting of this FPMCC is scheduled 5-6 PM Sunday, March 29, 2020 in conjunction with the CFP Biennial Meeting in Denver.

The FPMCC members then discussed ideal length and format for the FPMCC meetings, with consensus that these could be shorter, could use distance meeting technology, should be driven by the FPMCC workload and charges, and determined by the Chair and Vice Chair as needs dictate.

Tom Anderson of 360Training, an accredited certification body, stated his organization had employees conduct more than twenty "audits" using prohibited practices to test CFPM exam security.

Discussion ensued regarding the general state of exam security and related technology, with consensus emerging that this be considered in the next biennium.

The meeting was adjourned at 10:00 AM.
October 15, 2019
8:30 a.m. Meeting Call to Order - Sharon Wood, Vice Chair
I. Welcome and opening procedures
   - Chair welcome and comments
   - Committee member and guest introductions
   - Reading of the CFP Anti-trust Statement
   - Attendance, quorum, and alternate activations
   - Review of Bylaws requirements for membership and voting alternates
II. Review and approval of FPMCC Fall 2018 Meeting minutes – Geoff Luebkemann
III. Board Meeting Update – Sean Dunleavy
IV. ANSI, ACAC Updates – Vijay Krishna
V. ACAC Representative for FPMCC 2020 - 2022
VI. Workgroup Breakout Sessions – 1 hour
    VII. Begin Workgroup reports, work product review, deadlines
        A. Standards
        B. Bylaws
        C. Communications
        D. Logistics

October 16, 2019
8:30 Meeting Call to Order
Continue Workgroup reports, work product review, deadlines
   - Standards
   - Bylaws
   - Communications
   - Logistics

VIII. Committee housekeeping
   - Member roster review, vacancies, contact info verification
   - CFP 2020 Biennial Meeting Reports and Deadlines
   - Adjourn
ANSI-CFP Accredited Food Protection Manager Certification Programs

Education Outreach

Benefits of the ANSI-CFP Accredited Certification Programs
Disclaimer: The purpose and intent of this presentation is to educate regulatory, industry, academia, and consumer constituents. The Conference for Food Protection (CFP) and the American National Standards Institute (ANSI) does not assume any responsibility for the organizations, companies, and government agencies in this presentation. This is strictly a method of educational outreach to increase the understanding of all constituents as it relates to the Conference for Food Protection.

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Agenda

Welcome and thank you for your commitment to the global food supply!

Section 1: Conference for Food Protection (CFP), American National Standards Institute (ANSI), and ANSI-CFP Accredited Food Protection Manager Certification Exam Providers

Section 2: Legally defensible, Certification vs. Certificate, and Test Development Principles

Section 3: FDA, 2013 FDA Food Code, and FDA Risk Factor Study

Section 4: Benefits, Security Solutions, and Call To Action

Section 5: Resources, Conclusion, and Invitation
Section 1:

CFP, ANSI, and ANSI-CFP Accredited Food Protection Manager Certification Programs
What is CFP?

- The Conference for Food Protection (CFP) [http://www.foodprotect.org/](http://www.foodprotect.org/) is an organization that brings together representatives from the food industry, government, academia, and consumer organizations to identify and address emerging problems of food safety and to formulate recommendations.

- The CFP has been actively working to standardize Food Protection Manager Certification across the United States and Maintains the Standards for Accreditation of Food Protection Manager Certification Programs

- The CFP meets biennially to collaboratively discuss the issues submitted to it.
What is ANSI?

▪ As the voice of the U.S. standards and conformity assessment system, the American National Standards Institute (ANSI) https://www.ansi.org/ empowers its members and constituents to strengthen the U.S. marketplace position in the global economy while helping to assure the safety and health of consumers and the protection of the environment.

▪ ANSI maintains a conformity assessment division that conducts conformity assessment (accreditation) activities.

▪ ANSI is the body selected to conduct accreditation activities on behalf of CFP.
Did you know there are currently five ANSI-CFP Accredited Certification Programs?

- 360training.com [https://www.360training.com/]
- National Registry of Food Safety Professionals [http://www.nrfsp.com/]
- Prometric [https://www.prometric.com/]
- ServSafe [https://www.servsafe.com/]
- State Food Safety [https://www.statefoodsafety.com/]
Competency and Competency Examination

- **Competency** means a defined combination of *knowledge, skills and abilities* (KSAs) required in the satisfactory performance of a job.

- **Competency examination** means an instrument that assesses whether an individual has attained at least a minimum level of *competency* that has been determined to be necessary to perform effectively and safely in a particular occupation or job. It shall be based on a thorough analysis of requirements for safe and effective performance. ¹
Section 2:

Legally Defensible
Certification vs. Certificate
CFP Standards for Exam Development
It is important that certification programs adopted for use by regulatory bodies be *legally defensible*.

**Legally defensible** means the ability to withstand a legal challenge to the appropriateness of the examination for the purpose for which it is used.

Accreditation by a third party such as ANSI adds to the legal defensibility of the certification programs by ensuring the certification programs adhere to best practice standards such as the CFP Standards for Accreditation of Food Protection Manager Certification Programs.
Certification vs. Certificate

- There is a difference between Certification Programs and Certificate Programs.

- The CFP Standards for Accreditation of Food Protection Manager Certification Program is designed to be a set of voluntary unifying national standards providing a mechanism for the universal acceptance of food protection managers certification programs.

- The CFP national Standards for universal acceptance of Certified Food Protection Managers provide regulatory authorities reliable and legally defensible criteria for ANSI-CFP Accredited Certification Programs.
# Certification vs. Certificate

<table>
<thead>
<tr>
<th>Certification Programs</th>
<th>Certificate Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Credential awarded to candidates based on a third-party assessment of competence by a credentialing body.</td>
<td>Credential awarded to candidates based on successful completion of a training or educational program. It may include an assessment of learning.</td>
</tr>
<tr>
<td>The content of certification is based on a job or practice analysis that identifies the tasks and associated knowledge, skills and attributes (KSAs) required for competent performance</td>
<td>The content of a certificate program is based on the required learning objectives for the course curriculum.</td>
</tr>
<tr>
<td>Certification is time limited and must be regularly renewed as the candidate demonstrates continued competence</td>
<td>Certificates from certificate programs generally do not have to be renewed.</td>
</tr>
</tbody>
</table>
# Certification vs. Certificate

<table>
<thead>
<tr>
<th>Certification Programs</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Certificate is “owned” by the Certification Body and may be taken away from the certified person.</td>
<td>Certificates from certificate programs are owned by the graduate and are not taken away even if the person eventually forgets what he or she has learned.</td>
</tr>
<tr>
<td>Accreditation involves looking at how the scheme was developed and how competence is assured (i.e. how the assessment and examinations are developed).</td>
<td>Accreditation involves looking at how the curriculum is developed, delivered and evaluated and how learning is developed.</td>
</tr>
</tbody>
</table>

The Food Protection Manager Certification Programs are designed to be Certification Programs and not Certificate Programs. Seat time and completion of educational or training do not meet the definition of certification programs.
The CFP Standards for Accreditation of Food Protection Manager Certification Programs require accredited food manager programs to meet best practice standards.

Best practice standards apply to:

- Examination development
- Examination administration
- Security of confidential information
CFP Standards associated with examination development include:

- A *Job-Task Analysis (JTA)* that identifies the tasks that a Food Protection Manager would be responsible for doing and the knowledge, skills and attributes (KSAs) that are associated with those tasks. (Clause 4.4)

- Involvement of a representative sample of subject matter experts in the development of the JTA. (Clause 4.4)

- *Examination Specifications* that include a percentage or number of items for each content area. (Clause 4.6)
Examination Development

CFP Standards associated with examination development include:

▪ Requirements associated with *how the test items are written, reviewed and evaluated*. The certification body must use a fair, valid, reliable and legally defensible method for the development and maintenance of examinations. (Section 4.0)

▪ Requirements associated with the *qualifications of the experts* who write, review and evaluate test items. The certification body must maintain records on the qualifications of the Subject Matter Experts (SMEs) who participate in the development of the program. (Clause 4.7)

▪ Translation of examinations. *Equivalency* of translated examinations must be demonstrated. (Clause 4.14)
Examination Administration

CFP Standards associated with examination administration include:

▪ Test site requirements including requirements associated with the *physical location*. (Clause 5.2)

▪ Scoring considerations that include *how, when and where examinations will be scored*. (Clause 5.4)

▪ Test Administrator/Proctor requirements including information pertaining to their qualifications, training, roles and responsibilities and the *test administrator/proctor to candidate ratio*. (Clauses 5.5, 5.6, 5.7, 5.8 and 5.9)
Security of Confidential Information

Standards requirements associated with security of confidential information include:

- Examination booklet security (Clause 5.1)
- Examination security (Clause 5.11)
Section 3:

U.S. Food & Drug Administration (FDA)

2013 Food Code

Risk Factor Study
FDA Risk Factor Study and how it relates to the ANSI Accredited Food Protection Manager Certification Exam

“The FDA Trend Analysis Report on the Occurrence of Foodborne Illness Risk Factors in Selected Institutional Foodservice, Restaurants, and Retail Food Store Facility Types (1998-2008) presents the results of the examination of data from three collections over the ten-year period. The analysis focuses on the detection of trends over the study timeframe to determine what progress has been made toward the goal of reducing the occurrence of foodborne illness risk factors at retail.”
FDA Risk Factor Study and how it relates to the ANSI Accredited Food Protection Manager Certification Exam

- “A study was needed to determine the **effectiveness of the nation’s retail food protection system** and to establish performance measures.”

- “FDA will also continue to **promote adequate training and certification of facility personnel**, including a deliberate move towards increased use of certified food protection managers as common practice.”
Why should Regulators require FPM Certifications?

- FDA encourages food regulatory authorities and others evaluating credentials for food protection managers to recognize the ANSI-CFP Food Protection Manager Certification Accreditation Program.

- The ANSI-CFP Accreditation Program provides a means for universal acceptance of certified individuals who successfully demonstrate knowledge of food safety.

- ANSI-CFP Accreditation provides officials assurance that food safety certification is based on valid, reliable, and legally defensible criteria.

- In addition, universal acceptance eliminates the inconvenience and unnecessary expense of repeating training and testing when managers work across jurisdictional boundaries.”
FDA 2-102.12 Certified Food Protection Manager

- (A) The PERSON IN CHARGE shall be a certified FOOD protection manager who has shown proficiency of required information through passing a test that is part of an ACCREDITED PROGRAM.

- (B) This section does not apply to certain types of FOOD ESTABLISHMENTS deemed by the REGULATORY AUTHORITY to pose minimal risk of causing, or contributing to, foodborne illness based on the nature of the operation and extent of FOOD preparation.
FDA Definition: Person in Charge (PIC)

“Person in charge" means the individual present at a FOOD ESTABLISHMENT who is responsible for the operation at the time of inspection.”
FDA 2-102.20 Food Protection Manager Certification

- (A) A PERSON IN CHARGE who demonstrates knowledge by being a FOOD protection manager that is certified by a FOOD protection manager certification program that is evaluated and listed by a Conference for Food Protection-recognized accrediting agency as conforming to the Conference for Food Protection Standards for Accreditation of FOOD Protection Manager Certification Programs is deemed to comply with §2-102.11(B).

- (B) A FOOD ESTABLISHMENT that has an EMPLOYEE that is certified by a FOOD protection manager certification program that is evaluated and listed by a Conference for Food Protection-recognized accrediting agency as conforming to the Conference for Food Protection Standards for Accreditation of FOOD Protection Manager Certification Programs is deemed to comply with §2-102.12.
Section 4:

Benefits
Security Solutions
Call To Action
Benefits

• The ANSI-CFP Accreditation Program to the CFP Standards provides regulatory authorities with a valid, reliable, and legally defensible method for evaluating Food Protection Manager Certification Programs.

• A fair, valid, reliable, legally defensible, credible and objectively evaluated Food Protection Manager Certification Program is important to ensure food safety and ultimately for consumer protection.

• Regulatory authority universal acceptance of Certified Food Protection Managers in accordance with the CFP Standards for Accreditation benefits all stakeholders.
What are the benefits to Regulatory Jurisdictions?

Regulatory Jurisdictions benefits include:

▪ savings on human and financial resources required to evaluate and administer Food Protection Manager Certification Programs;

▪ limits of legal liability resulting from a lack of the required expertise on staff to develop, administer or evaluate Food Protection Manager Certification Programs (such as the lack of an individual with expertise in the psychometric development of written examinations);

▪ assurance by a third-party accreditor (ANSI) that all accredited certification programs meet the CFP Standards; and

▪ opportunities for regulatory agencies to devote their limited resources to their retail food protection program rather than the credentialing of Food Protection Managers.
What are the benefits to Industry?

Industry benefits include:

- increased reciprocal acceptance of certification across jurisdictional lines;
- increased value of the Food Protection Manager Certification;
- third party quality assurance conducted on the certification programs that are offered;
- a consistent meaning for certification within the profession; and
- enhanced confidence that the certification process is fair, valid, reliable, and legally defensible.
The charge to the Food Protection Manager Certification (FPMC) Committee is to maintain the Standards to enhance the **integrity** of the entire examination process, which includes identification and analysis of **root causes of security violations** and implementation of **solutions**.
Security Solutions in the Standard

- All examinations shall be delivered and administered in a format that ensures the **security of the examination** (i.e. in a secured environment with a *test administrator/proctor*).

- Unproctored examinations are **not** acceptable regardless of the mode of administration.
Security Solutions Call To Action – We need You!

If you see something, say something!

Please notify the appropriate ANSI Accredited Food Protection Manager Certification Exam Provider:

- 360training.com  https://www.360training.com/
- National Registry of Food Safety Professionals  http://www.nrfsp.com/
- Prometric  https://www.prometric.com/
- ServSafe  https://www.servsafe.com/
- State Food Safety  https://www.statefoodsafety.com/
Section 5:
Conclusion
Invitation
Conclusion

- Currently, there are **five choices** for Food Manager Certification in the industry.
  - **Regulators**: ANSI has accredited five Food Protection Manager Certification Programs!
  - **Industry**: You have options! Choose the specific certification that meets or exceeds your business needs but always follow your regulatory requirements!
- **Bottom line**: Regardless of the provider, the examination, or the delivery method, the outcome will be the same!
Invitation – ALL are welcome!

Join us at the next Biennial Meeting!

Make A Difference! Get Involved Today! www.foodprotect.org

Identify and address emerging food safety issues and make recommendations!
Q1. What is the Conference for Food Protection (CFP)?

   A1. CFP is an independent, national, and voluntary nonprofit organization with a purpose that includes identifying food safety problems, adopting fair and workable procedures to address those problems, maintaining a working relationship among government, industry, academia, professional and consumer groups, and promoting uniformity of regulation in food protection. In order to support those goals, CFP encourages active participation by representatives of diverse stakeholder groups and seeks to produce high quality standards by consensus.

Q2. Why did the Conference for Food Protection develop the Standards for Accreditation of Food Protection Manager Certification Programs (Standard)?

   A2. The Standard for Food Protection Managers was developed to assist regulatory authorities in identifying organizations who have valid, reliable and legally defensible certification programs. The Standard was developed to assess the competence of certification organizations to administer certification exams based on industry defined competence requirements. This assessment of the competence of certification organizations is conducted by a third-party accreditation body American National Standards Institute (ANSI) National Accreditation Board.

Q3. How did CFP develop the Standard?

   A3. The Standard was developed by the CFP Food Protection Manager Certification Committee through a consensus-based process and approved by CFP. The CFP Food Protection Manager Certification Committee includes representatives of food industry stakeholders including Federal, State, and local regulatory agencies, academia, foodservice and retail food store industries, trade associations, operators, consumer groups, certifying organizations, and test providers. The Committee’s approach provides for balanced decisions arrived by collaboration and consensus.

Q4. How can I obtain a copy of the CFP Standard?

   A4. The Standard may be obtained from the CFP website www.foodprotect.org.

Q5. What is a Certified Food Protection Manager?

   A5. A Certified Food Protection Manager is an individual who has demonstrated by means of passing a food protection manager certification examination from an accredited certifying organization that he/she has the knowledge, skills and abilities required to protect the public from foodborne illness. The duties of a Certified Food Protection Manager could include but are not limited to:

   • identifying hazards in the day-to-day operation of a food establishment that provides food for human consumption;

   • developing and implementing specific policies, procedures or standards aimed at preventing foodborne illness;

   • coordinating training, supervising food preparation activities, and taking corrective action as needed to protect the health of the consumer; and

   • completing in-house self-inspections of daily operations on a periodic basis to see that policies and procedures concerning food safety are being followed.
Q6. What is the difference between Certified Food Protection Manager and Food Handler?

A6. The differences between a Certificate Food Protection Manager and Food Handler are illustrated in the table below:

<table>
<thead>
<tr>
<th></th>
<th>Certified Food Protection Manager</th>
<th>Food Handler</th>
</tr>
</thead>
<tbody>
<tr>
<td>Role</td>
<td>Someone who is responsible for a food establishment operations and/or processes, has direct authority over food employees at the time of an inspection, and has been certified by an ANSI-accredited certification.</td>
<td>Someone who handles unpackaged food, food equipment or utensils or food contact surfaces but does not manage/supervise employees, processes, or operations.</td>
</tr>
<tr>
<td>Title</td>
<td>May be called Food Safety Manager, Food Service Manager, Food Manager or equivalent. The regulatory term is Person-In-Charge (PIC).</td>
<td>May be called Food Employee, Food Worker, or equivalent.</td>
</tr>
<tr>
<td>Responsibilities</td>
<td>Responsible for following Food Code requirements which include:</td>
<td>Responsible for following Food Code requirements which include:</td>
</tr>
<tr>
<td></td>
<td>• Overseeing operation and Food Employees</td>
<td>• Reporting to PIC</td>
</tr>
<tr>
<td></td>
<td>• Reporting certain illnesses to the local regulatory authority and restricts/excludes Food Employees as required</td>
<td>• Reporting symptoms and illnesses to the PIC, and comply with restriction/exclusion as required</td>
</tr>
<tr>
<td></td>
<td>• Ensuring that Food Employees are trained in food safety standards and practices and that those standards and practices are followed</td>
<td>• Maintaining cleanliness and personal hygiene</td>
</tr>
<tr>
<td></td>
<td>• Answering food safety questions during regulatory authority inspections</td>
<td>• Following food preparation standards and practices set in place by PIC</td>
</tr>
</tbody>
</table>

| ANSI-Accredited Programs | ANSI-CFP Accredited Food Protection Manager Programs | ANSI Accredited Food Handler Programs |

Q7. What is the difference between a certificate program and certification?

A7. There are significant differences between a “certificate program” and “certification”.

A certificate program is a non-degree-granting education or training program consisting of:

(1) a learning event or series of events designed to educate or train individuals to achieve specified learning outcomes within a defined scope, and

(2) a system designed to ensure individuals receive a certificate only after verification of successful completion of a program.
On the other hand, certification is a time-limited, revocable, renewable credential awarded by an independent, third-party certification organization.

The differences between a Certificate Program and Certification are illustrated in the table below:

<table>
<thead>
<tr>
<th>Certificate Program</th>
<th>Certification</th>
</tr>
</thead>
<tbody>
<tr>
<td>The certificate is awarded by an education or training organization</td>
<td>The certificate is awarded by an independent, third party certification organization</td>
</tr>
<tr>
<td>The assessment is knowledge based and intended to measure learning objectives and outcomes</td>
<td>The assessment measures competencies (knowledge, skills and abilities) related to a specific job in an occupation or profession</td>
</tr>
<tr>
<td>The individual owns the certificate. It may not be revoked</td>
<td>Certification organization owns certificate and can revoke it</td>
</tr>
</tbody>
</table>

Q8. What is accreditation?

A8. Accreditation is third party verification by an independent organization (such as ANSI National Accreditation Board) confirming a certification organization’s competence to carry out a certification program according to a standard (in this case the CFP Standard).

Q9. Who accredits Food Protection Manager Certification organizations according to the Standard developed by CFP?

A9. ANSI National Accreditation Board is under agreement with CFP to accredit certification organizations administering Food Protection Manager Certification programs. The final decision to accredit is determined by the ANSI-CFP Accreditation Committee (ACAC). CFP has two representatives on ACAC.

Q10. Who is eligible to enter the ANSI-CFP accreditation process?

A10. All Food Protection Manager Certification organizations will be eligible to apply for the accreditation if they meet ANSI National Accreditation Board's eligibility requirements.

Interested organizations can contact ANSI National Accreditation Board at www.ansi.org for more information.

Q11. How does a certification organization achieve ANSI-CFP accreditation?

A11. The certification organization must provide documented evidence through the ANSI-CFP accreditation process that it meets the CFP Standard. ANSI National Accreditation Board will review the evidence provided and evaluate the entire certification program, using specific criteria to verify compliance with the CFP Standard.

Q12. What Food Protection Manager Certification Organizations are currently accredited?

A12. ANSI National Accreditation Board maintains a current listing of accredited Food Protection Manager Certification Organizations on their website www.ansi.org.
Q13. Why should a regulatory agency adopt the CFP Standard and recognize the ANSI National Accreditation Board accreditation process?

A13. Beginning with the 2009 FDA Food Code, the FDA has recommended that states adopt the Food Protection Manager Certification as one way to demonstrate knowledge. In many states, persons-in-charge (PIC) are required to obtain a Food Protection Manager Certification.

Adopting this requirement provides regulatory agencies with a valid, reliable, and legally defensible mechanism to ensure that PICs who have passed a Food Protection Manager Certification exam have the knowledge, skills, and abilities required to protect the public from foodborne illness.

Q14. What confidence can regulatory agencies have in the Food Protection Manager Certification?

A14. The ANSI-CFP accreditation process includes a third-party assessment from qualified professionals at ANSI National Accreditation Board who measure and monitor each certification organization to ensure conformity with the CFP Standard. Therefore, regulatory agencies can confidently assume that any Food Protection Manager Certificate issued by an accredited Certification Organization has been issued according to the CFP Standard.

Q15. Is one Food Protection Manager Certification exam better than another?

A15. Passing an exam from any certification organization accredited to the CFP Standard by ANSI National Accreditation Board will satisfy the requirement for certification. While the examinations may be different (different number of questions, different passing score, etc.) being certified by any of the accredited certification organizations implies that the certified person has met the requirements for competence.

Q16. Do all Food Protection Manager certificates satisfy the requirement for certification?

A16. Certificates satisfy the requirement for certification only if they have been awarded by a certification organization that has been accredited to the CFP Standard by ANSI National Accreditation Board. Certificates that satisfy the requirement will bear the ANSI-CFP accreditation mark:
Committee Final Reports are considered DRAFT until acknowledged by Council or accepted by the Executive Board

Committee Name: Constitution Bylaws and Procedures Committee

Date of Final Report: November 1, 2019

Committee Assignment: Council I ☑ Council II ☐ Council III ☐ Executive Board

Report Submitted By: Davene Sarrocco-Smith, Chair

Committee Charge(s):

Issue #2018 II-024

1. Review the Conference for Food Protection governing documents (Conference for Food Protection Constitution and Bylaws, Conference Procedures, Conference Biennial Manual, position descriptions, conference policies, etc.) to facilitate a merger and conformance of these documents into a comprehensive "Conference for Food Protection Manual." (Issues 2012-II-001, 2012-II-004, 2014-II-018 and 2016-II-026)

2. Review membership and constituency at-large members on all committees and offer recommendations on how to address the quantity and functionality of committees.

3. Report back to the Executive Board; and submit recommendations as Issues at the 2020 Biennial Meeting.

Executive Board Charges

1. Work with the Strategic Planning Committee to discuss the impact of changing the name of our organization from "Conference for Food Protection" to "Congress for Food Protection".

2. Work with Issue Committee Chairs regarding framework of Issue management process, specifically what is taking place from Issues being made public until the Biennium.

3. Add “App Liaison” position to the CFP Procedures document.

4. Define “student” for registration purposes, self-reporting and what happens if they get a job during the cycle? Do they have to pay again or registration fee or just let the student registration fee carry over until the next cycle?

5. Chair to review the Issue management process with the Issue Committee Chairs to determine if the CFP governing documents have language preventing Issue submitters from contacting Council members in advance of the Biennial Meeting.

6. A general point of clarification was raised asking if committee and council chairs, and vice- or co-chairs, are to be included on a roster, and if their voting status is to be indicated or counted towards constituency balance.

7. CB&P Committee to categorize the CFP documents included on the list in the CB&P Committee report dated 03/01/2019 and use the category titles of “governing,” “administrative,” and “instructional.”

8. Chair to work independently with Issue Committee Chairs regarding Issue integrity.

9. CB&P Committee to bring to the Board meeting in August 2019 a single revised Constitution and Bylaws document, using underline and strikeover for any changes, so the Board can extract those items they feel need to be submitted as separate Issues.

10. Review the CFP MOU with NACCHO.

11. Define roles of Co-Chair and Vice Chair in the CFP Biennial Meeting/Conference Procedures document

Committee Work Plan and Timeline:

1. Fourth Wednesday of every month conference calls took place. As of the February 27, 2019, conference call frequency had been increased to the 2nd and 4th Wednesday of every month with the primary goal of continuing review and editing the Constitution and By Laws

2. Sub-committees were formed fall 2018: At-Large Constituency; Strategic Planning; Constitution review.

3. Sub-committees were formed spring 2019 and worked independently: Student Registration; Formatting; Grammar review, and MOU review.

4. Council Chair to work independently with Issue Committee Chairs regarding Issue integrity, spring 2019.

Committee Activities:

1. Full committee conference calls took place; 9/26/18, 10/24/18, 12/12/18, 1/23/19, 2/13/19, 2/27/19. 3/27/19, 4/10/19, 5/8/19, 5/22/19, 6/12/19, 6/26/19, 7/10/19, 10/9/19, 10/30/19.

2. Subcommittees were formed

   a. At-Large constituency subcommittee
      i. Brought drafts to full committee for discussion. Full committee reviewed and agreed on Committee At-Large document Jan. 23, 2019.

   b. Strategic Plan
      i. Worked with SPC and brought document for full committee review and agreement on Oct. 24, 2018, with an additional week for comments before SPC chairs were given last feedback on October 31, 2018.

   c. Constitution Review
      i. Continual review and editing of the 2018 Constitution and By Laws took place.
d. Formatting for the Constitution
   i. Current Constitution has inconsistent formatting throughout the document. Subcommittee provided this format:
      Article/Section/Subsection/a)1. to be used throughout the document. The full committee voted and this format was agreed upon.
   ii. The reformatting of the Constitution will wait until after the Fall 2019 Executive Board meeting. Committee agreed.

e. Grammar review of the Constitution
   i. Discussion regarding review for the edited version of the Constitution took place. Subcommittee thought it best to wait until after the Fall 2019 Executive Board meeting. At that time grammar corrections to the Constitution will be made. Full committee agreed.

f. Student Registration subcommittee
   i. Objective was to develop a procedure for what CFP should do when “students” gain employment during the 2-year, already paid, membership. (See Content document)
      (1) Recommendation to not require additional monies but may require update to member constituency group to reflect area of gainful employment.
      (2) Recommendation that the Board should establish a set fee reduction for students to easily guide fees for future biennial conferences and publish fees in all Conference materials that reference fees.
   ii. The draft was brought to the full committee for discussion. Full committee reviewed and agreed on document.

g. MOU subcommittee reviewed the MOU between NACCHO & CFP
   i. Verbage changes in sections III B, III C were recommended for clarification and section III D added a relevant example.
   ii. No conflicts were found within the Constitution and the MOU with CFP & NACCHO.
   iii. The full committee voted and the additions to the MOU were agreed upon.

3. Review the Constitution and Bylaws: (Conference for Food Protection Constitution and Bylaws, Conference Procedures, Conference Biennial Manual, position descriptions, conference policies, etc.) to facilitate a merger and conformance of these documents into a comprehensive “Conference for Food Protection Manual.” (Issues 2012-II-001, 2012-II-004, 2014-II-018 and 2016-II-026)
   i. In order to create a merge of existing documents, the documents being merged need to be harmonious with each other. Due to discord within the same documents as well as discord between documents, the rational approach was to have a solid foundational document. The CFP’s foundational document is our Constitution. Once the Constitution is a solid foundational document, steps can be taken to make the rest of the CFP documents harmonious with the Constitution and each other.

4. Chair corresponded with Issue Committee Chairs regarding Issue integrity
   a. Communications between Constitution, Bylaws, and Procedures Chair and Issue Co-chairs were held in March, 2019 to discuss Issue Submission Procedures. It was decided the best course of action was to add to the Council Member Position Description under Responsibilities and Duties “COMMIT ONESELF TO ISSUE INTEGRITY AND ETHICAL CONDUCT”. This gives the ability for Council Chairs and Council members to approach items of concern with Issues and have been submitted but not yet discussed at council to handle situations that might arise with integrity and ethics.

5. A general point of clarification was raised asking if committee and council chairs, and vice- or co-chairs, are to be included on a roster, and if their voting status is to be indicated or counted towards constituency balance. Council Chair completed
   a. Council Committee Chairs and all Council committee members are to be on a roster approved by the Executive Board. CFP Biennial Meeting/Conference Procedures 2018 document VIII A. 1. This is also in the Constitution with existing conflicting language.
      i. Article XIV Section 13, subsection 1 of the 2018 CFP Constitution state that the Committee Chair and Vice Chair each have a vote.
      ii. Council Chairs or Council Vice Chairs are not on a Council Committee roster.
      iii. Standing Committees shall be made to provide a balance in representation like all Conference committees.(Constitution Article XIV Section 1 and CFP Biennial Meeting/Procedures document VIII C 1)
      iv. There is nothing in the Constitution regarding Standing Committee membership. The Procedures document lumps all Committees together with no notation of size or who votes.

1. Charges COMPLETED and the rationale for each specific recommendation:
   a. Worked with the Strategic Planning Committee to discuss the impact of changing the name of our organization from “Conference for Food Protection” to “Congress for Food Protection”.
   b. Addressed At Large constituency and provided board with several options. (See Content Document)
   c. Worked with Issue Committee Chairs regarding framework of Issue management process, specifically what is taking place from Issues being made public until the Biennium.
   d. Added “App Liaison” position to the CFP Procedures document Section V, C. passed by Executive Board 1/28/19.
   e. Defined “student” for registration purposes, self-reporting and what happens if they get a job during the cycle? Do they have to pay again for registration fee or just let the student registration fee carry over until the next cycle? (See Content Document)
   f. Executive Board approved Fall 2019. All changes are administrative.
   g. Chair reviewed Issue management process with the Issue Committee Chairs to determine if the CFP governing documents have language...
f. Chair reviewed governing documents for point of clarification if committee and council chairs, and vice- or co-chairs, are to be included on a roster, and if their voting status is to be indicated or counted towards constituency balance.
   (1) Recommendation
   • Council Committee Chairs and all Council committee members are to be on a roster approved by the Executive Board. CFP Biennial Meeting/Conference Procedures 2018 document VIII A. 1. This is also in the Constitution with existing conflicting language. Addressed in new draft Constitution.
   • Article XIV Section 13, subsection 1 of the 2018 CFP Constitution state that the Committee Chair and Vice Chair each have a vote.
   • Council Chairs or Council Vice Chairs are not on a Council Committee roster.

g. CB&P Committee to categorize the CFP documents included on the list in the CB&P Committee report dated 03/01/2019 and use the category titles of “governing,” “administrative,” and “instructional.” Executive Board passed 11/1/19 (see Content document)

h. Chair to work independently with Issue Committee Chairs regarding Issue integrity.
   (1) Recommendation
   Add to the Council Member Position Description under Responsibilities and Duties “COMMIT ONESELF TO ISSUE INTEGRITY AND ETHICAL CONDUCT”. This gives the ability for Council Chairs and Council members to approach items of concern with Issues that have been submitted but not yet discussed at council to handle situations that might arise with integrity and ethics. Approved at Fall 2019 Executive Board meeting.

i. CB&P Committee to bring to the Board meeting in August 2019 a single revised Constitution and Bylaws document, using underline and strikeover for any changes, so the Board can extract those items they feel need to be submitted as separate Issues. (see Content document)

j. Reviewed the CFP MOU with NACCHO and had grammatical changes the Executive Board accepted Fall 2019 Board meeting. (see Content document)

k. Issue 2018 II-024 the Conference for Food Protection governing documents (Conference for Food Protection Constitution and Bylaws, Conference Procedures, Conference Biennial Manual, position descriptions, conference policies, etc.) to facilitate a merger and conformance of these documents into a comprehensive "Conference for Food Protection Manual." (Issues 2012-II-001, 2012-II-004, 2014-II-018 and 2016-II-026
   (1) In order to create a merge of existing documents, the documents being merged need to be harmonious with each other. Due to discord within the same documents as well as discord between documents, the rational approach was to have a solid foundational document. The CFP’s foundational document is our Constitution. Once the Constitution is a solid foundational document, steps can be taken to make the rest of the existing CFP documents harmonious with the Constitution and each other.

2. Charges INCOMPLETE and to be continued to next biennium:
   a. Define roles of Co-Chair and Vice Chair in the CFP Biennial Meeting/Conference Procedures document

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:
1. Committee is requesting the Board to have verbiage added to the Biennial Meeting/Conference Procedures document. The verbiage could be added under VII B9; or it can be a stand alone item; or under VIII A. 1 (a).
   - The proposal: After the Assembly approves Constitutional changes, those changes be automatically sent to the Constitution and ByLaws Committee. The CB & P will review the Constitution and ByLaws and Biennial Meeting/Conference Procedures document and update all sections that would apply to the changes the Assembly of Delegates approved.
   Reasoning: to attempt to keep the two governing documents updated and consistent.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:
1. CBPC Issue #1: Report – Constitution ByLaws & Procedures
   a. List of content documents submitted with this Issue:
      (1) Committee Final Report
      (2) Committee Member Roster
      (3) CB & P At-Large Committee Membership Options
      (4) Categorization of CFP documents
      (5) Draft revised CFP Constitution and ByLaws
      (6) Draft Memorandum Of Understanding between CFP & NACCHO
   b. List of supporting attachments
      (1) Conference call meeting minutes
      (2) Attendance at conference calls
2. CBPC Issue #2: Draft Revised Constitution and ByLaws

3. CBPC Issue #3: At Large constituency

4. CBPC Issue #4: Draft Memorandum Of Understanding between CFP and NACCHO
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<th>Position (Chair/Member)</th>
<th>Constituency</th>
<th>Employer</th>
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At Large Constituency Options

ORGANIZATIONAL OPTIONS FOR COMMITTEES

I. “Balanced Representation” –

A. Composition –

1) Model A (smaller) – 17 member committee with 15 voting members.
   1 Committee Chair (from any sector) selected by the Conference Chair and approved by the Executive Board;
   6 Regulatory members (one from each CFP region);
   6 industry members (selected by the industry caucus);
   1 consumer group member;
   1 academic member;
   1 FDA advisor; and
   1 USDA advisor. 
   a) The advisory roles would not be voting members of the committee.

2) Model B (larger) – 29 member committee with 27 voting members.
   1 Committee Chair (from any sector) selected by the Conference Chair and approved by the Executive Board;
   12 Regulatory members (two from each CFP region);
   12 industry members (selected by the industry caucus);
   1 consumer group member;
   1 academic member;
   1 FDA advisor; and
   1 USDA advisor.
   a) The advisory roles would not be voting members of the committee.

3) Model C (smaller) – 16 member committee with 13 voting members
   1 Committee Chair (from any sector) selected by the Conference Chair and approved by the Executive Board. The Chair would NOT hold a vote on the committee.
   6 Regulatory members (one from each CFP region);
   6 industry members (selected by the industry caucus);
   1 consumer group member;
   1 academic member;
   1 FDA advisor; and
   2 USDA advisors.
   a) The advisory roles would not be voting members of the committee.

4) Model D (larger) – 28 member committee with 25 voting members.
   1 Committee Chair (from any sector) selected by the Conference Chair and approved by the Executive Board. The Chair would NOT hold a vote on the committee.
Regulatory members (two from each CFP region);
industry members (selected by the industry caucus);
1 consumer group member;
academic member;
FDA advisor; and
USDA advisor.

a) The advisory roles would not be voting members of the committee.

B. Composition Details –

1) The regulatory members would be selected by each CFP region.
2) The industry members would be selected by the private sector caucus.
3) The consumer member nomination would be recruited by the committee chair and approved by the committee membership.
4) The academic member nomination would be recruited by the committee chair and approved by the committee membership.
5) The FDA advisor (non-voting) and USDA advisor (non-voting) would be selected by their respective agencies. It was noted that advising agencies may not have staffing for all committees so advisory roles could be offered, but not mandatory, to agencies.
6) The advisors would not have voting privileges, but the other 15 or 27 members would have voting privileges.

C. Format –

1) This model would use two equally balanced (in number) groups. Each of the 15 or 27 members would represent the voice of their region/group and be responsible for representing that voice during committee activities.

D. Pros:

1) This model (can) makes committees smaller and easier to manage so things can move quicker and more issues can be worked (not as easily as the “Regional” model, but easier than the “Organizational” model).
2) The chair has an easier role under this type of model (not as easy as the “Regional” model, but easier than the “Organizational” model).

E. Cons:

1) This type of model puts more of the burden on the representative as opposed to the individual voice (not as much as with the “Regional” model, but more so than the “Organizational” model).
2) Anyone who has desired input would have to contact their representative and provide their input.
3) Opens the discussion to criticism if individuals don’t feel they have had their voice heard or feel they didn’t have the ability to provide input (not as much as with the “Regional” model, but more so than the “Organizational” model).

4) Representatives would be responsible for any necessary discussions leading up to the committee meetings in order to provide accurate representation (not as much as with the “Regional” model, but more so than the “Organizational” model).

5) Difficulty ensuring the representatives are accurately conveying the voices of whom they represent (not as much as with the “Regional” model, but more so than the “Organizational” model).

F. Discussion Points:

1) This model creates mid-sized committees and is somewhere in the middle between the “Regional” and “Organizational” models.

2) The Conference Chair would select a committee chair with approval from the BOD.

3) In order to maintain an odd number of members to avoid tie votes a committee chair in addition to the other members would be selected from any sector by the Conference Chair.

4) The committee chair would have the option to recognize others not on the committee for further clarification or explanation of input on issues.

5) This would apply to the eleven standing committees, but not necessarily to the ad-hoc committees.

6) This model does provide a relatively balanced vote within the committee considering the number from each sector represented.

7) Important for members of CFP to reach out to their representatives to provide input and opinions. It is then incumbent upon the representatives to relay that information to the committee. The identity of the representatives would be published on the CFP website to allow ease of identification and access to all CFP members.

8) Non-committee members may listen in on calls and meetings but would not have a voice during the calls or meetings unless called upon by the Chair.

II. “Organizational Representation”

A. Composition – Unlimited (at the discretion of the committee chair);

1) FDA advisor; and

2) USDA advisor.

B. Composition Details:

1) Allows for the committee to be as large as the chair would like.

2) Comprised of as many members from any sector as granted by the committee chair.

3) The FDA advisor (non-voting) and USDA advisor (non-voting) would be selected by their respective agencies. It was noted that advising agencies
may not have staffing for all committees so advisory roles could be offered, but not mandatory, to agencies.

4) The advisors would not have voting privileges, but the other members would have voting privileges (one per organizational membership).

C. Format –
1) Each organizational membership gets one vote (even if multiple members from a single organization are on the committee) and represents their own voice.

D. Pros:
1) Each member is solely responsible for representing their own voice.
2) Anyone (voting members, non-voting members, and non-members) can participate in meetings and speak.
3) Voting limited to those on the membership roster only.
4) Each organization that is member of the committee (on the roster) has one vote only.

E. Cons:
1) This model makes committees larger and more difficult to manage.
2) Potential for dialogue to extend beyond necessity.
3) Need an experienced and/or strong chair with good time management skills.
4) Committee output can be swayed by singular interests.
5) Requires member organizations to be grouped together to distribute if balanced voting is used.
6) Roster maintenance is necessary to ensure regular participation.
7) A balanced voting system/formula is usually also necessary.

F. Discussion Points:
1) The Conference Chair would select a committee chair with approval from the BOD.
2) The chair would likely need officers to assist with the oversight and maintenance of this type of committee (if large).
3) This would apply to the eleven standing committees, but not necessarily to the ad-hoc committees.
4) Committee sizes would be different from one committee to another.
5) Important for members of CFP to reach out to their representatives to provide input and opinions. It is then incumbent upon the representatives to relay that information to the committee. The identity of the representatives would be published on the CFP website to allow ease of identification and access to all CFP members.
6) Non-committee members may listen in on calls and meetings but would not have a voice during the calls or meetings unless called upon by the Chair.

III. “Regional Representation”
A. Composition –
11 member committee with 9 voting members
6 Regulatory members (one from each CFP region);
3 industry members (selected by the industry caucus);
1 FDA advisor; and
1 USDA advisor.

B. Composition Details:
1) The regulatory members would be selected by each CFP region.
2) The industry members would be selected by the private sector caucus.
3) The FDA advisor (non-voting) and USDA advisor (non-voting) would be selected by their respective agencies. It was noted that advising agencies may not have staffing for all committees so advisory roles could be offered, but not mandatory, to agencies.
4) The advisors would not have voting privileges, but the other 9 members would have voting privileges.

C. Format –
1) Each of the 9 voting positions would represent the voice of their region/group and be responsible for presenting that voice during committee activities.

D. Pros:
1) This model makes committees small and easier to manage so things can move quicker and more issues can be worked.
2) The chair has an easier role under this type of model.

E. Cons:
1) This type of model puts more of the burden on the representative rather than the individual voice.
2) Anyone who has desired input would have to contact their representative and provide their input.
3) Opens the discussion to criticism if individuals don’t feel they have had their voice heard or feel they didn’t have the ability to provide input.
4) Other meetings may be needed to acquire input prior to the committee meeting.
5) Representatives would be responsible for any necessary discussions leading up to the committee meetings in order to provide accurate representation.
6) Difficulty ensuring the representatives are accurately conveying the voices of whom they represent.

F. Discussion Points:
1) The Conference Chair would select a committee chair with approval from the BOD.
2) The committee chair would have the option to recognize others not on the committee for further clarification or explanation of input on issues.
3) This would apply to the eleven standing committees, but not necessarily to the ad-hoc committees.
4) Important for members of CFP to reach out to their representatives to provide input and opinions. It is then incumbent upon the representatives to relay that information to the committee. The identity of the representatives would be published on the CFP website to allow ease of identification and access to all CFP members.
5) Non-committee members may listen in on calls and meetings but would not have a voice during the calls or meetings unless called upon by the Chair.
Constitution & Bylaws
Biennial Meeting/Conference Procedures

Position Descriptions

EXECUTIVE Administration Positions
- Board Member
- Director
- Executive Treasurer
- Executive Assistant

LEADERSHIP Positions
- Conference Chair
- Conference Vice Chair
- Immediate Past Chair

COUNCIL Positions
- Council Chair
- Vice Chair
- Council Member
- Council Scribe
- Council Runner
- Parliamentarian
- App Liaison

STANDING Committee Positions
- Audit Committee Chair
- Constitution & Bylaws Committee Chair
- Finance Committee Chair
- Food Protection Manager Certification Committee Chair
- Issue Committee Chair
- Nominating Committee Chair
- Program Committee Chair
- Program Standards Committee Chair
- Publications Committee Chair
- Resolutions Committee Chair
- Strategic Planning Committee Chair

Committee Chair Handbook

Policies
- Antitrust Policy
- Archiving CFP Documents
- Audit Policy
- Commercialism & Comity Policy
- Crumbine Award Policy
- Late Issue Submission Policy
- Open Meeting Policy
- Record Retention Policy
Travel Subsidy Policy  governing
Conference Spokesperson Policy  governing
Invoice Approval Policy  governing
Privacy Policy  governing

Helpful Templates  CATEGORIZATION OF ALL CFP DOCUMENTS
Committee Periodic Report Instructions  instructional
Committee Periodic Report Template  administrative
Committee Final Report Instructions  instructional
Committee Final Report Template  administrative
Conference Call Documentation Form Template  administrative
Council Chair Periodic Summary Report Instructions  instructional
Council Chair Periodic Summary Report  administrative
Council Chair Final Summary Report Instructions  instructional
Council Chair Final Summary Report  administrative

Terms and Conditions of Issue Acceptance
Issue Pre-submission Form  administrative
Late Issue submission policy  governing
Issue Preparation & Review-Process & Checklist  instructional

Membership Form/Application  administrative
Update Contact Information Form  administrative
Sponsorship Application Form  administrative
Sustaining Supporter Application  administrative
Constitution and Bylaws 2018 July
Biennial Meeting / Conference Procedures 2019
Biennial Meeting Information Manual Not posted Removed from website in 2018 pending revision

**Policies**
- Antitrust Policy: 2001 August
- Archiving CFP Documents: 2014 April
- Audit Policy: 2006 August
- Commercialism and Comity Policy: 2017 August
- Crumbine Award Policy: 1997 March
- Late Issue Submission Policy: 2013 August
- Open Meeting Policy: 2000 August
- Record Retention Policy: 2006 August
- Travel Subsidy Policy: 2018 April
- Conference Spokesperson Policy: 2014 May
- Invoice Approval Policy: 2017 August

**Position Descriptions (PDs)**

**Leadership Positions**
- Conference Chair: 2018 August
- Conference Vice Chair: 2018 August
- Immediate Past Chair: PD not available
- Executive Board Member: 2018 August
- Executive Director: 2019 April
- Executive Treasurer: 2016 February
- Executive Assistant: 2018 August

**Council Positions**
- Council Chair: 2017 August
- Council Vice Chair: 2017 August
- Council Member: 2019 April
- Council Scribe: 2017 August
- Council Runner: 2017 August
- Parliamentary: 2017 August
- Council App Liaison: 2019 April

**Committee Positions**
- Council Committee Chair / Vice Chair: 2017 August
- Committee Member: 2005 August

**Standing Committee Positions**
- Audit Committee: 2005 August
- Constitution & Bylaws Committee: 2014 August
- Finance Committee Chair: 2016 August
- Food Protection Manager Certification Committee: 2015 October
- Issue Chair: 2017 August
- Nominating Committee: Not dated
- Program Chair: 2005 August
- Program Standards Committee: 2015 April
- Publications Committee: PD not available
- Resolutions Committee: 2005 August
- Strategic Planning Committee Chair: 2015 November

**COUNCIL and COMMITTEE REPORT TEMPLATES**

**Committees**
- Committee Final Report Instructions: Not dated
- Committee Final Report Template: Not dated
- Committee Periodic Report Instructions: 2016 April
- Committee Periodic Report Template: 2016 April
- Committee Roster and Instruction Form Template: 2018 September
- CFP Committee Conference Call Documentation Form Template: 2018 April
- CFP Council Committee Chair Handbook: 2019 April

**Councils**
- Council Chair Periodic Summary Report Instructions: 2014 May
- Council Chair Periodic Summary Report: 2014 May
- Council Chair Final Summary Report Instructions: PD not available
- Council Chair Final Summary Report: PD not available

**FORMS**
- Membership Application: 01/30/2019
- Sponsorship Applications – Sustaining and Event: Pending Documents currently in the development stage
- Sustaining Supporter Application: Not dated Revised January 2019 to update EA contact info

**CFP PRESENTATIONS (organizational) – PowerPoint**
- CFP Orientation PowerPoint: Not posted
- CFP Biennial Meeting Council Orientation PowerPoint: Not posted Most recent version from 2014

**Administrative**, **Governing**, **Instructional**
CONFEERENCE FOR FOOD PROTECTION

CONSTITUTION AND BYLAWS
2018 2020

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July 18, 2018
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Conference for Food Protection Constitution and ByLaws

As revised July 18, 2018 April 2020

Preface
The following comments serve as a historical preface to the Constitution and Bylaws for the Conference for Food Protection.

The Conference for Food Protection dates back to the 1971 Conference on Food Protection held in Denver, Colorado. It was sponsored jointly by the Food and Drug Administration (FDA) and the American Public Health Association (APHA). The purpose of the Conference was to provide an inter-professional dialogue on the microbiological aspects of food safety for individuals representing industry, Government, and consumers.

The Second National Conference for Food Protection was held in Washington, D.C. in 1984. The 1984 Conference expanded its scope to cover toxicological as well as microbiological concerns. The purpose of the 1984 Conference was:

“To share perspectives on the toxicological and microbiological aspects of food safety problems in the United States; to identify the needs, direction and opportunities of food production, processing, handling and regulation through the year 1990; and to establish an organization for the continuing study of food safety problems and for promotion of the recommendations of the Conference.”

The 1984 Conference was organized into seven committees: Toxicology; Microbiology; Good Manufacturing and Quality Control; Standards and Regulations; Education and Training; New Foods Processing and Packaging; and Conference Program Committees, with selected individuals also serving as resource persons who prepared “white papers” on various issues that were to be discussed at the Conference. In addition to the Federal, state, and local health officials who had been invited to the 1971 Conference, the 1984 Conference included industry, academic and consumer representatives. The 1984 Conference adopted a recommendation that a continuing Conference organization be established, and that a constitution and bylaws be developed based upon a draft presented at the Conference. It was agreed that the objectives of the Conference would be:

• To identify emerging problems of food safety;
• To address the problems of food safety on a regular basis;
• To formulate recommendations for the solution of the identified problems;
• To follow up on the recommendations of the Conference so that they will be incorporated into public policy and in industry practice;
• To evaluate the effectiveness of the Conference recommendations; and
• To establish a working liaison with professional and trade associations, academic institutions, and Government agencies concerned with food safety.

Following the 1984 Conference, the Constitution and Bylaws were finalized, and the Conference was incorporated in 1985. The National Sanitation Foundation (NSF) agreed to support the Conference financially, and a Conference Executive Director was hired.
The 1986 Conference for Food Protection was held in Ann Arbor, Michigan. The 1986 Conference was again organized into seven committees representing the major science and technical aspects of food protection. A 25-member Executive Committee selected the topics to be discussed and requested “white papers” from technical experts. In addition to the committees, five Councils were formed representing the interests of the participants at the Conference.

Although the purposes of these Conferences were well established and accepted, the organization and procedures of the Conference were long debated. In the early meetings of the Steering Committee preparing for the 1984 Conference, the idea of emulating the National Conference on Interstate Milk Shipments (NCIMS) was introduced. Individuals working during this Conference to write a new constitution began introducing NCIMS-type structure into the Conference organization. During this Conference, individuals working on a new constitution began introducing NCIMS-type structure into the Conference organization. This was the first step leading to the current Constitution and ByLaws. This effort was the first step leading to the current Constitution and Bylaws.

The second step was action taken at the 1984 Conference to reaffirm the intent to model the Conference after the NCIMS. The following is quoted from the Proceedings of the 1984 Conference:

“An Organizational Model: from the beginning it was the intention of the organizers of the Second National Conference that it should include an effort 'to establish an organization for the continuing study of food safety problems and for the promotion of the recommendations of the Conference'. What the organizers had in mind in making that a goal of the Conference was to establish, in the area of food safety, something akin to the Interstate Milk Shipments Conference and the more recent Interstate Shellfish Sanitation Conference, so that a national dialogue on food safety might continue on a regular, periodic basis.” (Page 369)

“A National Conference for Food Protection should be established as an ongoing Conference and be structured similarly to the National Conference on Interstate Milk Shipments. One of the Conference's primary purposes should be to promote the formulation and use of uniform model laws and regulations among all government agencies to assure uniform interpretations and implementation and to eliminate duplication of services. Its membership should consist of federal, state and local food regulatory officials, academia and representatives from industry. It should be governed by an Executive Board with representatives from federal, state and local agencies and industry.” (Recommendation No. 10, Standards and Regulations Committee -- approved by the Conference, page 266).

The draft Constitution and Bylaws adopted by the 1984 Conference were, according to its authors, not meant to be a fully workable source for forming and operating the Conference model after the NCIMS. It was intended as an interim document that would be upgraded to provide a more authoritative foundation for Conference actions.

The final step in the decision to upgrade the Conference organization was taken at the 1986 Conference. The Program Committee reported that:

"It was the unanimous view of the committee that the Conference should operate as an action organization, existing not merely to identify problems and formulate recommendations, but to resolve issues through the implementation of recommendations, much as the Weights and Measures Conference and the Interstate
Milk Shippers do. Specific recommendations in this regard will be presented prior to
the next Conference." (Page 410, Proceedings)

To accomplish this, the 1986 Conference agreed:

• To develop a state regulatory ratification mechanism whereby each of the 50
states will have one vote; and
• To create a Constitution and Bylaws Committee to review the entire Constitution
and Bylaws and to formulate recommendations for the Executive Committee to
consider.

The Constitution and Bylaws Committee approached the review process with three
principal needs in mind. First, the Constitution needed to allow for the continuing study of
food safety problems, but with a more limited focus. To achieve this, the following changes
were made:

1. The objective of the Conference placed greater emphasis on food safety at the
point of ultimate sale to consumers through food services, retail food stores, and
food vending, and continued to identify and address problems in production,
processing, packaging, distribution, sale, and service of food;

2. The seven committees were condensed into three councils to provide a balance
between discussing the science and technology of food safety issues and developing
various certification guidelines, procedures, and models. However, as in the other two
Conference examples, separate committees in each discipline area could still function
to deliberate and review issues.

The second principle that guided the review process was the need for the Conference to be
more successful in promoting food safety, mutual respect, and uniformity. This was
accomplished through the following changes:

1. The final actions taken by the Conference regarding such items as food safety
controls, certification procedures, and Memoranda of Understanding, were to be
adopted by the regulatory delegates of the Conference with the advice of industry and
other non-regulatory members;

2. The Constitution created a Council on Laws and Regulations; a Council on
Administration, Certification, and Education; and a Council on Science and
Technology. These Councils provided vehicles by which the Conference could
deliberate on all food safety issues and promote more uniform and effective food
safety controls.

The final guiding principle was the need to ensure that the Conference would provide a
national and, to the extent possible, international dialogue on food safety on a regular, periodic
basis, and that this dialogue would be among representatives of regulatory, industry, and other
non-regulatory organizations. To accomplish this, the Constitution and Bylaws provided for
the following:

1. The name of the Conference remained unchanged consistent with the
recommendation made by the 1986 Program Committee. In order to increase
international information exchange, the Pan American Health Organization
(PAHO) and the World Health Organization (WHO) were added. The Food and
Agricultural Organization (FAO) was already a member of the Conference;

2. The role that industry plays in the Conference is substantial. Industry is fully
represented on all councils, committees, and the Executive Board. Industry
representatives alternate as Chair and Vice Chair on all councils. Industry representatives are elected through industry caucuses. Industry's concerns and advice are fully considered since problems submitted to the Conference are assigned to one of the councils. Regulatory delegates vote on each council's recommended actions;

3. The Science and Technology Council provided a forum for discussion by all concerned parties of the scientific and technological aspects and principles underlying the problems faced by Government and industry in their mutual goal of trying to provide safe foods for consumers and could include formation of individual committees for each scientific discipline.

The Constitution and Bylaws attempt to intertwine these guiding principles so that in pursuing one, each would be pursued. This interdependence is critically important if the Conference recommendations are going to command the respect of the food regulators and the food industry that would be called upon to implement the recommendations. As was stated by Mr. Archie Holliday in his comments on the 1988 proposed Constitution and Bylaws:

“The most important need for an organization of this kind is to have its recommendations respected by the community called upon to implement them. Without the results of our deliberations commanding the highest respect attainable, getting together to identify and study food safety problems will be of little or no value to enough people to support a viable organization. The strength of the organization structure now being proposed by your Constitution and Bylaws Committee is that it provides the means to balance the interests of regulatory and industry people while providing an open forum for the consideration of ideas from any source. At the same time, matters that are supported by the voting delegates will have endured such a process as to command the utmost of respect.”

The Constitution and Bylaws are one step in an evolving process to develop a viable permanent Conference. The next was also discussed. As also stated by Mr. Archie Holliday in his comments on the Constitution:

“One should be careful not to conclude that a food service oriented structure would prohibit the free and open study of the wider range of food safety problems. When the values of NCIMS and ISSC organizational structures are discussed, we often fail to acknowledge the importance of procedures to successful operation of these bodies. Well defined, established procedures will be essential to the effectiveness of the Conference operating under our proposal. Procedures should remain as a separate entity from the Constitution and Bylaws. When the new Constitution and Bylaws are adopted, the Executive Board should immediately begin the process of establishing procedures to be approved by the Conference. It is in this process that attention can be given to how broad the scope of the Conference should be. The adoption and revision of Conference procedures should receive the same careful consideration as the adoption of Conference recommendations.”

The Constitution and Bylaws Committee and the Executive Board believed that the Constitution and Bylaws proposed and accepted at the 1988 Conference provided a workable and proven approach that should be followed to develop an effective voice for present and future issues of food safety.
Preamble

The Conference for Food Protection, hereinafter referred to as the Conference or CFP, is incorporated as a non-profit organization under the laws of the State of Virginia to carry out the objective stated in the Constitution and Bylaws of the Conference.

Constitution and Bylaws

Article I  Objective

Section 1.  The objective of the Conference shall be to promote food safety and consumer protection by:

Subsection 1. Identifying and addressing problems in the production, processing, packaging, distribution, sale, and service of foods;

Subsection 2. Focusing on and facilitating the food protection programs governing the food service, retail food store, and food vending segments of the food industry;

Subsection 3. Adopting sound, uniform procedures which will be accepted by food regulatory agencies and industry;

Subsection 4. Promoting mutual respect and trust by establishing a working liaison among Governmental agencies, industry, academic institutions, professional associations, and consumer groups concerned with food safety;


Subsection 6. Utilizing as the primary channels for dissemination of information: The United States Department of Agriculture, Food Safety and Inspection Service (USDA/FSIS) in matters under their purview, such as food production, meat and poultry processing, and consumer information; and The United States Department of Health and Human Services, Public Health Service, Food and Drug Administration (HHS/PHS/FDA) in matters under their purview, such as food processing and assistance to other food regulatory agencies based on the model FDA Food Codes and related documents.

Article II  Organization and Operation

Section 1.  The Conference shall be directed by the delegates of the states, territories, and District of Columbia, who join together with representatives of regulatory, industry, academic institutions, academia, professional associations, and consumer groups to achieve the objective of the Conference.
The Conference shall include an Assembly of State Delegates (hereinafter referred to as the Assembly), an Executive Board (hereinafter referred to as the Board), Officers, an Executive Director (hereinafter referred to as the Director), Executive Assistant, Executive Treasurer, Councils, Council Committees, Standing Committees (see Article XIII-Article XV Section 2), and any member of the Conference as described in Article III, Sections 1 and 2.

Section 2. The Conference shall meet at least biennially during even-numbered years with additional meetings as the need arises as determined by the Board.

Section 3. Conference identifies food safety issues by receiving Issues submitted by interested persons. The Conference addresses Issues by assigning them to appropriate Councils or Committees for consideration. Council membership is balanced between government and industry interests. Aspects of Issues may also be assigned to Committees for study, procedure development or for other reasons. All committees that are assigned to a Council shall submit a report to the Council Chair and Conference at least ninety (90) days preceding the CFP Biennial Meeting. Councils then make recommendations to the Assembly, which is composed of delegates designated by the States, each territory and the District of Columbia. The Assembly considers and votes to approve or reject Council recommendations. CFP Biennial Meeting participation is open to all interested individuals who choose to become members and attend. Individuals may serve as appointed or elected members on the Board, Councils, and Committees; or as a participating registered member.

The Conference shall consider issues related to food safety that are submitted on approved forms and within specified time frames. Any interested person may submit an Issue for consideration. At least one hundred and fifty (150) days preceding the CFP Biennial Meeting, the Executive Director shall notify Conference members of the Conference of the time and place of the CFP Biennial Meeting. Each notice shall include information for submitting Issues, and a statement that all Issues shall be submitted to the Conference at least ninety (90) days preceding the CFP Biennial Meeting. Issues are to be assigned to appropriate Councils by the Issue Committee. At least forty (40) days preceding the CFP Biennial Meeting, the Executive Director shall make available to members of the Conference copies of the final committee reports and Issues, including Constitution changes that have been received and assigned for CFP Biennial Meeting deliberation.

The Board may submit special Issues to the Councils at the beginning of the CFP Biennial Meeting as necessary. Councils are to deliberate their Issues and report their recommendations on each to the Assembly. The Assembly considers and votes on recommendations it receives from the Councils.

Section 4. Interested persons may submit Issues pertaining to food safety to the Conference. Issues may also be created as outcome of Standing, Council and Adhoc Committees. All Issues shall be submitted to the Conference at least ninety (90) days preceding the CFP Biennial Meeting. (Late-breaking food safety Issues must
follow the current version of the “CFP Biennial Meeting/Conference Procedures”
document.) Issues are reviewed and assigned to appropriate Councils by the Issue
Committee. At least forty (40) days preceding the CFP Biennial Meeting, the
Director shall make the Issues available to members of the Conference. After
deliberation, each Council will make recommendations on assigned Issues to the
Assembly, which is composed of delegates designated by the states, each
territory, and District of Columbia. The Assembly considers and votes to approve
or reject Council recommendations.

**Subsection 1.** Committees assigned to the Board and to Councils will submit periodic
reports including a final report no later than ninety days (90) prior to the
Biennial Meeting.

**Subsection 2.** A CFP Issue is a topic submitted for consideration to the Conference by
any interested party addressing an identified concern related to retail food
safety and offering a recommended solution to that concern.

a. An Issue proposal includes the official Issue Submission Form and all
supporting documentation.

**Article III Registration and Membership**

**Section 1.** Any persons interested in promoting the objective in Article I may attend the CFP
Biennial Meetings by registering their name, address, and the business they
represent with the Executive Treasurer using forms provided and paying the
registration fee established by the Board under Article V, Section 10 and 12.
Persons who are interested in promoting the objective in Article I may become
members of the Conference by applying to the Executive Treasurer, using forms
provided, and paying the membership fee established by the Board under Article
VI, Section 12.

**Section 2.** Persons who are interested in promoting the objective in Article I but who cannot
attend the CFP Biennial Meeting may become members of the Conference by
applying to the Executive Treasurer using forms provided and paying the
membership fee established by the Board under Article V, Section 12.
Any members interested in promoting the objective in Article I may attend the
CFP Biennial Meetings by registering their name, address, and the constituency
they represent with the Executive Treasurer, using forms provided, and paying the
registration fee established by the Board under Article VI, Section 12. Persons
may apply for membership and registration at the same time.

**Section 3.** Persons paying the Conference membership fee through the Executive Treasurer’s
office, or by paid registration at the CFP Biennial Meetings, are members of
the Conference and are entitled to be on an official list to receive copies of the
CFP Biennial Meeting proceedings and other Conference matters determined
by the Board to be of interest to all members of the Conference.

**Section 4.** Conference membership begins at the time of payment of the membership fee.
Membership paid as part of the CFP Biennial Meeting registration begins on
the first day of one CFP Biennial Meeting and ends the day prior to the next
CFP Biennial Meeting.

Section 5. Membership in the Conference is classified into constituencies that are
representative of the key stakeholder groups which support the objectives of
Article I and facilitate the requirements of Article IV. The Conference
constituencies are defined as follows:

Subsection 1. The Regulatory constituency is comprised of those officers, agents,
or authorized representatives having authority over the regulation of
food establishments, production, processing, vending, or distribution, or has
have oversight for prevention of foodborne illness in accordance
with rules and/or laws in their respective governmental jurisdiction.
Sub-categories of this constituency include:

a. Local Regulator: Government employee or agent representing a
territorial division of local government with responsibility for
regulation of food establishments, production, processing, vending,
or distribution, or has oversight for prevention of foodborne illness.

b. State Regulator: Government employee or agent representing a
territorial division of state government with responsibility for
regulation of food establishments, production, processing, vending,
or distribution, or has oversight for prevention of foodborne illness.

c. Federal Regulator: Government employee or agent representing a
program or agency of the Federal Government with responsibility
for regulation of food establishments, production, processing,
vending, or distribution, or has oversight for prevention of
foodborne illness.

d. District/Territory Regulator: Government employee or agent
representing the U.S. District of Columbia or one of the six U.S.
territories with responsibility for regulation of food establishments,
production, processing, vending, or distribution, or has oversight for
prevention of foodborne illness.

Subsection 2. The Industry constituency is comprised of those employees, agents,
or executives representing business entities that operate food
establishment(s), production, processing, vending, or distribution, or
providers of an industry related service to such food operations, or
representatives of a professional organization or trade association that
promotes, supports, and/or markets to/for the food industry or its
related services. Sub-categories of this constituency include:

a. Food Service Industry: Employees, agents, or executives representing
business entities that operate food service establishments. Examples
include, but are not limited to, restaurants of all sizes/types/styles of
service, caterers, military food service, institutional and other health
care food service, schools and university food service, common
carrier food service (planes, trains, etc.), corporate food service operations, and Government food service.

b. Retail Food Industry: Employees, agents, or executives representing business entities that operate retail food establishments. Examples include, but are not limited to, grocery stores, supermarkets, convenience stores, retail pharmacies, produce markets, roadside stands, department stores, warehouse sales clubs, seafood markets, retail bakeries, military base PX/groceries, liquor stores, and retail food associations.

c. Processing Food Industry: Employees, agents, or executives representing business entities that manufacture, process, package, or label food items for wholesale sale. Examples include, but are not limited to, commercial food manufacturing, canning, packaging, commercial bakeries, commercial meat slaughter and processing, packing houses and distribution centers, farming and agricultural processing and packing operations, ice processing, packing plants, and food processing trade associations.

d. Vending and Distribution Food Industry: Employees, agents, or executives representing business entities that own and/or operate food companies that vend or distribute food either wholesale or retail. Examples include, but are not limited to, coffee and food vending service companies, service companies, commissaries, food supply chain operators, wholesale distributors, shipping lines, brokers, equipment manufacturers, and suppliers of products and services to operating service companies, and food vending and distribution trade associations.

e. Food Industry Support: Employees, agents, or executives representing business entities that provide direct or support services to food service establishments, retail food establishments, processing food operations, vending and distribution food operations, or regulatory agencies. Examples include, but are not limited to, professional organizations, food protection support trade associations, pest control companies, auditing firms, standards associations, consultants, cleaning and sanitation management operations, training and/or testing companies or services, equipment and supply operations, software and technology, dieticians or dietary managers, and media and legal representatives.

Subsection 3. The Academia constituency is comprised of Academic professionals employed by a college or university involved in education or research involving food sciences, food operations, or food safety. Examples include, but are not limited to, professors, adjunct instructors, researchers, teaching assistants, and extension agents.

Subsection 4. The Consumer constituency is comprised of employees, agents, or executives representing consumer advocacy
organizations supporting food safety, food wholesomeness, allergen awareness, food policy matters, and food standards and guidelines.

Subsection 5. The Emeritus constituency is comprised of persons retired or honorably discharged from full-time work and no longer receiving compensation for work related to the Conference's mission. This constituency is designed for those professionals who, prior to retirement, were members of any Conference stakeholder group in good standing of the Conference for Food Protection for at least three biennial cycles (6 years). Previous membership does not have to be in contiguous biennial cycles. An Emeritus member may participate as an attendee/observer in all usual Conference functions such as attending the Biennial Meeting, including workshops, Council deliberations, Assembly of Delegates, and social functions. Emeritus members may serve as a member of a Council Committee, as a Council Committee Chair, and participate and vote in constituency caucus meetings. The Executive Board may elect to assign an Emeritus member to participate in other Conference related activities.

Subsection 6. The Student constituency is comprised of any student enrolled in a two-year, four-year, or graduate program in a college or university involving food sciences, food operations, or food safety. A student member may participate as an attendee/observer in all usual Conference functions such as attending the Biennial Meeting, including workshops, Council deliberations, Assembly of Delegates, and social functions. Student members may serve as a member of a Council Committee. The Executive Board may elect to assign a student member to participate in other Conference related activities.

Article IV Composition of Organizational Components and Eligibility Requirements for Service in Official Capacities

Section 1. The Assembly shall consist of persons attending the Conference meeting and qualified as voting delegates under Article XVII, Section 3 and 4.

Section 2. To be eligible to serve on the Board, Councils, Committees, or as Issue Chair or Program Chair; individuals must be members of the Conference and must be in attendance at the CFP Biennial Meeting at which they are appointed or elected, or shall have attended the CFP Biennial Meeting immediately preceding the one at which they are appointed or elected. This requirement in respect to Councils and Committees may be waived by consent of the Board.

Section 3. Board Membership

Subsection 1. The Board shall be composed of twenty-three (23) voting members as follows:

a. Six (6) members from state food regulatory agencies (one from each CFP region);
b. Six (6) members from local food regulatory agencies (one from each CFP region);

c. Three (3) members from federal agencies (one (1) from FDA, one (1) from USDA, and one (1) from CDC) (one each from FDA, USDA, and CDC);

d. Six (6) members from the food industry with at least one (1) each representing food processing, food service, retail food stores, and food vending and distribution;

e. One (1) member from an academic institution; and

f. One (1) member representing consumers.

Subsection 2. Regulatory agency, industry, academic institution, and consumer Board members shall be elected by a caucus of registrants in each respective group. State and local regulatory Board members shall be elected in regional caucuses of regulatory registrants. Federal Regulatory Board members shall be appointed by the head of their agency.

Subsection 3. Such elected Board members shall serve through three (3) general CFP Biennial Meetings of the Conference. Elected Board members may succeed themselves unless reelection would extend the total of consecutive service to more than twelve (12) years. The terms of elected Board members shall be staggered so that one-third (1/3) of the members are elected at each CFP Biennial Meeting.

Subsection 4. The Board shall have non-voting Ex-Officio members as follows:

a. The Immediate Past Chair of the Board;

b. The Chair and Vice Chair of each Council;

c. The Conference Program Chair;

d. Representatives from regulatory agencies regulating retail food operations in other countries of the world, such as Canada, Mexico, etc.;

e. The Executive Director, Executive Treasurer, Executive Assistant;

f. The Conference Issue Chair, and

g. The Conference Constitution and Bylaws/Procedures Chair.

Section 4. The Board shall elect a Board Chair and Board Vice Chair, who will also serve as the Conference Chair and Conference Vice Chair, from its membership after caucus elections are held during each biennial meeting of the Conference, and
they may retain their positions at the pleasure of the Board as long as they are officially members of the Board. The Board Chair and Vice Chair shall be the Chair and Vice Chair of Conference meetings. The Board shall retain the services of a qualified person to act as an Executive Director, Executive Treasurer, and Executive Assistant. The Executive Treasurer shall be bonded. The compensation of the Executive Director, Executive Treasurer, and Executive Assistant shall be set by the Board.

Section 5. The Immediate Past Board Chair of the Board shall continue to serve on the Board until replaced by the next retiring Conference Chair. If the Immediate Past Board Chair of the Board is unable for any reason to continue to serve on the Board, the position shall remain vacant until filled by the next retiring Conference Chair. Immediate Past Board Chairs shall serve on the Board as non-voting members unless re-elected to the Board in a capacity other than as Immediate Past Chair.

Article V Duties of the Assembly and the Board

Section 1. The Assembly, with recommendation from a Council or the Board, shall accept or reject all recommendations including those pertaining to the Constitution and Bylaws, any Conference procedures, all Memoranda of Understanding or other formal agreements, and other necessary actions including resolutions, and establish Conference policies and positions on all subjects related to the objective of the Conference except as delegated (by the Assembly) to the Board. If a recommendation is approved, it shall be referred to the Board for appropriate disposition. If a “No Action” recommendation is rejected, the Issue will be referred to the Board for its consideration.

Subsection 1. If a recommendation is “ACCEPTED”, it shall be referred to the Board for appropriate disposition.

Subsection 2. If an extracted Issue has a recommendation of “No Action”, it is rejected, and the Issue will be referred to the Board for its consideration.

Article VI Duties of the Executive Board

Section 21. The Board shall manage the affairs of the Conference, adhere to the CFP Constitution and By Laws, and abide by the current CFP Biennial Meeting/Conference Procedures document.

Section 32. The Board may establish operational policies and procedures, with the concurrence approval of two-thirds (2/3) of the voting Board members, that detail management functions and oversight of the Conference organization. Such operational policies and procedures may include, but are not limited to, budget, finances, expenditures, and coordination and implementation of biennial meeting obligations and operations.
Section 43. The Board shall meet at least twice a year prior to each the CFP Biennial Meeting and after the meeting closes. The Board Chair shall call special meetings of the Board at any time at the request of two-thirds (2/3) of its voting members. In addition, the Board Chair is empowered to call special meetings of the Board at any time, as the need arises, with the concurrence approval of two-thirds (2/3) of the voting Board members.

Section 54. The Board may, at the discretion of the Board Chair, utilize a mail service, electronic mail, or fax ballots to establish voting members of the Board are unable to participate in a Board meeting, they may not send a substitute, but may forward by mail, electronic mail, or FAX, information for consideration by attending members of the Board. Voting and ex-officio members may participate through a telephone conference call.

Section 65. The Board shall direct the Conference Chair, Executive Director, and Program Chair in the preparation of the programs for each meeting of the Conference.

Section 76. The Board shall set the time and place of the meetings of the Conference.

Section 87. If elected voting members of the Board are unable to participate in a Board meeting, they may not send a substitute, but may forward by mail, email, or FAX, information for consideration by attending members of the Board. Voting and ex-officio members may participate through a telephone conference call.

Section 98. Voting Board members who fail to attend two (2) consecutive Board meetings, and who fail to show cause why they were absent, may have their positions declared vacant by the Board Chair.

Section 109. If a vacancy occurs for any reason in Board membership between biennial meetings, the Board Chair, with concurrence approval of the Board, may fill the vacancy with a person representing the same discipline as the person being replaced until the next biennial meeting, at which time the vacancy shall be filled by a qualified person who is properly elected.

Section 1410. The Board shall direct the Executive Treasurer to collect registration and membership fees as necessary to defray the costs of the operation of the Conference. The Board shall cause an annual audit to be made of the Executive Treasurer’s financial reports.

Section 1421. The Board shall authorize the form used to tally votes in meetings of the Board and Assembly.

Section 1432. The Board shall establish the registration and membership fees identified in Article III.

Section 1413. The Board shall approve an annual budget for the fiscal year established by the Board. The Board shall approve a biennial budget prepared and presented by the Executive Treasurer.
Section 1514. The Board shall appoint Committees as necessary to accomplish the Conference objective. The Board shall appoint Adhoc Committees as necessary to accomplish the Conference objective.

Section 1615. The Board shall approve the membership of each Standing Committee.

Article VI-VII Duties of the Conference Chair

Section 1. The Conference Chair shall preside at all meetings of the Assembly and Board, except as provided in Article VII, VIII Section 1.

Section 2. The Conference Chair shall assist the Executive Director in arranging CFP Biennial Meetings.

Section 3. The Conference Chair, with the approval of the Board, shall appoint Council Chairs and Vice Chairs.

Section 4. The Chair shall appoint Council consultants required in Article X Regulatory consultants, as required in Article XIII, will be selected for appointment by their respective agencies and presented to the Conference Chair for acceptance to Councils.

Section 5. The Conference Chair shall appoint Chairs of the Conference Standing Committees established in Article XV Section 2, with the exception of the Nominating Committee.

Section 6. The Conference Chair, with the approval of the Board, shall appoint qualified persons to Councils and Committees as provided in the Constitution and Bylaws.

Section 7. The Conference Chair shall appoint a Local Arrangements Committee to assist in planning the physical facilities for the next CFP Biennial Meeting.

Section 8. The Conference Chair shall appoint a parliamentarian to advise on matters of parliamentary procedures at Board and Assembly meetings.

Section 9. The Conference Chair, with Board approval, may retain clerical administrative assistance for the Conference.

Section 10. Between Conference meetings, the Conference Chair shall require from each Council Chair a report at least twice a year regarding the status of implementation of each approved recommendation originating in the respective Council. This information shall be provided to the Conference participants.

Section 11. The Conference Chair shall perform all other responsibilities and duties as detailed in the Conference Chair position description.
Article VII-VIII Duties of the Conference Vice Chair

Section 1.  In the event the Conference Chair is unable to perform the duties of the Chair, the Conference Vice Chair shall act as Chair.

Section 2.  When acting as Conference Chair, the Vice Chair shall perform all the necessary duties for the Conference as outlined in Article VII.

Section 3.  The Conference Vice Chair shall perform all other responsibilities and duties as detailed in the Conference Vice Chair Position Description.

Article VIII-IX Duties of the Executive Director

Section 1.  The Executive Director shall ensure that the minutes of each meeting of the Assembly and the Board are recorded and transcribed.

Section 2.  The Executive Director shall tally and record all voting of the Assembly on a form authorized by the Board.

Section 3.  The Executive Director shall notify all members of the time and place of the next CFP Biennial Meeting, and of Issues that are to be deliberated.

Section 4.  The Executive Director shall accomplish the duties outlined in Article VI, Section 4, 5, and Article XVII, XIX, Section 1, Subsections 2, 3, 4, and Sections 4-5 and 6.

Section 5.  The Executive Director shall maintain an up-to-date list of the qualified delegates designated as required by Article XIV, XVII, Sections 2, 3, and 4.

Section 6.  The Executive Director shall retain, subject to Board’s approval, a qualified person to serve as Executive Assistant, and shall direct and oversee duties assigned to the Executive Assistant.

Section 7.  The Executive Director shall perform all other responsibilities and duties as detailed in the Executive Director position description.

Article IX-X Duties of the Executive Treasurer

Section 1.  The Executive Treasurer shall collect registration and membership fees and shall pay bills as directed by the Board. The Executive Treasurer shall obtain a receipt for all disbursements and shall make all such receipts a part of Board records.

Section 2.  The Executive Treasurer shall prepare a proposed annual/biennial budget for presentation to the Board.

Section 3.  The Executive Treasurer shall prepare all budget and financial reports.
Section 4. The Executive Treasurer shall perform all other responsibilities and duties as detailed in the Executive Treasurer position description.

**Article X-XI  Duties of the Executive Assistant**

Section 1. The Executive Assistant manages the information on the CFP website, with the assistance of the Executive Director and a professional webmaster, and publishes the CFP newsletter.

Section 2. The Executive Assistant maintains the CFP membership database, creates reports and rosters, and develops mailing lists.

Section 3. The Executive Assistant assists the Executive Director with development of a Standard Operating Procedures Manual to include position descriptions, Board policies, and scripts for presentations, and is responsible for their maintenance.

Section 4. The Executive Assistant records, transcribes, and distributes Board meeting minutes.

Section 5. The Executive Assistant assists the Executive Director with the Delegate process to include outreach and rosters.

Section 6. The Executive Assistant assists the Executive Director with the preparation of the biennial meeting program, provides onsite assistance to the Director at the biennial meeting, and compiles biennial meeting proceedings with the assistance of the Executive Director.

Section 7. The Executive Assistant shall perform all other responsibilities and duties as detailed in the Executive Assistant position description.

**Article X-LXII Councils**

Section 1. There shall exist three (3) Councils in the Conference to provide for continuity of action in carrying out the objective of the Conference. The Councils shall be known as:

- Council I: Laws and Regulations;
- Council II: Administration, Education, and Certification;
- Council III: Science and Technology.

Subsection 1. The Councils shall be known as Council I, Council II and Council III.

Section 2. Each Council shall have a Chair, Vice Chair, and twenty (20) other members to be appointed by the Conference Chair with the approval of the Board. Except as specified in Article X, Section 3, Subsection 3, the term for a Council member shall begin at appointment and expires upon adjournment of that the full Board meeting following the CFP Biennial Meeting. If a Council member cannot attend a CFP Biennial Meeting, the member's term expires, and the
Conference Chair may appoint a member who can attend the Council meeting during the CFP Biennial Meeting.

Subsection 1. Of the twenty-two (22) members of Councils I and II, nine (9) members plus one Council Chair or Vice Chair shall be selected from regulatory agencies, one (1) shall be from a national, state, or local consumer organization, one (1) shall be from academia, and nine (9) members plus one Council Chair or Vice Chair from industry.

Subsection 2. Eight (8) of the food regulatory agency representatives on Councils I and II shall be equally apportioned among state and local agencies and two (2) members can be from the territories, District of Columbia, or Federal jurisdictions that regulate commercial or institutional operations. If two (2) members cannot be obtained from the territories, District of Columbia, or Federal food inspection programs, these positions may be filled from state or local food regulatory agencies. The ten (10) industry representatives shall be apportioned so at least one (1) member represents food processing, two (2) members represent food service, two (2) members represent retail food stores, and one (1) member represents food vending and distribution.

Subsection 3. Of the twenty-two (22) members of Council III, at least five (5) shall be from state and local regulatory agencies, at least five (5) from industry, up to ten (10) at-large, plus a Council Chair and Vice Chair. The industry representatives shall include at least one (1) each from food processing, food service, retail food stores and food vending and distribution. At-large members may include members representing Federal agencies, academia, and other stakeholder groups.

Subsection 4. If sufficient designated members are not available at a CFP Biennial Meeting to complete a Council's membership, the Conference Chair may appoint other members to the Council so long as the balance between regulatory and industry is maintained as specified.

Section 3. The Council Chair and Vice Chair shall select twenty (20) Council members from persons holding membership in the Conference, and offer their names for Conference Chair appointment and Board confirmation.

Subsection 1. The Council Chair shall, after appointment, serve through one (1) CFP Biennial Meeting. The Council Vice Chair shall, after appointment, serve through two (2) consecutive CFP Biennial Meetings, one (1) as Vice Chair and the second as Chair.

Subsection 2. On Councils I and II, when the Council Chair represents a food regulatory agency, the Vice Chair shall be an industry representative. If the Council Chair represents industry, the Vice Chair shall be a food regulatory agency representative. The Chair and Vice Chair from Council III shall be from one of the following disciplines: Regulatory, Industry, or Academia, and at no time shall both the Chair and Vice Chair represent the same group or constituency.
Subsection 3. The term for the Council Chair and Vice Chair shall begin at the conclusion of the scheduled CFP Biennial Meeting and expire upon adjournment of the following last through the full Board meeting following the next biennial CFP Biennial Meeting. At the end of the outgoing Council Chair’s term, the Vice Chair shall assume the position of Council Chair, and a new Vice Chair shall be appointed as set forth in Subsection 2 of this Section.

Section 4. Each member of the Council, other than the Vice Chair, shall have one vote. The Council Chair shall only vote to break a tie. The Council Vice Chair shall only vote when acting as Chair.

Article XIII Council Consultants

Section 1. The following agencies and international organizations may each provide a non-voting consultant for each of the Councils:

- Centers for Disease Control and Prevention (CDC);
- U. S. Environmental Protection Agency (EPA);
- U. S. Food and Drug Administration (FDA);
- U. S. Department of Agriculture (USDA);
- Food and Agriculture Organization (FAO);
- Pan American Health Organization (PAHO);
- World Health Organization (WHO);
- The Dominion of Canada; and
- Others as deemed appropriate by the Board.

Article XIII XIV Duties and Responsibilities of Councils

Section 1. Councils shall deliberate on all assigned Issues. Council Chairs shall report the recommendations of their Councils to the Assembly under Article XIX. (See also current CFP Biennial Meeting/Conference Procedures document.)

Subsection 1. Recommendations are:

- a. “Accept as Submitted”
- b. “Accept as Amended”
- c. “No Action”

Subsection 2. When a Council recommends “No Action” on an assigned Issue, the Council shall specify/identify the reason why “No Action” was taken and it shall be recorded by the Scribe and confirmed by the Council Chair.

Section 42. Council I: Council on Laws and Regulations
Subsection 1. Issues submitted to the Conference dealing with laws, regulations and model codes governing the safety of food shall be assigned to Council I by the Conference Issue Committee.

Section 23. Council II: Council on Administration, Education, and Certification
Subsection 1. Issues submitted to the Conference dealing with matters relating to the Constitution and Bylaws, Conference procedures, memoranda of understanding, program evaluation, education, training and certification and the like shall be assigned to Council II by the Conference Issue Committee.

Section 34. Council III: Council on Science and Technology
Subsection 1. Issues submitted to the Conference dealing with science and technology shall be assigned to Council III by the Conference Issue Committee.

Section 4. Councils shall deliberate on all assigned Issues. Council Chairs shall report the recommendations of their Councils to the Assembly.

Section 5. When a Council recommends “No Action” on an assigned Issue, the Council Chair shall record the reason why “No Action” was recommended.

Section 65. Duties of the Councils between CFP Biennial Meetings

Subsection 1. Following the CFP Biennial Meeting, the Conference Chair shall contact the Council Chairs to review the recommendations approved by the Assembly, of State Delegates and to plan for the implementation of approved recommendations originating in their respective Councils.

Subsection 2. During the period between biennial meetings, The Council Chairs shall monitor, encourage, and proactively support the progress of implementation of approved recommendations originating in their respective Councils.

Subsection 3. Council Chairs shall prepare a written report on the status of implementation of approved recommendations originating in their respective Councils or on the activities of committees assigned to their Council. These reports shall be submitted to the Conference Chair thirty (30) days prior to each Board meeting, or more frequently at the request of the Conference Chair.

Subsection 4. The new Council Chairs shall submit for Board approval the names of Council Committee Chairs and membership of all committees assigned to their Council to the Conference Chair for approval by no later than the fall Board meeting following the CFP Biennial Meeting.

Article XIV-XV Committees

Section 1. All appointments to Conference Committees shall be made to provide a balance in representation of the stakeholders in the particular matter under consideration.
Subsection 1. The incoming Council Chairs appoint the Chairs of each Committee formed within their Council with the concurrence of the Conference Chair. The Conference Chair will confirm the appointment of the Committee Chair and then notify the person of their appointment. Once confirmed, the Committee Chair will select the remaining members of the Committee and submit them to the Conference Chair for final Board approval.

Subsection 2. Federal participants (FDA/USDA/CDC) may appoint a member and an alternate for each Committee. The member participates in discussion but does not vote. The alternate may act in the member’s place if the member is unable to attend.

Section 1. CFP members in good standing may express interest to serve on a committee by forwarding their name to the Executive Assistant following the CFP Biennial Meeting. This list will be used in creation of committee rosters. All appointments to Committees shall be made to provide a balance in representation of the stake holders in the particular matter under consideration.

Subsection 1. The incoming Council Chairs will select Council Committee Chairs for each committee formed within their Council, and present those names to the Conference Chair for acceptance. The Conference Chair will notify the persons of their appointment. Once confirmed, the Council Chairs and Council Committee Chairs will select the remaining members of the Council Committees. The Council Chairs will submit full committee rosters to the Conference Chair for final Board approval.

Subsection 2. Federal participants (FDA, USDA, CDC) may appoint a consultant and an alternate for each committee. The consultant participates in committee discussions but does not vote. An alternate may act in the appointed consultant’s place if the consultant is unable to attend. Consultants may or may not be CFP members to serve on a committee, but shall be members to attend Biennial meetings. Only one Federal participant who is a non-CFP member per Council Committee is permitted.

Subsection 3. Committees may vote to invite a non-member to present pertinent information related to the committee’s charges. Non-members will not have a vote, nor will they participate in debate or discussion.

Section 2. The following standing committees shall be established:

Subsection 1. Audit Committee;
Subsection 2. Constitution and Bylaws/Procedures Committee;
Subsection 3. Finance Committee;
Subsection 4. Issue Committee;
Subsection 5. Food Protection Manager Certification Committee;
Subsection 6. Nominating Committee;
Subsection 7. Program Committee;
Subsection 8. Program Standards Committee;
Subsection 9. Publications Committee;
Subsection 10. Resolutions Committee; and
Subsection 11. Strategic Planning Committee.
• Issue Committee
• Program Committee
• Constitution and Bylaws/Procedures Committee
• Resolutions Committee
• Audit Committee
• Food Protection Manager Certification Committee (FPMCC)
• Program Standards Committee
• Finance Committee
• Nominating Committee
• Strategic Planning Committee (SPC)
• Publications Committee

Section 3. Other committees may be established by the Board as necessary to accomplish the Conference objectives. Such committees may be for the purpose of focusing Conference resources around specific scientific disciplines, for studying multifaceted issues, for developing new procedures or for other purposes.

Subsection 1. Local Arrangements Committee shall be established for each CFP Biennial Meeting.

Section 4. A Standing Committee may establish its own bylaws establishing and operational procedures that may include, but are not limited to, objectives, organization and operation, duties, and responsibilities. Bylaws of a committee must be approved by the Board.

Section 5. No later than the Fall Board meeting following the CFP Biennial Meeting, the Standing Committee Chairs shall submit the names of their members to the Board for approval.

Article XV-XVI Duties and Responsibilities of Committees

Section 1. The Issue Committee shall review all Issues submitted at least ninety (90) days before the CFP Biennial Meeting. This Committee shall assign for Council deliberation those Issues that have met the Issue acceptance criteria specified in the Conference Procedures Manual current CFP Biennial Meeting/Conference Procedures document. Issue assignments shall be made in accordance with Article XII, Section 1, Subsection 1; Section 2, Subsection 1; and Section 3, Subsection 1-XIV Sections 2-4.

Section 2. The Program Committee shall be responsible for the educational workshop, and the reports and updates session at the biennial meeting.

Section 3. The Constitution and Bylaws/Procedures Committee shall submit recommendations to improve Conference administrative functions through proposals to amend the Constitution and Bylaws. The Committee shall review proposed memorandums of understanding and ensure consistency among governing documents such as the memorandum of understanding.
Section 4. The Resolutions Committee shall report to the Board. Except for “thank you” resolutions, the Resolutions Committee shall prepare all necessary resolutions for Board approval.

Section 5. The Audit Committee shall report to the Board, and shall audit the Conference’s financial records annually. In addition, a certified public accountant shall conduct an audit of the Conference’s financial records at least every 4 years. Additionally, when a certified public accountant conducts an audit of the Conference’s financial records, the Audit Committee shall audit the Conference’s financial records annually.

Section 6. The Food Protection Manager Certification Committee shall report to the Board. The Food Protection Manager Certification Committee and shall work with the accreditation organization for food protection manager certification programs in order to:

Subsection 1. Establish and refine policies and standards to which certifiers must conform in order for them to be accredited;

Subsection 2. Provide Conference input into the development of accreditation standards for certifying organizations specific to food protection manager certification programs;

Subsection 3. Develop strategies for enhancing equivalence among food protection manager certificates issued by certifiers; and

Subsection 4. Promote universal acceptance of certificates issued by accredited certifiers.

Section 7. The Program Standards Committee shall report to the Board. The Program Standards Committee and shall provide ongoing input to the FDA on issues that arise with the Voluntary National Retail Food Regulatory Program Standards.

Subsection 1. The Committee shall serve the Conference by indirectly assisting Voluntary National Retail Food Regulatory Program Standards enrollees in achieving making progress towards meeting the Standards.

Section 8. The Finance Committee shall report to the Executive Board and shall provide financial oversight for the Conference. Duties of the Finance Committee shall include budgeting and financial planning, financial reporting, and the creation and monitoring of internal controls and accountability. The Finance Committee will include between consist of 5 to 7
members from the Executive Board. The Finance Committee membership should be reflective of the Conference membership. Members will serve a term of at least two (2) years.

Subsection 1. The Finance Committee responsibilities include:

a. Budgeting and Financial Planning
   i. Develop an annual biennial operating budget with staff.
   ii. Approve the budget within the Finance Committee.
   iii. Monitor adherence to the budget.
   iv. Set long-range financial goals along with funding strategies to achieve them.
   v. Develop multi-year operating budgets that integrate strategic plan objectives and initiatives.
   vi. Present all financial goals and proposals to the CFP’s Executive Board for approval.

b. Reporting
   i. Develop useful and readable report formats with staff.
   ii. Work with staff to develop a list of desired reports noting the level of detail, frequency, deadlines, and recipients of these reports.
   iii. Work with staff to understand the implications of the reports.
   iv. Present the financial reports to the full Board.

c. Internal Controls and Accountability Policies
   i. Create, approve, and update (as necessary) policies that help ensure the assets of the Conference are protected.
   ii. Ensure policies and procedures for financial transactions are documented in a manual, and that the manual is reviewed annually and updated as necessary.
   iii. Ensure approved financial policies and procedures are being followed.

Section 9. The Nominating Committee shall report to the Executive Board. The Nominating Committee shall provide to the Board a list of viable candidates for Conference Chair and Vice Conference Chair prior to each Biennial Meeting.

Section 10. The Strategic Planning Committee (SPC) shall report to the Executive Board. The Strategic Planning Committee shall provide an active leadership role in developing both long term and short term goals that will enhance and sustain the relevance and viability of the Conference for Food Protection. To accomplish these goals the SPC will include such activities as:

Subsection 1. Anticipate changing business and regulatory environment;

Subsection 2. Assess membership satisfaction of the CFP and its processes;

Subsection 3. Identify changing expectations of CFP members;

Subsection 4. Explore ways to build membership;
Subsection 5. Assist in efforts to communicate more effectively with membership;

Subsection 6. Expand outreach to collaborate and partner with organizations of similar public safety goals.

Subsection 7. Search for viable funding sources to ensure long-term financial sustainability.

Section 10. The Strategic Planning Committee (SPC) shall report to the Board, and shall advise the Board on the current and future direction for CFP. This Committee shall make recommendations to keep the CFP relevant and increase the viability and growth of the organization. The SPC will actively engage CFP Committees and the Board by:

Subsection 1. Positioning CFP to respond to changes in the business and regulatory environment by staying abreast of changing needs to keep CFP a viable and relevant organization.

Subsection 2. Assessing member satisfaction, exploring ways to increase membership, improving communication with members, and responding to membership’s changing expectations of CFP, its programs, services, and the Biennial meeting.

Subsection 3. Finding ways for CFP to collaborate/partner with organizations that hold similar values and interests in retail food safety.

Subsection 4. Sustaining the financial stability of CFP by seeking new, increased, or alternative sources of funding.

Section 11. The Publications Committee shall report to the Executive Board and the Publications Committee shall make recommendations to the Board to establish, maintain, and improve Conference publications regarding Conference endorsement, copyright, scientific and regulatory accuracy, and external publication approval. The Committee shall report all publication recommendations to the Board for approval prior to internal publication and revisions or external publication.

Section 12. All Committees, including Standing Committees, shall submit their reports for the Board meetings in a timely prescribed manner as specified under Article II, Section 3 as follows:

Subsection 1. Committees assigned to a Council shall submit their report to their respective Council Chairs; and

Subsection 2. Standing Committees shall submit their report to the Conference Chair and Executive Director.

Section 13. Council Committee Size and Constituency: Committee membership discussion is limited to Council Committees only. Membership on Standing Committees or Executive Board Ad hoc Committees is defined by the CFP Executive Board.
Subsection 1. Committee size.
Voting membership for Council Committees should be comprised of at least eleven (11) voting members, with a maximum of no more than twenty-three (23) voting members.

a. Minimum size: Voting membership for a minimum size Council committee is the Chair, Vice Chair, one (1) representative from state regulatory, one (1) representative from local regulatory, two (2) representatives from industry, one (1) from an academic institution, one (1) consumer representative, and three elective (3) representatives who may be selected from any Conference constituency with an emphasis on expertise specific to the Committee’s charge(s).

b. Maximum size: Voting membership for a maximum size Council committee is the Chair, Vice Chair, four (4) representatives from state regulatory, four (4) representatives from local regulatory, eight (8) representatives from industry, one (1) from an academic institution, one (1) consumer representative, and three elective (3) representatives who may be selected from any Conference constituency with an emphasis on expertise specific to the Committee’s charge(s).

c. Any committee comprised of membership numbers between the minimum and maximum shall make every reasonable effort to maintain constituency balances.

Subsection 2. The Chair and Vice Chair of a Council Committee may be selected from any of the Conference constituencies as approved by the Council Chair and the Executive Board. Conference Chair, provided each is from a different constituency. If a Council Committee Chair does not receive sufficient volunteers in the appropriate constituencies, they shall confer with the Council Chair to seek volunteers from the Conference membership, making every reasonable effort to maintain constituency balances. The Council Committee Chair, in consultation with the Council Chair and/or Executive Board, shall have the flexibility to fill vacancies in the voting membership with unbalanced constituency representation if deemed necessary to reach a minimum of eleven (11) voting members. All proposed Council Committee members must be approved by the Executive Board in accordance with Article XIII, Section 6, Subsection 4 of the Constitution and Bylaws.

Subsection 3. A maximum of twenty-three (23) voting members are permitted on a Council Committee. All volunteers not selected for a voting position shall be offered an "at-large" non-voting position on the Council Committee. There is no limit to the number of at-large non-voting members that may participate. At-large members will be included and can be allowed to participate in all Council Committee functions, including but not limited to; meetings, conference calls, emails, deliberations,
research, and activities. At-large members but will not have an individual vote on Council Committee actions. All voting members and at-large non-voting members shall be identified as such on the Council Committee roster along with their respective constituency.

Subsection 4. In the event a Council Committee voting member departs, such Committee during a biennial cycle, an at-large member of the same constituency as the departing member shall be selected by the Council Committee Chair to fill the vacancy, subject to approval by the Council Chair and Executive Board, in accordance with Article XIII, Section 6, Subsection 4 of the Constitution and Bylaws. If a Council Committee voting member changes constituency during a biennial cycle, and there is no vacancy in that member's new constituency, the member will need to transition from service as a voting member on that Committee and may continue to serve as an at-large non-voting member for the remainder of the biennial cycle. This transition will occur upon notification to the Council Committee Chair.

Subsection 5. A Council Committee Chair who The Chair of a council committee that continues over more than one biennial cycle shall assess the immediate previous Council Committee membership to ensure at least 50% of the ongoing Committee’s voting membership are new members that did not serve as voting members on the immediate previous Committee. This provision will ensure that an increased number of at-large members or others have an opportunity to participate as voting members over time when there are a large number of volunteers.

Article XVI-XVII Duties of States, Territories and District of Columbia

Section 1. The states, territories, and the District of Columbia shall be responsible for designating and keeping the Executive Director informed of the name(s) and address(es) of the person(s) designated to represent them in the Assembly.

Section 2. The food regulatory agency or agencies in each state, territory and District of Columbia participating in the CFP Biennial Meeting will receive from the Director at least one hundred and fifty (150) days prior to the CFP Biennial, a notice of the forthcoming meeting. Each notice shall include a current copy of Article II, Section 3 and Article XVIII and XIX of the current version of the Constitution and Bylaws.

Section 3. Each Agency shall report to the Director the following information, using approved forms:

Subsection 1. The agency’s authority and responsibility over the regulation of food establishments, production, processing, vending, or distribution, or the oversight for prevention of foodborne illness;

Subsection 2. The name of the delegate and the alternate, if any; and
Subsection 3. Designation of the vote to which that person is entitled, whether one (1) vote or a fraction of one (1) vote.

Section 4. In the event that more than one (1) delegate is designated and the sum of the votes designated for the delegates is greater than one (1), the Director shall reject, void, and return the reports to the agencies for correction. Such revision shall be submitted to the Director at least forty-five (45) days before the CFP Biennial Meeting.

Article XVII-XVIII Rules of the CFP Biennial Meeting

Section 1. The current version of the “CFP Biennial Meeting/Conference Procedures” document contains the rules of the Biennial meeting.

Section 12. CFP Biennial meeting participation is open to all interested individuals who choose to become members and attend. Individuals may serve as appointed or elected members on the Board, Councils, and committees, or as a participating registered member.

Section 23. CFP Biennial Meetings shall be of at least two (2) days duration, except this requirement may be waived for special meetings called by the Board.

Section 34. Except for additional meetings as provided for in Article II, Section 2, the Conference will meet each even-numbered year.

Section 45. Robert’s Rules of Order shall prevail unless specified rules are established.

Section 56. FDA, CDC, and USDA reports shall be presented.

Article XVII-XIX Rules of the Assembly

Section 1. Meetings of the Assembly shall be conducted as follows:

Subsection 1. Call to order by the Conference Chair;

Subsection 2. Roll call by the Director of states, territories, and District of Columbia, and the announcement of the names of the delegates who will vote for each in the Assembly;

Subsection 3. The Director calls for a vote to approve Approval of the minutes of the previous meeting;

Subsection 4. Reports from the of the Executive Director and Executive Treasurer;

Subsection 5. Council Chair reports, resolutions, and other new business;

Subsection 6. Assembly voting (see the current CFP Biennial Meeting/Conference Procedures document);
Subsection 7. Authorization that may be required by the Assembly for the Board to conclude and implement any necessary recommendations prior to the next CFP Biennial Meeting; and

Subsection 8. Adjournment.

Section 2. Each state shall be entitled to one (1) full vote and each territory and the District of Columbia shall be entitled to one-half (½) vote in the Assembly. When a state has more than one (1) state food regulatory agency enforcing food laws and regulations for food processing, food service, retail food stores and food vending, the vote may be divided into appropriate fractions. State agencies within each state must agree among themselves regarding apportioning the one vote. Only a registrant at the CFP Biennial Meeting who is the designated representative of a state, territory, or District of Columbia can be a delegate in the Assembly.

Section 3. Only a registrant at the CFP Biennial Meeting who is a representative of a state, territory or District of Columbia food regulatory agency responsible for the enforcement of food laws and regulations for food processing, food service, retail food stores or food vending is entitled to be a delegate in the Assembly. When any state is represented by more than one food regulatory agency, the vote may be cast together as one vote or separately as a fraction of a vote. Representatives of states with more than one regulatory agency delegate certified in compliance with the provisions of Section 4 of this Section may, during any meeting of the Assembly, reassign their voting privilege to another duly certified delegate from their state by giving written notice of such action to the Conference Chair. When a state is represented by only one agency, the state’s delegate may cast a full vote for that state in the Assembly.

Section 3. Each state shall be entitled to one (1) full vote, and each territory and District of Columbia shall be entitled to one-half (1/2) vote in the Assembly.

Section 4. At least one hundred and fifty (150) days prior to a CFP Biennial Meeting the Executive Director shall send to the food regulatory agency or agencies in each state, territory and District of Columbia participating in the CFP Biennial Meeting a notice of the forthcoming meeting. Each notice shall include a current copy of Article II, Section 3 and Article XVII XVIII, Sections 2 through 9 of the Constitution and Bylaws.

Section 4. When any state is represented by more than one food regulatory agency, the vote may be divided into appropriate fractions or may be cast together as one vote. Representatives of states with more than one regulatory agency delegate, in compliance with Section 2 of this Article, can reassign their voting privilege to another duly certified delegate from their state by giving written notice of such action to the Conference Chair.

Section 5. Each Agency shall report to the Executive Director on approved forms the following:

Subsection 1. The agency’s officially designated regulatory responsibility regarding food processing, food service, retail food stores and food vending

Subsection 2. The name of the delegate and the alternate, if any; and
Subsection 3. Designation of the vote to which that person is entitled, whether one (1) vote or a fraction of one (1) vote.

Section 6. In the event that more than one (1) delegate is designated and the sum of the votes designated for the delegates is greater than one (1), the Executive Director shall reject, void and return the reports to the agencies for correction. Such revision shall be submitted to the Executive Director at least forty-five (45) days before the CFP Biennial Meeting.

Section 75. Delegates shall record their names with the Executive Director and shall cast their votes in the Assembly when called by announcing “yes,” “no,” or “abstain” for one (1) vote; or “yes,” “no,” or “abstain” for the appropriate fraction of one (1) vote.

Section 86. Voting in the Assembly shall be recorded by the Executive Director as “yes,” “no,” or “abstain.”

Section 97. If delegates wish to caucus, they may “pass” when their names are called for the purpose of caucusing, and then shall vote when the second roll is called.

Section 408. To adopt in the Assembly:

Subsection 1. A quorum must be present. A quorum is defined as the presence of registered voting delegates from at least two-thirds (2/3) of the states with designated official delegates in attendance at the CFP Biennial Meeting. Each territory and District of Columbia shall count as one half (½) state in constituting a quorum.

Subsection 2. To change a procedure adopted at a previous CFP Biennial Meeting or to make a change in the Constitution and Bylaws requires a two-thirds (2/3) majority vote.

Subsection 3. Other actions require a simple majority unless specifically covered by Robert’s Rules of Order.

Article XIX XX Parliamentary Authority

Section 1. The rules of parliamentary procedure comprised in the current edition of Roberts Rules of Order, Newly Revised, shall govern all proceedings of the Conference and the Executive Board, subject to such special rules as have been or may be adopted.

Article XX X XI Dissolution of the Conference

Section 1. Upon the dissolution of the Conference, assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, or tax code, or shall be distributed to the Federal Government, or to a state or local government, for a public purpose. Any such assets not so disposed of shall be disposed of by the Court of Common Pleas of the county in which the principal office of the corporation is then located, exclusively for
such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

**Article XXI XXII Amendments to the Constitution and Bylaws**

**Section 1.** The Constitution and Bylaws may be amended at a duly called CFP Biennial Meeting, the delegates having had thirty-four (40) days notice from the Executive Director of such proposal to amend as provided in Article II, Section 3 and Article VIII, Section 3 XVI, Section 3.

**Section 2.** Amendments to the Constitution and Bylaws will become effective at the close of the biennial meeting at which they are adopted.
Appendix

Map of CFP Regions*

Non-contiguous states and territories not shown on map
*Used in Allocating Members of Executive Board

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Organizational Structure Composition

Assembly of State Delegates

Role: Approves or rejects all Council recommendations

Chair and Vice Chair: Conference Chair and Conference Vice Chair preside at meetings of the Assembly

Delegates: Designated by 57 food regulatory agencies representing:
50 states
6 territories
- American Samoa
- Guam
- Northern Mariana Islands
- Puerto Rico
- Trust Territory
- U.S. Virgin Islands
1 District of Columbia

Voting: 53 ½ total possible

Fifty (50) states have 1 vote each. Those states with multiple state regulatory jurisdictions may divide vote equitably, cast their vote as one or separating as a fraction of one.

6 territories and District of Columbia have ½ votes each
### Executive Board

**Role:** Manages the affairs of the Conference

**Chair and Vice Chair:** Board Chair and Board Vice Chair are also the Conference Chair and Conference Vice Chair. Elected from Board Voting Membership

**Members:** **Twenty-three** (23) elected to stagger terms by caucus of registrants in each respective constituency group. Federal members are appointed by agency head.

**Voting**
- 6 state regulatory agencies (1 each per CFP Region)
- 6 local regulatory agencies (1 each per CFP Region)
- 3 Federal agencies (FDA, USDA, and CDC)
- 6 Food Industries
- 1 Academic Institution
- 1 Consumer Representative

**Non-Voting Ex-Officio**
- 1 Immediate Past Conference Chair
- 3 Chairs’ of each Council
- 3 Vice Chairs’ of each Council
- 1 Program Chair
- 1 Issue Chair
- 1 Constitution and Bylaws/Procedures Chair
- 1 Program Standards Chair
- 1 Finance Committee Chair
- 4 International Representatives (i.e., Canada, Mexico, etc.)
- 1 Executive Director
- 1 Executive Treasurer
- 1 Executive Assistant


**Councils**

**Role:** Deliberate assigned Issues and develop recommendations for Assembly consideration

**Council Chairs and Vice Chairs:** 2 appointed by Conference Chair with approval of the Council. For Councils I and II, if the Chair has a regulatory affiliation, the Vice Chair is to be an industry affiliate, and vice versa. The Council Chair affiliation alternates back and forth each term.

**Council III Chair and Vice Chair** can be from regulatory, industry, and academia. The Council Chair and Vice Chair cannot be from the same constituency.

**Council Members:** 20 selected by Council Chair and Vice Chair for appointment by Conference Chair with approval of the Board

I. Council on Laws and Regulations
   - **Regulatory** (including Council Chair or Vice Chair)
     - 4 local
     - 4 states
     - 2 territorial, District of Columbia, or Federal
   - **Industry** (including Council Chair or Vice Chair)
     - 1 Food Processing
     - 2 Food Service
     - 2 Food Store Retail Food
     - 1 Food Vending and Distribution
     - 4 not specified
   - **Consumer and Academia**
     - 1 Consumer
     - 1 Academic-Academia

II. Council on Administration, Education, and Certification
    Membership allocated as shown in Council I

III. Council on Science and Technology
    - 5 Regulatory agencies (min.) selected from state and local
    - 5 Food Industry (min.) with at least 1 each from food processing, food service, retail food, stores and food vending and distribution;
    - 10 At-large including consumer and academia and may include federal and other may include academia, consumer, Federal agencies, and other stakeholders

**Consultants:** 9 possible
   - 4 Designated Federal agencies
3 Designated international organizations additional if necessary, as deemed by the Board.

Voting: Council Chair votes only to break a tie; Council Vice Chair does not vote.
Standing Committees

Appointments

All appointments to Conference Committees and shall be made to provide a balance in representation of the stakeholders in the particular matter under consideration.

Audit Committee

Role: Except when a certified public accountant conducts an audit of the Conference’s financial records, the Audit Committee audits the Conference’s financial records annually. Committee reports to the Board.

Chair: Appointed by Conference Chair

Constitution and Bylaws/Procedures Committee

Role: Submits recommendations to improve Conference administrative functions through proposals to amend the Constitution and Bylaws. Reviews proposed memoranda of understanding and ensure consistency among the memoranda of understanding, the Conference Procedures manual, the Constitution and Bylaws and other working documents. Reports all recommendations to the Board prior to Council II deliberation and follows the direction of the Board. Committee reports to the Board.

Chair: Appointed by Conference Chair

Issue Committee

Role: Reviews all Issues submitted to Conference and assigns to Councils for deliberation. Committee reports to the Board.

Chair: Appointed by Conference Chair

Food Protection Manager Certification Committee

Role: Reports to the Board. Works with the accreditation organization for food protection manager certification programs to:

a. Establish and refine policies and standards to which certifiers may conform in order for them to be accredited;

b. Provide Conference input into the development of accreditation standards for certifying organizations specific to food protection manager certification programs;

c. Develop strategies for enhancing equivalence among food protection manager certificates issued by certifiers; and

d. Promote universal acceptance of certificates issued by accredited certifiers.

Chair: Appointed by Conference Chair

Nominating Committee

Role: Selects the nominees for the Conference Chair and Vice Chair. Committee reports to the Board.

Chair: Immediate Past Chair of the Conference

Program Committee

Role: Assists in planning and arranging of CFP Biennial Meeting. Committee reports to the Board.
Chair: Appointed by Conference Chair

Publications Committee
Role: To establish, maintain, and improve Conference publications regarding Conference endorsement, copyright, scientific and regulatory accuracy, and external publication approval.
Chair: Appointed by Conference Chair

Program Standards Committee
Role: Provide ongoing input to the FDA on issues that arise with the Voluntary National Retail Food Regulatory Program Standards.
Chair: Appointed by Conference Chair

Resolutions Committee
Role: Except for thank you resolutions, the Resolutions Committee prepares all necessary resolutions for Board approval. Committee reports to the Board.
Chair: Appointed by Conference Chair

Strategic Planning Committee
Role: Provide an active leadership role in developing both long term and short term goals that will enhance and sustain the relevance and viability of the Conference for Food Protection.
Chair: Appointed by Conference Chair

Finance Committee
Role: Provide financial oversight for the Conference including but not limited to budgeting and financial planning, financial reporting, and the creation and monitoring of internal controls and accountability policies.
Chair: Appointed by Conference Chair

Other Committees
Appointed as needed to carry out Conference objectives.
Standing Committees

All Standing Committee Chairs are appointed by the Conference Chair. The Standing Committees shall attempt to provide a balance in representation of the stakeholders in the particular matter under consideration. Standing Committees report to the Board.

Standing Committees:

Issue Committee
Role: Reviews all Issues submitted to Conference and assign them to Councils for deliberation.

Program Committee
Role: Responsible for the Educational Workshop and the Reports and Updates session of the Biennial meeting.

Constitution and Bylaws/Procedures Committee
Role: The Constitution and Bylaws/Procedures Committee shall submit recommendations to improve Conference administrative functions through proposals to amend the Constitution and Bylaws. The Committee shall review proposed memorandums of understanding and ensure consistency among governing documents such as, the Constitution and Bylaws, the CFP Biennial Meeting/Procedures document, and other governing documents. The Committee shall report all recommendations to the Board prior to Council II deliberation, and shall follow the direction of the Board.

Resolutions Committee
Role: Except for thank you resolutions, the Resolutions Committee prepares all necessary resolutions.

Audit Committee
Role: In addition to when a certified public accountant conducts an audit of the Conference’s financial records, the Audit Committee audits the Conference’s financial records annually.

Food Protection Manager Certification Committee
Role: Works with the accreditation organization for food protection manager certification programs to:
1. Establish and refine policies and standards to which certifiers may conform in order for them to be accredited;
2. Provide recommendations to the Conference on accreditation standards for certifying organizations specific to food protection manager certification programs;
3. Develop strategies for enhancing equivalence among food protection manager certificates issued by certifiers; and
4. Promote universal acceptance of certificates issued by accredited certifiers.
**Program Standards Committee**

**Role:** Provide ongoing input to the FDA on issues that arise with the Voluntary National Retail Food Regulatory Program Standards.

**Finance Committee**

**Role:** Provide financial oversight that includes budgeting, financial planning, reporting, internal controls and accountability policies.

**Nominating Committee**

**Role:** Selects the nominees for the Conference Chair and Vice Chair.

**Strategic Planning Committee**

**Role:** Advise the Board on the current and future direction for CFP. This Committee shall make recommendations to keep the CFP relevant and increase the viability and growth of the organization.

**Publications Committee**

**Role:** To establish, maintain, and improve Conference publications regarding Conference endorsement, copyright, scientific and regulatory accuracy, and external publication approval.

**Other Adhoc Committees**

Appointed by the Board as needed to carry out Conference objectives.
**Timeline for Conference Activities**

This chart outlines the “When, Whom and What” of actions that are to be taken.

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1. **At least 150 days preceding CFP Biennial Meeting**
   - **Executive Director (Article II, Section 3 and Art. XVII, Sec. 4)**
   - Announces to members the time and place of CFP Biennial Meeting, and provides forms for submitting Issues and proposals

2. **By 90 days preceding CFP Biennial Meeting**
   - **Any person (Article II, Section 3 & 4)**
   - May submit Issues on approved forms by this deadline

3. **By 90 days preceding CFP Biennial Meeting**
   - **Program Committee (Article II, Section 3 & 4 and Art. XIV, Sec. 1)**
   - Reviews properly submitted Issues and assigns each for Council deliberation

4. **By 40 days preceding CFP Biennial Meeting**
   - **Executive Director (Article II, Section 3 & 4)**
   - Makes available to members committee reports and copies of Issues which have been properly submitted and assigned to Council

5. **During CFP Biennial Meeting**
   - **Councils (Article II, Section 3 & 4 and Art. XII, Sec. 4)**
   - Deliberate assigned Issues and develop recommended actions for Assembly consideration

6. **During CFP Biennial Meeting**
   - **Assembly (Article V, Sec. 1)**
   - approves or rejects actions recommended by Councils

7. **Following CFP Biennial Meeting**
   - **Board (Article VII, Section 1)**
   - Submits approved actions to states and Board for implementation
   - May return rejected actions to originating body explaining basis for rejection or reassignment
   - Distributes Assembly actions to Conference members for implementation
MEMORANDUM OF UNDERSTANDING

Between The

CONFERENCE FOR FOOD PROTECTION

And The

NATIONAL ASSOCIATION OF COUNTY AND CITY HEALTH OFFICIALS

I. PURPOSE

The purpose of this Memorandum of Understanding (MOU) is to establish a mutually beneficial relationship between the Conference for Food Protection (CFP) and the National Association of County and City Health Officials (NACCHO). It is to the advantage of CFP and NACCHO to enter into this MOU as a means to enhance dialogue and information sharing related to food safety and defense with an emphasis on local public health support and advocacy.

II. BACKGROUND

A. Article I, Section 1 of the Constitution and Bylaws of the CFP state, in part, that the objective of the Conference shall be to promote food safety and consumer protection by:

1. Identifying and addressing problems in the production, processing, packaging, distribution, sale, and service of foods;

2. Focusing on and facilitating the food protection programs governing the food service, retail food store, and food vending segments of the food industry;

3. Adopting sound, uniform procedures that will be accepted by state and local food regulatory agencies and industry;

4. Promoting mutual respect and trust by establishing a working liaison among governmental agencies, industry, academic institutions, professional associations, and consumer groups concerned with food safety; and


B. The mission of the NACCHO is to improve the health of communities by strengthening and advocating for every local health department in the nation. NACCHO serves 3000 local health departments and is the leader in providing cutting-edge, skill-building, professional resources and programs, seeking health equity, and supporting effective local public health practice and systems. NACCHO promotes food safety and consumer protection by:
1. Supporting and working with local health department to improve food safety and food defense to prevent foodborne illness;

2. Connecting retail food regulatory program practitioners who are experienced in applying the FDA’s Voluntary National Retail Food Regulatory Program Standards with those who are newly enrolled and looking for assistance, resources, and recommendations;

3. Advocating for environmental justice with respect to the development, adoption, and enforcement of environmental laws, regulations and policies, including food safety and security;

4. Administering the Samuel J. Crumbine Consumer Protection Award for Excellence in Food Protection at the Local Level. This award is given annually to local environmental health jurisdictions that demonstrate unsurpassed achievement in providing outstanding food protection services to their communities and highlight successful approaches to food safety that can be replicated in other communities;

5. Holding NACCHO’s Food Safety Workgroup to advise and guide the improvement of foodborne disease prevention, surveillance, outbreak response, reporting, and control at the local level. The workgroup has provided guidance and feedback on the following:
   a. Promoting and adopting the Food and Drug Administration’s Voluntary National Retail Food Regulatory Program Standards;
   b. Identifying and sharing model practices related to food safety;
   c. Promoting and adopting the Council for Foodborne Outbreak and Response (CIFOR) guideline, and associated tools and resources.
   d. Providing input on and guidance for NACCHO’s food safety programs and projects.
   e. Dissemination of food safety tools, resources, and data to LHDs.
   f. Developing food safety policies.
   g. Gaining insight into fostering better partnerships on food safety between local, state, and federal agencies.

6. Convening the NACCHO Foodborne Illness Outbreak Response Community of Practice (CoP) to bring together food safety professionals from across the country to share foodborne illness outbreak response tips and best practices across jurisdictions. Participants include local, state, and federal health staff involved in the investigations of foodborne illness outbreaks. The CoP convenes through regular conference calls and webinars.

III. SUBSTANCE OF AGREEMENT

To enhance dialogue and information sharing related to food safety and defense, the following activities are proposed:

A. NACCHO leadership and the Executive Board of CFP will engage in an ongoing effort to share information related to food safety and food defense as each organization develops draft position statements, issue papers, resolutions, strategies, reports, and related documents.

B. Each organization will share with the other any significant dialogue held with federal counterparts (FDA, USDA/FSIS, CDC, etc.) which may result in a final position regarding a national food safety
or food defense issue. Necessarily excluded would be information in confidence obtained through specific federal credentialing.

C. In order to minimize duplication of effort, each organization, as appropriate and feasible, will work together in a timely manner to solve food safety and food defense related problems that affect the memberships of both organizations.

D. Information will be shared regarding meeting times and locations, including future meeting dates and sites. CFP shall share with NACCHO important Conference deadlines such as those for committee volunteer application and Issue submission in advance of the biennial meetings.

E. Both organizations shall include the Presidents and/or Executive Directors in general membership information emails to ensure that each may, in turn, distribute these communications to their respective organizations.

F. Each organization shall ensure that the organizations are listed on the other’s websites as a “food safety partners” link.

IV: ACCEPTANCE

This Memorandum of Understanding becomes effective upon signing with the option to renew every other year on even numbered years.

APPROVED AND ACCEPTED FOR THE NATIONAL ASSOCIATION OF COUNTY AND CITY HEALTH OFFICIALS

APPROVED AND ACCEPTED FOR THE CONFERENCE FOR FOOD PROTECTION

______________________________  ______________________________
Chief Executive Officer  Executive Director
National Association of County and City Health Officials  Conference for Food Protection

Date: __________________________  Date: __________________________
Meeting minutes from January 23, 2019 Conference Call

Matt, Dave, Scott, Jason, Angela, Susan, Allen, and Davene present on the call

1. Finalized and voted on the “At-Large” constituency choices with the addition of:
   - non-voting Chair Model in the Balanced constituency model
   - in the Composition Details an additional comment in all Three Representations regarding any CFP member can reach out to their constituency member on a committee to give their input.
   - in the Composition Details an additional comment in all Three Representations regarding any CFP member can listen in on any conference call but can not participate in the conversation.

   ACTION ITEM: Matt will update and send to all committee members

2. Regarding the 2016 II-026 Charge: The Committee agreed to clean up the existing documents and not create a new one. Fewer documents that are consistent with each other. Constitution is equivalent to a Law and the Procedures document is equivalent to the Rules for the Law. Discussed needing a system in place so that the governing documents don’t get out of sync in the future. Perhaps putting Job Descriptions in the Appendix of the Procedure Manual could be done. Conversation will continue moving forward.

3. Do homework on Constitution. We will be adding a second conference call on February 13th at 11:00 EST to work through the Constitution.

4. Student registration is still Tabled for later discussion.

NEXT CONFERENCE CALL WEDNESDAY, FEBRUARY 13TH 11:00 a.m. EST
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CONFERENCE FOR FOOD PROTECTION – COMMITTEE FINAL REPORT

COMMITTEE NAME: Ad Hoc Committee Membership Committee

DATE OF FINAL REPORT: July 11, 2019

COMMITTEE ASSIGNMENT: ☐ Council I  ☐ Council II  ☐ Council III  X Executive Board

REPORT SUBMITTED BY: Brenda Bacon, Chair of Ad Hoc Committee Membership Committee

COMMITTEE CHARGE(S):

1. Review proposals from the CB&P in the “Organizational Options for Committees” attachment to the CB&P Committee periodic status report dated 3/1/2019;
2. Form a single proposal addressing committee constituency size and at-large membership; and
3. Report findings back to the Board at the August 2019 Board meeting.

COMMITTEE WORK PLAN AND TIMELINE:

1. Conference call(s) by July 9 to determine recommendation to the Executive Board.
2. Submit final report to the Executive Board to deliberate at the August 2019 meeting.

COMMITTEE ACTIVITIES:

2. Overview of committee activities.
   
   Dave Gifford, Thomas McMahon, David Lawrence and Brenda Bacon participated on a May 31 conference call. The C&BL committee suggestions in their status report were discussed and it was determined that none of the options were ideal. Discussed replacing the term “at-large” with “alternate”. Discussed the unwieldiness of the very large council committees when there is an abundance of at-large members due to the language in the C & BL requiring all volunteers serve on the committee they signed up for. This Ad Hoc committee determined that a fixed number of alternates would be selected from the committee volunteers. These alternates would be included in all committee activities and could be called upon by Committee Chair and Vice Chair to replace a voting member should they depart the committee voluntarily or from non-participation. This will make it clear to all committee members who are voting and who are alternates (much like Council members during the conference). Other CFP members can listen in on the committee deliberations. The council committee rosters would provide a list of voting members, consultants and alternates. Deliberation included that the primary mechanism for CFP members to get experience to better serve on Council is through committee work. Having the alternates would be easy for committee chairs to select a member to fill a vacancy. Committees should strive for balanced representation.

The conference call on July 9, 2019 finalized discussion of the amount of alternates for committees and to revise language in C&BL Article XV Section 13. Present on this call was Dave Gifford, Amber Daniels, Thomas McMahon, David Lawrence and Brenda Bacon. Ann Johnson provided email comments throughout this process and provided valuable input.

3. Charges COMPLETED and the rationale for each specific recommendation: See 2 above.
4. Charges INCOMPLETE and to be continued to next biennium: N/A

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:

1. Approve the recommendation provided by the Ad Hoc Committee Membership Committee and assign to C&BL Committee to submit an issue to the 2020 Biennial Meeting of the Conference for Food Protection.
LISTING OF CFP DOCUMENTS TO BE SUBMITTED BY COMMITTEE:

1. Report – Ad Hoc Committee Committee Report
   a. List of content documents submitted with this Report:
      (1) Committee Member Roster (see attached PDF)
      (2) Article XV Section 13 with strikeouts and additions
      (3) Article XV Section 13 “clean copy”
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12/5/2019
With the exception of material that is copyrighted and/or has registration marks, committee generated documents submitted to the Executive Board and via the Issue process (including issues, reports, and content documents) become the property of the Conference.

COMMITTEE NAME: Constitution Bylaws and Procedures Committee

DATE OF FINAL REPORT: November 1, 2019

COMMITTEE ASSIGNMENT: ☐ Council I ☑ Council II ☐ Council III ☐ Executive Board

REPORT SUBMITTED BY: Davene Sarrocco-Smith, Chair

COMMITTEE CHARGE(S):

Issue #2018 II-024

1. Review the Conference for Food Protection governing documents (Conference for Food Protection Constitution and Bylaws, Conference Procedures, Conference Biennial Manual, position descriptions, conference policies, etc.) to facilitate a merger and conformance of these documents into a comprehensive "Conference for Food Protection Manual." (Issues 2012-II-001, 2012-II-004, 2014-II-018 and 2016-II-026)

2. Review membership and constituency at-large members on all committees and offer recommendations on how to address the quantity and functionality of committees.

3. Report back to the Executive Board; and submit recommendations as Issues at the 2020 Biennial Meeting.

Executive Board Charges

1. Work with the Strategic Planning Committee to discuss the impact of changing the name of our organization from "Conference for Food Protection" to "Congress for Food Protection".

2. Work with Issue Committee Chairs regarding framework of Issue management process, specifically what is taking place from Issues being made public until the Biennium.

3. Add "App Liaison" position to the CFP Procedures document.

4. Define "student" for registration purposes, self-reporting and what happens if they get a job during the cycle? Do they have to pay again or registration fee or just let the student registration fee carry over until the next cycle?

5. Chair to review the Issue management process with the Issue Committee Chairs to determine if the CFP governing documents have language preventing Issue submitters from contacting Council members in advance of the Biennial Meeting.

6. A general point of clarification was raised asking if committee and council chairs, and vice- or co-chairs, are to be included on a roster, and if their voting status is to be indicated or counted towards constituency balance.

7. CB&P Committee to categorize the CFP documents included on the list in the CB&P Committee report dated 03/01/2019 and use the category titles of "governing," "administrative," and "instructional."

8. Chair to work independently with Issue Committee Chairs regarding Issue integrity.

9. CB&P Committee to bring to the Board meeting in August 2019 a single revised Constitution and Bylaws document, using underline and strikethrough for any changes, so the Board can extract those items they feel need to be submitted as separate Issues.

10. Review the CFP MOU with NACCHO.

11. Define roles of Co-Chair and Vice Chair in the CFP Biennial Meeting/Conference Procedures document

COMMITTEE WORK PLAN AND TIMELINE:

1. Fourth Wednesday of every month conference calls took place. As of the February 27, 2019, conference call frequency had been increased to the 2nd and 4th Wednesday of every month with the primary goal of continuing review and editing the Constitution and Bylaws.

2. Sub-committees were formed fall 2018: At-Large Constituency; Strategic Planning; Constitution review.

3. Sub-committees were formed spring 2019 and worked independently: Student Registration; Formatting; Grammar review, and MOU review.

4. Council Chair to work independently with Issue Committee Chairs regarding Issue integrity, spring 2019.

COMMITTEE ACTIVITIES:

1. Full committee conference calls took place; 9/26/18, 10/24/18, 12/12/18, 1/23/19, 2/13/19, 2/27/19, 3/27/19, 4/10/19, 5/8/19, 5/22/19, 6/12/19, 6/26/19, 7/10/19, 10/9/19, 10/30/19.

2. Subcommittees were formed
   a. At-Large constituency subcommittee
      i. Brought drafts to full committee for discussion. Full committee reviewed and agreed on Committee At-Large document Jan. 23, 2019.
   b. Strategic Plan
      i. Worked with SPC and brought document for full committee review and agreement on Oct. 24, 2018, with an additional week for comments before SPC chairs were given last feedback on October 31, 2018.
   c. Constitution Review
      i. Continual review and editing of the 2018 Constitution and By Laws took place.
d. Formatting for the Constitution
   i. Current Constitution has inconsistent formatting throughout the document. Subcommittee provided this format:
      Article/Section/Subsection(a)1. to be used throughout the document. The full committee voted and this format was agreed upon.
   ii. The reformatting of the Constitution will wait until after the Fall 2019 Executive Board meeting. Committee agreed.

e. Grammar review of the Constitution
   i. Discussion regarding review for the edited version of the Constitution took place. Subcommittee thought it best to wait until after the Fall 2019 Executive Board meeting. At that time grammar corrections to the Constitution will be made. Full committee agreed.

f. Student Registration subcommittee
   i. Objective was to develop a procedure for what CFP should do when “students” gain employment during the 2-year, already paid, membership. (See Content document)
      (1) Recommendation to not require additional monies but may require update to member constituency group to reflect area of gainful employment.
      (2) Recommendation that the Board should establish a set fee reduction for students to easily guide fees for future biennial conferences and publish fees in all Conference materials that reference fees.
   ii. The draft was brought to the full committee for discussion. Full committee reviewed and agreed on document.

g. MOU subcommittee reviewed the MOU between NACCHO & CFP
   i. Verbage changes in sections III B, III C were recommended for clarification and section III D added a relevant example.
   ii. No conflicts were found within the Constitution and the MOU with CFP & NACCHO.
   iii. The full committee voted and the additions to the MOU were agreed upon.

3. Review the Conference for Food Protection governing documents (Conference for Food Protection Constitution and Bylaws, Conference Procedures, Conference Biennial Manual, position descriptions, conference policies, etc.) to facilitate a merger and conformance of these documents into a comprehensive “Conference for Food Protection Manual.” (Issues 2012-II-001, 2012-II-004, 2014-II-018 and 2016-II-026)
   i. In order to create a merge of existing documents, the documents being merged need to be harmonious with each other. Due to discord within the same documents as well as discord between documents, the rational approach was to have a solid foundational document. The CFP’s foundational document is our Constitution. Once the Constitution is a solid foundational document, steps can be taken to make the rest of the CFP documents harmonious with the Constitution and each other.

4. Chair corresponded with Issue Committee Chairs regarding issue integrity
   a. Communications between Constitution, Bylaws, and Procedures Chair and Issue Co-chairs were held in March, 2019 to discuss Issue Submission Procedures. It was decided the best course of action was to add to the Council Member Position Description under Responsibilities and Duties “COMMIT ONESELF TO ISSUE INTEGRITY AND ETHICAL CONDUCT”. This gives the ability for Council Chairs and Council members to approach items of concern with Issues and have been submitted but not yet discussed at council to handle situations that might arise with integrity and ethics.

5. A general point of clarification was raised asking if committee and council chairs, and vice- or co-chairs, are to be included on a roster, and if their voting status is to be indicated or counted towards constituency balance. Council Chair completed
   a. Council Committee Chairs and all Council committee members are to be on a roster approved by the Executive Board. CFP Biennial Meeting/Conference Procedures 2018 document VIII A. 1. This is also in the Constitution with existing conflicting language.
      i. Article XIV Section 13, subsection 1 of the 2018 CFP Constitution state that the Committee Chair and Vice Chair each have a vote.
      ii. Council Chairs or Council Vice Chairs are not on a Council Committee roster.
      iii. Standing Committees shall be made to provide a balance in representation like all Conference committees,(Constitution Article XIV Section 1 and CFP Biennial Meeting/Procedures document VIII C 1)
      iv. There is nothing in the Constitution regarding Standing Committee membership. The Procedures document lumps all Committees together with no notation of size or who votes.

1. Charges COMPLETED and the rationale for each specific recommendation:
   a. Worked with the Strategic Planning Committee to discuss the impact of changing the name of our organization from “Conference for Food Protection” to “Congress for Food Protection”.
   b. Addressed At Large constituency and provided board with several options. (See Content Document)
   c. Worked with Issue Committee Chairs regarding framework of Issue management process, specifically what is taking place from Issues being made public until the Biennium.
   d. Added “App Liaison” position to the CFP Procedures document Section V, C. passed by Executive Board 1/28/19.
   e. Defined “student” for registration purposes, self-reporting and what happens if they get a job during the cycle? Do they have to pay again for registration fee or just let the student registration fee carry over until the next cycle? (See Content Document) Executive Board approved Fall 2019. All changes are administrative.
   f. Chair reviewed Issue management process with the Issue Committee Chairs to determine if the CFP governing documents have language
f. Chair reviewed governing documents for point of clarification if committee and council chairs, and vice- or co-chairs, are to be included on a roster, and if their voting status is to be indicated or counted towards constituency balance.

   (1) Recommendation
   • Council Committee Chairs and all Council committee members are to be on a roster approved by the Executive Board. CFP Biennial Meeting/Conference Procedures 2018 document VIII A. 1. This is also in the Constitution with existing conflicting language. Addressed in new draft Constitution.
   • Article XIV Section 13, subsection 1 of the 2018 CFP Constitution state that the Committee Chair and Vice Chair each have a vote.
   • Council Chairs or Council Vice Chairs are not on a Council Committee roster.

g. CB&P Committee to categorize the CFP documents included on the list in the CB&P Committee report dated 03/01/2019 and use the category titles of “governing,” “administrative,” and “instructional.” Executive Board passed 11/1/19 (see Content document)

h. Chair to work independently with Issue Committee Chairs regarding Issue integrity.

   (1) Recommendation
   Add to the Council Member Position Description under Responsibilities and Duties “COMMIT ONESELF TO ISSUE INTEGRITY AND ETHICAL CONDUCT”. This gives the ability for Council Chairs and Council members to approach items of concern with Issues that have been submitted but not yet discussed at council to handle situations that might arise with integrity and ethics. Approved at Fall 2019 Executive Board meeting.

i. CB&P Committee to bring to the Board meeting in August 2019 a single revised Constitution and Bylaws document, using underline and strikeover for any changes, so the Board can extract those items they feel need to be submitted as separate Issues. (see Content document)

j. Reviewed the CFP MOU with NACCHO and had grammatical changes the Executive Board accepted Fall 2019 Board meeting. (see Content document)

k. Issue 2018 II-024 the Conference for Food Protection governing documents (Conference for Food Protection Constitution and Bylaws, Conference Procedures, Conference Biennial Manual, position descriptions, conference policies, etc.) to facilitate a merger and conformance of these documents into a comprehensive “Conference for Food Protection Manual.” (Issues 2012-II-001, 2012-II-004, 2014-II-018 and 2016-II-026

   (1) In order to create a merge of existing documents, the documents being merged need to be harmonious with each other. Due to discord within the same documents as well as discord between documents, the rational approach was to have a solid foundational document. The CFP’s foundational document is our Constitution. Once the Constitution is a solid foundational document, steps can be taken to make the rest of the existing CFP documents harmonious with the Constitution and each other.

2. Charges INCOMPLETE and to be continued to next biennium:
   a. Define roles of Co-Chair and Vice Chair in the CFP Biennial Meeting/Conference Procedures document

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:
1. Committee is requesting the Board to have verbiage added to the Biennial Meeting/Conference Procedures document. The verbiage could be added under VII B9; or it can be a stand alone item; or under VIII A. 1 (a).
   -The proposal: After the Assembly approves Constitutional changes, those changes be automatically sent to the Constitution and ByLaws Committee. The CB & P will review the Constitution and ByLaws and Biennial Meeting/Conference Procedures document and update all sections that would apply to the changes the Assembly of Delegates approved.
   Reasoning: to attempt to keep the two governing documents updated and consistent.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:
1. CBPC Issue #1: Report – Constitution ByLaws & Procedures
   a. List of content documents submitted with this Issue:
      (1) Committee Final Report
      (2) Committee Member Roster
      (3) CB & P At-Large Committee Membership Options
      (4) Categorization of CFP documents
      (5) Draft revised CFP Constitution and ByLaws
      (6) Draft Memorandum Of Understanding between CFP & NACCHO
   b. List of supporting attachments
      (1) Conference call meeting minutes
      (2) Attendance at conference calls
2. CBPC Issue #2: Draft Revised Constitution and ByLaws
3. CBPC Issue #3: At Large constituency
4. CBPC Issue #4: Draft Memorandum Of Understanding between CFP and NACCHO
For inquiries, please contact:

Doug Baker
Vice President, Industry Relations
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Food Marketing Institute proudly advocates on behalf of the food retail industry, which employs nearly 5 million workers and represents a combined annual sales volume of almost $800 billion. FMI member companies operate nearly 33,000 retail food stores and 12,000 pharmacies. FMI membership includes the entire spectrum of food retail venues; single owner grocery stores, large multi-store supermarket chains, pharmacies, online and mixed retail stores. Through programs in public affairs, food safety, research, education, health and wellness and industry relations, FMI offers resources and provides valuable benefits to almost 1,000 food retail and wholesale member companies and serves 85 international retail member companies. In addition, FMI has almost 500 associate member companies that provide products and services to the food retail industry. For more information, visit www.fmi.org and for information regarding the FMI Foundation, visit www.fmifoundation.org

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FOOD PRODUCT TAMPERING AND INTENTIONAL CONTAMINATION GUIDELINES

Introduction

Food and product contamination are primarily associated with the introduction of a foreign item, bacteria, virus, chemical or any other hazard that may cause injury, illness, or even death when ingested. It can also include the contamination of products that are used on the body, such as lotions and hair sprays, or a component of a product that is not typically ingested but could cause harm, such as the use of lead paint on a toy.

Contamination can occur at any point in the supply chain—from the field or production to the table or household. Contamination can be caused by anyone, including customers, employees, and vendors.

Several different circumstances, mostly related to employee behaviors and preparation practices, can result in unintentional contamination of products. Intentional contamination results from the deliberate and malicious actions taken by an individual or group with the intent of causing harm.

Food defense mitigation strategies are the actions you take to protect food products against intentional contamination. A Food Defense Plan is a tool to help establishments prevent, prepare for, respond to, and recover from intentional food and product tampering and contamination events. A Food Defense Plan provides specific actions to take when tampering or intentional contamination is suspected.

The following information in this document is meant for assisting key personnel to prepare, respond, stabilize, and recover from a tampering or intentional contamination event. Although the goal of these guidelines is to be thorough and detailed, it is meant to serve as a resource and a supplement to the many resources provided by federal government agencies (see References and Resource Section) and partnerships with your local law enforcement agencies. You will most likely want to customize this document to meet the specific needs of your organization, stores and personnel.
Prepare

- Assemble a food defense team and assign responsibilities, including identifying a designated person responsible for implementing, managing and updating the Food Defense Plan.
- Conduct Vulnerability Assessment of physical security and operations to assess potential threats and areas vulnerable to attack. Review and verify assessment periodically, at least annually.
- Develop and implement a Food Defense Plan (See FDA Food Defense Plan Builder) and ensure plan is kept up to date. Plan should include, but should not be limited to, procedures for:
  - Addressing any vulnerabilities identified in the vulnerability assessment.
  - Identifying, responding to, and containing threats and acts of tampering/intentional contamination.
  - Segregating and securing any contaminated or potentially harmful products.
  - Safe handling and disposing of contaminated products and decontamination of the facility.
- Identify contact information for key emergency, law enforcement and public health authorities contact (i.e. police, fire, ems, local hospital, etc.)
- Provide Food Defense Training for all levels of employees (front line associates to leadership).
- Develop internal communication system to inform staff about relevant product and facility protection concerns.
- Develop external communication strategy for communicating with public.
- Purchase products from reputable and trusted suppliers. Suppliers should have a food defense program and should be proactively taking all the necessary steps to monitor and verify the integrity of their products.
- Deliveries should be scheduled and verified against scheduled delivery list.
- Develop procedures for receiving unscheduled deliveries.
- Inspect incoming shipments for signs of damage and tampering. Doors/hatches on delivery vehicles should be locked or sealed and tamper-evident seals should be intact and match information provided on shipping documentation.
- Conduct background checks on all employees, including seasonal, temporary, and contract staff.
- Utilize an identification system to identify employees such as uniforms, name tags or badges with individual control numbers for authorized access to non-public areas of the store.
- Limit access by staff to areas necessary for their job function and only during appropriate hours.
- Limit poisonous and toxic chemicals in the establishment to those that are required for the operation and maintenance of the facility and those that are intended for retail sale.
- Restrict access to areas where poisonous and toxic chemicals (e.g., pesticides, industrial chemicals, cleaning materials, sanitizers, disinfectants, etc.) are stored to only to authorized personnel.

Disclaimer: This guidance is provided by the Food Marketing Institute as a service to its members and does not constitute legal advice. As legal advice must be tailored to the specific circumstances of each case and laws and regulations are frequently changing, nothing provided herein should be used as a substitute for the advice of competent counsel.
• Display poisonous and toxic chemicals for retail sale in a location where they can be easily monitored and periodically check these items for signs of tampering.
• Prevent public access to critical areas (e.g., receiving, preparation, storage and dishwashing areas).
• Employees should monitor public areas, customer self-service areas (e.g., salad bars, bulk food bins, etc.) and security of the premises for unusual or suspicious behavior.
• Ensure security measures such as cameras, lighting, alarm systems are working properly.
• Encourage employees to report signs of possible product contamination, unknown or suspicious persons, or any breaks in the food defense system.
• Review, at least annually, the effectiveness of the Food Defense Plan and revise accordingly.

**Respond**

• Follow Food Defense response procedures
• Employees should report any signs of possible product contamination, unknown or suspicious persons, or any breaks in the food defense system.
• Notify law enforcement and public health authorities if any suspicious activity is suspected.
• Activate the Crisis Management team immediately.
• If appropriate, appoint a Team Leader to manage the company response and communication with stakeholders.
• Conduct an internal investigation using prescribed procedures in all events.
• Notify manufacturers of the product in all events, and request assistance as needed.
• Identify affected product and follow prescribed procedures to remove, segregate and secure affected product.
• Stop additional distribution to stores of affected product as necessary.

**Stabilize**

• Work with regulatory agency to determine if a recall is needed and destroy/return affected product as necessary.
• Audit as necessary, review POS and other data, and follow-up verbally as needed to ensure all affected product has been removed from the shelves/supply chain.
• Communicate with all stakeholders, including customers, when safety has been restored.
• Obtain new source, if necessary, to replenish stock.
• Provide for new product to replace recalled product.

**Recover**

• Maintain records related to incident including impacted products.
• Review events and implement corrective actions to prevent future incidents.
• Evaluate incident response and review and revise Vulnerability Assessment and effectiveness of the Food Defense Plan.
• Retrain employees.
• Restore customer confidence in the company and affected food product(s).

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References and Resources

- FDA Food Defense and Emergency Response for Retail Food  
  https://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodDefenseEmergencyResponseRetail/default.htm

- FDA Food Defense Self-Assessment Tool for Retail Food Stores and Food Service Establishments  

- FDA Food Defense Plan Builder – A user-friendly software program designed to assist owners and operators of food facilities with developing personalized food defense plans for their facilities.  
  https://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm349888.htm

- FDA Food Defense Strategies Database – A tool designed to assist owners, operators or agents in charge of companies that produce, process, store, package, distribute, and/or transport food with identifying preventive measures to protect the food against intentional adulteration.  
  https://www.accessdata.fda.gov/scripts/fooddefensemitigationstrategies/

- FDA Office of Criminal Investigations (OCI) -- FDA’s criminal law enforcement arm, OCI conducts criminal investigations of illegal activities involving FDA-regulated products.  
  https://www.fda.gov/iceci/criminalinvestigations/default.htm

- FSIS Food Defense and Emergency Response Resources -  

- Food Protection and Defense Institute (FPDI) – https://foodprotection.umn.edu/

- FBI Food Defense Awareness and Outreach -  
  https://www.fbi.gov/file-repository/commercial-facilities-food-defense.pdf/view

Food Defense Training Resources

- FSPCA Food Defense Awareness for the FDA Intentional Adulteration Rule  
  https://www.ifsh.iit.edu/fspca/courses/intentional-adulteration

- Food Defense 101 – Food Defense Awareness for Front-line Food Industry Workers  
  https://www.accessdata.fda.gov/scripts/FDTraining/

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STATEMENT OF POLICY

Food System Safety

Policy
The National Association of County and City Health Officials (NACCHO) supports the development of a science-based and fully funded food safety system. It should ensure local health department participation in all areas of food safety as a means to reduce foodborne illness with particular attention to challenges such as new and re-emerging foodborne pathogens, food safety and security issues associated with climate change retail food safety, cottage food industry, and changing demographics.

Safety in the Food System and the Role of Local Health Departments
NACCHO supports the following:

- The critical role that local health departments play as the first line of defense in preventing foodborne illness at the local level.
- Local health departments’ role in working with retail food establishments at the local level to reduce foodborne illness through education efforts, inspections, licensing, training, and technical assistance.
- Effective interaction among local health departments and their state and federal counterparts to enhance the food safety system.
- Enhanced local health department workforce training to identify risks associated with purveying food to the public through active inspection and education programs.
- Policies that enhance and improve education for consumers, food handlers, retail food establishments, and other sectors of the food industry at the local level to prevent foodborne illness.
- Adoption of the most recent Food and Drug Administration (FDA) Model Food Code to promote best practices for the safety and protection of food served at retail and in food service.
- Adoption and promotion of the use of the FDA Voluntary National Retail Food Regulatory Program Standards (Retail Program Standards) as a mechanism for continuous quality improvement for local food regulatory programs.
- Local health department involvement on the Partnership for Food Protection, the Food Safety Modernization Act working groups, Conference for Food Protection, and other relevant federal advisory groups aimed at preventing foodborne disease outbreaks.
- Initiatives to prepare for the food safety and security challenges associated with climate change.
- Paid sick leave to promote health by encouraging sick employees to stay home and limit the spread of foodborne disease (see NACCHO’s policy statement 11-07 Paid Sick Leave).
- Recognition of the local health department role in foodborne illness outbreak response efforts (See NACCHO’s policy statement 13-07 Foodborne Disease Outbreak Response).
• Federal efforts to phase out the non-therapeutic use of critical antimicrobial drugs and growth hormones in food-producing animals (see NACCHO’s policy statement 12-09 Antimicrobials in Animals).

• Local and state health department reporting of data from outbreak investigations to CDC’s foodborne illness outbreak surveillance systems (National Outbreak Reporting System (NORS); National Environmental Assessment Reporting System (NEARS)).

**Funding Local Health Department Actions to Prevent Foodborne Disease**

In funding for local health department actions to prevent foodborne disease, NACCHO:

• Supports enhanced federal, state, and local funding for local health departments to meet the basic food safety capacity and infrastructure needs for routine public health activities related to food safety education and food retail and manufacturing inspection.

• Urges Congress to appropriate funds to support activities authorized in the Food Safety Modernization Act.

• Supports increased federal and state funding for foodborne-illness research, a student education subsidy, and training for the current and future local public health workforce as effective means to protect people from disease and enhance prevention of foodborne illnesses at the local level and throughout the larger food safety system.

• Supports additional federal, state, and local funding to build and improve communications, coordination, and partnerships throughout the food safety system.

• Supports the practice of fee-for-services to ensure continued local funding for retail food inspections and recognition that the retail food industry supports these activities.

• Endorses the inspector/inspection ratio as described in the Retail Program Standard’s Standard 8: Program Support and Resources.

**Justification**

Foodborne illness in the United States is estimated to cause 48 million cases of illness, over 128,000 hospitalizations, and 3,000 deaths each year. Salmonella alone costs $365 million annually in direct medical expenses. While everyone is susceptible to foodborne disease, 60 million Americans are especially vulnerable to foodborne illness. These populations include children, pregnant women, people with disabilities, the elderly, and individuals with compromised immune systems. Preventing foodborne illness remains one of public health’s greatest challenges.

Protecting food safety in the retail setting is an important component of any food safety system. About a third of all meals are eaten outside of the home, meaning that almost half of all consumer food expenditures go toward food made in the retail setting (restaurants, delis, etc). Furthermore, 53% of known sources of foodborne illness occur from food produced in the retail setting. Critical risk factors such as poor personal hygiene, improper food handling, and contaminated food surfaces and equipment remain a significant problem in the retail setting and affect the safety of food at the local level. It is crucial that local health departments work with local retail food establishments such as schools, restaurants, nursing homes, and grocery stores to reduce the risk of foodborne disease at the local level. According to a 2013 survey of local health departments conducted by NACCHO, 78% of local health departments conduct food service inspection and licensing and 72% of local health departments provide food safety education.
Paid sick leave for food service workers and health department inspection staff could help to limit the spread of foodborne disease in retail food establishments. For example, the CDC found that infected food workers transmitted 70% of foodborne noroviruses. According to the Department of Labor, 75% of hospitality and food service workers do not have paid sick leave. In a survey conducted of food workers, nearly 90% responded that they went to work sick. Of those who went to work sick, 45% said they worked because they could not afford to lose pay.

In order to work effectively with retail food establishments, local health departments need a legal framework that is cognizant of local independence, fully funds the work they do, and enables them to apply “practical, science-based guidance and enforceable provisions for mitigating risk factors known to cause foodborne illness.” The FDA Food Code provides a model that state and local governments can adopt to ensure that their licensing and inspections programs are utilizing the most up-to-date, scientific approaches to guide their food regulatory program requirements. Furthermore, as local health departments strive for excellence within their food regulatory programs, the FDA Program Standards provides a continuous quality improvement mechanism that local health departments can implement. The FDA Retail Program Standards recommend a staffing level of one full-time equivalent (FTE) devoted to food for every 280 – 320 inspections performed. Inspections for purposes of this calculation include routine inspections, re-inspections, complaint investigations, outbreak investigations, compliance follow-up inspections, risk assessment reviews, process reviews, variance process reviews and other direct establishment contact time such as on-site training.

Even as local health departments seek to prevent foodborne disease and protect the public from foodborne illness, funding and resource allocation has been declining nationally. In a study conducted in 2012, NACCHO found that nearly 3 out of 10 local health departments experienced a reduction of their environmental health staff. Food safety services were reduced or eliminated by the largest percentage by 12.8% of local health departments. These cuts come despite that many local health departments lack sufficient funding to meet the resource and staffing levels recommended by the FDA Program Standards. Federal funds allocated to local health departments for food safety have been modest. Increased financial support from federal, state, and local governments is necessary to help local health departments continue and further enhance their efforts to prevent foodborne disease outbreaks.

References

Record of Action
Proposed by NACCHO Food Safety Workgroup
Approved by NACCHO Board of Directors November 7, 1999
Updated March 2008
Updated May 2013
Updated October 2016
STATEMENT OF POLICY

Foodborne Disease Outbreak Response

Policy
The National Association of County and City Health Officials (NACCHO) supports building local health department foodborne disease surveillance, investigation, and control capacities to promote and improve evidence-based public health practice that reduces foodborne disease.

Foodborne Disease Outbreak Response
NACCHO supports the following:

• Ongoing interaction and involvement among local health departments and state and federal agencies to respond rapidly and effectively to multi-jurisdictional and multi-state outbreaks and recalls.

• A team approach to foodborne outbreak response that fully engages epidemiology, environmental health, laboratory, public health nursing, agriculture departments and other food regulatory agencies and allows for participation from emergency response and industry, as appropriate.

• Enhanced local health department workforce training around surveillance, investigation, and response activities, including cross-training of staff.

• Policies that enhance federal, state, and local laboratory capacity for testing clinical, food, and environmental specimens to identify and respond quickly to foodborne disease outbreaks.

• Local health department representation on national food safety and response initiatives that enhance or impact the ability of local health departments to conduct food safety response activities, such as the Council to Improve Foodborne Outbreak Response, Conference for Food Protection, and the Partnership for Food Protection.

• Training for public health students to fulfill surge capacity interviewing needs during an outbreak.

• Policies and training that enhance healthcare providers’ ability to properly diagnose and report incidents of foodborne disease.

• A coordinated communication response for keeping the public well-informed and the message consistent in the event of a multijurisdictional outbreak.

• Paid sick leave because it promotes health by encouraging sick employees to stay home and limit the spread of foodborne disease (see NACCHO’s policy statement 11-07 Paid Sick Leave).

• Preventive action along the farm-to-fork continuum aimed at improving the safety of the food system (see NACCHO’s policy statement 99-08 Food System Safety).
• Federal efforts to phase out the non-therapeutic use of critical antimicrobial drugs and growth hormones in food-producing animals (see NACCHO’s policy statement 12-09 Antimicrobials in Animals).

• Policies and training that support local and state health department reporting of data from outbreak investigations to CDC’s foodborne illness outbreak surveillance systems (National Outbreak Reporting System (NORS); National Environmental Assessment Reporting System (NEARS)).

Foodborne Disease Response Funding
In funding for foodborne disease response, NACCHO:
• Supports the development of methods for reimbursement from federal and state governments to local health departments for special requests and assistance during foodborne disease outbreaks and recalls.
• Supports enhanced federal, state, and local funding for local health departments’ food safety capacity and infrastructure and for routine public health activities related to foodborne-illness surveillance, investigation, and control.
• Supports additional federal, state, and local funding to build and improve communication, coordination, and partnerships to improve foodborne disease outbreak response (for example federal agencies, state and local health departments, emergency preparedness programs, food industry, consumers, and public health professional organizations).
• Urges Congress to appropriate funds authorized in the Food Safety Modernization Act for activities related to foodborne disease outbreak response.
• Endorses the inspector/inspection ratio as described in the FDA Voluntary National Retail Food Regulatory Program Standards’ (Retail Program Standards) Standard 8: Program Support and Resources.

Justification
The extent of the problem is difficult to accurately define because foodborne disease incidence in general is probably under-reported. However, foodborne illness in the United States is estimated to cause 48 million cases of illness, over 128,000 hospitalizations, and 3,000 deaths each year. A specific pathogen cause can be identified in only 20 percent of the [48 million] cases (9.4 million illnesses). In the cases when a pathogen can be identified, over 90 percent of these cases are caused by only 15 pathogens. According to a report from the United States Department of Agriculture/Economic Research Service, foodborne illnesses pose an annual economic burden of over $15.5 billion. Foodborne illness remains a major threat to public health and local health departments serve as the frontline defense against foodborne disease outbreaks.

Foodborne illnesses are diseases or infections caused by consuming contaminated food or drink. While single cases of foodborne illness are common, the true number of foodborne outbreaks is not known because of underreporting and or misdiagnosis. The proportion of cases of foodborne illness reported to public health authorities can depend on the severity of the case, medical provider and consumer reporting rates to health officials, and surveillance capacity at the state and local levels. Improving consumer education, strengthening reporting requirements, and building local health department capacity to respond to foodborne disease outbreaks will continue to be critical to reducing the impact of foodborne illness.
Each reported case of foodborne illness is identified, investigated, and controlled primarily at the local and state levels. State and local governments investigate the majority of foodborne illnesses and are responsible for sampling food products for contamination during an outbreak investigation. According to the CDC, of the 4,163 foodborne outbreaks in 2010–2014, 120 (or about 3%) were multistate. The first steps taken by local and state health departments are critical to preventing and responding to foodborne illness in the United States. Furthermore, coordinating foodborne surveillance, investigations, and control efforts between the local, state, and federal levels is crucial because a disproportionate amount of outbreak-associated hospitalization and death are attributed to multistate foodborne outbreaks compared with single state outbreaks in the United States. Multistate foodborne outbreaks cause 11% of outbreak–associated illnesses, 34% of hospitalizations, and 56% of deaths.

Paid sick leave for food service workers and health department inspection staff could help limit the spread of foodborne disease in retail food establishments. For example, the CDC found that infected food workers transmitted 70 percent of foodborne noroviruses. According to the Department of Labor, 75 percent of hospitality and food service workers do not have paid sick leave. In a survey conducted of food workers, nearly 90 percent responded that they went to work sick. Of those who went to work sick, 45 percent said they worked because they could not afford to lose the pay.

According to a 2013 survey of local health departments conducted by NACCHO, 78 percent of local health departments conduct environmental health surveillance. Since September 2010, 25 percent of local health departments responded to a major foodborne disease outbreak. Expanding resources at the local level may prevent potential foodborne outbreaks and control the spread of illness. In 2012, seven percent of local health departments reduced or eliminated their food safety programs and their epidemiology and surveillance programs. Federal funds allocated to local health departments for food safety have been modest. Increased financial support is necessary to help local health departments continue to further enhance their surveillance, investigation, and control of foodborne disease outbreaks. In addition, the FDA Retail Program Standards recommend a staffing level of one full-time equivalent devoted to food for every 280 – 320 inspections performed. Inspections for purposes of this calculation include routine inspections, re-inspections, complaint investigations, outbreak investigations, compliance follow-up inspections, risk assessment reviews, process reviews, variance process reviews and other direct establishment contact time such as on-site training.

References


Record of Action

Proposed by NACCHO Food Safety Workgroup

Adopted by NACCHO Board of Directors May 15, 2013

Updated October 2016
COMMITTEE NAME: Allergy Committee

DATE OF FINAL REPORT: 11/1/2019

COMMITTEE ASSIGNMENT: ☐ Council I  ☑ Council II  ☐ Council III  ☐ Executive Board

REPORT SUBMITTED BY: Jeff Hawley - Committee Chair, Mike Pascucilla - Committee Vice Chair

COMMITTEE CHARGE(S): Issue 2018 I-015

- Review Issues 2018-I-015, 2018-II-007, 2018-II-008 and their original submitted Recommended Solution, including but not limited to:
  - Evaluation of major food allergen disclaimers in retail food establishments.
  - Development of methodology for retail food establishments to notify consumers when menu items contain major food allergens.
  - Determining if any additional staff training for food allergen awareness is needed.
  - Identifying any supporting research or evidence that supports recommendations.

- Recommend changes to the Food Code that support retail food establishments in their efforts to protect consumers with major food allergens.

- Report back findings and recommendations to the 2020 Biennial Meeting of the Conference for Food Protection.

COMMITTEE WORK PLAN AND TIMELINE:

1. This Committee has been holding regular conference calls, and workgroup calls between Committee calls. All Committee work has been completed.

COMMITTEE ACTIVITIES:

1. Dates of committee meetings or conference calls: 9/28/18, 11/9/18, 11/30/18, 1/25/19, 2/22/19, 3/29/19, 4/26/19, 5/31/19, 6/28/19, 7/19/19, 8/9/19, 8/30/19, 9/13/19.

2. Overview of committee activities:

Two workgroups were formed to address Committee charges. Notification Workgroup addressed allergen notification in food service establishments. Training Workgroup addressed food allergen training in food service establishments. Committee members were asked to volunteer for one of the workgroups. Emilee Follett chaired the Notification Workgroup. Betsy Craig chaired the Training Workgroup.

The first order of business was to identify and review current major food allergen requirements for notification, labeling, disclaimers, and training. After reviewing current regulatory requirements the Committee recognized that rules for labeling major food allergens on packaged foods are very thorough. However, there is a gap in regulatory requirements for notification of major food allergens in food service establishments.

Notification Workgroup researched types of allergen notification that are currently being used domestically and internationally, to try and determine which methods are most effective. The Workgroup developed surveys that were sent to industry members within CFP and consumer groups, including food allergy organizations, to get input on how they prefer to be notified about major food allergens in food products.

Notification Workgroup made 3 recommendations that were approved by the Committee.

1) **3-602.11 Food Labels** - Amend part (C) to require posting of notification of major food allergens in bulk food that is available for customer self-service. This is currently not required for bulk foods.

2) Add new section to Food Code that requires the permit holder to notify consumers of the presence of major food allergens as ingredients in unpackaged food items using brochures, deli case or menu notifications, label statements, table tents, placards, or other effective written means.

3) **3-602.12 Other Forms of Information** - Add new part (C) that requires the permit holder to, upon request, provide consumers with a written list of all major food allergen ingredients in food items.
Additionally, the Workgroup developed a food allergy guidance document for food service establishments. Recommendation is to post this guidance document on the CFP website.

Training Workgroup researched food allergy training requirements by state, and county, and compiled a spreadsheet with this information. A survey was developed and sent to representatives of the food industry (restaurant and retail) to gather information about food allergy training provided by these establishments. Slightly more than half of those who completed the retail industry survey responded that they provide food allergy training, separate from food safety training. The survey was also sent to restaurant and retail members of the Allergen Committee. Results indicated that most establishments provide additional training for allergens. It was expressed that food allergen training courses are more specific to restaurants, so majority of retail respondents rely on in-house developed food allergy training. Consensus by the Workgroup was that additional food allergen training is necessary for food employees, but there should not be additional requirements for food allergen training in the Food Code.

Training Workgroup made 1 recommendation that was approved by the Committee.

1) **2-103.11 Person in Charge** - Amend part (N) to remove food allergy awareness training and add a new section (Q) identifying recommended components that should be included in food allergen training:
   - Identification of the major food allergens;
   - Food allergen ingredient identities and labeling;
   - Knowledge of cross-contact concerning the major food allergens;
   - Recognition of symptoms of an allergic reaction;
   - How to respond to an allergic reaction.

**Other Activity**: Committee Chair Jeff Hawley was interviewed by Eric Athas, writer with the NY Times, on 1/4/19. Mr. Athas is working on an article about food allergies that will cover people with food allergies, labeling and notification rules, manufacturing, etc, and contacted CFP through Jen Jobrack (FARE). I explained the CFP process and why the Allergen Committee was formed. I explained that current rules cover labeling of packaged foods, but there's very little regulation about major food allergen notification in food service establishments. I also explained that states must adopt the Food Code before it can become regulation. We spoke for about 15-20 minutes and I asked him to call or email me if he had further questions.

### 3. Charges **COMPLETED** and the rationale for each specific recommendation:

- **a.** Charge 1: Review Issues 2018-I-015, 2018-II-007, 2018-II-008 and their original submitted Recommended Solution, including but not limited to:
  - Evaluation of major food allergen disclaimers in retail food establishments.
  - Development of methodology for retail food establishments to notify consumers when menu items contain major food allergens.
  - Determining if any additional staff training for food allergy awareness is needed.
  - Identifying any supporting research or evidence that supports recommendations.

After reviewing current major food allergen regulatory requirements the Committee determined that there is a gap in regulations for notification of major food allergens in food service establishments. We were also in consensus that the general statement about food allergy awareness training in 2-103.11(N) is weak, and should include recommendations for content of an allergen training programs. Because of these deficiencies in food allergen notification and training in the Food Code four states (Illinois, Massachusetts, Michigan, Rhode Island), one county (Montgomery County, Maryland), and 1 locality (Edison, NJ) have enacted their own food allergen notification and/or training requirements.

- **b.** Charge 2: Recommend changes to the Food Code that support retail food establishments in their efforts to protect consumers with major food allergens.

The Committee is making recommendations to address deficiencies in major food allergen regulatory requirements in food service establishments. These recommended changes will provide food allergen regulatory requirements that can be applied consistently in all states, counties and localities.

- **c.** Charge 3: Report back findings and recommendations to the 2020 Biennial Meeting of the Conference for Food Protection.

### 4. Charges **INCOMPLETE** and to be continued to next biennium:

- **a.** None

**COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:**

- No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.
LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. **Report - Allergen Committee:** Acknowledge the 2018-20 Allergen Committee final report; thank the Committee members for their work; and disband the Committee.

   a. List of content documents submitted with this Issue:
      
      (a.1) Committee Report
      (a.2) Committee Member Roster
      (a.3) Food Allergy Notifications: A Guidance for Industry

   b. List of supporting attachments: □ No supporting attachments submitted
      
      (1) Allergy Training Courses and Laws
      (2) Allergen Committee Survey
      (3) Allergen Notification Consumer Survey
      (4) Food Industry Survey Results
      
      (5) Restaurant servers’ risk perceptions and risk communication-related behaviors when serving customers with food allergies in the US
      (6) Comparing the Eating Out Experiences of Consumers Seeking to Avoid Different Food Allergens
      (7) Consumer Preferences for Written and Oral Information about Allergies When Eating Out
      (8) Food Allergy Knowledge and Attitudes of Restaurant Managers and Staff: An EHS-Net Study

2. **Amend Food Code for Major Food Allergen Training for Food Employees**

3. **Amend Food Code for Notification of Major Food Allergens in Bulk Foods**

4. **Amend Food Code for Written Notification of Major Food Allergens**

5. **Amend Food Code for Major Food Allergen Notification Upon Request by Consumer**
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<td>740-594-3266</td>
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Food Allergen Notifications: A Guidance for Industry

Introduction

Background
Millions of Americans have food allergies, and the numbers appear to be on the rise. The increasing prevalence of food allergies presents a significant challenge for food establishments who manage allergen control alongside the countless other responsibilities associated with retail food service. During the 2018 biennial meeting of the Conference for Food Protection, an Allergens Committee was created with the charge to “develop methodologies for retail food establishments to notify consumers when menu items contain major food allergens, using research or evidence to support recommendations.” This guidance document was created in response to that charge.

Purpose
To provide food establishment operators with current industry best practices for notifying consumers of major food allergens present in menu items and food that is unpackaged.

Scope
This guidance document recommends best practices for informing consumers of major food allergen ingredients in menu items that are unpackaged (i.e., not covered by the Food Allergen Labeling and Consumer Protection Act or other labeling requirements). The recommendations outlined herein are supported by published peer-reviewed research, case studies, and survey results from operators and consumers. This guidance is intended for operators of retail food establishments, as defined in the US Food and Drug Administration (FDA) Food Code. For more detailed information, please refer to the appendix.

Major Food Allergens
The FDA has identified the following foods that account for 90% or more of the documented food allergies in the United States. Known as “major food allergens,” they are:

1. Milk
2. Egg
3. Soy
4. Wheat
5. Fish
6. Crustacean shellfish
7. Peanuts
8. Tree nuts

1 (Stallings & Oria, 2017)
2 (US Food & Drug Administration, 2017)
Guidance
Consumers with food allergies depend on allergen information that is made available on labels and menus (or “notifications”) when making a purchasing decision. In a recent survey of 788 food-allergic consumers and family members, respondents overwhelmingly preferred a combination of verbal and written allergen notifications (Appendix B.1). Additionally, they indicated that notifications should be specific to menu items and the major food allergens they contain, rather than generic warnings that may apply to the entire menu or food preparation environment. Food allergen notifications should address all ingredients containing major food allergens, including “hidden ingredients,” such as egg washes, sauces, garnishes, etc.

In some cases, a food operation not be able to accommodate an allergen-free order. Be open and honest with the consumer about the limitations of the establishment in controlling food allergens.

Written Notifications
Design menus (including those for online ordering, catering, and take-out) to ensure names and descriptions of food items fully represent the major food allergens they contain. For example:

1. Next to each menu item, include additional text to specify allergens (e.g., Contains egg, milk).
2. Use images (or “icons”) of food allergens next to menu items where they are present. Include a key so consumers know what the icons represent³. (See Appendix A for icon sets available for commercial use.)
3. Keep a clear and thorough allergen menu available to customers that provides all the ingredients for each menu item. This is particularly helpful for customers who are allergic to foods not listed as major food allergens by the FDA.

Verbal Notifications
When allergen information is provided verbally (by servers, managers, etc.), ensure the information is accurate, verifiable, and consistent. Food-allergic customers pay close attention to the way food workers respond to their questions and make purchasing decisions based on their perceptions. Food workers who appear uninformed or disinterested can negatively impact a customer’s confidence that their meal will be prepared safely⁴.

³ (Marra, et al., 2017)
⁴ (Begen, et al., 2016)
To provide a safe and enjoyable dining experience, operators are encouraged to implement the following practices:

- Provide a list of menu items and their ingredients for food workers to study so they are well-prepared at the point of sale. Keep the information somewhere it can be easily accessed and used frequently.
- Conduct training for front-of-the-house and back-of-the-house employees on major food allergens and cross-contact prevention. Training is essential to preventing unintended food allergen exposure.
- Appoint at least one team member or manager per shift to respond to customer requests and questions about food allergens. That team member may be a manager or person in charge5.

Additional Notifications
Many food establishments provide information regarding major food allergens in places other than menu (Appendix B.2). These notifications can be very effective when the information provided is specific and assists consumers in making informed decisions.

Depending on the specific food operation, menu, and workflow, an operator may consider using these additional methods for informing consumers about the presence of major food allergens in menu items:

- For operations that emphasize major allergens as key menu items (e.g., bakery or seafood restaurant), add a notification in a highly visible area, such as on or near the entrance, informing consumers of the prevalence of that specific allergen.
- When contact with a major food allergen is unavoidable (e.g., french fries prepared in the same fryer as breaded [wheat-containing] items), use counter cards, table-talkers or signs at the point of sale to inform consumers.
- Static clings on display cases provide major food allergen information in customer view. Tags or tents next to food items also work well.

Conclusion
When food-allergic customers feel confident and well-informed about their food choices, they are more willing to purchase—and they often bring friends and family along! Food operators who employ any combination of practices described in this document are making a business decision that will positively impact public health while simultaneously growing their customer base.

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5 (Radke, et al., 2016)
Food Allergen Notifications: A Guidance for Industry

APPENDIX

A) Food Allergens Icons
Recommendations from this guidance include the use of food allergen icons. While there is currently no uniform set of icons to represent the major food allergens identified by the FDA, there are several vector sets available for download online. The following options are available for commercial use.

1. International Association for Food Protection (IAFP) Food Allergen Icons
2. StateFoodSafety Allergen Icons
3. Erudus Food Allergy Icons

B) Allergens Committee Notification Workgroup Surveys
In preparation for the development of this guidance document, the Notification Workgroup of the CFP Allergens Committee conducted two surveys: one to be completed by operators of licensed food establishments (“Industry Survey”) and the second to be completed by food-allergic consumers and their family members and/or caregivers (“Consumer Survey”). These surveys were conducted during April and May 2019 by food operators and consumers in the United States.

1. Consumer Survey

Consumer Survey Overview
In May 2019, the Allergens Notification Workgroup created a survey to solicit the opinions of food-allergic consumers and their family members and caregivers. The survey was distributed to CFP members and to email directory recipients of Food Allergy Research and Education (FARE) and Food Allergy and Anaphylaxis Connection Team (FAACT). The survey garnered 788 responses from individuals across 49 US states.

Consumer Survey Summary of Responses
• More than 90% of respondents are dealing with food allergies or intolerances.
• The majority of respondents prefer:
  o A combination of written and verbal notifications regarding major food allergens;
  o Menus with major food allergen ingredients listed.
• A significant number of respondents requested cross-contact prevention information to be provided by food establishments claiming to be able to accommodate an allergen-free request.
• There was a consensus among respondents for:
  o Easy-to-recognize major food allergen icons;
  o Major food allergens to be listed directly near menu items rather than in a separate grid of all menu items.
2. Industry Survey

Industry Survey Overview
A survey was sent out to industry regarding allergen notification in order to assess the following: current methods utilized to notify consumers of allergens present in unpackaged food; challenges associated with allergen notification; and to determine if there is a general consensus to provide a standard method for allergen notification across the food service industry.

The survey was distributed to the CFP industry caucus members and Florida Restaurant and Lodging Association members. A total of 72 individuals/organizations responded to the survey. Responses were received from individuals in the grocery and restaurant sectors.

Industry Survey Summary of Responses
- Of industry respondents, 77% provide written information regarding major food allergens to consumers. This information is provided through a variety of means (menus, pamphlets, table tents, websites, smartphone apps, posters, scale labels, etc.). Many of the respondents use more than one method to provide the information. Of the remaining 23% of the survey respondents, the majority provide verbal information when asked by a customer.
- Of those that provide written information, 13% utilize symbols to identify major food allergens.
- Among respondents, 88% share information verbally when a customer asks about allergens, whereas 12% reported that the server takes a proactive approach and asks the customer if they have a food allergy prior to placing an order.
- In an open-ended survey question, respondents identified several challenges to notifying consumers of major food allergens, including:
  - Employee Training
  - Limited space on labels to provide full details
  - Customer understanding of challenges and requirements
- The majority of the respondents agree that a standard method of allergen notification should be utilized by establishments that serve prepared food that is not pre-packaged.

C) References


<table>
<thead>
<tr>
<th>Data Set</th>
<th>Year</th>
<th>Author Affiliation</th>
<th>Study Population</th>
<th>Report Title</th>
<th>Link</th>
<th>Summary</th>
<th>Conclusions related to training</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2018</td>
<td>Virginia Polytechnic Institute and State University</td>
<td>Food Service Industry</td>
<td>Food Allergy Awareness Training for the Food Service Industry by Virginia Polytech</td>
<td><a href="https://vtechworks.lib.vt.edu/bitstream/handle/10919/82732/Stoneman-MALS%20Project%20and%20Report%20Final%20April%202018.pdf?sequence=1&amp;isAllowed=y">https://vtechworks.lib.vt.edu/bitstream/handle/10919/82732/Stoneman-MALS%20Project%20and%20Report%20Final%20April%202018.pdf?sequence=1&amp;isAllowed=y</a></td>
<td>This study was conducted in southwest Virginia to determine if an instructor-led food allergy training program specifically designed for foodservice workers could produce an increase in knowledge and potentially change behavior to minimize the risk of food allergy reactions in food service establishments. Virginia Polytech Institute survey on effectiveness of training on knowledge (short term, they recognize the need to go further out) is also interesting, just published last March.</td>
<td>93 people trained: 97% of participants had an increase in knowledge, 98% felt they gained new ideas to implement, and 100% indicated they would recommend this training to others in the industry. Additional studies should assess the long-term effect on knowledge and behavior.</td>
</tr>
<tr>
<td>2</td>
<td>2018</td>
<td>Ryerson University</td>
<td>Restaurants and Food Service</td>
<td>A systematic review and meta-regression of the knowledge, practices, and training of restaurant and food service personnel toward food allergies and Celiac disease</td>
<td><a href="https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0203496">https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0203496</a></td>
<td>A systematic review to identify and characterize all published research on the prevalence of food allergy and celiac disease knowledge, practices, and training among restaurant and food service personnel. 38 relevant studies were identified with 50% being conducted in the United States. Key knowledge and practice gaps were identified that could be targeted by future training programs. Research gaps were also identified, including a need for more experimental studies to evaluate food allergy and CD training interventions.</td>
<td>Participants generally had a higher knowledge, self-efficacy, and use of practices related to preparing and serving allergen-free meals compared to food allergy emergency response. Participants’ reported use of various risk prevention and response practices was generally low. Most participants across studies had not received prior food allergy training (median prevalence of 65% across 12 studies). Key knowledge and practice gaps were identified that could be targeted by future training programs. Research gaps were also identified, including a need for more experimental studies to evaluate food allergy and CD training interventions.</td>
</tr>
<tr>
<td>Year</td>
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<td></td>
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<tr>
<td>2016</td>
<td>CDC</td>
<td>Restaurants</td>
<td>EHS-Net (that's also the CDC) Report</td>
<td><a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5321626/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5321626/</a></td>
<td>This publication is based on data collected and provided by CDC EHS-Net, which is supported by a CDC grant award funded under CDC-RFA-EH05-013. Knowledge and attitudes of all groups were higher at restaurants that had a specific person to answer food allergy questions or a plan for answering questions from customers. Food allergy training was not associated with knowledge but was associated with attitude of managers and servers.</td>
<td></td>
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<tr>
<td>2016</td>
<td>CDC</td>
<td>Restaurants</td>
<td>CDC Report simple conclusions in 2 pages</td>
<td><a href="https://www.cdc.gov/nceh/ehs/ehsnet/plain_language/food-allergies.pdf">https://www.cdc.gov/nceh/ehs/ehsnet/plain_language/food-allergies.pdf</a></td>
<td>Simple conclusions from the CDC study produced by the CDC</td>
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<tr>
<td>2017</td>
<td>CDC</td>
<td>Restaurants</td>
<td>Restaurant Food Allergy Practices — Six Selected Sites, United States, 2014</td>
<td><a href="https://www.cdc.gov/mmwr/volumes/66/wr/mm6615a2.htm">https://www.cdc.gov/mmwr/volumes/66/wr/mm6615a2.htm</a></td>
<td>More of the hard facts from the CDC survey MMWR Report of EHS-Net data presented in 2016 CDC publication below. 278 restaurants at 6 sites: 44% of managers, 41% of food workers, and 33% of servers reported receiving food allergy training.</td>
<td></td>
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</tr>
<tr>
<td>2017</td>
<td>Australian Society of Clinical Immunology and Allergy</td>
<td>Food Service Industry</td>
<td>P53: Addressing food allergy in food service: The National Allergy Strategy Food Service Project</td>
<td><a href="https://onlinelibrary.wiley.com/doi/full/10.1111/imj.13578">https://onlinelibrary.wiley.com/doi/full/10.1111/imj.13578</a></td>
<td>Project aimed to identify education needs through a Food Service Forum for Food Allergy in Australia and New Zealand. Forum identified that a standardized, basic level online training course for food service staff should be developed. In addition, consumers should be educated about their responsibility for declaring their food allergy when eating out.</td>
<td></td>
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<tr>
<td>2017</td>
<td>University of North Texas</td>
<td>Restaurants</td>
<td>Restaurant servers' risk perceptions and risk communication-related behaviors when serving customers with food allergies in the U.S.</td>
<td><a href="https://www.sciencedirect.com/science/article/pii/S027843191730275X">https://www.sciencedirect.com/science/article/pii/S027843191730275X</a></td>
<td>Survey to explore perceived risk and risk communication related behaviors of restaurant servers when serving customers with food allergies in the U.S. 316 participants, split 50/50 between chain operated and independently owned restaurants. Results indicated that most servers lacked knowledge about food allergies and perceived that initiating communication and preventing allergic reactions were mostly the responsibility of the customer. Respondents who had received training had higher knowledge scores than those who had not. Only 46% of participants had received some type of food allergy training.</td>
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<td></td>
<td>Year</td>
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<td>Study Title</td>
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<td>6</td>
<td>2016</td>
<td>University of Pennsylvania</td>
<td>Restaurants - Food Allergy Management among restaurant workers in a large U.S. city</td>
<td>Food allergy management among restaurant workers in a large U.S. city</td>
<td><a href="https://www.sciencedirect.com/science/article/pii/S095671351530298X">https://www.sciencedirect.com/science/article/pii/S095671351530298X</a></td>
<td>Survey of quick-service Philadelphia restaurants regarding their adherence to 7 best practices to reduce food allergy adverse events. No restaurant employee used all 7 best practices, few respondents knew how to respond to anaphylaxis, improved training and review of policies is warranted.</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>2016</td>
<td>Iowa State University</td>
<td>University Foodservice</td>
<td>A mixed methods approach to examining food allergy accommodation efforts in colleges and universities</td>
<td><a href="https://lib.dr.iastate.edu/aeshm_pubs/121/">https://lib.dr.iastate.edu/aeshm_pubs/121/</a></td>
<td>Findings suggest variability in CU foodservice professionals’ approaches to accommodations, regardless of policy presence.</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>2016</td>
<td>Auburn University</td>
<td>Restaurants - Comparison of Food allergy policies and training between Alabama (AL) and National Restaurant Industry</td>
<td>Comparison of Food Allergy Policies and Training between Alabama (AL) and National Restaurant Industry</td>
<td><a href="https://www.tandfonline.com/doi/abs/10.1080/15428052.2016.1185071?journalCode=wcsc20">https://www.tandfonline.com/doi/abs/10.1080/15428052.2016.1185071?journalCode=wcsc20</a></td>
<td>Online questionnaires completed by 185 managerial staff (75 AL, 110 US). Managers viewed employees' lack of commitment and interest as barriers of training provision.</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>2016</td>
<td>Auburn University</td>
<td>Restaurants - Food Allergy knowledge and training among restaurant employees</td>
<td>Food allergy knowledge and training among restaurant employees</td>
<td><a href="https://www.sciencedirect.com/science/article/pii/S0278431916300627">https://www.sciencedirect.com/science/article/pii/S0278431916300627</a></td>
<td>Study investigated 229 restaurant employees’ food allergy knowledge, prior training, preferred characteristics of future training, and reasons for low interest in training. Many employees not trained (63%) but expressed interest in training. Participants who had been trained had a higher knowledge score. Preference for self-paced training with real world examples and simple language.</td>
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<tr>
<td>Year</td>
<td>Date</td>
<td>Institution</td>
<td>Title</td>
<td>URL</td>
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<tr>
<td>10</td>
<td>2016</td>
<td>University of Bath</td>
<td>Consumer Preferences for Written and Oral Information about Allergens When Eating Out</td>
<td><a href="https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0156073">https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0156073</a></td>
<td>Interviews with food allergic/intolerant adults and parents/caregivers of food allergic/intolerant children to identify consumer preferences for written and/or verbal allergen information when eating out or ordering takeout food. Overwhelmingly, written information was favored in the first instance but credible personal/verbal communication was highly valued and essential to a good eating out experience. When written information is lacking, verbal reliability is more in doubt. Conclusion—Understanding the subtle negotiations and difficulties encountered by FA/FIs when eating out can serve as a guide for legislators and food providers; by encouraging provision of clear written and verbal allergen information, and training of proactive, allergen-aware staff. This, in tandem with legal requirements for allergen information provision, paves the way for FA/FIs to feel more confident in eating out choices; and to experience improved eating out experiences.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>2015</td>
<td>Auburn University</td>
<td>Restaurants - Food allergy knowledge, attitudes, and preparedness among restaurant managerial staff</td>
<td><a href="https://www.tandfonline.com/doi/abs/10.1080/15378020.2015.1093452?journalCode=wfbr20">https://www.tandfonline.com/doi/abs/10.1080/15378020.2015.1093452?journalCode=wfbr20</a></td>
<td>Survey of 110 restaurant managers to investigate food allergy knowledge, awareness, and preparedness. 69% of managers surveyed have provided employee food allergy training. Identified employee lack of commitment and time constraints as training barriers</td>
<td></td>
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<tr>
<td>11.5</td>
<td>2014</td>
<td>Kansas State University</td>
<td>Child Nutrition professionals</td>
<td>A Focus Group Study of Child Nutrition Professionals’ Attitudes about Food Allergies and Current Training Practices</td>
<td><a href="https://schoolnutrition.org/5--News-and-Publications/4-The-Journal-of-Child-Nutrition-andManagement/Spring-2014/Volume-38,-Issue-1,-Spring-2014---Lee,-Kwon,-Sauer/">https://schoolnutrition.org/5--News-and-Publications/4-The-Journal-of-Child-Nutrition-andManagement/Spring-2014/Volume-38,-Issue-1,-Spring-2014---Lee,-Kwon,-Sauer/</a></td>
<td>This study conducted focus groups that explored Child Nutrition Professionals’ attitudes (in Midwestern States) about food allergies, current practices related to food allergy training, and operational issues related to training in school foodservice operations. Participants felt that the prevalence and types of food allergies affecting school nutrition programs have increased in recent years. They also felt that communicating with other stakeholders and verifying physicians’ recommendations regarding food allergies can be difficult. Participants agreed that training could improve food allergy knowledge and awareness of their employees and improve safety of children with food allergies. However, only a few reported providing specific food allergy training for employees. Cost, scheduling difficulties, and time constraints were identified as barriers to providing food allergy training. Participants preferred having credentialed professionals to conduct employee food allergy training. Support from school administrators and witnessing a food allergic reaction in the cafeteria would trigger a decision to initiate food allergy training.</td>
<td></td>
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<tr>
<td>12</td>
<td>2013</td>
<td>Iowa State University</td>
<td>University Foodservice - Food Allergy Knowledge, attitudes, practices, and training of foodservice workers at a university foodservice operation in the Midwestern United States</td>
<td>Food Allergy Knowledge, attitudes, practices, and training of foodservice workers at a university foodservice operation in the Midwestern United States</td>
<td>193 participants completed a paper-based questionnaire at one large university to assess food allergy knowledge, attitudes, practices, and training among university foodservice employees. Food allergy training was not provided to 69-79% of respondents but was perceived to be important. Development of training and appropriate policies and procedures is needed. Significant differences between student and non-student employees.</td>
<td></td>
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<tr>
<td>13</td>
<td>2013</td>
<td>University of Houston</td>
<td>Retail Delis - Identifying baseline food safety training practices for retail delis using the Delphi expert consensus method</td>
<td>Identifying baseline food safety training practices for retail delis using the Delphi expert consensus method</td>
<td>3 round Delphi technique used to screen food safety objectives overall. Goal of the study was to identify baseline food safety training objectives that should be included in a new deli employee's food safety training program.</td>
<td>Food allergies were identified as a food safety objective that should be included in deli employee training. None of the current online food safety training materials address deli specific content.</td>
<td></td>
</tr>
</tbody>
</table>
1. Does your brand have its own food allergy training class?
   - 3 Yes
   - 7 No

2. Does your brand believe you teach enough about food allergies within your food safety program such as a food manager or food handler class?
   - 6 Yes
   - 3 No
   - 1 N/A

3. Have you used an allergy training class by a 3rd party?
   - 4 Yes
   - 6 No

4. If YES than which training class have you used? (Check any/all that apply)

<table>
<thead>
<tr>
<th>Training Program</th>
<th>Yes</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>AllerTrain or AllerTrain Lite (MenuTrinfo)</td>
<td>1</td>
<td>25.0%</td>
</tr>
<tr>
<td>Allergen or Allergy Awareness (TAP, Always Food Safe or A Plus)</td>
<td>0</td>
<td>0.0%</td>
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<tr>
<td>Basics of Food Allergy Training (Diversys)</td>
<td>0</td>
<td>0.0%</td>
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<tr>
<td>Food Allergen (NRA)</td>
<td>2</td>
<td>50.0%</td>
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<tr>
<td>Food Allergen Training Program (Institute of Food Safety)</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Food Safety Allergen (State Food Safety)</td>
<td>1</td>
<td>25.0%</td>
</tr>
<tr>
<td>Total</td>
<td>4</td>
<td>100%</td>
</tr>
</tbody>
</table>

5. Any additional comments about food allergy training classes?
   - FARRP, FARE
   - I’ve always wondered why there was a need for a separate allergen training course. Why not update the Manager certification and food handler courses to contain sufficient allergen training rather than create separate courses.
   - I strongly believe that while there should be better allergen communication be that labeling or verbal communication at the point of sale I strongly feel the consumer should have the responsibility to educate themselves and make responsible decisions when choosing foods to eat. In other words.. consumer allergen classes as well.
   - Our goal is to get every PIC certified.
   - We have developed our own Allergen Training Program that focuses heavily on the allergens we have within our operation. The training program is required for all employees.
CFP Allergen Notification Sub-Committee

Consumer Survey Summary

June 7, 2019
Agenda

➢ Background
➢ Objective / CFP Allergen Committee Charges
➢ Executive Summary
➢ Demographics
➢ Food Allergens
➢ Allergen Notification Preference
The Conference for Food Protection (CFP) is a non-profit organization which originated in 1971. It was created to provide a formal process whereby members of industry, regulatory, academia, consumer, and professional organizations are afforded equal input in the development and/or modification of food safety guidance. Such guidance is incorporated into food safety laws and regulations at all levels of government throughout the United States.

The Allergen Notification Sub-Committee solicited the opinion of consumers in May 2019 in regard to consumer preferences regarding notifications of food allergens in retail food establishments.

Based on consumer feedback, the responses were reviewed and recommendations will be made during the 2020 biennial CFP meeting.

Survey results: https://www.surveymonkey.com/results/SM-2LGT2YK6V/
CFP Allergen Committee, 2018-20 Charges

- Review Issues 2018-I-015, 2018-II-007, 2018-II-008 and their original submitted. Recommended Solution, including but not limited to:
  - Evaluation of major food allergen disclaimers in retail food establishments.
  - Development of methodology for retail food establishments to notify consumers when menu items contain major food allergens.
  - Determining if any additional staff training for food allergen awareness is needed
  - Identifying any supporting research or evidence that supports recommendations.

- Recommend changes to the Food Code that support retail food establishments in their efforts to protect consumers with major food allergens.

- Report back findings and recommendations to the 2020 Biennial Meeting of the Conference for Food Protection.
Executive Summary

➢ 788 respondents (consumers) completed the survey across US 49 states

➢ Over 90% respondents are dealing with food allergies or intolerance
  – >90% responded that food allergen menus are very to extremely important to have in retail food establishment for those suffering with food allergies vs >60% for those without allergies
  – Similarly, availability of online food allergen menus in food retail establishment are very to extremely important to have for those suffering with food allergies

➢ Type of food allergen notification
  – Majority prefer combination of written and verbal food allergen notification
  – Majority prefer allergen menu to include ingredients with major allergens listed
  – Significant amount of respondents requested cross-contact risk be listed as well (i.e. cooking oil or equipment processing cross contamination risk)
  – Consensus is to recommend a set of easy to recognize major food allergen icon to represent the food allergen for consistency
  – Consensus is to list allergen information next to menu for easy reference; avoid big or long table to trace the allergen information
Most Preferred Food Allergen Notification (Example)

Food Item
List ingredients: and/or list allergen icon:

Poster
Please inform us if anyone in your party has FOOD ALLERGY before ordering
788
Total Responses

Date Created: Tuesday, April 30, 2019

Complete Responses: 518
Q1: What is your ethnicity? (Please select all that apply.)

Answered: 788    Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
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<tbody>
<tr>
<td>American Indian or Alaskan Native</td>
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<tr>
<td>Asian or Pacific Islander</td>
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<td>Black or African American</td>
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<td>Hispanic or Latino</td>
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<tr>
<td>White / Caucasian</td>
<td>673</td>
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<tr>
<td>Prefer not to answer</td>
<td>34</td>
</tr>
<tr>
<td>Other (please specify)</td>
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Total Respondents: 788
Q2: What is your gender?

Answered: 779   Skipped: 9

<table>
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<th>ANSWER CHOICES</th>
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<tbody>
<tr>
<td>Female</td>
<td>89.73%</td>
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<td>Male</td>
<td>10.27%</td>
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<td>TOTAL</td>
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</table>
Q3: What is your age?

Answered: 786    Skipped: 2

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
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<tbody>
<tr>
<td>18 to 24</td>
<td>4.58%</td>
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<tr>
<td>25 to 34</td>
<td>17.68%</td>
</tr>
<tr>
<td>35 to 44</td>
<td>41.73%</td>
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<tr>
<td>45 to 54</td>
<td>26.46%</td>
</tr>
<tr>
<td>55 to 64</td>
<td>7.51%</td>
</tr>
<tr>
<td>65 to 74</td>
<td>1.78%</td>
</tr>
<tr>
<td>75 or older</td>
<td>0.25%</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>786</strong></td>
</tr>
</tbody>
</table>
Q4: What state do you reside in?

Answered: 776  Skipped: 12

➢ Great participation across 49 states, except from Hawaii
Q5: Do you or does anyone in your home have food allergies or intolerance?

Answered: 786    Skipped: 2

- **Yes**: 90.46% (711 responses)
- **No**: 9.54% (75 responses)

**Total**: 786 responses
Q6: Who in your home has food allergies/intolerance?

Answered: 755    Skipped: 33

- **You**: 18.15% (137 responses)
- **Dependent(s) living in your household**: 71.39% (539 responses)
- **Individuals you order for or purchase food for in a professional capacity**: 1.32% (10 responses)
- **None (no one in my circle of care has a food allergy)**: 9.14% (90 responses)

**Total responses**: 755
Ages of those in care with food allergies?
Q8: How important is having food allergen disclaimers/notifications in retail food establishments to you?

Answered: 788    Skipped: 0
Q8: How important is having food allergen disclaimers/notifications in retail food establishments to you?

➢ For those >90% respondent have food allergies; they responded that food allergen notification is very/extremely important; in contrary, those without food allergies, their responses vary greatly.
Q9: Thinking of the food-allergic individuals within your circle of care, select which food allergies they experience:

Answered: 711    Skipped: 77

- **Peanuts**: 68.92% (490 responses)
- **Tree Nuts**: 62.87% (447 responses)
- **Milk**: 37.83% (269 responses)
- **Soy**: 16.17% (115 responses)
- **Egg**: 39.94% (284 responses)
- **Wheat**: 18.28% (130 responses)
- **Shellfish**: 21.94% (156 responses)
- **Fish**: 10.41% (74 responses)

Total Respondents: 711
Q9: List other food allergies within your circle of care:

Sesame and gluten allergies / intolerance are the leading food allergies outside of the BIG 8 major allergens.
Q9: List other food allergies within your circle of care:
Q9: List other food allergies within your circle of care:

- Gluten
- Sesame
- Strawberries
- Tofu
- Quinoa
- Soy
- Beef
- Pork
- Peanuts
- Seafood
- Eggs
- Mango
- Other legumes, milk
- Coastal fish
- Mushrooms
- Mustard
- Peaches
- Poppy seeds
- Sesame seeds
- Sunflower seeds
- Tree nuts
- Wheat
Q9: List other food allergies within your circle of care:
**Q10-Q15: From pictures, please rate effectiveness and ease of use of allergen notification on table menus A, B & C (1=worst, 10 = best)**

Answered: 677    Skipped: 111

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>5.8 ± 2.7</td>
<td>5.3 ± 2.7</td>
<td>Table too busy, hard to understand symbol, need a legend</td>
</tr>
<tr>
<td>B</td>
<td>5.0 ± 2.8</td>
<td>5.0 ± 2.8</td>
<td>Like the icon in front/beginning of menu, need a legend</td>
</tr>
<tr>
<td>C</td>
<td>6.0 ± 2.4</td>
<td>6.0 ± 2.5</td>
<td>Standardized symbol is a must, easiest to read</td>
</tr>
</tbody>
</table>
Q16-Q21: From pictures, please rate effectiveness and ease of use of allergen notification on table menus D, E & F (1=worst, 10 = best)

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>7.4 ± 2.4</td>
<td>7.3 ± 2.5</td>
<td>Too busy to read; like it clearly stated; don’t like “may contain”</td>
</tr>
<tr>
<td>E</td>
<td>7.3 ± 2.3</td>
<td>7.3 ± 2.4</td>
<td>Like the dots; hard to scan by column; like the table approach</td>
</tr>
<tr>
<td>F</td>
<td>7.0 ± 2.7</td>
<td>6.6 ± 2.8</td>
<td>Easy to read; need to bold out allergen information</td>
</tr>
</tbody>
</table>
Q22-Q27: From pictures, please rate effectiveness and ease of use of allergen notification on table menus G, H & I (1=worst, 10 = best)

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments – need cross contamination information</th>
</tr>
</thead>
<tbody>
<tr>
<td>G</td>
<td>6.3 ± 2.3</td>
<td>6.1 ± 2.4</td>
<td>Allergen notification lost with nutritional info</td>
</tr>
<tr>
<td>H</td>
<td>6.7 ± 2.7</td>
<td>6.8 ± 2.7</td>
<td>Easy to follow; not enough information</td>
</tr>
<tr>
<td>I</td>
<td>6.8 ± 2.3</td>
<td>6.7 ± 2.3</td>
<td>Like the color to differentiate nutrition from allergen, too small</td>
</tr>
</tbody>
</table>
### Q28-Q33: From pictures, please rate effectiveness and ease of use of allergen notification on table menus J, K & L (1=worst, 10 = best)

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments – <strong>would be nice to include actual ingredients</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>J</td>
<td>7.0 ± 2.2</td>
<td>6.9 ± 2.2</td>
<td>Comprehensive; hard to scan if it’s a long list, need sesame info</td>
</tr>
<tr>
<td>K</td>
<td>6.5 ± 2.2</td>
<td>6.5 ± 2.2</td>
<td>Need bolder lines; glad it includes sesame</td>
</tr>
<tr>
<td>L</td>
<td>6.2 ± 2.3</td>
<td>6.1 ± 2.4</td>
<td>Too many columns to follow; glad it includes nitrites/sulfites</td>
</tr>
</tbody>
</table>
Q34-Q39: From pictures, please rate effectiveness and ease of use of allergen notification on online menus M, N & O (1 = worst, 10 = best)

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>M</td>
<td>5.9 ± 2.4</td>
<td>5.7 ± 2.4</td>
<td>Allergen information is buried, should be listed on top</td>
</tr>
<tr>
<td>N</td>
<td>7.5 ± 2.3</td>
<td>7.6 ± 2.3</td>
<td>Easy and simple</td>
</tr>
<tr>
<td>O</td>
<td>6.3 ± 3.0</td>
<td>5.6 ± 2.9</td>
<td>Like “may contain” info; too many words to sort through</td>
</tr>
</tbody>
</table>
Again, responses vary greatly. Those with food allergies, responded that availability of an online allergen menu is very/extremely important.
Q41-Q46: From pictures, please rate effectiveness and ease of use of allergen notification on online menus P, Q & R (1=worst, 10 = best)

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments – would be nice to include ingredients</th>
</tr>
</thead>
<tbody>
<tr>
<td>P</td>
<td>6.9 ± 2.6</td>
<td>6.8 ± 2.6</td>
<td>Would be nice to include equipment oil and cross-contamination</td>
</tr>
<tr>
<td>Q</td>
<td>7.1 ± 2.4</td>
<td>7.2 ± 2.3</td>
<td>Would be nice to include disclaimer; dislike “I agree to...” (risk?)</td>
</tr>
<tr>
<td>R</td>
<td>6.9 ± 2.4</td>
<td>7.1 ± 2.3</td>
<td>Prefer ingredient listed for those with allergens outside of big8</td>
</tr>
</tbody>
</table>
Q47: How important is a customize-able online allergen menu to you?

➢ Again, responses vary greatly. Those with food allergies, responded that availability of a customizable online allergen menu is very/extremely important.
Q48-Q53: From pictures, please rate effectiveness and ease of use of allergen notification on posters S, T & U (1=worst, 10 = best)

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments – would be nice to include ingredients</th>
</tr>
</thead>
<tbody>
<tr>
<td>S</td>
<td>5.7 ± 2.6</td>
<td>5.7 ± 2.6</td>
<td>Nice to have chef included! Worried about relaying correct information</td>
</tr>
<tr>
<td>T</td>
<td>7.3 ± 2.4</td>
<td>7.3 ± 2.4</td>
<td>Greatly dependent on staff knowledge and training</td>
</tr>
<tr>
<td>U</td>
<td>6.4 ± 2.5</td>
<td>6.4 ± 2.5</td>
<td>Too informal, still greatly dependent on staff knowledge and training</td>
</tr>
</tbody>
</table>
**Q54-Q59: From pictures, please rate effectiveness and ease of use of allergen icons V, W & X (1=worst, 10 = best)**

<table>
<thead>
<tr>
<th>Menu</th>
<th>Effectiveness</th>
<th>Ease of Use</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>V</td>
<td>6.5 ± 2.5</td>
<td>6.5 ± 2.4</td>
<td>Triangle mimic hazard signage; prefer colors; easy to mix up</td>
</tr>
<tr>
<td>W</td>
<td>6.6 ± 2.5</td>
<td>6.6 ± 2.5</td>
<td>Hard to identify food; too many icon</td>
</tr>
<tr>
<td>X</td>
<td>7.8 ± 2.0</td>
<td>7.9 ± 2.0</td>
<td>Clear, easy to read; too colorful; make sure words accompany icon</td>
</tr>
</tbody>
</table>
Q60: Which of the allergen notification menus above do you prefer?

>70% prefer full text as icon was difficult to distinguish unless a legend is provided
Q61: Which of the allergen notification menus above do you prefer?

>60% prefer to include only the major food allergen information be included in notification.
Q62: How do you prefer to be notified of food allergens in retail establishments?

➢ Majority prefer combination of written and verbal notification
Contributor & Survey Partnership

**Contributor:**
- **Elaine Money**, Principal Regulatory Specialist, Ecolab®
- **Dee Dee Vicino**, Chief Executive Officer, AllerCuisine™
- **Archer Campbell**, Environmental Health Technical Consultant, VA Thomas Jefferson Health District
- **Todd Pelech**, Public Health Sanitarian, Arizona Department of Health Services
- **Crystine Sylvis**, Environmental Health Supervisor, Southern Nevada Health District
- **Emilee Follett**, VP Product Development, StateFood Safety

**In Partnership with and special thanks to:**
- **Jon Hoffman**, Associate Director of Advocacy, FARE® (Food Allergy Research & Education)
- **Chef Keith Norman**, Food Safety Manager/Asst Executive Chef, South Point Hotel Casino and Spa
Q1 What type of food establishment do you represent?

Answered: 51   Skipped: 21

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Restaurant</td>
<td>41.18%</td>
</tr>
<tr>
<td>Deli</td>
<td>0.00%</td>
</tr>
<tr>
<td>Food Truck</td>
<td>0.00%</td>
</tr>
<tr>
<td>Retail Store (e.g. Grocery, Convenience, Deli)</td>
<td>58.82%</td>
</tr>
<tr>
<td>School</td>
<td>0.00%</td>
</tr>
<tr>
<td>Nursing Home/Hospital/Assisted Living Facility</td>
<td>0.00%</td>
</tr>
<tr>
<td>Other</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
Q2 Do you provide written information regarding allergens to your customers on things such as a menu/menu board, website, pamphlet, etc.?

**Answered:** 66  **Skipped:** 6

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>77.27%</td>
</tr>
<tr>
<td>No</td>
<td>22.73%</td>
</tr>
<tr>
<td>Both written and verbal</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>100%</td>
</tr>
</tbody>
</table>
Q3 Where do you use written communication to provide food allergen information to your customers. (List all below)

Answered: 47   Skipped: 25

**Answer Choices**

<table>
<thead>
<tr>
<th>Choice</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Menu</td>
<td>36.17%</td>
</tr>
<tr>
<td>Pamphlet</td>
<td>34.04%</td>
</tr>
<tr>
<td>Table Tents</td>
<td>14.89%</td>
</tr>
<tr>
<td>Website</td>
<td>59.57%</td>
</tr>
<tr>
<td>Smartphone App</td>
<td>25.53%</td>
</tr>
<tr>
<td>Other (please specify)</td>
<td>51.06%</td>
</tr>
</tbody>
</table>

Total Respondents: 47
Q4 Do you utilize symbols for the various allergens?

Answered: 47  Skipped: 25

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>27.66%</td>
</tr>
<tr>
<td>No</td>
<td>72.34%</td>
</tr>
<tr>
<td>kkkk</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
Q5 Do you provide verbal information regarding allergens to your customers?

Answered: 59  Skipped: 13

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>64.41%</td>
</tr>
<tr>
<td>No</td>
<td>35.59%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
Q6 In which of the following situations do you verbally share food allergen information?

Answered: 33  Skipped: 39

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>When a customer asks about allergens</td>
<td>87.88%</td>
</tr>
<tr>
<td>We ask the customer before they order if they have a food allergy and need more information</td>
<td>12.12%</td>
</tr>
<tr>
<td>Comments</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
Q7 What types of challenges do you encounter with food allergen notification?

Answered: 47    Skipped: 25
Q8 How much do you agree or disagree that a standard method for allergen notification should be utilized by establishments that use prepared food (that’s not pre-packaged)?

Answered: 51  Skipped: 21

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 = Strongly Agree</td>
<td>35.29%</td>
</tr>
<tr>
<td>4 = Somewhat Agree</td>
<td>41.18%</td>
</tr>
<tr>
<td>3 = Nether Agree Nor Disagree</td>
<td>13.73%</td>
</tr>
<tr>
<td>2 = Somewhat Disagree</td>
<td>7.84%</td>
</tr>
<tr>
<td>1= Strongly Disagree</td>
<td>1.96%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
Q9 Please let us know why you selected your response

Answered: 51    Skipped: 21
Restaurant servers’ risk perceptions and risk communication-related behaviors when serving customers with food allergies in the U.S.

Han Wen,a,b Junhee Kwonb

a University of North Texas, Denton, TX, USA b Kansas State University, Manhattan, KS, USA

Article history: Received 14 April 2016 Received in revised form 30 March 2017 Accepted 31 March 2017
Keywords: Food allergy Restaurant servers Risk perception Risk communication

Abstract
Communication between and among customers with food allergies and foodservice staff has become a concern in the restaurant industry. The purpose of this research was to explore the perceived risks and risk communication-related behaviors of restaurant servers when serving customers with food allergies in the U.S. An online survey instrument was developed based on interviews with full service restaurant managers, pilot-tested, and distributed through an online survey research firm. The results indicated that most servers lacked knowledge about food allergies and perceived that initiating communication and preventing allergic reactions were mostly the responsibilities of customers with food allergies. Servers’ risk reduction and communication behaviors were affected by their perceived severity of food allergy reactions, previous training, sources of media exposure, and the perceived responsibilities of preventing food allergy reactions. Restauranters and foodservice educators may use these findings to develop training and strategies for food allergy risk communication in the restaurant industry.

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1. Introduction
A food allergy is “an adverse health effect arising from a specific immune response that occurs reproducibly on exposure to a given food” (Boyce et al., 2010, p. 88). Food allergy reactions range from mild to severe and usually appear within the first two hours after the ingestion of allergens (Chafen et al., 2010). Anaphylaxis, one of the most severe food allergy responses, can result in circulatory collapse, coma, and even death (Mandell et al., 2005).

Food allergies are prevalent in the United States (U.S.), affect- ing about 9 million adults (4% of the U.S. adult population) and 6 million children (8% of the U.S. children ≤18 years) (Branum and Lukacs, 2008; De Bliek et al., 2007; Food Allergy Research and Education, 2016). The Centers for Disease Control and Prevention (CDC) estimates an increased number of anaphylaxis caused by food allergies (Centers for Disease Control and Prevention, 2011). Food allergy reactions account for nearly 200,000 emergency room visits, approximately one every three minutes (Clark et al., 2011) and 150–200 deaths each year (Sampson, 2003). Eggs, fish, milk, peanuts, soy, shellfish, tree nuts, and wheat are the “Big 8” food allergens, which have triggered more than 90% of the food allergy reactions in the U.S. (Sicherer et al., 2010). For the food manufactur- ing industry, the Food Allergen Labeling and Consumer Protection Act (FALCPA) of 2004 requires any ingredients or proteins derived from the “Big 8” food allergens to be disclosed on all food labels that are regulated by the U.S. Food and Drug Administration (FDA). However, for the restaurant industry, the Food Code (Food and Drug Administration, 2013) is the only federal level regula- tion related to the management of food allergies in restaurants. The Food Code states that the person in charge of a foodservice establishment should have knowledge about major food aller- gens, cross-contacts, and symptoms of food allergy reactions (Food and Drug Administration, 2013). The code also mandates that all establishments “ensure that employees are properly trained in food safety, including food allergy awareness as it relates to their assigned duties” (Food and Drug Administration, 2013, p. 31). These statements in the Food Code, however, lack practical guidelines for operations to follow in order to prevent food allergy reactions. Furthermore, food allergy legislation at the state level is limited only to Massachusetts, Michigan, Rhode Island, and Virginia, where legislation for the management of food allergies in restaurants are established (Food Allergy Research and Education, 2016).

About 33% of all the fatal food allergy reactions (n = 31) that occurred in the U.S. between 2001 and 2006 were triggered by foods prepared away from home (Bock et al., 2001, 2007; Wanich et al., 2008). The existence of hidden allergens and cross-contacts from food allergens were the most recognized causes of food allergy reactions in restaurants, followed by miscommunication between and among restaurant staff and customers with food aller- gies (Furlong et al., 2001; Kwon and Lee, 2012; Leftwich et al., 2011). Communication researchers have found that risk commu- nication plays an important role in controlling and preventing negative consequences (McComas, 2006; Parrott, 2004) such as food allergy reactions in restaurants. Establishing proper communi- cation between and among customers and foodservice employees may be one of the first and most important steps in preventing food allergy reactions in restaurants (Leftwich et al., 2011). Proper communication among stakeholders would initiate increased attention to food preparation and service staff when serving customers with food allergies. Although there are other food allergy-related pub- lications available, no research has been published regarding food allergy risk communication.

Therefore, the purpose of this study was to explore the perceived risks and risk reduction and communication-related behaviors of restaurant service staff when serving customers with food allergies in the U.S. The specific objectives were to examine the per- ceived risks of restaurant

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staff when serving consumers with food allergies, explore factors affecting restaurant service staff’s risk reduction and communication-related behaviors, and provide recommendations for the restaurant industry regarding food allergy risk communication strategies and training needs.

2. Literature review

2.1. Food allergies and the restaurant industry
Considering the fact that the population with food allergies is increasing in the U.S., it is important for restaurant staff to be fully informed about food allergies and ways to prevent allergic reactions (Mandabach et al., 2005). The benefits of accommodating consumers with food allergies include increased sales, customer appreciation, and customer loyalty (Kwon et al., 2013; Tsai, 2013). However, serving consumers with food allergies also poses challenges given the variety of food allergens present at restaurants (Abbot et al., 2007; Ahuja and Sicherer, 2007; Kronenberg, 2012).

Researchers found that restaurant staff lacked knowledge regarding food allergens in the menu, ways to prevent cross-contact, and the severity of food allergy reactions (Abbot et al., 2007). One study from the United Kingdom revealed that about 21% of the peanut-free meals that were prepared right after peanut-containing meals were contaminated with peanut or peanut protein (Leith et al., 2005). Researchers also found that restaurant employees’ confidence levels were high even though their knowledge about serving customers with food allergies was not adequate (Ahuja and Sicherer, 2007). Specifically, 70% of the respondents in this study felt that they could guarantee a safe meal, while 35% thought that frying heat could destroy allergens and 25% thought it was safe to remove allergens from a finished meal (Ahuja and Sicherer, 2007).

Researchers have revealed that most foodservice employees did not receive food allergy training (Ahuja and Sicherer, 2007; Choi and Rajagopal, 2013; Mandabach et al., 2005). If servers lack knowledge about food allergies, they may not be able to respond to questions and requests from customers with food allergies (Kronenberg, 2012). In addition, servers may incorrectly assume that an item is allergen-free if they are not aware of the hidden ingredients (Mandabach et al., 2005). The high cost of training, high labor turnover rate, time constraints, language barriers, the lack of interest in implementing food allergy training, and the lack of commitment from employees were identified as reasons why such training was not provided to restaurant employees (Abbot et al., 2007; Lee and Xu, 2014; Mandabach et al., 2005).

2.2. Dining experiences of customers with food allergies
Strict avoidance of food allergens and early recognition and response to allergic reactions are extremely important for individuals with food allergies to prevent fatal food allergy reactions (Food Allergy Research and Education, 2016; Sicherer and Teuber, 2004). To prevent potential food allergy reactions, customers with food allergies have used various strategies prior to and while dining out (Kwon and Lee, 2012; Kwon et al., 2013). For example, customers chose restaurants with which they were familiar and where they were known by the staff; avoided establishments and cuisines that are considered high-risk such as buffets or ethnic restaurants; and checked online menus, ingredients, and allergen information before dining out (Kwon et al., 2013; Leftwich et al., 2011).

Despite these prevention strategies, customers with food allergies have experienced communication challenges when dining out because some restaurant staff did not seem to have knowledge about food allergies, did not understand special requests, and were not aware of the severity of food allergy reactions (Kwon and Lee, 2012; Kwon et al., 2013). Because many customers with food allergies or parents of children with food allergies have perceived a lack of control in food preparation and service processes, they have felt anxiety or fear when dining in restaurants, especially when going to a restaurant for the first time (Kwon et al., 2013; Leftwich et al., 2011). Such anxiety and fear may also be due to a significant number of customers with food allergies experiencing allergic reactions after eating in restaurants (Bock et al., 2001, 2007; Wanich et al., 2008). In many of these food allergy reaction cases, customers believed that the food they ordered was safe (Sampson et al., 1992) and failed to notify restaurant staff about their food allergies (Mandabach et al., 2005).

Further, even though some restaurant operators or managers provide food allergy training with regard to identifying food allergens and preventing cross-contact, few of them have provided training about the proper communication between the front- and back-office employees or between restaurant employees and customers (Lee and Xu, 2014). Considering one of the major causes of food allergy reactions is the lack of proper communication between and among restaurant employees and customers with food allergies (Furlong et al., 2001; Kwon and Lee, 2012; Leftwich et al., 2011), there is a strong need for researchers to address this risk and promote interpersonal communication among restaurant staff and customers.

2.3. Food allergy risk perception and risk communication
Risk perception, which refers to an individual’s views regarding the risk involved in a particular situation (Schroeder et al., 2007), is a special concern in the food safety context. Food allergies pose one of the food safety risks that has been widely discussed lately through food and foodservice industries, as well as related consumer advocacy groups. As for the risk of food allergies in foodservice establishments, scholars contended that zero risk is not realistic or attainable (Kroes et al., 2000; Madsen et al., 2012). Risk perception, as part of the health behavior theories, includes different dimensions or determinants, such as perceived susceptibility and perceived severity (Brewer et al., 2007; Janmaimool and Watanabe, 2014). Perceived susceptibility refers to an individual’s subjective perception of the risk of contracting a hazard (Janz and Becker, 1984). Perceived severity refers to an individual’s feelings regarding the seriousness of contracting a hazard and reflects the extent of the harm a hazard would cause (Brewer et al., 2007; Janz and Becker, 1984). Risk perceptions can also be influenced by different
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Comparing the eating out experiences of consumers seeking to avoid different food allergens

Julie Barnett¹, Fiona M. Begen¹*, M. Hazel Gowland² and Jane S. Lucas³

Abstract

Background: Eating outside the home is challenging for consumers with food allergy (FA) and intolerance (FI) and lack of allergen information provision in eating out venues can lead to unnecessary restrictions. Following European legislation (2014) designed to improve allergen information provision, little is known about differences in information provision experienced by consumers seeking to avoid particular allergens, or how this impacts on their eating out experiences. This study compared the information provision that consumers with FA/FI to different allergens experience when eating out.

Methods: Using mixed methods, participants were recruited from across the UK and took part in self-report surveys or in-depth interviews. Surveys were completed by 232 participants avoiding either gluten (n = 66), nuts (peanuts/tree nuts) (n = 94), or milk (n = 74), and responses were subject to quantitative analyses. Interviews were carried out with 49 participants avoiding either gluten (n = 13), nuts (n = 14), milk (n = 13) or a combination of these allergens (n = 9), and analysed using the framework approach.

Results: Although general improvements in information provision following the legislation were reported, variations in provision between allergen groups led participants seeking to avoid milk to conclude that their dietary needs were less well-understood and seen as less important. These perceptions were reflected in a reluctance to involve eating out venue staff in deliberations about the potential for milk-free meal options.

Conclusions: The provision of visual indicators of the presence of milk and of staff trained in allergen-awareness would improve the eating out experiences of consumers seeking to avoid milk. Medical professions can play a key role in encouraging these patients to pursue their right to make enquiries about allergens in order to avoid accidental milk ingestion when eating out.

Keywords: Food allergy, Food intolerance, Allergen avoidance, Eating out, Information provision, Gluten, Peanuts / tree nuts, Milk

Background

Allergen avoidance is a key management strategy for food allergic (FA) and food intolerant (FI) individuals, and eating outside the home represents a particular risk of accidental allergen ingestion [1] where the provision of information regarding ingredients and food preparation is inadequate or insufficient [2]. Food allergies are caused by an abnormal immunological response to a food, whereas food intolerances have a non-immunological basis [3, 4]. As a general rule, allergic reactions occur very rapidly after ingestion and sometimes lead to immediately life threatening symptoms [5], whilst food intolerances have a delayed reaction and extremely rarely have life threatening symptoms although, like FA, they too can result in significant ill health and impaired quality of life [6]. Between 21 and 31% of accidental allergen ingestions occur when eating in restaurants, and 13–23% occur in other eating out settings such as the work-place or school canteens [7]. In cases of children suffering anaphylaxis to a known food allergen, over half of these occurred outside the home [8].

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EU legislation (EU Food Information for Consumer Regulation No. 1169/2011, (EU FIC)) introduced in December 2014 [9], requires food businesses providing and selling non-prepacked foods to provide allergen information relating to the inclusion of any of 14 specified food allergens (peanuts, tree nuts, milk, soya, mustard, lupin, eggs, fish, molluscs, crustaceans, cereals containing gluten, sesame seeds, celery, and sulphur dioxide at levels above 10 mg/kg, or 10 mg/litre) as ingredients in their foods. The legislation thus affects restaurants, takeaway establishments, food stalls, institutions including prisons and nursing homes, as well as workplace and school canteens. Allergen information can be provided in written or verbal form. Where verbal information is provided, written information must also be available to customers within the venue. Thus far however, there has been little consideration of how people’s eating out experiences - including the provision of allergen information – varies in relation to different allergens.

Given that adverse reactions can occur in response to any of these allergens, differences in the quality of information provided about them is important. Little work has considered the differential impact of seeking to avoid particular allergens or how experiences of seeking to avoid particular allergens vary. Although adherence to an allergen-free diet has been associated with poorer quality of life, and significant social and behavioural restrictions [10–14], literature tends to generalise across populations avoiding allergens [11, 15] or focus on one specific allergen grouping; most commonly avoidance of peanuts and/or tree nuts [16–18], or gluten in coeliac populations [19, 20]. Where studies have focused on the difficulties encountered by populations seeking to avoid ‘staple food’ allergens (milk, wheat, eggs) [21–23], no distinction has been made between allergens in order to assess any differences experienced between these groups. Where differences between allergen avoidance groups have been considered in parents of FA children, there was greater psychosocial impact on parents seeking to avoid milk or eggs on behalf of their child than for parents seeking to avoid other food allergens [24, 25].

As yet, the eating out experiences of populations seeking to avoid particular allergens has not been considered. In light of the EU FIC legislation, eating out venues are required to provide information about the content of each of the 14 allergens in their foods, and attention has recently turned to the adequacy of this information provision for each allergen. For example, online resources such as 'Guide to eating out with a food allergy' [26], show how well some eating out venues cater for customers avoiding a particular allergen by reporting the availability of allergen-free meals for each of the 14 allergens.

Evaluating the impact of the EU FIC legislation provided the opportunity to compare the information provision that customers with FA/FI experience in relation to different allergens when eating out. In order to investigate this, in a mixed methods study we conducted semi-structured interviews and self-report surveys with customers who avoided particular allergens (gluten, nuts: peanuts/tree nuts, or milk) following implementation of the legislation. We assessed differences between these groups based on their satisfaction with allergen information provision, and their preferences for written and verbal forms of information delivery.

Methods
Overview
As part of wider programme of longitudinal research into the eating out experiences of adults and parents/carers of children with FA/FI [27] prior to (2014) and following (2016) implementation of EU FIC legislation [28], we recruited participants from across the UK to take part in either (A) In-depth interviews in 2014 and 2016, or (B) Surveys in 2014 and/or 2016. Ethical approval was gained from the institution’s departmental ethics committee prior to recruitment (Ref: 14–055/16–146). The current paper reports findings relating to participants who reported avoiding gluten, nuts (peanuts and/or tree nuts) or milk in 2016 interviews or surveys. Interview findings from 2014 are reported elsewhere [2].

Online survey
Recruitment and study population
Survey participants were recruited from across the UK by a professional market research agency: Acumen Fieldwork-Medical (66%) and using the websites and mailing lists of three UK-based charities: Allergy UK (28%), Anaphylaxis Campaign (3%), Coeliac UK (3%). Between November and December 2016, 392 participants completed the survey. Of these, 188 (48%) had been recruited to complete a prior version of the survey in 2014 and returned to complete the 2016 survey, and 204 (52%) were recruited as new participants to complete the 2016 survey. Of the total 2016 survey population, 232 (59%) participants were included in analyses because they avoided either gluten, nuts or milk when eating out.

Online survey
Participants completed a screening questionnaire to ensure that they met the minimum requirements for inclusion in the study. The inclusion criteria were that participants aged over 18, or their child in the case of parents/caregivers: a) experienced reactions to one or more of the 14 allergens covered by the EU FIC legislation; b) ate out at, or ordered takeaway food from a restaurant, café, coffee shop, fast food outlet, or any other place where they can buy non-prepacked food; c) sought to avoid one or more of the 14 allergens covered by the
EU FIC legislation when eating out or ordering takeaway food; d) experienced one or more symptoms typically associated with IgE-mediated food allergy or non-IgE-mediated reactions (classified as food intolerance in this study). Survey results for participants seeking to avoid nuts (tree nuts and peanuts), gluten or milk are reported. Classification criteria are shown in Table 1.

**Survey content**
We designed an online survey relating to attitudes and behaviours when eating out specifically for the study. Survey design was informed by a literature review, discussions with support groups and interviews conducted in 2014, prior to EU FIC legislation [2]. Interviews were coded and analysed using the framework approach. Themes derived from these interviews were used as the basis for survey items, which were worded and sense-checked by the research team before being piloted with a small sample (n = 20) of participants. Survey subscales included: ‘Reliance on speaking to staff’; ‘Satisfaction with written information’; ‘Staff as an additional information source’; ‘Preference for separate allergen menu’; and two single items—‘Menu invites you to ask staff’ and ‘Sign invites you to ask staff’. All 2014 survey items were retained in the 2016 survey. Full details of subscale items and item reversals are shown in Table 2.

**Procedure**
Following provision of informed consent, participants meeting the inclusion criteria were routed to the survey for completion.

**Data analyses**
Statistical analyses were carried out using IBM SPSS Statistics (v22). Data was screened to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. The extent of missing data (less than 2%) and non-response patterns were assessed to see if missing items would impact on analyses (Little’s MCAR test (p > .05)). Missing values for items within subscales were imputed using expectation-maximization (EM) [29] and subscale reliabilities were calculated. Differences between allergen groups (gluten, nuts or milk) were analysed using mixed ANOVAs including ‘Adult/Parent’, ‘food allergy/intolerance’ as independent variables (IVs), and the four eating out subscales and two single-item questions as outcome variables. Post hoc analyses was carried out using Bonferroni procedure. A post hoc cut-off of p ≤ .05 was used, although post hoc tests approaching significance (p = .051 – p = .056) are also reported.

**In-depth interviews**

**Recruitment and population**
Full details of 2014 interview recruitment procedure, populations and results are reported elsewhere [2]. Of the 57 participants who completed interviews between June and July 2016, all had been recruited through a professional research agency (as above) and had completed previous interviews in 2014. Of the total interview population in 2016, 49 (86%) participants were included in analyses because they avoided gluten, nuts and/or milk when eating out.

**Procedure**
In-depth semi-structured interviews were carried out in participants’ homes following an interview protocol detailing questions and possible prompts (a copy of this interview protocol can be provided on request from the corresponding author). Each interview was audio-recorded with participants’ permission. Initial questions related to any changes that had occurred in returning participants’ lives; and in relation to their food allergy in particular. The interview then focused on participants’ recent eating out experiences and any changes in these, including their encounters with information about food allergens. They were asked for their reflections and evaluations of these changes, and about the impact of the legislation on allergen information provision in relation to their eating out experiences. Interviews lasted between 27 and 76 min.

**Analyses**
Interview recordings were transcribed verbatim and explored in detail using framework analysis [30]. Interviews

---

**Table 1** Allergy or intolerance classification criteria and allergy severity classification criteria

<table>
<thead>
<tr>
<th>Classification</th>
<th>Symptoms</th>
<th>Severity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ALLERGY:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Symptoms</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Associated</td>
<td>'Stinging nettle' rash, urticaria, hives, itching or swelling of the lips,</td>
<td>MILD/MODERATE</td>
</tr>
<tr>
<td>IgE-mediated</td>
<td>tongue or mouth, asthma, wheezing, facial swelling (does not experience 'severe' symptoms)</td>
<td>(Does not include 'severe' symptoms)</td>
</tr>
<tr>
<td>reactions</td>
<td>Breathing difficulties, anaphylaxis, collapse (May additionally include symptoms associated with non-IgE-mediated reactions)</td>
<td>SEVERE</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(May additionally include 'mild/moderate' symptoms)</td>
</tr>
<tr>
<td><strong>INTOLERANCE:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Symptoms</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Associated</td>
<td>Vomiting, Diarrhoea, Sneezing, Catarrh, Hyperactivity, Tiredness,</td>
<td></td>
</tr>
<tr>
<td>non-IgE-mediated</td>
<td>Stomach cramps, Other digestive problems (e.g. bloating, constipation),</td>
<td></td>
</tr>
<tr>
<td>reactions</td>
<td>Eczema flare, Migraines/headaches, Aching joints/muscles, Behavioural/</td>
<td></td>
</tr>
<tr>
<td></td>
<td>mood changes (Does not include symptoms associated with IgE-mediated reactions)</td>
<td></td>
</tr>
</tbody>
</table>
were coded and analysed using QSR-NVivo (version 10). Identified themes are illustrated in results. In order to maintain anonymity, participant details are indicated in brackets as follows: A/P refers to Adult/Parent; participant number; and reported food allergens. Italicised text within quotes reflects interviewer prompts.

Results

Online survey
Characters of survey participants are shown in Table 3 (further demographic details are shown in Additional file 1). Of the 392 participants who completed surveys, 232 (59%) avoided one of the target food allergens, either: gluten, nuts or milk. Participants who avoided more than one target food allergen (n = 121, 31%) and those who avoided an allergen other than gluten, nuts or milk (n = 39, 10%) were excluded from analyses.

Summarised in Table 4, the survey revealed significant differences in participants’ perceptions of information provision depending on whether they wished to avoid gluten, nuts or milk when eating out. Unless otherwise stated, there were no interactions between ‘allergen avoided’ and other IVs (‘Food allergy/Food intolerance’ or ‘Adult/Parent’) (all ps > .05).

Reliance on speaking to staff
There was a significant main effect of ‘allergen’ (gluten/nuts/milk) on participants’ reliance on speaking to staff (p < .05). Participants avoiding nuts reported a greater reliance on speaking to staff than those avoiding gluten (p = .019), and those avoiding milk (p = .003).

Satisfaction with written information
There was a significant main effect of ‘allergen’ (gluten/nuts/milk) on participants’ satisfaction with written information (p < .05). Post hoc analysis approached significance (p = .053) suggesting that those who avoided nuts were more satisfied that written information could aid confident food choices than those avoiding gluten.

Staff as an additional information source
There was a significant main effect of ‘allergen’ (gluten/nuts/milk) on participants’ preference for staff as an additional information source (p < .05). Participants avoiding

<table>
<thead>
<tr>
<th>Table 2 Details of survey subscales</th>
</tr>
</thead>
<tbody>
<tr>
<td>Survey subscale</td>
</tr>
<tr>
<td>Reliance on speaking to staff</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Satisfaction with written information</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Preference for a separate allergen menu</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Menu invites you to ask staff about allergens</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Sign invites you to ask staff about allergens</td>
</tr>
</tbody>
</table>

*Survey items were not subject to factor analysis*
nuts ($p = .009$) and those avoiding gluten ($p = .001$) both preferred staff as an additional source of information in comparison to those avoiding milk.

**Preference for separate allergen menu**

There was a significant main effect of ‘allergen’ (gluten/nuts/milk) on participants’ preference for a separate allergen menu ($p < .01$). Participants avoiding nuts ($p = .007$) and those avoiding gluten ($p = .001$) had greater preference for a separate allergen menu as a potential source of information than those avoiding milk.

### Menu invites you to ask staff

There was a significant main effect of ‘allergen’ (gluten/nuts/milk) on participants’ perceptions of a statement on the menu inviting customers to ask staff about dishes ($p < .05$). Participants avoiding nuts were more positive

### Table 3 Characteristics of survey population based on allergen avoided

<table>
<thead>
<tr>
<th>Variable</th>
<th>Gluten (n = 66)</th>
<th>Nuts (n = 94)</th>
<th>Milk (n = 72)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult</td>
<td>56 (84.8)</td>
<td>40 (42.6)</td>
<td>39 (54.2)</td>
</tr>
<tr>
<td>Parent</td>
<td>10 (15.2)</td>
<td>54 (57.4)</td>
<td>33 (45.8)</td>
</tr>
<tr>
<td><strong>Gender</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult/Parent</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>13 (19.7)</td>
<td>12 (12.8)</td>
<td>9 (12.5)</td>
</tr>
<tr>
<td>Female</td>
<td>53 (80.3)</td>
<td>81 (86.2)</td>
<td>61 (84.7)</td>
</tr>
<tr>
<td>Childa</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>4 (40.0)</td>
<td>32 (59.3)</td>
<td>19 (57.6)</td>
</tr>
<tr>
<td>Female</td>
<td>6 (60.0)</td>
<td>21 (38.9)</td>
<td>14 (42.4)</td>
</tr>
<tr>
<td>Age (yrs)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult/Parent</td>
<td>41.2 (11.9)</td>
<td>39.6 (9.7)</td>
<td>37.6 (10.5)</td>
</tr>
<tr>
<td>Child</td>
<td>8.5 (3.8)</td>
<td>10.6 (4.2)</td>
<td>5.1 (3.8)</td>
</tr>
<tr>
<td>Food allergic</td>
<td>8 (12.1)</td>
<td>86 (91.5)</td>
<td>27 (37.5)</td>
</tr>
<tr>
<td>Food intolerant</td>
<td>58 (87.9)</td>
<td>8 (8.5)</td>
<td>45 (62.5)</td>
</tr>
<tr>
<td><strong>Diagnosis</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clinical diagnosis (by GP; Dietician or Allergy specialist at hospital)</td>
<td>47 (71.2)</td>
<td>84 (89.4)</td>
<td>44 (61.1)</td>
</tr>
<tr>
<td>Self diagnosis</td>
<td>19 (28.8)</td>
<td>10 (10.6)</td>
<td>28 (38.9)</td>
</tr>
<tr>
<td><strong>Severity of reaction (FA only)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mild/Moderate</td>
<td>5 (62.5)</td>
<td>28 (32.6)</td>
<td>23 (85.2)</td>
</tr>
<tr>
<td>Severe</td>
<td>3 (37.5)</td>
<td>58 (67.4)</td>
<td>4 (14.8)</td>
</tr>
<tr>
<td><strong>Time since diagnosis (yrs)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt; 2</td>
<td>12 (18.2)</td>
<td>3 (3.2)</td>
<td>14 (19.2)</td>
</tr>
<tr>
<td>2–4</td>
<td>20 (30.3)</td>
<td>23 (24.5)</td>
<td>24 (33.3)</td>
</tr>
<tr>
<td>5–9</td>
<td>18 (27.3)</td>
<td>24 (25.5)</td>
<td>22 (30.6)</td>
</tr>
<tr>
<td>≥ 10</td>
<td>16 (24.2)</td>
<td>43 (45.7)</td>
<td>11 (15.3)</td>
</tr>
<tr>
<td><strong>Treatment</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Avoidance</td>
<td>66 (100)</td>
<td>94 (100)</td>
<td>72 (100)</td>
</tr>
<tr>
<td>Antihistamines</td>
<td>4 (6.4)</td>
<td>67 (71.3)</td>
<td>15 (20.8)</td>
</tr>
<tr>
<td>Injectable adrenaline</td>
<td>1 (1.5)</td>
<td>66 (70.2)</td>
<td>2 (2.8)</td>
</tr>
<tr>
<td>Inhaler</td>
<td>1 (1.5)</td>
<td>33 (35.1)</td>
<td>10 (13.9)</td>
</tr>
<tr>
<td>Special diet</td>
<td>32 (48.5)</td>
<td>9 (9.6)</td>
<td>25 (34.7)</td>
</tr>
<tr>
<td>Support group membership</td>
<td>27 (40.9)</td>
<td>36 (38.3)</td>
<td>7 (9.7)</td>
</tr>
</tbody>
</table>

*Child % calculation based on total parent participants per allergen group

*Severity % calculation based on total FA participants per allergen group

Where % total < 100, there are missing values. Where % total > 100, participants could select multiple responses
Table 4 Differences in perceptions of information provision for participants avoiding Gluten, Nuts and Milk following legislation*  

<table>
<thead>
<tr>
<th>Survey subscale</th>
<th>Gluten Mean (SD)</th>
<th>Nuts Mean (SD)</th>
<th>Milk Mean (SD)</th>
<th>df</th>
<th>F</th>
<th>ηp²</th>
<th>p</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reliance on speaking to staff</td>
<td>3.26 (1.25)</td>
<td>3.79 (1.27)</td>
<td>3.15 (1.22)</td>
<td>2, 220</td>
<td>4.20</td>
<td>.037</td>
<td>.016</td>
</tr>
<tr>
<td>Satisfaction with written information</td>
<td>3.30 (0.91)</td>
<td>3.59 (0.73)</td>
<td>3.41 (0.73)</td>
<td>2, 220</td>
<td>3.13</td>
<td>.028</td>
<td>.046</td>
</tr>
<tr>
<td>Staff as an additional information source</td>
<td>3.48 (1.29)</td>
<td>4.00 (1.02)</td>
<td>3.10 (1.23)</td>
<td>2, 220</td>
<td>4.13</td>
<td>.036</td>
<td>.017</td>
</tr>
<tr>
<td>Preference for separate allergen menu</td>
<td>4.11 (0.87)</td>
<td>3.93 (0.97)</td>
<td>3.49 (0.99)</td>
<td>2, 219</td>
<td>5.15</td>
<td>.045</td>
<td>.007</td>
</tr>
<tr>
<td>Menu invites you to ask staff about allergens</td>
<td>4.55 (0.79)</td>
<td>4.67 (0.67)</td>
<td>4.33 (0.87)</td>
<td>2, 218</td>
<td>3.53</td>
<td>.031</td>
<td>.031</td>
</tr>
<tr>
<td>Sign invites you to ask staff about allergens</td>
<td>4.59 (0.78)</td>
<td>4.60 (0.81)</td>
<td>4.29 (0.94)</td>
<td>2, 217</td>
<td>3.83</td>
<td>.034</td>
<td>.023</td>
</tr>
</tbody>
</table>

*Higher mean score indicates greater levels of agreement

about the menu inviting customers to ask about dishes than those avoiding milk ($p = .016$).

**Sign invites you to ask staff**

There was a significant main effect of ‘allergen’ (gluten/ nuts/milk) on participants’ perceptions of a sign inviting customers to ask staff about dishes ($p < .05$). Post hoc analysis approached significance ($p = .056$) suggesting that those avoiding nuts were more positive about the sign inviting customers to ask about dishes than those avoiding milk.

**In-depth interviews**

Characteristics of interview participants are shown in Table 5. Of the 57 participants who completed interviews in 2016, 49 (86%) avoided gluten, nuts and/or milk. Participants who avoided an allergen other than gluten, nuts or milk ($n = 8$, 14%) were excluded from analyses.

Following implementation of the legislation, three overall themes were described by participants in relation to their observations and experiences of allergen information provision when eating out. Participant responses focused on management of their FA/FI when eating out and related to: ‘disparities in allergen information provision,’ ‘understanding the needs of customers avoiding different allergens,’ and ‘customer demand for information about specific allergens’.

**Disparities in allergen information provision**

Following implementation EU FIC, the majority of participants had observed general improvements in the provision of allergen information when eating out; though they noted that these improvements were largely focused on the provision of information for customers seeking to avoid nuts or gluten. For many participants, a disparity in allergen-specific information was observed, regardless of the allergen that they themselves sought to avoid (Table 6: quote 1).

For participants seeking to avoid gluten, the separate ‘gluten-free’ menu was seen as a gold standard which was becoming increasingly available. In the absence of this provision, the use of a symbol or letter displayed beside each dish on the main menu served as a simple and trusted indicator which facilitated food choices (Table 6: quote 2). Similarly, for participants seeking to avoid nuts, the display of a symbol or letter ‘N’ beside menu items had become widespread, and enabled them to make independent food choices without the need to involve staff in their decision-making process. (Table 6: quote 3).

Participants seeking to avoid milk had also observed the improvements in information provision for those avoiding nuts or gluten, but had not seen similar improvements in relation to their own dietary needs. These participants were impressed by the gluten-free provision that was now available, and wished that similar information was available for milk-free diets (Table 6: quote 4). They also noted that diets which might be deemed ‘lifestyle choices’ were also catered for, whilst their need for information about the milk content of foods remained largely neglected and misunderstood (Table 6: quotes 4 & 5); a scenario that they felt could be resolved with little effort on the part of eating out venues (Table 6: quote 6).

**Understanding the needs of customers avoiding different allergens**

Many participants seeking to avoid milk felt that their dietary needs were not well understood, and that this in turn might be leading to a lack of appropriate allergen information provision in eating out environments. Participants noted that many eating out staff failed to understand their need for avoidance of milk as a ‘hidden ingredient’ within many dishes. In the absence of tangible written allergen information, participants used subtle social cues to detect misunderstanding on the part of venue staff (Table 7: quote 1), and often interpreted these cues as a more generalised indicator that their needs were underestimated or undervalued (Table 7: quote 2).

For participants seeking to avoid gluten, the issue of gluten as a ‘hidden ingredient’ coupled with indicators of confusion exhibited by venue staff had been experienced in the past, and were now less common in light of increased staff awareness and improved information provision (Table 7: quote 3). These improvements, whilst welcomed, did not guarantee a gluten-free eating out experience however. A minority of participants expressed concern that the
popularity of gluten-free diets as a 'lifestyle choice' had undermined staff perceptions of the importance of gluten avoidance for those with the medical need to remain gluten-free (Table 7: quote 4). Similarly for those seeking to avoid nuts, whilst improvements in information provision were appreciated, the risk of cross-contamination and potential for staff underestimation of that risk undermined their confidence in ensuring a nut-free eating out experience (Table 7: quote 5).

**Customer demand for information about specific allergens**

One participant, who worked in an eating out venue, provided insights into the relative frequency of customer

**Table 5** Characteristics of interview population based on allergen avoided

<table>
<thead>
<tr>
<th>Variable</th>
<th>Gluten (n = 13) n (%) or M (SD)</th>
<th>Nuts (n = 14) n (%) or M (SD)</th>
<th>Milk (n = 13) n (%) or M (SD)</th>
<th>Multiplea (n = 9) n (%) or M (SD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult</td>
<td>12 (92.3)</td>
<td>11 (78.6)</td>
<td>8 (61.5)</td>
<td>9 (100)</td>
</tr>
<tr>
<td>Parent</td>
<td>1 (7.7)</td>
<td>3 (21.4)</td>
<td>5 (38.5)</td>
<td>0</td>
</tr>
<tr>
<td><strong>Gender</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult/Parent</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>1 (7.7)</td>
<td>5 (34.7)</td>
<td>4 (30.8)</td>
<td>1 (11.1)</td>
</tr>
<tr>
<td>Female</td>
<td>12 (92.3)</td>
<td>9 (64.3)</td>
<td>9 (69.2)</td>
<td>8 (88.9)</td>
</tr>
<tr>
<td>Childa</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>0</td>
<td>2 (66.7)</td>
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</tr>
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<td>3 (60.0)</td>
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<td>43.1 (10.8)</td>
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<td>13 (92.9)</td>
<td>7 (53.8)</td>
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<td>(by GP; Dietician or Allergy specialist at hospital)</td>
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<tr>
<td>Self diagnosis</td>
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<td>6 (46.2)</td>
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<td>**Severity of reaction (FA only)**c</td>
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<td>8 (61.5)</td>
<td>3 (21.4)</td>
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<td>≥ 7</td>
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<td>8 (61.5)</td>
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<td>13 (100)</td>
<td>9 (100)</td>
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<tr>
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<td>Support group membership</td>
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<td>3 (21.4)</td>
<td>0</td>
<td>2 (22.2)</td>
</tr>
</tbody>
</table>

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aTwo or more target allergens avoided- e.g. gluten and milk.
bChild % calculation based on total parent participants per allergen group.
cSeverity % calculation based on total FA participants per allergen group.

Where % total > 100, participants could select multiple responses. Where % total < 100, there are missing values.
Table 6 Disparities in the provision of allergen information

| 1) | ‘I’ve definitely seen it [allergen information] a lot more about. It’s kinda really visible in a lot of places which is alright… I think it is just a few of them [allergens].… Just nuts and gluten.’ (A32, FI: Gluten) |
| 2) | ‘…they have an entirely separate menu so I feel very comfortable going there… my preference is a separate gluten free menu but I realise it’s probably unrealistic to expect everywhere to do that so if I guess, if I’m going into a place I know doesn’t have a gluten free menu it just makes things 10 times easier if they’ve got a little symbol… the little symbols and then a key under every dish. Just printed those symbols and then it’s done, easy.’ (A13, FI: Gluten) |
| 3) | ‘…going out it normally says on the menu now. It will have a little ‘N’ next to it or something… Is that a new thing? It’s getting better since I last saw you. Most places do it now and they do it for gluten free and things… It will say if it’s got nuts in. It makes it easier for them because they’re not having to answer your questions all the time. You can read the menu and say “that has got nuts in.”‘ (AS8, FA: Peanuts & tree nuts) |
| 4) | ‘In my experience it’s [the legislation] been ineffective for his condition and I have actually been in a restaurant with a friend that was presented with a gluten free menu for breakfast and I was so impressed that they could do that with the gluten free but [it] wasn’t available for dairy- and in fact the same restaurant was able to present a different menu for [healthy weight loss] diets which I thought was amazing- that they could go to that effort but yet it wasn’t available for something that seems to affect a lot of people.’ (P7, FI: Milk) |
| 5) | ‘…mainly vegetarian and vegan, yep, and gluten free and they were the main ones. But not dairy? Not dairy, nothing. I haven’t come across a single place that talks about dairy free. But I think it’s because it’s not very well understood.’ (A51, FI: Milk) |
| 6) | ‘On the menu where you see the ‘V’ or the ‘G’ and all that business, to have a ‘D’ for dairy so that covers any type of dairy then at least you could say, actually for me, I would rule it all out…’ (A44, FI: Milk) |

enquiries about the allergens. They noted that such enquiries were infrequent; relating to the gluten and nuts, but not to the milk content of foods (Table 8: quote 1). Participants who sought to avoid milk speculated that their own lack of communication with staff might imply to food businesses that there was little demand for the provision of milk-related allergen information (Table 8: quote 2 & 3). Participants compared the relative impact of their milk-related symptoms with those who experience life-threatening reactions to nuts. Whilst they wished that eating out venues could appreciate the discomfort that they experienced due to accidental allergen consumption (Table 8: quote 4 & 5), they equally tended to underplay such reactions and often failed to inform the eating out venue that a problem had occurred.

Discussion

Using a mixed methods approach, this study indicates that the eating out experiences of consumers with FA/FI differ depending on the food allergen that they are seeking to avoid, and that allergen-based inequities in information provision are impacting on some consumers with FA/FI following the introduction of EU FIC legislation in December 2014. Specifically, not only do those avoiding milk have less positive experiences, but in addition they perceive that the provision made for those avoiding other allergens tends to be better. Participants seeking to avoid milk had also observed the improvements in information provision for those avoiding nuts or gluten, but had not seen similar improvements in relation to their own dietary needs. They noted that many staff in eating out venues failed to understand their need for avoidance of milk as a ‘hidden ingredient’ within many dishes.

In general, survey participants reported being moderately satisfied with the availability and adequacy of allergen information provision when eating out, and interview participants suggested that this provision was an improvement on the allergen information made available prior to EU
Table 8 Customer demand for information about specific allergens

1) ‘… out of interest what are the sort of allergies and intolerances that you hear more of, most of? Gluten, nuts and seafood. Okay right and very often? No, not often at all actually. Like a lot, gluten more than anything… Nuts maybe four or five times in a year, yeah not often at all. I don’t know whether it’s not that common, or people just don’t mention it and seafood maybe once or twice a year to be fair, not often at all.’ (A59, FA: Peanuts, Tree nuts)

2) ‘… I think there aren’t enough people who are lactose intolerant for companies to see it as viable. Or enough people to make a fuss. So I’m part of the problem I think. There aren’t enough people making a fuss about it because of people not wanting to make it a big thing so companies don’t have to make a big deal about it, but if everyone who had slight lactose intolerance… pushed in restaurants I think there would be a bigger appeal for it. We are part of the problem.’ (A51, FI: Milk)

3) ‘Well, if everywhere could do soya milk that would be excellent, or start having optional lactose or dairy free cheese as options rather than having to not have anything that’s a milk product but I don’t know if there’s an economic imperative for shops. If there’d be enough customers who would be interested in that, there might be. There might be plenty of people who are just avoiding these things who would buy them if they knew that they could have nachos with lactose free cheddar, then they would but I suppose until they try that they don’t know.’ (A10, FI: Milk)

4) ‘Nut allergies I think prevail a lot. I think they are aware of nut allergies… I don’t think they think anything else is… it’s a killer, do you know what I mean? But I’m not going to die eating a sandwich, but I can be in pain for hours and it can have a massive effect, because you can’t do anything.’ (A34, FI: Gluten, Milk)

5) ‘… it’s not life threatening like if I had nut [allergy] or anything like that. So, I just know that night I’m going to suffer… I think if I was nut intolerant I would be very… but because it’s not life threatening I think I tend to put up with it and think “I won’t have that again.”’ (A44, FA: Milk)

FIC. However, satisfaction levels and perceived improvements in provision differed depending on whether participants sought to avoid gluten, nuts, or milk as ingredients in foods. Amongst survey participants, those seeking to avoid milk were less satisfied with the information provided for their specific dietary needs in comparison to participants seeking to avoid gluten or nuts. In particular, they were less likely to involve staff in their deliberations about the potential for allergen free meal options- either by asking staff directly about the allergen content of foods or as an additional information resource following inspection of the menu. They were also less likely to take a positive view of written statements inviting customers to ‘ask staff’. Although this is in part unsurprising given that research prior to the implementation of EU FIC indicated that consumers with FA/FI were often reluctant to make enquiries of staff [2], crucially, such reluctance was similar across allergen groups at this earlier time-point. Prior to the legislation, there were no differences between gluten, nut or milk avoiding participants in relation to their satisfaction with the information provided for specific dietary needs or their likelihood to involve staff in deliberations about allergen-free meal options [27, 31] (see also Additional file 2). Therefore, findings suggest that these differences have arisen since the legislation.

Under the themes ‘disparities in allergen information provision,’ understanding the needs of customers avoiding different allergens, and ‘customer demand for information about specific allergens,’ in-depth interviews provided insights into the potential reasoning behind participant survey responses. Whilst participants seeking to avoid gluten and nuts reported improvements in written allergen information provision when eating out, those seeking to avoid milk observed no such improvements. It is likely that this post-legislative disparity between groups created feelings of inequity of provision that did not exist prior to the legislation’s implementation, thus fragmenting allergen avoiding populations. This is an important consideration for eating out venues given that consumers with FA/FI tend to equate the adequacy of allergen information provision with wider judgements about the venue’s ‘understanding,’ ‘allergen-awareness’ and ‘capacity’ to accommodate specific dietary needs safely [2]. For participants seeking to avoid milk, an absence of relevant allergen information suggested a lack of understanding on the part of eating out venues and their staff. These participants were less likely to trust staff as an information source, and were potentially less likely to patronise such venues as a result. Furthermore, as noted in previous research consumers with FA/FI attempt to balance their need for allergen avoidance, with their wish to avoid being seen as ‘making a fuss’ and creating ‘misunderstanding’ [32, 33]. For those seeking to avoid milk, insufficient allergen information provision suggested that asking staff might indeed lead to misunderstanding and potential social embarrassment. They were less willing to speak to staff about their dietary requirements, and more likely to expose themselves to the risk of accidental allergen consumption as a consequence.

The perceived understanding of the needs of some consumers with FA/FI (nuts and gluten) in comparison to others (milk), led participants seeking to avoid milk to conclude that the implications of their accidental allergen consumption were taken less seriously, and their concerns seen as less legitimate than other allergen-avoiding groups. This distinction has been observed in FA and FI populations, where FI can be viewed as more ‘socially problematic’ than FA, due to the ambiguity of FI symptoms and diagnosis when compared to FA [34]. Some of
our participants who sought to avoid milk due to lactose intolerance perceived that there was 'stigma' attached to the condition and recognised that their own reticence in speaking to staff due to concerns about being seen as 'making a fuss' might in turn be viewed as a lack of 'demand' for milk allergen information provision on the part of eating out venues.

Equally, it is important for eating out venues to consider the implications of accidental allergen consumption for customers with severe FA to milk. Whilst FA to peanuts/tree nuts is more common, and the potential for anaphylaxis amongst this population more widely understood, cow's milk is the most common cause of anaphylaxis amongst UK children [5] and persistence of milk FA into adulthood is associated with greater risk of severe reactions [35].

Implications

This study is the first to provide insight into the perceived differences in allergen information provision for particular allergens, and most importantly, the difficulties that consumers with FA/FI report when seeking to avoid milk whilst eating outside the home.

Alongside their legal responsibilities to provide allergen information for consumers as a result of EU FIC, it is important that eating out providers understand that FA/FI customers are sensitive to inequities in allergen information provision and interpret these as a wider indicator of customer care and food safety in venues. Any such inequities are likely to be magnified for FA/FI customers who seek to avoid 'staple foods' (milk, wheat, eggs) which are ubiquitous in the western diet and more difficult to avoid as a result [21–23]. An absence of customer enquiries about particular allergens - in this case milk - should not be interpreted as a lack of demand for information about the allergen, and participants felt that venues could usefully convey their willingness and ability to accommodate these customers using simple, visible visual indicators such as letters/symbols on the menu. Increased staff allergen awareness training [36] and effective communication systems between food preparation and serving areas [2] will help to ensure that FA/FI customers feel more confident and secure in their food choices when eating out; regardless of the allergen that they are seeking to avoid. Normalising the notion that customers are able and entitled to make their allergen requirements known may be particularly helpful. For example, serving staff could take a proactive approach at the table, by enquiring as to whether customers have any specific dietary requirements [2]. They should be particularly aware that those seeking to avoid milk may be less confident in the ability of the venue to provide a meal without the presence of this allergen.

Health professionals (allergists, dieticians, general practitioners), support groups and charities have important contributions to make by educating and encouraging their FA/FI patients- and those avoiding milk in particular - to be confident in requesting and expecting the provision of allergen information when eating out, as they are entitled to do since the introduction of EU FIC. Patients can also be encouraged to use proactive techniques such as informing eating out venues in advance [15] or carrying an allergy/coeliac information card [37] in order to ameliorate their fears of embarrassment in the inherently social setting of the eating out environment.

Limitations

Participants self-reported their FA/FI status, and a minority were self-diagnosed alongside those who reported receiving a clinical diagnosis. Entry to the study was through the careful application of symptom-based FA/FI criteria although we recognise it is unlikely that classification of patients as FA or FI would accord with a medical diagnosis. However, our approach of making the distinction between populations based on the allergen that they were seeking to avoid rather than between FA and FI renders this limitation as less problematic. Our approach allowed us to highlight the common difficulties experienced by milk avoiding FA/FI participants, and these difficulties were particularly salient given that no allergen-based differences between FA and FI populations were shown in analyses. Furthermore, in the context of eating out, the distinction between FA and FI becomes less relevant because the legal requirement for venues to provide allergen information applies for all customers and is not contingent on their FA/FI status.

We also acknowledge that we took a conservative approach in survey analyses. In order to ensure that responses were attributable to each particular allergen avoided, we only included participants who avoided either gluten or nuts or milk and did not include those who reported avoiding multiple allergens. It is likely that participants who sought to avoid multiple allergens experienced greater difficulties when eating out [11]. Lastly, we recognise that we were unable to include other allergens in our analyses due to insufficient participant numbers. It is possible that populations seeking to avoid different allergens and in particular those seeking to avoid eggs which are also a 'staple food' [21–23] - would have reported inequities in allergen information provision akin to those reported for milk allergen in this study. Possible limitations to generalisability of the survey results should be borne in mind in the light of these issues.

Conclusion

A mixed methods approach was valuable in exploring the experiences of those seeking to avoid gluten, milk and
nests when eating out. Through the application of surveys and interviews, FA/FI participants reported that there were general improvements in allergen information provision in eating out venues following introduction of EU FIC legislation. However, inequities in the provision of allergen information for particular allergens (gluten, nuts, milk) led participants seeking to avoid milk to conclude that their dietary needs were less well-understood and seen as less important. These perceptions were reflected in a reluctance to involve eating out venue staff in deliberations about the potential for allergen free meal options, and limited the food choices of those seeking to avoid milk as a result. The provision of visible visual indicators on menus of the presence of milk and increased allergen-awareness training for staff can play a key role in increasing confidence in the eating out venues and improve the eating out experience of customers seeking to avoid milk. Medical professionals also have a key role to play in educating and encouraging their FA/FI patients to pursue their legal right to make allergen enquiries in order to avoid accidental milk allergen consumption when eating out.

Additional files

**Additional file 1:** Further demographic and background characteristics of survey participants. Description of data: Further demographic and background characteristics of survey participants. (DOCX 14 kb)

**Additional file 2:** Perceptions of information provision for participants avoiding Gluten (n = 149), Nuts (n = 272) and Milk (n = 77) prior to legislation. Description of data: Perceptions of information provision for participants avoiding Gluten (n = 149), Nuts (n = 272) and Milk (n = 77) prior to legislation. (DOCX 14 kb)

Abbreviations

FA: Food Allergy; FI: Food Intolerance

Acknowledgements

We acknowledge the support of the Anaphylaxis Campaign, Allergy UK, Coeliac UK and Acumen Fieldwork-Medical in conducting this research; and acknowledge the contribution of other members of the research team: Ros Payne, Dr. Audrey Dunn Galvin, Prof Monique Raats, Dr. Anita Eves and Dr. Bernadette Egan. The research based at University of Southampton was further supported by The Asthma, Allergy and Inflammation Research Charity (AAIR).

Funding

Food Standards Agency (UK) Grant number: FS305013. URL: http://www.food.gov.uk/
The funder (FSA) provided support in the form of salaries for authors JB, FMB, MHG & JSL, but did not have any additional role in the study design, data collection and analysis, decision to publish, or preparation of the manuscript. They provided comment on an early, full draft of this paper. Acumen Fieldwork-Medical were funded by the FSA through subcontract to recruit participants for the study. They did not play any role in the study design, the conduct of the interviews and the analysis, decision to publish, or preparation of the manuscript.

Availability of data and materials

Interview and survey data on which the conclusions of the manuscript rely are presented in the main paper. Full interview transcripts and survey data are available from the corresponding author on reasonable request.

Authors’ contributions

MHG provided advice as an allergic consumer to the project throughout. JSL contributed to reviewing and commenting on early drafts of the paper. JB, MHG, JSL conceived and designed the project. FMB, JB analysed the data. JB, FMB wrote the paper. All authors read and approved the final manuscript, and agreed to be accountable for all aspects of the work.

Ethics approval and consent to participate

Ethical approval was gained from the University of Bath, Department of Psychology Ethics Committee (Ethical Approval Ref: 14–055/16–146). All participants were fully briefed about the nature of the study and their rights as participants before providing written informed consent prior to interview.

Consent for publication

Not applicable.

Competing interests

JB, FM, MHG & JSL declare no competing interests.

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Received: 31 May 2018 Accepted: 12 October 2018

Published online: 15 November 2018

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Consumer Preferences for Written and Oral Information about Allergens When Eating Out

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Abstract

Background

Avoiding food allergens when eating outside the home presents particular difficulties for food allergic (FA) and intolerant (FI) consumers and a lack of allergen information in restaurants and takeaways causes unnecessary restrictions. Across Europe, legislation effective from December 2014, aims to improve allergen information by requiring providers of non-prepacked foods to supply information related to allergen content within their foods.

Methods

Using in-depth interviews with 60 FA/FI adults and 15 parents/carers of FA/FI children, we aimed to identify FA/FI consumers’ preferences for written and/or verbal allergen information when eating out or ordering takeaway food.

Results

A complex and dynamic set of preferences and practices for written and verbal allergen information was identified. Overwhelmingly, written information was favoured in the first instance, but credible personal/verbal communication was highly valued and essential to a good eating out experience. Adequate written information facilitated implicit trust in subsequent verbal information. Where written information was limited, FA/FIs depended on social cues to assess the reliability of verbal information resources, and defaulted to tried and tested allergen avoidance strategies when these were deemed unreliable.

Conclusion

Understanding the subtle negotiations and difficulties encountered by FA/FIs when eating out can serve as a guide for legislators and food providers; by encouraging provision of clear written and verbal allergen information, and training of proactive, allergen-aware staff. This, in tandem with legal requirements for allergen information provision, paves the way for
FA/FIs to feel more confident in eating out choices; and to experience improved eating out experiences.

**Introduction**

For individuals who experience food allergy (FA) and food intolerance (FI) avoidance of allergens is the key recommended strategy in preventing negative health outcomes. Accidental allergen ingestion is potentially life threatening for many FA individuals [1, 2], and can account for a substantial number of ‘healthy’ days lost in FA/FI populations [3]. Twenty-one to 31% of such accidental allergen ingestion occurs when eating in restaurants and 13–23% occurs in other eating out environments such as work or school canteens [4]. As a result, eating out presents a particular challenge for FA/FI individuals, and is a broader public health concern for legislators, food providers, and the wider community as a whole.

In order to improve the provision of food allergen information for FA/FI consumers when eating out, Europe wide EU legislation was introduced in December 2014. This requires providers of non-prepacked foods to supply written and verbal information related to the content of one or more of 14 specified food allergens within their foods. Within the UK, the Food Standards Agency (FSA) has provided guidance on how allergen information might be provided [5]. However, the guidance regarding the format for delivery of this information is broad and at the discretion of individual eating out providers. Little is known about the preferences for such information provision from FA/FI populations’ perspectives. Understanding these perspectives prior to the legislation’s introduction was vital in order to provide legislators and eating out providers with insights into FA/FI’s information delivery preferences; thereby informing initial and ongoing implementation of improvements in allergen information provision for the benefit of FA/FI consumers.

We explored the allergen-related information delivery preferences of FA/FI populations when eating out or ordering takeaway foods. Results serve to inform legislators in their future recommendations for allergen information provision, and act as a guide of ‘good practice’ for food providers who are required to supply food allergen information for FA/FI consumers.

**Background**

Within Europe, FA affects up to 5% of adults and 8% of children [6], and the prevalence of FI is thought to be substantially greater [7, 8]. For FAs, accidental consumption of food allergens accounts for 32.2% of anaphylaxis-related hospital admissions [9], and eating outside the home has been implicated in 50% of deaths related to food allergen consumption [10]. Whilst morbidity and mortality rates are generally low, symptom-based figures underestimate the ongoing impact of food allergy avoidance on FA/FI individuals’ well-being, and decrements in quality of life have been reported alongside significant restrictions in social and behavioural outcomes for these populations [11–14].

The implications of having to exclude one or more foods from the diet can present wide-ranging and unique challenges for FA and FI populations. FA populations describe the need for constant vigilance, with no guarantee that their efforts will be effective in ensuring successful avoidance of the offending food. This has been termed ‘trying to control the uncontrollable’ [15](p. 284). Both FA and FI consumers express concerns regarding the risks posed when consuming foods which they have not prepared; and eating out or ordering takeaway food in particular [16–19]. This apprehension may be justified given literature suggesting a mismatch.
between restaurant staff’s confidence in their knowledge of food allergens, and the knowledge actually exhibited in practice [20] [21].

EU legislation [22] introduced in December 2014 affects restaurants, takeaway shops, food stalls, institutions like prisons and nursing homes as well as workplace and school canteens. The regulations require food providers to supply customers with accurate and accessible information relating to the inclusion of any of the allergens—peanuts, tree nuts, milk, soya, mustard, lupin, eggs, fish, molluscs, crustaceans, cereals containing gluten, sesame seeds, celery, and sulphur dioxide at levels above 10mg/kg, or 10 mg/litre—in their foods. Allergen information can be provided in written or verbal form. Where verbal information is provided, there must also be written information within the venue that customers can be directed to.

Whilst the intention of the legislation is to provide FA/FI populations with clearer information regarding allergenic ingredients, little is known about how consumers prefer allergen information to be delivered when they eat out—through staff or through written sources of information—or what leads to trust or distrust in these sources. Findings from research into the labelling of pre-packed foods suggest that FA customers combine information seeking strategies by using allergen advice boxes in conjunction with ingredients lists and familiarity cues to minimise their risk of accidental allergen consumption [23]. When offered the option of an information resource in addition to packet labelling, FAs favoured a telephone advice line over an information website; perhaps suggesting that verbal information—though not face to face in this instance—has a particular role in generating trust [24]. The relationship between verbal and written information preferences becomes much more significant when eating out and consuming non-prepacked foods. Although in theory FA/FI individuals have the opportunity to discuss their dietary requirements with staff when eating out, communication difficulties are common; leading to social embarrassment, misunderstanding, and misinformation [16, 17]. This can lead FA/FIs to unduly limit their food selections, or to take unnecessary risks when eating out.

We aimed to understand the preferences and trust cues used by FA/FI individuals when eating out in order to inform the provision of allergen information resources and to outline the implications of this for legislators, food providers, and the wider community. Conducted in the 6 months immediately prior to implementation of EU FIC (1169/2011) legislation, our research is the first to assess the allergen information delivery preferences of both FA and FI populations when eating out; and in particular, their preferences for written and verbal information. This research constitutes phase 1 of the project and ongoing follow-up research will assess the impact of ongoing changes in allergen information provision on FA/FI’s eating out preferences and behaviours.

**Methods**

**Recruitment and population**

Ethical approval was gained from the University of Bath, Department of Psychology Ethics Committee prior to participant recruitment (Ethical Approval Ref: 14–055). A specialist market research agency recruited 75 participants to complete in-depth interviews. Of the total population, 60 were adults reporting FA/FI, and 15 were parents/carers of children aged up to 17 years with FA/FI. Within the latter group, although the experience of parents/carers was the primary focus of the interview, their FA/FI children were sometimes present and contributed to it. In order to represent the views of consumers throughout the UK, participants were recruited from England, Wales, Scotland, and Northern Ireland. A breakdown of participant characteristics is shown in Table 1.
Prior to interview, participants completed a screening questionnaire characterising their or (for parents) their child’s reactions to one or more of the 14 specified allergens. Characteristics were based on nature of reaction, speed of onset, and how FA/FI was diagnosed. This information was used to classify participants as IgE-mediated FA; or non IgE-mediated FA/FI which was either medically or non-medically/self-diagnosed. Thirty-nine participants (52%) were classified as having IgE-mediated FA, and thirty-six (48%) were classified as non IgE-mediated FA/FI. Of the 14 allergens covered by the legislation, FA/FI to peanuts, tree nuts, milk, soya, mustard, lupin, fish, crustaceans, cereals containing gluten, sesame seeds, celery, and/or sulphur dioxide were reported. No participants reported FA/FI to lupin or molluscs.

### Procedure
Following written informed consent, in-depth semi-structured interviews were carried out with participants in their own homes on the basis of an interview protocol detailing questions and possible prompts (a copy of this interview protocol can be provided on request from the corresponding author). Interviews were carried out by RP, JB, or DR, and each interview was audio-recorded with participants’ permission. Initial questions engaged participants with the topic of food and experiences relating to allergy/intolerance diagnoses, adaptation, and day-to-day coping strategies. The interview then focused on participants’ experiences and behaviours when eating out. Participants were encouraged to discuss strategies and environmental/social cues which influenced their decision-making processes; and to consider these preferences in relation to current and future information provision within the new legislation. Interviews lasted between 60–90 minutes.

### Analyses
In order to communicate the diversity of views and perspectives surrounding participants’ eating out experiences, interview recordings were transcribed verbatim and explored in detail using framework analysis [25]. Framework analysis has become popular in social, policy, and

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**Table 1. Characteristics of the 75 food allergy/intolerance adult participants and children of parent/carer participants.**

<table>
<thead>
<tr>
<th>Variable</th>
<th>Allergy n = 39</th>
<th>Intolerance n = 36</th>
<th>Total (%) N = 75</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sex:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>7 (17.9)</td>
<td>9 (25.0)</td>
<td>16 (21.3)</td>
</tr>
<tr>
<td>Female</td>
<td>32 (82.1)</td>
<td>27 (75.0)</td>
<td>59 (78.7)</td>
</tr>
<tr>
<td>Age:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;8</td>
<td>2 (5.1)</td>
<td>2 (5.5)</td>
<td>4 (5.3)</td>
</tr>
<tr>
<td>8–12</td>
<td>3 (7.7)</td>
<td>0</td>
<td>3 (4.0)</td>
</tr>
<tr>
<td>13–17</td>
<td>4 (10.3)</td>
<td>4 (11.1)</td>
<td>8 (10.7)</td>
</tr>
<tr>
<td>18–30</td>
<td>9 (23.1)</td>
<td>8 (22.2)</td>
<td>17 (22.7)</td>
</tr>
<tr>
<td>31–45</td>
<td>10 (25.6)</td>
<td>8 (22.2)</td>
<td>18 (24.0)</td>
</tr>
<tr>
<td>46–60</td>
<td>5 (12.8)</td>
<td>9 (25.0)</td>
<td>14 (18.7)</td>
</tr>
<tr>
<td>60+</td>
<td>6 (15.4)</td>
<td>5 (13.9)</td>
<td>11 (14.7)</td>
</tr>
<tr>
<td>Region:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>England</td>
<td>15 (38.5)</td>
<td>17 (47.2)</td>
<td>32 (42.7)</td>
</tr>
<tr>
<td>N Ireland</td>
<td>4 (10.3)</td>
<td>6 (16.7)</td>
<td>10 (13.3)</td>
</tr>
<tr>
<td>Scotland</td>
<td>10 (25.6)</td>
<td>8 (22.2)</td>
<td>18 (24.0)</td>
</tr>
<tr>
<td>Wales</td>
<td>10 (25.6)</td>
<td>5 (13.9)</td>
<td>15 (20.0)</td>
</tr>
</tbody>
</table>

doi:10.1371/journal.pone.0156073.t001
health research because it applies a systematic approach to qualitative analysis which prioritises the transparency of the analytical process; thereby maximising accessibility and strengthening confidence in subsequent results and conclusions [26, 27]. Interviews were coded and analysed using QSR NVivo (version 10). Although participants were classified based on their, or (for parents) their child’s, IgE-FA or non IgE-FA/FI status, interviews were analysed across the population as a whole. The analysis was led by FMB and refined and developed in discussion with JB.

Identified themes are illustrated in results. In order to maintain anonymity, participant details are indicated in brackets as follows: A/P refers to Adult/Parent; participant number; country of residence—E = England, S = Scotland, W = Wales and NI = Northern Ireland; and food allergens associated with FA/FI responses. Italicised text reflects interviewer prompts.

**Results**

Participants described written food allergen information resources in terms of day to day ‘use’, the ‘adequacy’ of the information, and ‘preferences’ for information provision. Additional theme-based quotes are available in S1 File.

**Use of written information resources**

Where possible, participants preferred to rely on written information in preparation for, and during, their eating out experiences. For many, particularly in relation to unfamiliar venues, written information provided the first tangible point of contact on which to base their initial food choices. Preliminary enquiries were made using venue websites to explore food options (Box 1A); and checking recipes of potential meals on the internet (Box 1B). Before committing to dine in a venue, participants gathered information about their potential food options by inspecting menus displayed in the restaurant window (Box 1C). Within the eating out venue itself, participants emphasised the role of the menu in providing detail in relation to ingredients and preparation method (Box 1D and 1E), and additional sources of written information (Box 1F).

When written information, on menus in particular, was considered to provide adequate information about ingredients and food preparation, participants reported a sense of autonomy and control when making choices. In part, this normalised the process of their food selections by allowing participants to choose their meals without recourse to additional resources. This in turn gave them greater freedom and a sense of relaxation when eating out.

**Adequacy of written resources**

Participants had mixed experiences in relation to the adequacy of written information resources and provided examples of good and poor practice. It was generally perceived that venues which provided more detailed allergen information would be more accommodating and caring towards FA/FI consumers (Box 2A and 2B). For some participants, the experience of poor written resources was variously a source of frustration, annoyance and anxiety; which potentially reduced their enjoyment in the entire eating out experience and caused them to avoid certain venues or eating out as a whole (Box 2C and 2D).

**Preferences regarding written information provision**

Within the context of the new legislation and more generally, participants had clear, though varied ideas on how best to convey allergen information in a written/visual format. As a basic principle, the overwhelming majority of respondents believed that written information...
regarding food allergen content in meals should be readily available. Ideally, information provision requiring minimal effort on the part of the consumer, whilst avoiding the potential risk of reliance on staff as intermediaries in information provision, was desired (Box 3A). Expectations regarding the levels of complexity and detail for that information differed however. Many advocated the use of abbreviations or symbols (Box 3B and 3C), or a simple notification inviting further enquiries (Box 3D); whilst others appreciated more detailed allergen information provided as a section within the menu or as a separate and comprehensive written resource (Box 3E and 3F).

Although many participants requested a more detailed menu, it was also recognised that the inclusion of such detail might pose practical problems for menu presentation and readability; particularly in the case of comprehensive ingredient lists within main menus. A minority of participants also raised concerns about their own ability to identify and recognise the relevant allergens listed (Box 3G). Similar reservations in relation to the use of abbreviations/symbols as a more simplified form of allergen warning were also highlighted. Although this was a preferred method of information delivery for many, a small number of respondents raised

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**Box 1. Use of written information.**

*Preparation for eating out:*

1. “I’ll look usually online—I thank God for the internet—at what their menu is. As I said, before we went to (European restaurant), I’d decided… I’d looked it up online and looked at their menu and gone, right, and I know I had a penne pasta dish... so I knew that one was going to be fine.” (A14 G2 S: Milk)

2. “If you’re going in a few days, you can Google what the recipe is sort of thing, a rough guide, and you think, mm, that’s okay, and then you just reiterate when you get there, right, I’m allergic to this. So, you know, it’s just basically Googling things...” (A39 G1 W: Peanuts, tree nuts, celery)

3. “We look in the windows and we try and read, they’ll put a sample menu or whatever, or outside and you try and read what kind of things are in there and if you can see that there is something that you think would be okay then it’s worth a try.” (P1 G1 E: Peanuts, tree nuts, milk)

*In the venue:*

1. “...I’d look at the menu... I’d sort of look at the list, oh, yeah, I like that one, and then I’d look underneath, which would tell me the ingredients, most times, with most of them, and then I’d order it.” (A6 G1 E: Peanuts, tree nuts, cereals containing gluten)

2. “...it’s fine because it (the menu) normally gives me, 9 times out of 10, it will tell me what’s in the food. So, if I go to a restaurant and there’s a fish, it will tell me how...it will normally say “Cooked with a white wine sauce” or cooked with whatever. It’ll say how it’s served.” (A23 G2 NI: Milk)

3. “Well pizza (chain outlet)...have the thing on the menu that says if you want to make sure of anything else in the ingredients, take a picture of this QR code, and if you take a picture of the QR code, it takes you to (chain outlet’s) website and you can check yourself.” (A33 G1 S: Peanuts, fish)
questions relating to the consistent use of symbols across venues and countries, and the potential for confusion and accidental allergen ingestion that might result from the inconsistent application of symbols or abbreviated messages.

Verbal information resources

As an inherently social experience, participants reported that the seeking of verbal information relating to food allergens within dishes varied based on their familiarity with the eating out venue. In regularly attended venues, where a successful track record of eating out had been established over time, participants valued the feelings of confidence and relaxation which resulted from their previous interactions with helpful and accommodating staff. In unfamiliar venues, where no such prior relationships had been established and written information was judged to be incomplete, participants used a number of cues to assess the reliability of the allergen information provided by staff. Primarily, participants based these assessments on staff knowledge and more subtle perceptions of staff interest, engagement and attitude with regard to their dietary needs. Where staff knowledge (Box 4A and 4B) and demeanour (Box 4C and 4D) were deemed to be good, trust and confidence in the safety of their meal was raised. Equally, the opposite was the case when knowledge (Box 4E and 4F) and demeanour (Box 4G and 4H) was deemed to be poor.

Participants identified other factors which inspired trust or served as barriers to their perceptions of staff members as reliable information resources. Younger staff members were viewed as inherently less reliable as information resources. This was largely due to an absence of life experience, and the potential for a lack of personal investment in their appointed roles. For some, this perceived lack of reliability did not necessarily lie with young frontline staff per se, but pointed instead to a potential systemic problem relating to eating out establishments as a whole. Better training was thought to hold the key to greater levels of trust and confidence in the information provided by staff.
Whilst a minority of participants sought verbal information as a safety clarification in addition to written information resources, the majority reported a sense of reluctance and embarrassment when making enquiries of staff. Although asking questions of staff was seen as a necessity by many participants; for others the perceived embarrassment of asking staff for further information led to self-imposed limitations in food selections, or unnecessary risk taking.

**Discussion**

Written information of sufficient quality was used as a baseline resource which liberated FA/FIs to make their food selections independently and without recourse to other information seeking strategies. Beyond the written resource itself, FA/FIs inferred a wider message of ‘understanding’ on the part of venues that provided adequate written allergen information, and were reassured by notices encouraging customers to ask staff about the allergen content of foods. This implied awareness gave FA/FIs permission to ask questions of staff with the

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**Box 3. Preferences for written information.**

1. If you’re going to be providing information, provide the information—don’t make the customer go and ask for it. . . . Human beings are human and they make mistakes. . . . In a busy restaurant where people are talking to you, you know, you could be given the wrong information actually, so I would like that information provided in written form somehow. . . . I wouldn’t want to have to ask for it. (A52 G1 S: Tree nuts, cereals containing gluten)

2. . . . they’ve got the “V” and the “N” on the menu, it would need to be a symbol-based thing, I think. . . . Because if you had a particular allergy, you would just be scanning the menu for that particular symbol or letter or whatever it may be. I think that would be far more useful than having the huge list of every ingredient. (A7 G1 E: Peanuts, tree nuts)

3. All it’s got to have is a GF next to it and I’m happy. Or even if it says ‘not GF’. It would be better. . . . I think that would be really, really useful, and if it doesn’t do that then I feel like I’m a pain. (P5 G2 E: Cereals containing gluten)

4. . . . if they just had a nice wee clear “We supply gluten-free” or “Ask our staff”, you know, to provide a list. . . . if you do have any form of intolerances, and we can leave any ingredients out or something. (A30 G3 NI: Cereals containing gluten)

5. . . . the menu, that “Oh, we’ve got a gluten-free section,” . . . that is something that they can start doing more, because some people may be embarrassed to talk about it and, you know, not . . . ask the question. (A4 G2 E: Cereals containing gluten)

6. . . . they have the list on every single item in there—you know, dressings. . . . sauces. . . . all the allergy ingredients information, is listed on there. So. . . . you know what you’re getting and you know exactly what’s in everything. . . . and they update it as well. . . . so that’s brilliant. (A39 G1 W: Peanuts, tree nuts, celery)

7. I would prefer a simple description, but I have been in restaurants where. . . . I’m not too sure what it means. . . . They maybe list about six different ingredients and. . . . I can recognise so many of them, and some of them, I’m not too sure about. (A20 G1 NI: Peanuts, tree nuts)
expectation of an informed response; and without fear of embarrassment. At its best, accurate and trustworthy food allergen information delivered verbally by staff also enhanced FA/FI’s eating out experience. Judgements regarding the potential for accidental exposure to food allergens were contingent on subtle social cues suggestive of staff knowledge; and were assessed by FA/FIs accordingly. Where doubts surrounding verbal allergen information occurred, FA/FIs retreated to their default position of reliance on written information resources, and in turn limited the potential variety of venues and food options available to them as a result. However, with adequate written allergen information, and the positive interactions of reliable allergen-aware staff; FA/FIs experienced an increase in trust and loyalty to eating out/takeaway venues concerned.

Box 4. Staff knowledge and demeanour.

1. The (Asian restaurant), as I said, they done gluten-free. They were able to offer an alternative to soy sauce and everything. So, she was able to say, ‘Well, you can’t have noodles but you can have rice noodles.’ So, she was actually more knowledgeable than me on coeliac, so that was good. (A48 G2 S: Cereals containing gluten)

2. (Sandwich chain) are usually quite good because I . . . went to one a couple of years ago now, and I said, “Oh can I have that, but I’m allergic to cucumbers so you’re going to have to completely . . .” you know, and she said, “Well, that’s cut in the same machine, so you can’t have that.” So, they kind of know . . . what’s cut what and what’s doing what. So, (Sandwich chain) are quite good for knowing what’s in the products and stuff. (A39 G1 W: Peanuts, tree nuts, celery)

3. You get some people that are quite perky and cheery and . . . Also, asking specifically as well . . . So, I’d say, like I might accidently say ”No milk” and they’d be like ”Do you also not want cheese?” or ”No prawns” and they’re like, ”Are you okay with . . .?” you know, this other thing. So, you know, you get some people that are quite on the ball in that sense. (A11 G1 S: Milk, Crustaceans)

4. . . . if a waiter is really keen on like listening and just writing all the ingredients, just to make sure she speaks or he speaks to the chef. So, yeah, just basically communication and the way they treat those things. (A9 G1 E)

5. The trust is in the staff, to begin with. I mean, they’re your first contact, aren’t they? If they have knowledge of the food, then I’m quite confident. If they have no knowledge of the food, then I think I’m not coming here again. (A18 G3 E: Milk)

6. Some do say, ”What do you mean, dairy, what do you mean?” and I say cream, cheese, milk, anything like that, and . . . what makes me laugh, people think I’m going to be allergic to mayonnaise because it’s from the eggs, and . . . I said, ”Actually, it’s not dairy, even though it’s from the hen, it’s not dairy, it’s not a cow . . .” (A26 G2 E: Milk)

7. There’s been times in the past when I know . . . I can read people, and I know that they’re thinking ”Oh, for God’s sake, this is a fad!” sort of thing, you know, and it’s not good enough. (A18 G3 E: Milk)

8. I’ve had them just shrug their shoulders and say ”I don’t know.” ”Well, does the chef know?” ”I don’t think he will,” you know, sort of thing . . . and you’re thinking, you’re joking . . . ! (A53 G2 E: Cereals containing gluten)
Fundamental to FA/FI’s concerns surrounding allergen information provision when eating out, was the need for constant vigilance to ensure allergen avoidance, balanced against a wish to avoid ‘drawing attention’ [16]. EU FIC (1169/2011) legislation has the potential to address these issues by making the provision of food allergen information mandatory, thereby validating and normalising food allergies and intolerances. By empowering FA/FIs with the right to ask and expect adequate information provision, it is to be hoped that the latter fear of embarrassment and resultant social isolation will be reduced [14, 17].

Given that strict allergen avoidance is necessary for many FA/FIs [28, 18] and the risk of food allergen exposure when eating out is high [4], our research indicates that FA/FIs clearly have no coherent set of preferences for the delivery of allergen information within an eating out setting. At its best, legislators should aim to cater for this diversity of preferences by recommending a combination of written and face to face allergen information provision to accommodate the varying needs and preferences of FA/FI populations. Food providers can play a crucial role in meeting FA/FI’s needs through the provision of clear written allergen information, increased allergen-awareness training for staff, and effective communication mechanisms between food preparation and serving areas. Alongside written information, our results indicate that staff use of simple, proactive face to face strategies to make enquiries and reassure customers, is favoured by FA/FIs. For example, training staff to ask diners about any food sensitivities from the outset, would convey allergen awareness, and would likely diminish much of reticence exhibited by FA/FIs within this study and in wider literature [14, 16].

In recognising the insights gained through the in-depth analysis of FA/FIs information preferences when eating out, we also acknowledge the limitations of the study. Given that we were seeking to understand the perspectives of those with both FA and FI it was necessary to use self-report measures to assess FA/FI status. Although this was done through the careful application of strict symptom-based FA/FI criteria; the assignment of some participants presented a challenge. However accuracy of allocation was less critical within the remit of the current study which sought a broader perspective on FA/FI populations’ preferences for written and/or verbal food allergen information when eating out. Due to the qualitative nature of our research we were also unable to account for the impact of demographic factors such as sex, age and region of residence within the UK. These factors may have affected FA/FI’s preferences in terms of allergen information provision and willingness to communicate with staff.

Conclusion

In light of EU legislation requiring that eating out providers supply consumers with information regarding the allergen content of their foods, this study is the first to gain in-depth insights into FA/FI consumers’ preferences for the provision of allergen information when eating out or ordering takeaway foods. Findings indicate that FA/FI consumers were often ambivalent or conflicted in their preferences for written and verbal allergen information provision. FA/FIs overwhelmingly favoured tangible, written information in the first instance; and adequate written information often led to an implicit trust in subsequent verbal information. Where written information was limited, FA/FIs depended on social cues to assess the reliability of verbal information resources, and defaulted to tried and tested allergen avoidance strategies when these were deemed unreliable. Understanding the subtle negotiations and difficulties encountered by FA/FIs when eating out can serve as a guide for legislators and food providers; by encouraging the provision of clear written and verbal allergen information, and the training of proactive, allergen aware staff. This, in tandem with legally enforceable requirements for food allergen information provision provided by the EU legislation, paves the way for FA/FIs to feel more confident in their eating out choices; and to experience a safer eating out experience.
Supporting Information

S1 File. Additional theme-based quotes from interviews.

(DOCX)

Acknowledgments

We acknowledge the support of the Anaphylaxis Campaign, Allergy UK, Coeliac UK and Acumen Fieldwork- Medical in conducting this research; and acknowledge the contribution of other members of the research team: Dr Audrey Dunn Galvin, Prof Monique Raats, Dr Anita Eves and Dr Bernadette Egan. The research based at University of Southampton was further supported by The Asthma, Allergy and Inflammation Research Charity (AAIR).

Author Contributions

Conceived and designed the experiments: JB MHG JSL. Performed the experiments: JB RP DR FMB. Analyzed the data: FMB JB. Wrote the paper: FMB JB. Provided advice as an allergic consumer to the project throughout: MHG. Provided clinical expertise as an allergist to the project throughout: JSL. Contributed to reviewing and commenting on early drafts of the paper: MHG JSL RP DR. Collected the data: RP JB DR. Analyzed the data: FMB JB. Wrote the paper: FMB JB. Approved the manuscript for submission: FMB JB RP DR MHG JSL. Agree to be accountable for all aspects of the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved: FMB JB RP DR MHG JSL.

References

Food Allergy Knowledge and Attitudes of Restaurant Managers and Staff: An EHS-Net Study

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ABSTRACT

Dining outside of the home can be difficult for persons with food allergies who must rely on restaurant staff to properly prepare allergen-free meals. The purpose of this study was to understand and identify factors associated with food allergy knowledge and attitudes among restaurant managers, food workers, and servers. This study was conducted by the Environmental Health Specialists Network (EHS-Net), a collaborative forum of federal, state, and local environmental health specialists working to understand the environmental factors associated with food safety issues. EHS-Net personnel collected data from 278 randomly selected restaurants through interviews with restaurant managers, food workers, and servers. Results indicated that managers, food workers, and servers were generally knowledgeable and had positive attitudes about accommodating customers’ food allergies. However, we identified important gaps, such as more than 10% of managers and staff believed that a person with a food allergy can safely consume a small amount of that allergen. Managers and staff also had lower confidence in their restaurant’s ability to properly respond to a food allergy emergency. The knowledge and attitudes of all groups were higher at restaurants that had a specific person to answer food allergy questions and requests or a plan for answering questions from food allergic customers. However, food allergy training was not associated with knowledge in any of the groups but was associated with manager and server attitudes. Based on these findings, we encourage restaurants to be proactive by training staff about food allergies and creating plans and procedures to reduce the risk of a customer having a food allergic reaction.

Key words: Food allergies; Food allergy attitudes; Food allergy knowledge; Food safety; Restaurants

Food allergies are a growing public health and food safety concern affecting an estimated 15 million U.S. residents, including 1 in every 13 children (8). A food allergic reaction occurs when the immune system overreacts to the proteins in food (2). Currently, the only way to prevent a food allergic reaction is strict avoidance of the allergen (15). Eight foods are responsible for approximately 90% of all food allergic reactions in the United States: milk, eggs, fish, shellfish, wheat, tree nuts, peanuts, and soybeans (8). Symptoms of an allergic reaction range from mild skin rashes to severe, potentially life-threatening anaphylactic reactions (10). In the case of anaphylactic reactions, administration of epinephrine within minutes is crucial to survival (15). Food-related anaphylaxis is responsible for approximately 30,000 emergency room visits, 2,000 hospita...
Servers can accurately describe menu items to the customer and alert
* Author for correspondence. Tel: 770-488-7652; Fax: 770-488-
the manager and kitchen staff to requests for allergen-free 7310; E-mail: tradke@cdc.gov.
meals. Miscommunication between any of these groups can
result in an unsafe meal being served (3). Benefits to
restaurants that consistently provide safe meals to food
allergic customers include preventing harm to their
clientele, avoiding lawsuits, and gaining the loyal patronage
of the food allergic community.

A key to preventing food allergic reactions in
restaurants is understanding manager, food worker, and
server food allergy knowledge, attitudes, and practices.
Several studies have been conducted to examine these
topics collectively (1, 3, 5, 6, 11, 12). However, the
measures used in these studies have been limited with
regard to food allergy attitudes and practices. All studies
either included a regional or convenience sample (1, 6, 11)
or were conducted outside of the United States (3, 5, 11,
12); thus, the generalizability of their results must be
considered.

In 2014, the Centers for Disease Control and Preven-
tion’s (CDC) Environmental Health Specialists
Network (EHS-Net) conducted a study on restaurant
manager and staff (food workers and servers) food allergy
knowledge, attitudes, and practices. Our measures of
knowledge, attitudes, and practices were comprehensive
and were primarily based on the Food Allergy Research
and Education guidance document “Welcoming Guests
with Food Allergies” (7). EHS-Net also collected data in
six demographically diverse sites, providing good
geographic coverage of the United States (Northeast, South,
Midwest, West). The goals of this study were threefold: (i)
describe restaurant manager and staff food allergy
knowledge, attitudes, and practices; (ii) compare
knowledge, attitudes, and practices among managers and
staff; and (iii) identify factors associated with food allergy
knowledge, attitudes, and practices. This article primarily
focuses on knowledge and attitudes. Complete practice data
will be published at a later date.

MATERIALS AND METHODS
EHS-Net is a network of environmental health specialists
and epidemiologists who conduct research designed to identify
and understand environmental factors associated with foodborne
illness outbreaks and other food safety issues. EHS-Net is a
collaborative project of the CDC, the U.S. Food and Drug
Administration, the U.S. Department of Agriculture, and state and
local health departments. At the time this study was conducted,
six state and local health departments were funded by CDC to
participate in EHS-Net. The state and local health departments
(EHS-Net sites) were in California, Minnesota, New York, New
York City, Rhode Island, and Tennessee.

Sample. For this study, we used a random sample from a
nonrandomly selected cluster (i.e., site). In each site, EHS-Net
personnel chose an area, based on convenience (reasonable travel
distance), in their jurisdiction to recruit restaurants for study
participation through telephone calls. SAS version 9.3 (SAS
Institute, Cary, NC) was used to select a random sample of
restaurants from population lists of restaurants in those areas.
Data collectors (EHS-Net personnel) collected data in
approximately 50 randomly selected restaurants per site. For this
study, restaurants were defined as facilities that prepare and serve
food or beverages to customers and are not institutions, food carts,
mobile food units, temporary food stands, supermarkets,
restaurants in supermarkets,
or caterers. Only restaurants with English-speaking managers
were included in the study.

Data collection. Data were collected from January 2014
to February 2015. The institutional review boards of the
participating EHS-Net site health departments approved the study
protocol. We did not collect any data that could identify
individual restaurants, managers, food workers, or servers. All
data collectors participated in training designed to increase data
collection accuracy and consistency. Data collectors solicited
restaurant participation by contacting randomly selected
restaurants within a specified geographic location via telephone
using a standardized recruiting script.

After obtaining permission from the restaurant manager,
data collectors conducted an on-site interview with a manager
(worker with authority over the kitchen), food worker (worker
who primarily prepares or cooks food), and server (worker who
primarily takes orders or serves food to customers). To increase
participation and cooperation, data collectors asked the manager
to choose the food worker and server to be interviewed. Manager
interviews lasted approximately 20 min and were focused on
characteristics of the restaurant (e.g., chain versus independent
ownership and number of meals served in a typical day) and the
manager (e.g., years of experience in current restaurant and
whether they had been food safety certified). Food worker and
server interviews lasted approximately 12 min each and were
focused on food worker and server characteristics (e.g., highest
level of education and whether they had received food allergy
training in their current restaurant).

Interviewers asked 19 questions to assess manager, food
worker, and server food allergy knowledge (e.g., identifying major food allergens and knowing what to do when a customer has a bad food allergic reaction). Five questions (e.g., should servers be knowledgeable about food allergies and should restaurants try to meet food allergic customers’ special requests) were scored on a Likert scale to assess staff food allergy attitudes. Another 13 to 22 questions (e.g., whether the restaurant has a plan for answering questions from food allergic customers and whether the restaurant has a specific person on duty to handle food allergy questions and requests) were used to assess food allergy practices. Data collectors also observed the restaurant and examined its menu to assess additional restaurant characteristics (e.g., highest priced food item and number of critical violations on the restaurant’s last inspection) and food allergy documentation (e.g., whether the menu mentioned anything about allergens and whether documentation about allergens was available in the kitchen area).

Data analysis. We initially created knowledge and attitude variables were recoded to provide approximately even groups to facilitate interpretation. For example, managers’ experience was split into <4 years (52.0%) and ≥4 years (48.0%). We next conducted a series of simple logistic regressions to examine associations between potential explanatory variables (restaurant, manager, food worker, and server characteristics; food preparation and service practices; and allergy documentation) and each outcome variable (knowledge and attitude scores) for managers, food workers, and servers (data not shown). We then created multiple logistic regression models for each group and outcome using a forward selection criterion (entrance criterion of P < 0.10) to further explore the relationship between 20 potential explanatory variables and the outcomes. We choose P < 0.10 to allow for more inclusiveness, given the relative exploratory nature of these analyses. We used SAS version 9.3 for all analyses.

RESULTS

Restaurant characteristics. Of the 1,307 restaurants contacted for participation in the study, 852 fit the study definition, and 278 (32.6%) of those agreed to participate (Table 1). Manager interview data indicated that 60.1% of the participating restaurants were independently owned. Data collectors classified 56.9% of the restaurants as either quick service (e.g., fast food), fast casual service, or takeout only. Manager interview data indicated that 54.3% of the restaurants had complex food preparation processes (i.e., preparation that includes holding food beyond same day service or some combination of holding, cooling, reheating, and freezing). Additionally, 64.1% had American (nonethnic) menus, 29.7% served more than 300 meals in a typical day, 50.5% had three or more managers, 50.7% employed more than 10 workers, 25.5% had a food item priced more than $20, and 23.0% were cited for more than one critical violation on the last inspection.

Manager, food worker, and server characteristics. Interview data from the 277 managers indicated that 66.4% were male, 81.2% spoke English as their primary language, 61.0% had some college education or more, 48.0% had been working at the restaurant for at least 4 years, and 80.8% had been food safety certified (Table 1). Less than half (44.7%) of managers had received training on food allergies while working at their current restaurant, and 27.8% did not recall serving any meals to food allergic customers in the past month.

Interview data from the 211 food workers indicated that 67.3% were male, 77.7% spoke English as their primary language, 37.0% had some college education or more, and 50.7% had been working at the restaurant for at least 2 years (Table 1). Less than half (44.1%) had received food allergy training while working at their current restaurant, and 21.0% did not recall preparing any meals for food allergic customers in the past month.

Interview data from the 156 servers indicated that 72.9% were female, 85.9% spoke English as their primary language, 50.0% had some college education or more, and 52.6% had been working at the restaurant for at least 2 years (Table 1). Only 33.5% had received training on food allergies while working at their current restaurant, and
12.6% did not recall serving any meals to food allergic customers in the past month.

Practices and observations. According to manager interview data, 70.8% percent of the restaurants had a plan for answering questions from food allergic customers (Table 2). Approximately half (53.3%) of the restaurants typically had a specific person on duty to handle food allergy questions and requests. Data collectors found that 22.0% of menus mentioned allergens. In 55% of these menus, the allergen information was a note for the customer to inform the restaurant whether they or someone with them had a food allergy. Food allergen documentation was available in the front of the restaurant (areas accessible to customers or the dining area) and the kitchen area in 23.1 and 36.3% of restaurants, respectively.

Manager, food worker, and server knowledge. Overall, managers correctly identified peanuts (95.0%), milk and dairy (91.0%), shellfish (92.4%), and eggs (81.6%) as major allergens (Table 3). Managers also recognized that trouble breathing (97.1%), hives or rash (98.2%), and swelling of tongue and throat (97.5%) are symptoms of an allergic reaction to food. Nearly all managers knew to call 911 (99.3%) when a customer has a bad food allergy reaction, such as trouble breathing. Managers (95.0%) knew that a person who eats food they are allergic to can die, and 92.8% of managers correctly said that taking a food allergen out of a meal after the meal had been prepared is not a way to make it safe for a food allergic customer. However, more than 1 in 10 managers (11.9%) incorrectly believed that a person allergic to a specific food ingredient can safely eat small amounts of that food.

Food workers also correctly identified peanuts (95.3%), milk and dairy (88.2%), shellfish (90.5%), and eggs (77.7%) as major allergens (Table 3). Food workers recognized trouble breathing (96.7%), hives or rash (97.2%), and swelling of tongue and throat (95.7%) as symptoms of an allergic reaction to food. Nearly all workers knew to call 911 (98.1%) when a customer has a bad food allergic reaction, such as trouble breathing. Food workers (94.8%) knew that a person who eats food they are allergic to can die, and 91.5% of food workers correctly said that taking a food allergen out of a meal after the meal has been prepared is not a way to make it safe for a food allergic customer. However, more than 1 in 10 food workers (11.8%) incorrectly believed that a person allergic to a specific food ingredient can safely eat small amounts of that food.

Servers correctly identified peanuts (95.5%), milk and dairy (93.0%), shellfish (94.2%), and eggs (72.4%) as major allergens (Table 3). Servers also recognized trouble breathing (99.4%), hives or rash (100%), and swelling of tongue and throat (100%) as symptoms of an allergic reaction to food. All servers knew to call 911 (100%) when a customer has a bad food allergic reaction, such as trouble breathing. Servers (97.4%) knew that a person who eats food they are allergic to can die, and 93.0% of servers correctly said that taking a food allergen out of a meal after the meal has been prepared is not a way to make it safe for a food

**TABLE 1. Descriptive data on restaurant, manager, and staff characteristics**

<table>
<thead>
<tr>
<th>Parameter</th>
<th>n %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Restaurant characteristics^a</td>
<td></td>
</tr>
<tr>
<td>Restaurant type (N 1/4 276)</td>
<td></td>
</tr>
<tr>
<td>Chain 110 39.9 Independent 166 60.1 Service type (N 1/4 276)^b</td>
<td></td>
</tr>
<tr>
<td>Full service casual or fine dining 119 43.1 Quick service, fast casual service, or takeout</td>
<td></td>
</tr>
<tr>
<td>only 157 56.9 Establishment type (N 1/4 278)^b</td>
<td></td>
</tr>
<tr>
<td>Prep serve or cook serve 127 45.7 Complex 151 54.3 Menu</td>
<td></td>
</tr>
</tbody>
</table>

specific food ingredient can safely eat small amounts of

Food workers also correctly identified peanuts (95.3%), milk and dairy (88.2%), shellfish (90.5%), and eggs (77.7%) as major allergens (Table 3). Food workers recognized trouble breathing (96.7%), hives or rash (97.2%), and swelling of tongue and throat (95.7%) as symptoms of an allergic reaction to food. Nearly all workers knew to call 911 (98.1%) when a customer has a bad food allergic reaction, such as trouble breathing. Food workers (94.8%) knew that a person who eats food they are allergic to can die, and 91.5% of food workers correctly said that taking a food allergen out of a meal after the meal has been prepared is not a way to make it safe for a food allergic customer. However, more than 1 in 10 food workers (11.8%) incorrectly believed that a person allergic to a specific food ingredient can safely eat small amounts of that food.

Food workers also correctly identified peanuts (95.3%), milk and dairy (88.2%), shellfish (90.5%), and eggs (77.7%) as major allergens (Table 3). Food workers recognized trouble breathing (96.7%), hives or rash (97.2%), and swelling of tongue and throat (95.7%) as symptoms of an allergic reaction to food. Nearly all workers knew to call 911 (98.1%) when a customer has a bad food allergic reaction, such as trouble breathing. Food workers (94.8%) knew that a person who eats food they are allergic to can die, and 91.5% of food workers correctly said that taking a food allergen out of a meal after the meal has been prepared is not a way to make it safe for a food allergic customer. However, more than 1 in 10 food workers (11.8%) incorrectly believed that a person allergic to a specific food ingredient can safely eat small amounts of that food.

Servers correctly identified peanuts (95.5%), milk and dairy (93.0%), shellfish (94.2%), and eggs (72.4%) as major allergens (Table 3). Servers also recognized trouble breathing (99.4%), hives or rash (100%), and swelling of tongue and throat (100%) as symptoms of an allergic reaction to food. All servers knew to call 911 (100%) when a customer has a bad food allergic reaction, such as trouble breathing. Servers (97.4%) knew that a person who eats food they are allergic to can die, and 93.0% of servers correctly said that taking a food allergen out of a meal after the meal has been prepared is not a way to make it safe for a food type (N 1/4 276)

American 177 64.1 Non-American 99 35.9 No. of meals served in a typical day (N 1/4 266)

1–100 95 35.7 101–300 92 34.6 .300 79 29.7 No. of managers or persons in charge that work in this restaurant (N 1/4 277), .3 137 49.5 .1 140 50.5 No. of workers other than managers that work in this restaurant (N 1/4 272), .1 104 49.3 .1 138 50.7 Highest priced food item on the menu (N 1/4 267), $10 95 35.6 $20 104 38.9 .20 68 25.5 No. of critical violations received after the last inspection (N 1/4 278), 0 134 48.2 1 80 28.8 .1 64 23.0

Manager characteristics^a

Sex (N 1/4 276)

^a Descriptive data on restaurant, manager, and staff characteristics.
Male 184 66.4 Female 93 33.6 Primary language spoken (N 1/4 277)
English 225 81.2 Other 52 18.8 Highest level of education (N 1/4 277)
High school diploma or less 108 39.0 Some college or more 169 61.0 Experience as a manager in this restaurant (N 1/4 277) 4 yr 144 52.0 4 yr 133 48.0 Ever been food safety certified (N 1/4 276) Yes 223 80.8 No 53 19.2 Received training on food allergies while working at this restaurant (N 1/4 209) Yes 86

### Table 1. Continued

<table>
<thead>
<tr>
<th>Parameter</th>
<th>n</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of meals served to food allergic customers per month (N 1/4 151)</td>
<td>0 19 12.6 1–10 97 64.2 10 35 23.2</td>
<td></td>
</tr>
<tr>
<td>Sex (N 1/4 155)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male 42 27.1 Female 113 72.9 Primary language spoken (N 1/4 156)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>English 134 85.9 Other 22 14.1 Highest level of education (N 1/4 156)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>High school diploma or less 78 50.0 Some college or more 78 50.0 Experience in this restaurant (N 1/4 156) 2 yr 74 47.4 12 yr 82 52.6 Received training on food allergies while working at this restaurant (N 1/4 155) Yes 52 33.5 No 103 66.5 No. of meals served to food allergic customers per month (N 1/4 151) 0 19 12.6 1–10 97 64.2 10 35 23.2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Data were obtained from manager interviews, unless otherwise noted.*

*Data were obtained from data collector observations.*

*Data were obtained from food worker interviews.*

*Data were obtained from server interviews.*
Comparisons of manager, food worker, and server knowledge scores. All three groups had similar knowledge scores (Table 4). Median knowledge scores were 13 for managers (mean $\bar{x}$ 13.7, SD $\sigma$ 2.0, n 142), 12 for food workers (mean $\bar{x}$ 13.0, SD $\sigma$ 2.5, n 142), and 13 for servers (mean $\bar{x}$ 13.5, SD $\sigma$ 2.2, n 146).

The overall ANOVA model suggested significant differences between groups ($F_{2,641} = 7.45, P = 0.001$). Post hoc tests revealed that managers (mean $\bar{x}$ 13.75, SD $\sigma$ 2.0, n 142) had significantly higher knowledge scores than did food workers (mean $\bar{x}$ 12.96, SD $\sigma$ 2.5, n 142), and their scores were not significantly different from those of managers or workers.

Multiple logistic regression of manager, food worker, and server knowledge. A multiple logistic regression analysis identified two characteristics that were significantly associated with manager food allergy knowledge (Table 5). Managers in restaurants that served more than 10 meals to allergic customers in the past month had greater odds of having a higher food allergy knowledge score than did managers in restaurants that served 10 or fewer such meals. Managers in restaurants that had a specific person to answer food allergy questions and requests had greater odds of having a higher food allergy knowledge score than did those managers in restaurants without such a person.

A multiple logistic regression analysis identified three characteristics that were significantly associated with server food allergy knowledge (Table 5). Servers in restaurants with a specific person to answer food allergy questions and requests had greater odds of having a higher food allergy knowledge score. Servers in full service restaurants had greater odds of having a higher food allergy knowledge score than did servers in quick service restaurants. Servers in restaurants that served more than 300 meals in a typical day had greater odds of having a higher food allergy knowledge score than did servers in restaurants that served 300 meals or less.

Manager, food worker, and server attitudes. Managers (97.5%) agreed or strongly agreed that servers should be knowledgeable about food allergies (Table 6). Nearly all managers (99.6%) agreed or strongly agreed that kitchen staff should be knowledgeable about food allergies. Managers (91.3%) agreed or strongly agreed that restaurants should try to meet food allergic customers’ special requests. Most managers (87.4%) agreed or strongly agreed that their restaurant could easily meet food allergic customers’ special requests. However, fewer managers (70.7%) agreed or strongly agreed that the staff in their restaurant would know what to do if a customer had a bad food allergic reaction.

All food workers (100%) agreed or strongly agreed that servers should be knowledgeable about food allergies (Table 6). Food workers (99.5%) agreed or strongly agreed that kitchen staff should be knowledgeable about food allergies. Food workers (97.1%) also agreed or strongly agreed that restaurants should try to meet food allergic customers’ special requests. Most food workers (92.9%) agreed or strongly agreed that their restaurant could easily meet food allergic customers’ special requests. However, only 74.4% of food workers agreed or strongly agreed that the staff in this restaurant would know what to do if a customer had a bad food allergic reaction.

All servers (100%) agreed or strongly agreed that servers should be knowledgeable about food allergies (Table 6). Servers (100%) also unanimously agreed or strongly agreed that kitchen staff should be knowledgeable
about food allergies. Nearly all servers (98.1%) agreed or strongly
agreed that restaurants should try to meet food allergic customers’ special requests. Most servers (93.0%) agreed or strongly agreed that their restaurant could easily meet food allergic customers’ special requests. However, only

A multiple logistic regression analysis identified four characteristics that were significantly associated with food worker food allergy knowledge (Table 5). Food workers in restaurants with a plan for answering questions from food allergic customers had greater odds of having a higher food allergy knowledge score than did workers in restaurants with no such plan. Female food workers had greater odds of having a higher food allergy knowledge score than did male food workers. Food workers with at least 2 years of experience in the restaurant had greater odds of having a higher food allergy knowledge score than did food workers with less experience. Food workers in restaurants in which the highest priced food item was between $10 and $20 had greater odds of having a higher food allergy knowledge score than did those workers in restaurants in which the highest priced food item was less than $10.

**TABLE 2. Descriptive data on food allergy practices and restaurant environment observations**

<table>
<thead>
<tr>
<th>Parameter</th>
<th>n</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Practices</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a Restaurant has plan for answering questions from food allergic customers (N 144 267) Yes 189 70.8 No 78 29.2 Specific person typically on duty to handle food allergy questions and requests (N 144 276) Yes 147 53.3 No 129 46.7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b Menu shows anything about allergens (N 144 273) Yes 60 22.0 No 213 78.0 Documentation in the front of the house</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Documentation in the front of the house (areas accessible to customers) or dining area about allergens (N 144 277)**

Yes 64 23.1 No 213 76.9 Documentation about allergens in the kitchen area (N 144 278) Yes 101 36.3 No 177 63.7

Data were obtained from manager interviews. Data were obtained from data collector observations.
three-quarters of servers (75.7%) agreed or strongly agreed that the staff in their restaurant would know what to do if a customer had a bad food allergic reaction.

Comparisons of manager, food worker, and server attitude scores. The three participant groups had approximately equivalent median attitude scores: 4.2 for managers (mean 1/4 4.4, SD 1/4 0.4, n 1/4 207), and 4.4 for servers (mean 1/4 4.5, SD 1/4 0.4, n 1/4 155) (Table 4). Knowledge and attitude scores were not significantly correlated in any of the respondent groups: managers, r 1/4 0.06, P 1/4 0.317, n 1/4 277; food workers, r 1/4 À0.03, P 1/4 0.684, n 1/4 207; and servers, r 1/4 0.04, P 1/4 0.653, n 1/4 155.

The overall ANOVA model suggested significant differences between groups (F 2,636 1/4 6.31, P 1/4 0.002). Post hoc tests revealed that servers (mean 1/4 4.46, SD 1/4 0.41, n 1/4 155) had significantly higher attitude scores than did managers (mean 1/4 4.30, SD 1/4 0.50, n 1/4 277). Food workers had a mean score of 4.39 (SD 1/4 0.44, n 1/4 211), and their scores were not significantly different from those of managers or servers.

Multiple logistic regression of manager, worker, and server attitudes. A multiple logistic regression analysis identified six characteristics that were significantly associ-

### TABLE 3. Descriptive data on restaurant manager and staff food allergy knowledge

<table>
<thead>
<tr>
<th>Question</th>
<th>% n %</th>
<th>Of the following foods, which do you think are major allergens?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peanut</td>
<td>263 95.0</td>
<td>201 95.3 149 95.5 Tomatoes 53 19.1 47 22.3 37 23.7 Milk or dairy (correct) 252 91.0 186 88.2 145 93.0</td>
</tr>
<tr>
<td>Strawberries</td>
<td>88 31.8</td>
<td>68 32.2 47 30.1 Shellfish (correct) 256 92.4 191 90.5 147 94.2 Eggs (correct) 226 81.6 164 77.7 113 72.4</td>
</tr>
<tr>
<td>Chocolate</td>
<td>64 23.1</td>
<td>59 28.0 27 17.3</td>
</tr>
</tbody>
</table>

Which of the following are symptoms of an allergic reaction

- Trouble breathing (correct) 269 97.1 204 96.7 155 99.4 Hives or rash (correct) 272 98.2 205 97.2 156 100 Headache 154 55.6 109 51.7 72 46.2 Swelling of tongue and throat (correct) 270 97.5 202 95.7 156 100 Fever 166 59.9 122 57.8 102 65.4

Which of the following should you do if a customer is having a bad food allergic reaction, such as trouble breathing? Suggest that the customer drink water 67 24.2 59 28.0 41 26.3 Call 911 (correct) 275 99.3 207 98.1 156 100 Ask the customer if they have medicine they could take 250 90.3 193 91.5 145 93.0 Suggest that the customer throw up 42 15.2 28 13.3 9 5.8

Someone with a food allergy can safely eat small amounts of the food they are allergic to. Yes 33 11.9 25 11.8 18 11.5 No (correct) 225 81.2 159 75.4 122 78.2 Unsure or skipped 19 6.9 27 12.8 16 10.3

Someone with a food allergy can die from eating the food they are allergic to. Yes (correct) 263 95.0 200 94.8 152 97.4 No 7 2.5 6 2.8 2 1.3 Unsure or skipped 7 2.5 5 2.4 2 1.3

Taking a food allergen out of a meal after it has been made is one way to make it safe for a food allergic customer. Yes 17 6.1 12 5.7 6 3.8 No (correct) 257 92.8 193 91.5 145 93.0 Unsure or skipped 3 1.1 6 2.8 5 3.2

### TABLE 4. Comparisons of food allergy knowledge and attitude scores by group

- **Group**
  - **Manager (N 1/4 277)** Food worker (N 1/4 211) Server (N 1/4 156)
  - **Fruit**
    - **Peach**
      - **Correct** 263 95.0 201 95.3 149 95.5 Tomatoes 53 19.1 47 22.3 37 23.7 Milk or dairy (correct) 252 91.0 186 88.2 145 93.0
    - **Correct** 269 97.1 204 96.7 155 99.4 Hives or rash (correct) 272 98.2 205 97.2 156 100 Headache 154 55.6 109 51.7 72 46.2 Swelling of tongue and throat (correct) 270 97.5 202 95.7 156 100 Fever 166 59.9 122 57.8 102 65.4
  - **Correct** 263 95.0 200 94.8 152 97.4 No 7 2.5 6 2.8 2 1.3 Unsure or skipped 7 2.5 5 2.4 2 1.3
  - **Correct** 263 95.0 200 94.8 152 97.4 No 7 2.5 6 2.8 2 1.3 Unsure or skipped 7 2.5 5 2.4 2 1.3

**a** Responses are shown in the order they were asked. n, the number of managers and workers that affirmatively answered the question.
ated with manager food allergy attitudes (Table 7). Managers in restaurants that served more than 10 meals to food allergic customers in the past month had greater odds of difference of having a higher food allergy attitude score than did managers in restaurants that served 10 meals or fewer. Managers in restaurants with plans for answering questions from food allergic customers had greater odds of having a higher food allergy attitude score. Managers in restaurants with a specific person to answer food allergy questions and requests had greater odds of having a higher food allergy attitude score than did managers in restaurants without such a person. Managers in restaurants that had allergen information on the menu were less likely to have a higher food allergy attitude score than did managers in restaurants without this information. Managers with at least 4 years of experience in the restaurant were also less likely to have a higher food allergy attitude score than were managers with less experience. Managers who had received food allergy training at their restaurant had greater odds of having a higher food allergy attitude score than did managers with no food allergy training.

### TABLE 5. Multiple logistic regression analysis of characteristics associated with restaurant managers, food workers, and servers scoring in the top 50% of food allergy knowledge scores

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>OR (90% CI)</th>
<th>P</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manager scored in top 50%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No. of meals served to allergic customers in the past month</td>
<td>0.003 1–10 vs 0 vs 1–10 1.48 (0.89, 2.48) 0.208 .1 vs 1–10 2.33 (1.35, 4.04) 0.101 .10 vs 0 3.45 (1.87, 6.36) 0.001 Specific person to answer food allergy questions and requests</td>
<td>0.05</td>
</tr>
<tr>
<td>Yes vs no 1.71 (1.09, 2.70) 0.052</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Restaurant plan for answering questions from food allergic customers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yes vs no 4.23 (2.20, 8.12) 0.001</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex Female vs male 3.63 (1.81, 7.26) 0.002 Experience in this restaurant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;.1 yr vs 2 yr 2.60 (1.43, 4.72) 0.009 Highest priced food item on the menu</td>
<td>0.071 $10–$20 vs $10 2.72 (1.33, 5.56) 0.022 .20 vs $10–$20 0.68 (0.32, 1.42) 0.389 .20 vs $10 1.84 (0.80, 4.24) 0.228 Server scored in top 50%</td>
<td></td>
</tr>
<tr>
<td>Specific person to answer food allergy questions and requests</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yes vs no 2.49 (1.33, 4.66) 0.017 Service type</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Full service vs quick service 2.71 (1.40, 5.24) 0.013 No. of meals served in a typical day</td>
<td>0.077 101–300 vs 1–100 1.03 (0.51, 2.05) 0.953 .300 vs 101–300 2.54 (1.20, 5.38) 0.042 .300 vs 1–100 2.60 (1.19, 5.69) 0.045</td>
<td></td>
</tr>
</tbody>
</table>

**a** Overall models were created using a forward selection criterion of P = 0.10. Variables are presented in order of steps at which they entered the model. OR, odds ratio; CI, confidence interval. OR = 1 indicates that the odds of the outcome (knowledge score in top 50%) were greater for the first mentioned category (e.g., 1 to 10) than for the second mentioned category (e.g., 0).

**b** $\chi^2 <$ 1/4

17.18, df = 3, P = 0.001, N = 262. $c$ $\chi^2$ = 1/4 30.50, df = 5, P = 0.001, N = 192. $d$ $\chi^2$ < 1/4 16.97, df = 4, P = 0.002, N = 149.

95% confidence interval

Knowledge scores

Manager vs food worker 0.785 (0.28, 1.29) Manager vs server 0.292 (0.08, 0.84) Server vs food worker 0.493 (0.08, 1.07)

Attitude scores

Manager vs food worker $\hat{A}$0.087 ($\hat{A}$0.19, 0.02) Manager vs server $\hat{A}$0.157 ($\hat{A}$0.27, $\hat{A}$0.04) Server vs food worker 0.069 ($\hat{A}$0.05, 0.19)

**a** Fisher’s $b$ P one-way ANOVA ($F_{2.641}$ < 1/4 7.45, P = 0.001).

0.05. $c$ Equal variance not assumed. Welch’s one-way ANOVA ($F_{2.606}$ < 1/4 6.31, P = 0.002).
A multiple logistic regression analysis identified four characteristics that were significantly associated with food worker food allergy attitudes (Table 7). Food workers in restaurants with a plan for answering questions from food allergic customers were more likely to have a higher food allergy attitude score than were workers in restaurants without such a plan. Food workers with at least some college education had greater odds of having a higher food allergy attitude score than did workers with less education. Food workers in restaurants that employed fewer than five workers for every manager were more likely to have a higher food allergy attitude score than were those workers in restaurants with five workers or more for every manager. Food workers in chain restaurants had greater odds of having a higher food allergy attitude score than did workers in independent restaurants.

A multiple logistic regression analysis identified four characteristics that were significantly associated with server food allergy attitudes (Table 7). Servers with at least some college education were more likely to have a higher food allergy attitude score than were servers with less education. Servers who had received food allergy training at the restaurant had greater odds of having a higher food allergy attitude score than did servers with no food allergy training. Servers in restaurants with a plan for answering questions from food allergic customers were more likely to have a

<table>
<thead>
<tr>
<th>Statement</th>
<th>Manager (N=277)</th>
<th>Food worker (N=211)</th>
<th>Server (N=276)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Servers should be knowledgeable about food allergies

Strongly agree 173 62.5 137 72.4 Agree 97 35.0 74 35.1 43 27.6 Unsure 0 0 0 0 0 Disagree 7 2.5 0 0 0

Kitchen staff should be knowledgeable about food allergies

Strongly agree 194 70.0 147 69.7 125 80.1 Agree 82 29.6 63 29.8 31 19.9 Unsure 0 0 1 0.5 0 Disagree 1 0.4 0 0 0

Restaurants should try to meet food allergic customers’ special requests

Strongly agree 133 48.0 106 50.2 88 56.4 Agree 120 43.3 99 46.9 65 41.7 Unsure 7 2.6 0 2 1.3 Disagree 15 5.4 4 1.9 1 0.6

This restaurant can easily meet food allergic customers’ special requests

Strongly agree 113 40.8 82 38.9 74 47.5 Agree 129 46.6 114 54.0 71 45.5 Unsure 9 3.2 4 1.9 1 0.6 Disagree 26 9.4 10 4.7 10 6.4

The staff in this restaurant know what to do if a customer has a bad food allergic reaction

Strongly agree 66 23.8 51 24.2 36 23.1 Agree 130 46.9 106 50.2 82 52.6 Unsure 27 9.8 29 13.7 22 14.1 Disagree 49 17.7 25 11.9 16 10.2

\* Strongly disagree 1/4 1; disagree 1/4 2; unsure 1/4 3; agree 1/4 4; strongly agree 1/4 5.
Table 7. Multiple logistic regression analysis of characteristics associated with restaurant managers, food workers, and servers scoring in the top 50% of food allergy attitude scores.

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>OR (90% CI)</th>
<th>P</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manager scored in top 50%</td>
<td>1.29 (0.73, 2.28)</td>
<td>0.467</td>
</tr>
<tr>
<td>No. of meals served to allergic customers in past month</td>
<td>3.72 (2.00, 6.92)</td>
<td>0.001</td>
</tr>
<tr>
<td>Restaurant plan for answering questions from food allergic customers</td>
<td>4.80 (2.35, 9.77)</td>
<td>0.001</td>
</tr>
</tbody>
</table>

DISCUSSION

The overarching goal of this study was to describe food allergy knowledge, attitudes, and practices in restaurants. This multisite study revealed that restaurant managers and staff are knowledgeable and have positive attitudes concerning accommodations for food allergic customers. One positive finding was that nearly all restaurant staff could correctly identify symptoms of an allergic reaction and knew to call emergency medical services (i.e., 911) in these situations. Most managers and staff thought it was important for food workers and servers to be knowledgeable about food allergies and that their restaurant could easily meet food allergic customers’ special requests. However, we identified important gaps in knowledge and attitudes. For example, restaurant staff members were less likely to recognize eggs as a major allergen, and conversely, some foods such as strawberries were incorrectly believed to be major allergens. Another troubling finding was that more than 10% of managers and staff believe that someone with a food allergy can safely consume a small amount of that allergen. These findings for food workers are particularly troubling, because their main job responsibilities include food preparation. Accurate knowledge is critical to preventing an allergic reaction. Managers and staff also had lower confidence in their restaurants’ ability to properly respond to a food allergy emergency. This finding suggests that...
Yes vs no 2.77 (1.59, 4.81) 0.003 Specific person to answer food allergy questions and requests
Yes vs no 1.71 (1.02, 2.85) 0.085 Allergen information on menu
Yes vs no 0.42 (0.22, 0.79) 0.023 Experience in this restaurant
14 vs .4 yr 0.57 (0.35, 0.94) 0.061 Received food allergy training at this restaurant

Yes vs no 1.71 (1.00, 2.92) 0.099 Food worker scored in top 50%

Restaurant plan for answering questions from food allergic customers
Yes vs no 2.43 (1.33, 4.43) 0.015 Highest level of education
Some college or more vs high school diploma or less 3.33 (1.80, 6.17) 0.001 Worker:manager ratio

5:1 vs 15:1 2.44 (1.37, 4.35) 0.011 Restaurant type

Chain vs independent 2.04 (1.13, 3.70) 0.048 Server scored in top 50%

Highest level of education

Some college or more vs high school diploma or less 3.33 (1.80, 6.17) 0.001 Received food allergy training at this restaurant
Yes vs no 2.60 (1.32, 5.08) 0.020 Restaurant plan for answering questions from food allergic customers
Yes vs no 2.43 (1.16, 5.12) 0.050 Experience in this restaurant

12 vs ,2 yr 1.89 (1.01, 3.52) 0.093

Overall models were created using a forward selection criterion of \( P < 0.10 \). Variables are presented in order of steps at which they entered the model. OR, odds ratio; CI, confidence interval. OR \( \geq 1 \) indicates that the odds of the outcome (attitude score in top 50%) were greater for the first mentioned category (e.g., 1 to 10) than for the second mentioned category (e.g., 0).

\[ \chi^2 \approx 27.86, df = 14, P < 0.001, \]  
\[ \chi^2 \approx 24.43, df = 14, P < 0.001, \]

restaurant plans and training may not adequately prepare staff for these emergencies. Because the incidence of food allergies continues to increase, it is important for restaurants to be prepared for potential anaphylaxis emergencies.

Identifying areas of concern is only the first step in preventing food allergic reactions in restaurants. Our additional analyses quantified the associations between restaurant, manager, and staff characteristics, practices, and observations and their food allergy knowledge and attitudes. Understanding these relationships is critical to creating effective interventions.

We found that several individual characteristics were significantly associated with food allergy knowledge and attitudes, e.g., education, work experience, and sex. Food worker knowledge level was higher among female workers and those with more experience working in their current restaurant. These findings suggest that it is important for restaurants to engage less experienced workers in food allergy trainings. Work experience and education were also significantly related to attitudes for managers, food workers, and servers. Managers with less experience had positive attitudes. In this case, experience might be a proxy for age. Anecdotal information from our data collectors suggests that younger managers were more receptive to accommodating food allergens than were older managers. In contrast, servers with more experience had positive attitudes. The contradiction between these findings is not readily explainable. Both food workers and servers with higher levels of education had positive attitudes.

Our findings also revealed a number of restaurant characteristics associated with food allergy knowledge and attitudes. Food workers in restaurants with higher priced food and servers in full service restaurants were more knowledgeable about food allergies. These characteristics might be indicative of restaurants with more resources to hire and retain staff who are more knowledgeable in general. Servers who served more meals per day also were more knowledgeable, perhaps because they recited the ingredients in meals to customers more frequently. Food workers in chain restaurants and those in restaurants with a lower worker-to-manager ratio also had positive food allergy attitudes.

Several allergy-specific practices were consistently related to knowledge and attitudes for managers, food workers, and servers. Serving more meals to food allergic customers was positively related to manager knowledge and attitudes but not to food worker and server knowledge and attitudes. Although staff are all involved in the process
of serving food allergic customers, managers have more of the burden to ensure a meal is allergen free, especially if they are designated as the specific person in the restaurant to handle food allergy questions and requests. Having a plan for answering questions from food allergic customers or having a specific person to answer food allergy questions and requests was positively related to food allergen knowledge and attitudes for all staff groups. Both of these practices are recommended by the Food Allergy Research and Education group (8) as part of a restaurant’s food allergy management plan. Research concerning the direction of the relationship between restaurant practices and food allergy knowledge and attitudes should be explored.

Food allergy training was associated with positive manager and server attitudes but not with knowledge in any staff group. These findings suggest that food allergy trainings influence attitudes but either do not impart enough food allergy knowledge or do not result in retention of that knowledge. Relevant material for these trainings can include information on major food allergens, menu items containing food allergens, symptoms of an allergic reaction, interacting with food allergic customers, preparing for a food allergic reaction, and preventing cross-contact with allergens. Food allergy training can also be provided to new employees, and existing staff can be retrained periodically. Further research could explore which training techniques are most effective and result in long-term retention of important food allergy information.

Counterintuitively, the presence of allergen information on the menu was associated with less positive attitudes for managers. In 55% of these menus, the allergen information was a note for the customer to inform the restaurant if they or someone with them had a food allergy. In at least one of the data collection sites, legislation requires restaurants to state in the menu that customers should notify the server of any food allergies. Such legislation may produce situations in which even managers with less positive food allergy attitudes still include such notices on their menus. As more states and cities adopt food allergy laws, the extent to which these laws affect restaurants' food allergy practices can be evaluated. In any case, alerting customers to menu items containing allergens or encouraging these customers to notify staff regarding their allergies might help prevent allergic reactions. Only 22% of restaurant menus mentioned anything about allergens; we encourage more restaurants to include information about allergens on their menus.

This study had several limitations. Because we included only English-speaking managers, food workers, and servers in the study, the findings might not generalize to non-English speakers. Similarly, because the interviewed food workers and servers were chosen by managers rather than randomly, the food worker and server data might not be representative of these groups as a whole. This study also had a low participation rate (32.6%). The low response rate might have resulted in an overrepresentation of better and safer restaurants in the sample. In reporting results of a food allergen survey that also had a low response rate (4), the authors suggested that a lack of participation might reflect “a general discomfort in responding to an inquiry regarding food allergies.” In comparison to other food safety topics, food allergies have emerged more recently, and managers might not feel as comfortable participating in research. Almost all participants in the present study had very favorable food allergy attitudes. This range restriction limited our ability to investigate the relationship between explanatory variables and attitudes. We also were not able to make causal inferences about the relationships between explanatory and outcome variables. For example, knowledgeable managers may attract and retain more customers with food allergies, or an increase in customers with food allergies may compel staff to acquire additional knowledge about allergens. We cannot determine whether serving more

J. Food Prot., Vol. 79, No. 9 ALLERGY KNOWLEDGE AND ATTITUDES IN RESTAURANTS
ACKNOWLEDGMENTS

We thank the restaurant managers, workers, and servers who participated in this study and the EHS-Net staff who assisted with study design and data collection. This publication is based on data collected and provided by CDC EHS-Net, which is supported by a CDC grant award funded under CDC-RFA-EH05-013. The findings and conclusions in this report are those of the authors and do not necessarily represent the views of CDC or the Agency for Toxic Substances and Disease Registry.

REFERENCES


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COMMITTEE NAME: Program Standards Committee (PSC)

DATE OF FINAL REPORT: October 31, 2019 Date amended: 12/3/2019

COMMITTEE ASSIGNMENT: ☐ Council I  X Council II  ☐ Council III  X Executive Board

REPORT SUBMITTED BY: Angie Cyr, Chair; Amanda Douglas, Co-Vice Chair; Andre Pierce, Co-Vice Chair

COMMITTEE CHARGE(S):

Issue # 2018 II-013 Report – Program Standards Committee (PSC)
1. Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards (charge originally assigned via Issue 2016-II-009);
2. Continue work on a cost/benefit analysis for recognizing partial achievement of the VNRFRPS following clarification from the FDA (as noted above) (charge originally assigned via Issue 2016-II-009);
3. Identify inconsistencies in language between all Standards in the VNRFRPS; and
4. Report back the Committee's findings and recommendations to the 2020 biennial meeting.

Issue # 2018 II-014 PSC 2 – Improvements to VNRFRPS (Note: These charges were assigned by the Executive Board at their meeting August 21-22, 2018.)
1. Work with the FDA to include plan review in the VNRFRPS. The committee recognizes that facility design and construction support behaviors that reduce the occurrence of foodborne illness risk factors.
2. For the Listing of Jurisdictions Enrolled in the VNRFRPS on the FDA’s website: Work with the FDA to identify a means to recognize enrolled jurisdictions that are self-reporting partial achievement of a Standard. For example, place an asterisk (*) by an agency's name under that particular VNRFRPS Standard to denote partial achievement and a footnote that states the reason why the jurisdiction cannot fully meet the Standard.

Issue # 2018 II-018 PSC 3 – Continue Revision of VNRFRPS Standard 8 Staffing Level Criteria
1. Continue to collaborate with the FDA internal Program Standards working group on modifying the "Description of Requirements" for "Staffing Level" in Standard 8 of the FDA Voluntary National Retail Food Regulatory Program Standards (VNRFRPS);
2. Use the supporting attachments listed in the 2016-2018 Program Standards Committee, Standard 8 Subcommittee report as the foundation to establish a more statistically sound logic model for the FTE (full-time equivalent)/Inspection ratio and provide the new calculation/formula to be used by a VNRFRPS enrollee to assess the Standard 8 "Staffing Level";
3. Propose amendments to Standard 8 of the VNRFRPS and the CFP guidance document titled “Standard 8 Staffing Level Assessment Workbook” and accompanying "Instruction Guide" to incorporate the outcomes of Charges 1 and 2; and
4. Report back committee findings and recommendations to the 2020 Biennial Meeting.

Issue # 2018 II-019 PSC 7 - Training of Food Safety Regulatory Professionals
1. Continue review of initiatives (existing, new or under development) involving the training, evaluation and/or certification of food safety inspection officers to ensure the sharing of information and eliminate unnecessary redundancy in the creation of work products or assignments of tasks/responsibilities.
2. Review the results of the PFP TCWG recommendations for the nationally recognized Retail Food Curriculum based on the Retail Food Competency and Curriculum Framework to determine if changes are needed in the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) Standard 2 curriculum; including, but not limited to: a) Identifying any gaps and recommendations for change; and b) Reviewing the time frame for completion of Standard 2, Steps 1 through 4, for new hires or staff newly assigned to regulatory retail food protection programs.
3. Continue to assess if any changes will be needed in VNRFRPS Standard 2 - Trained Regulatory Staff to provide better alignment with Standard 4 of the VNRFRPS.
4. Report back the Committee's findings and recommendations to the 2020 biennial meeting.

Issue # 2018 II-020 PSC 8 - Approval & Posting of Updated Foodborne Illness Training Crosswalk
1. Maintaining the "Crosswalk - Requirements for Foodborne Illness Training Programs" document as a resource for content baseline for foodborne illness training;
2. Evaluating the following references for inclusion in the Crosswalk document: a) CDC EHS e-Learning on Environmental Assessment of Foodborne Illness Outbreaks https://www.cdc.gov/nceh/ehs/elearn/ea_fio/ b) FDA Food Related Emergency Exercise Bundle (FREE-B)
Issue # 2018 II-021 Amend VNRFRPS - Standard 4 - Uniform Inspection Program
...address the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Program Standard No. 4 - Uniform Inspection Program to:
1. Research a new model, solution and/or recommendation that will allow large and small jurisdictions to have the same statistical compliance requirements;
2. Amend audit requirements to include randomized selection of files to be reviewed; and
3. Report back to the 2020 Biennial meeting of the Conference for Food Protection its findings and recommendations.

COMMITTEE WORK PLAN AND TIMELINE:
1. See the attached Program Standards Committee Work Plan.
2. All subcommittee work was completed in October, 2019. The PSC final report and issue submittals were drafted and submitted to the Executive Director and Conference Chair for review on October 31, 2019.

COMMITTEE ACTIVITIES:
1. Dates of committee meetings or conference calls:
   a. PSC Committee chair and co-vice chairs met via conference call on September 11, 2018 to discuss PSC issues and subcommittee formation.
   b. PSC Committee chair participated in the Clearinghouse Work Group calls on September 25, 2018, February 14, 2019, May 7, 2019 and September 10, 2019.
   c. Full committee meetings were held via conference call or WebEx on October 5, 2018, August 8, 2019 and August 9, 2019.
   e. PSC subcommittee #2 (Issue # 2018 II-018) held conference calls on February 19, 2019, March 19, 2019, May 13, 2019, June 18, 2019, October 17, 2019 and October 21, 2019.
   g. PSC subcommittee #4 (Issue # 2018 II-020) held a conference call on December 6, 2018. A second call was scheduled for January 23, 2019 but was postponed due to the federal government shutdown. The subcommittee chair reached out to team members individually to discuss progress on their assigned tasks throughout 2019.
   h. PSC subcommittee #5 (Issue #2018 II-021) held conference calls on January 2, 2019, January 30, 2019, February 14, 2019, and February 28, 2019 with biweekly calls scheduled from this date on.
2. Overview of committee activities:
   a. A full committee meeting was held on October 5, 2018. The CFP Anti-trust statement was read and the CFP Master Calendar and committee charges were discussed. The committee has six issues with charges to be worked on. It was decided that a subcommittee will be formed to work on the charges for each issue.
   b. Amanda Douglas, co-vice chair, Andre Pierce, co-vice chair and Angie Cyr, chair, discussed subcommittee formation further on October 5, 2018. It was decided to combine Issue 2018 II-013 and Issue 2018 II-014 since they are closely related. Five subcommittees were formed to work on the assigned charges.
   c. The PSC chair sent an email on October 8, 2018, requesting that committee member’s signup for the subcommittees that they are interested in. Co-chairs of the subcommittees were also solicited at that time.
   d. The committee chair created teams for each of the subcommittee’s within FoodSHIELD on November 6, 2018 and then sent subcommittee rosters to each of the subcommittee co-chairs so they could begin scheduling subcommittee meetings.
   e. Due to the federal government shutdown, the subcommittees had limited dialogue with our FDA partners for part of the biennium. This had an impact on the subcommittee work on the assigned charges.
f. Subcommittee #1 (Issue # 2018 II-013 & Issue # 2018 II-014) - The PSC co-vice chair, Andre Pierce took the lead on scheduling subcommittee meetings. His work got the subcommittee on track to complete the assigned charges by the deadline. Members of the committee developed a survey related to partial achievement that was sent to VNRFRPS enrolled jurisdictions in North Carolina and Texas. There were 47 respondents - 91% were local jurisdictions. The results showed that most jurisdictions would like some way to track their partial achievement of standards for internal purposes only. Only three of the 47 respondents wanted a public facing website to report. Nearly half (49%) of the respondents had not heard about the tracking spreadsheet. The committee used the data to develop the position that the tracking spreadsheet is a useful tool for internal self-reporting and needs to be marketed, rather than having a public website for reporting. The issue will reflect these discussions and will close this charge. Additionally, the subcommittee discussed the value of plan review to support behaviors that reduce the occurrence of risk factors associated with foodborne illness. The subcommittee developed draft criteria and is recommending that those ideas be explored further in the next biennium with the submittal of PSC Issue #5 Continuation of Issue 2018 II—014 PSC2 Plan Review Incorporation in the Program Standards. The subcommittee also discussed potential inconsistencies in the VNRFRPS. No changes were identified at this time.

g. Subcommittee #2 (Issue # 2018 II-018) - The work of the subcommittee and the subcommittee co-chairs team at Harris County Public Health included surveys of Retail Program Standards enrollees, data compilation, statistical analysis, and providing graphic representations of data and data analysis, as well as conducting a pilot study of the proposed additional method to determine compliance with the staffing levels in Standard 8. Subcommittee documents were posted to the Subcommittee #2 workgroup folder on FoodSHIELD for review during conference calls. The proposed model for Standard 8 staffing level assessment, developed by Mr. Schaffer’s team at Harris County Public Health with assistance from this (and the 2016-2018) PSC subcommittee, was presented for subcommittee review. The proposed change provides three options for assessing staffing levels including one which removes the range (280-320 inspections/FTE) and is based on data obtained through surveys conducted by the 2016-18 subcommittee assigned to work on this issue. See the attached Standard 8 Summary and Standard 8 PowerPoint PDF documents for additional information. FDA continues to express concern that the proposed changes to Standard 8 staffing levels do not adhere to the "Best Practice" approach that the Standards promote and does not present a uniform staffing level standard. The voting members of Subcommittee #2 supported the proposed changes. Mr. Sudler, FDA CFSAN, agreed to contact a FDA statistician and set up a meeting with Mr. Schaffer to further evaluate the most appropriate use of the data (primarily data related to times assigned to inspection categories). However, as of the due date of this report, we have not been notified of a meeting with an FDA statistician. A statistician with Harris County Public Health did review the pilot study methods and data.

In August 2019, Subcommittee #2 met with the voting members of the PCS to discuss the work that had been completed to date. A key decision made on the call was to pilot the proposed model with a pool of health departments across the nation. In September 2019, Subcommittee #2 conducted a pilot study of a proposed staffing level evaluation model as directed by the PSC. The study consisted of sending a survey to health departments in order to obtain staffing level data and use the proposed model to analyze this data. Harris County Public Health led the study. The subcommittee shared the result of the pilot study with the subcommittee members to get their feedback before drafting an issue requesting modification of the criteria for assessing staffing levels in Standard 8 for consideration by the 2020 CFP. The consensus was to move forward with an issue proposing an additional model for assessing staffing levels in Standard 8. The existing methods in Standard 8 are maintained and may be used to determine compliance with the staffing level rather than using the new proposed model.

h. Subcommittee #3 (Issue # 2018 II-019) - The conference call on December 19, 2018 was used to review the committee charges, determine the timeline for addressing the charges, and it was decided that FoodSHIELD will be used for document sharing. The conference call on January 9 addressed charge 1, and a list of training, evaluation and/or certification courses available to food safety inspection officers was developed. The conference call on January 23, 2019 addressed charge 3, and the committee started work on a document of the twenty Standard 4 Quality Assurance elements and associated trainings. The conference call on February 6, 2019 provided an overview of the Retail Food Competency and Curriculum Framework from International Food Protection Training Institute (IFPTI) and addressed the time frame for completion of Standard 2, steps 1 through 4. Conference calls March 13, 2019 through July 17, 2019 were to review the IFPTI framework courses. Four teams were assembled with one industry and one regulatory member. Each team was assigned four courses to review (one per month) for its usefulness, whether there is any missing content, and if it should be implemented as “pre” or “post” coursework in the current VNRFRPS Standard 2 curriculum in Appendix B-1. The conference call on August 14, 2019 reviewed the list of charge 1 initiatives for training, certification, and evaluation of food inspection officers, charge 2a, and the recommendations received at that point, i.e. add, replace, or no action and indicating “pre” or “post” coursework. The conference call on September 11, 2019 continued discussion of group recommendations and discussed charge 3. An insufficient number of voting members on the call prohibited voting. On October 2, 2019, the final conference call was held. The group voted on majority of potential issues for charge 2a and charge 3. Voting continued electronically on October 4, 2019. The results of the vote were emailed on October 14 and issue submittal documents compiled.
i. PSC subcommittee #4 (Issue # 2018 II-020) - The subcommittee had discussions regarding the use of the Crosswalk document for Standard #5. In addition, updating previous resources identified, such as CIFOR, occurred in 2019. EATS 102 was evaluated as a resource. EATS 101 is already a resource, so there was no need to review EATS 101. Subcommittee members continued to identify resources and report at the subcommittee meetings. Emphasis was on industry private sector courses. Four of the eight resources currently identified were reviewed for accuracy in order to maintain the Crosswalk document. Pending resources were reviewed against the Crosswalk document, to verify that the reference citations were still accurate. On February 11, 2019, the PSC committee chair reached out to FDA to request Pathlore access to non-regulatory subcommittee members for purposes of materials review related to the subcommittee charges. The subcommittee chair worked directly with the subcommittee members throughout the biennium as they worked on reviewing their assigned resources. The Crosswalk document was updated with the new resources that were reviewed.

j. PSC subcommittee #5 (Issue #2018 II-021) - Time has been spent reviewing Standard 4. Subcommittee members reached out to larger jurisdictions who are enrolled in the standards and have indicated that they have met Standard 4. Things explored with these agencies was the burden of conducting the 3 field exercises with applicable file review over the 5 year time period. The agencies that responded were Tri-County Health in Colorado and Florida Dept. of Business and Professional Regulation. The subcommittee reviewed the statistical methodology for Standard 4 and had a discussion with the FDA statistician about the percentage of each quality element in order for compliance to be 75%. The subcommittee also reached out to the original issue submitter, Veronica Bryant, for further clarification on the issue that was submitted. The subcommittee reviewed the instructions for auditors and the possibility of random sampling and a randomly selected sample size as opposed to the auditor reviewing all records for each applicable field exercise. Marc Boyer, CFSAN statistician attended the February 14, 2019 meeting and provided Statistical Methodology and Explanation of the Statistical Model for Standard 4. See the attached Standard 4-Statistical Methodology document provided by FDA. It was decided at the February 28, 2019 meeting, on advice of Robert Sudler, FDA consultant, to submit the issue via questions to the Clearinghouse Work Group (CWG) and to suspend meetings until the CWG was able to address the questions (see CFP PSC Subcommittee CWG Questions attached PDF). The subcommittee submitted the questions to the CWG and provided clarifying information after the May meeting of the CWG. A response was received from the CWG after the September meeting of the CWG. See attached CWG Standard 4 Response PDF. With regards to the charge related to the review of files during an audit, this was discussed and interpreted, after extensive review of the standard documentation, that file review is not required by the auditor. The auditor can request a random number of files to review, upon their discretion.

k. The PSC chair solicited feedback from the committee membership on the formation of a Retail Food Alliance due to a request from the Executive Director. The feedback was provided to the Executive Director on January 25, 2019.

l. The PSC chair assisted the Executive Director with the development of a Supplemental Funding Proposal that was submitted to AFDO on July 24, 2019. The proposed use of the requested funding, should it be granted, is to hold a 2.5 day meeting in 2020 to focus on sharing information about the VNRFRPS.

m. A full PSC meeting was held on August 9, 2019 to learn about and provide feedback on the FDA’s proposed Flexible Funding Model. Marlbeth Niesen, FDA, presented the information to the committee during the meeting.

n. The PSC chair had a conference call with Robert Sudler, FDA, on August 12, 2019 to discuss the upcoming changes to the VNRFRPS. The majority of the changes were the result of previous CFP issue submittals, along with correcting typographical errors. Further action was not needed by the PSC.

o. A subcommittee was formed to work on the VNRFRPS special session at the 2020 conference. The workshop will be hands on with stations set up for each of the standards. For each standard, a regulatory agency will showcase something they did related to conformance or continuous improvement with meeting the standard.

Charges COMPLETED and the rationale for each specific recommendation:

a. Issue # 2018 II-013 charge #1 Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards (charge originally assigned via Issue 2016-II-009). The subcommittee’s survey data indicated that most jurisdictions in the surveyed states wanted internal rather than external recognition. The subcommittee concluded there is an undue burden on volunteer auditors to audit components of a standard as well as for FDA to maintain a public facing website. The subcommittee recommended marketing the Self-Assessment tool (see attached Draft 2017 VNRFRPS Self-Assessment Audit Form) for internal self-reporting and will ask FDA to maintain it.

b. Issue # 2018 II-013 charge #2 Continue work on a cost/benefit analysis for recognizing partial achievement of the VNRFRPS following clarification from the FDA (as noted above) (charge originally assigned via Issue 2016-II-009). The subcommittee’s survey data indicated that most jurisdictions in the surveyed states wanted internal rather than external recognition. The Self-Assessment tool is an effective way to track partial achievement and report to internal auditors. Based on this information, a cost-benefit analysis of recognizing partial achievement is no longer necessary.
c. Issue # 2018 II-013 charge #3 - The subcommittee did not identify any changes for the VNRFRPS.

d. Issue # 2018 II-013 charge #4 - This report serves as completion of this charge.

e. Issue # 2018 II-014 charge #2 - Based on the survey that was done, the subcommittee feels that this external recognition is not necessary.

f. Issue # 2018 II-018 charge #1 - FDA has been consulted and has participated on subcommittee conference calls. See PSC Issue #2 Recommendation to include a new proposed assessment tool to Standard 8 of VNRFRPS Staffing Level Criteria which has been submitted to resolve this issue.

g. Issue # 2018 II-018 charge #2 - Use the supporting attachments listed in the 2016-2018 Program Standards Committee, Standard 8 Subcommittee report as the foundation to establish a more statistically sound logic model for the FTE (full-time equivalent)/Inspection ratio and provide the new calculation/formula to be used by a VNRFRPS enrollee to assess the Standard 8 "Staffing Level". A more statistically sound model for the FTE/inspection ratio has been developed along with a new formula for calculating staffing needs that may be used by enrollees to assess staff level. This model is proposed as an additional method that may be used to determine compliance with the staffing level in Standard 8. The existing methods in Standard 8 are maintained and may be used to determine compliance with the staffing level.

h. Issue # 2018 II-018 charge #3 – Amendments to Standard 8, the Standard 8 Staffing Level Assessment Workbook and accompanying Instruction Guide have been made and submitted as an Issue.

i. Issue # 2018 II-018 charge #4 - This report serves as the completion of this charge.

j. Issue # 2018 II-019 charge #1 - The committee discussed initiatives (existing, new, or under development) involving the training, evaluation and/or certification available to Food Safety Inspection Officers (FSIO) in their respective jurisdictions (see PSC subcommittee #3 Charge 1 Training Evaluation and Certification Initiatives attached PDF).

k. Issue # 2018 II-019 charge #2a - The Committee reviewed 26 Integrated Food Safety System Basic Curriculum courses for Food Protection Professionals provided by the International Food Protection Training Institute (IFPTI) (see attachments PSC subcommittee #3 Charge 2 IFPTI Course Review and Integrated Food Safety System (IFSS) Food Protection Professionals Curriculum Framework). Courses B7 Emergency Response and B19 Pest Control were under development and not available for review. After the team’s review, the committee discussed the training and voted on whether to (1.) replace existing Standard 2 curriculum in appendix B-1 with the IFPTI course, (2.) add the IFPTI course to existing Standard 2 curriculum in appendix B-1, or (3.) do not include the IFPTI course in existing Standard 2 curriculum in appendix B-1 (“no action”). The committee recommends the following changes to existing Standard 2 (Appendix B-1):

i. Reformat Appendix B-1 into a table with training topics in one column and courses which fulfill the curriculum topics in another column. The current formatting implies the course listed is the only course that will fulfill the training requirement. The proposed format better shows that other courses may be used if deemed equivalent by the regulatory jurisdiction. It is anticipated that there may be accessibility issues with ComplianceWire courses in the future and other comparable courses may be needed as substitutions. Attachment PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft demonstrates suggested changes to Appendix B-1 using current Standard 2 curriculum; Attachment PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft demonstrates suggested changes to Appendix B-1 with all proposed issues below incorporated.

ii. IFPTI Course B2 (CC8029W): Replace FD252, Allergen Management in “post” curriculum. This course is a significant upgrade in course content providing more relevant and up to date information.

iii. IFPTI Course B8 Environmental Hazards (CC8024W): Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new (Food Safety Inspection Officer’s) FSIO’s baseline knowledge.

iv. IFPTI Course B12 Integrated Food Safety System (CC8018W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

v. IFPTI Course B15 Jurisdiction (CC8037W): Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

vi. IFPTI Course B16 Labeling (CC8038W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.
vii. IFPTI Course B17 Laws, Regulations, Policies, & Procedures (CC8039W): Replace FDA35, Basic Food Law for State Regulators in “pre” courses. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

viii. IFPTI Course B19 Pest Control: Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

ix. IFPTI Course B20 Plumbing: Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

tax. IFPTI Course B22 Professionalism (CC8025W): Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xi. IFPTI Course B23 Public Health Principles (CC8026W): Replace FDA36, “Public Health Principles” in “pre” courses. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xii. IFPTI Course B24 Recalls (CC8041W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xiii. IFPTI Course B25 Sampling (CC8035W): Replace MIC13, Aseptic Sampling, in the pre-requisite curriculum. This course is a significant upgrade in course content providing more relevant and up to date information.

xiv. IFPTI Course B26 Sanitation Practices (CC8032W): Replace MIC15, Cleaning & Sanitizing, in “pre” courses. This course is a significant upgrade in course content providing more relevant and up to date information.

xv. IFPTI Course B27 Traceability (CC8042W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xvi. IFPTI Course B28 Transportation (CC8036W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

l. Issue # 2018 II-019 charge #2b - The committee reviewed the time frame for completion of Standard 2, Steps 1 through 4, for new hires or staff newly assigned to regulatory retail food protection programs. The committee voted on February 16, 2019 to increase the timeframe from 18 to 24 months to align with Standard 2 of the Manufactured Food Regulatory Program Standards and to provide adequate time for standardization of staff.

m. Issue # 2018 II-019 charge #3 - The committee reviewed the twenty quality assurance program elements in Standard 4 of the VNRFRPS. It was determined that all but three elements are contained in the CFP Field Training Manual, Training Plan and Log. To better align with training in Standard 2 (see PSC subcommittee #3 Charge 3 Quality Elements Cross-referenced PDF attached), the committee recommends adding the following three missing elements to the CFP Field Training Manual, Training Plan and Log:

i. Standard 4 Performance Element III: “Verifies that the establishment is in the proper risk category and that the required inspection frequency is being met. Informs the supervisor when the establishment is not in the proper risk category or when the required frequency is not met.” Add “Reviewed establishment file for documentation indicating the assigned risk category” to CFP Training Manual Section I Pre-inspection, #2. Reviews establishment file for previous inspection report, complaints on file, and if applicable, required HACCP Plans or documents supporting the issuance of a variance by the agency. Also add “Verified the establishment is assigned the correct risk category, and when necessary, informs the supervisor when the establishment is not in the proper risk category.” to CFP Training Manual Section II Inspection Observations and Performance, #3 Uses a risk-based inspection methodology to correctly assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food.

ii. Standard 4 Performance Element IX: “Discuss options for the long-term control of risk factors with establishment managers, when the same out-of-control risk factor occurs on consecutive inspections, in accordance with the jurisdiction’s policies. Options may include, but are not limited to; risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP plans.” Add “Discussed options for the long-term control of risk factors with establishment managers when the same out-of-control risk factor occurs on consecutive inspections (e.g., risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP plans)” to CFP Training Manual Section II Inspection Observations and Performance, #6 Verifies correction of out of compliance observations identified during previous inspection.

iii. Standard 4 Performance Element XVIII: “Documents that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections. Options may include, but are not limited to, risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP....
Plans." Add “Documented that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections” to CFP Training Manual Section IV Written Communication, #1 Completes inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).

n. Issue # 2018 II-019 charge #4 - This report serves as completion of this charge.

o. Issue # 2018 II-020 charge #1 - The materials in the current Crosswalk document have been reviewed and the Crosswalk document has been revised. The “Crosswalk - Requirements for Foodborne Illness Training Programs" draft document is attached to this report.

p. Issue # 2018 II-020 charge #2 - The materials have been reviewed and the Crosswalk document has been revised. The "Crosswalk - Requirements for Foodborne Illness Training Programs" draft document is attached to this report.

q. Issue # 2018 II-020 charge #3 - This report serves as completion of this charge.

r. Issue # 2018 II-021 charge #1 - Based on the information provided by the FDA Statistician, small and large jurisdictions already have the same statistical compliance requirements. (See Standard 4 – Statistical Methodology attached PDF)

s. Issue # 2018 II-021 charge #2 - This charge was related to the review of files during an audit. This was discussed and interpreted, after extensive review of the standard documentation, that file review is not required by the auditor. The auditor can request a random number of files to review, upon their discretion.

t. Issue # 2018 II-021 charge #3 - This report serves as completion of this charge.

3. Charges INCOMPLETE and to be continued to next biennium:
   a. Issue # 2018 II-013 charge #3 is a standing PSC charge
   b. Issue #2018 II-014 charge #1 - see PSC Issue #5
   c. Issue #2018 II-019 charge #1 is a standing PSC charge
   d. Issue # 2018 II-020 charge #1 is a standing PSC charge

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:
X No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. PSC Issue #1: Report - 2018-2020 Program Standards Committee
   a. List of content documents submitted with this Issue:
      (a.1) Program Standards Committee Final Report (see attached PDF)
      (a.2) Program Standards Committee Roster (see attached PDF)
      (a.3) Program Standards Committee Work Plan (see attached PDF)
      (a.4) Crosswalk - Requirements for Foodborne Illness Training Programs Based on Standard 5 2019 Final (attached Word document)
      (a.5) Standard 8 – Proposed Model (see attached PDF)
      (a.6) Draft CFP Training Manual Revision
      (a.7) Draft Attachment A - CFP Training Plan and Log Revision (attached Word document)
   b. List of supporting attachments:
      (b.1) Program Standards Committee subcommittee #1 final report
      (b.2) Program Standards Committee subcommittee #2 final report
      (b.3) Program Standards Committee subcommittee #3 final report
      (b.4) Program Standards Committee subcommittee #4 final report
      (b.5) Program Standards Committee subcommittee #5 final report
2018 Program Standards Committee Final Report

Standard 8 Summary (see attached PDF)
Standard 8 PowerPoint (see attached PDF)
Standard 8 Re-Evaluation of Staffing Level Model Pilot Study Report (see attached PDF)
CFP PSC Subcommittee CWG Questions (see attached PDF)
CWG Standard 4 Response (see attached PDF)
Standard 4 - Statistical Methodology (see attached PDF)
Partial Achievement Survey (see attached PDF)
Preliminary Plan Review Proposal (see attached Word document)
PSC subcommittee #3 Meeting #1 Minutes 12 19 2018
PSC subcommittee #3 Meeting #2 Minutes 1 09 2019
PSC subcommittee #3 Meeting #3 Minutes 1 23 2019
PSC subcommittee #3 Meeting #4 Minutes 2 06 2019
PSC subcommittee #3 Meeting #5 Minutes 3 13 2019
PSC subcommittee #3 Meeting #6 Minutes 4 10 2019
PSC subcommittee #3 Meeting #7 Minutes 5 8 2019
PSC subcommittee #3 Meeting #8 Minutes 6 12 2019
PSC subcommittee #3 Meeting #9 Minutes 7 17 2019
PSC subcommittee #3 Meeting #10 Minutes 8 14 2019
PSC subcommittee #3 Meeting #11 Minutes 9 11 2019
PSC subcommittee #3 Meeting #12 Minutes 10 2 2019
PSC subcommittee #3 Charge 1 Training Evaluation and Certification Initiatives
PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft
PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft
PSC subcommittee #3 Charge 2 IFPTI Course Review
PSC subcommittee #3 Charge 3 Quality Elements Cross-referenced
Integrated Food Safety System (IFSS) Food Protection Professionals Curriculum Framework
B2 Allergens IFPTI Course Profile
B17 Laws Regulations IFPTI Course Profile
B23 Public Health Principles IFPTI Course Profile
B25 Sampling IFPTI Course Profile
B26 Sanitation Practices IFPTI Course Profile
Standard 2 Appendix B-1 (see https://www.fda.gov/media/86752/download)
B8 Environmental Hazards IFPTI Course Profile
B12 Integrated Food Safety System IFPTI Course Profile
B15 Jurisdiction IFPTI Course Profile
B16 Labeling IFPTI Course Profile
B19 Pest Control IFPTI Course Profile
B20 Plumbing IFPTI Course Profile
2. **PSC Issue #2 New assessment tool for Standard 8 Staffing Level Criteria**
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments: ☐ No supporting attachments submitted
      
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 – Proposed Model (see attached PDF)
      
      (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #2 final report (attached PDF)
      
      
      
      (5) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 Summary (see attached PDF)
      
      (6) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 PowerPoint (see attached PDF)
      
      

3. **PSC Issue #3 Posting updated Crosswalk**
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Crosswalk-Requirements for Foodborne Illness Training Programs Based on Standard 5 2019 Final (attached Word document)
      
      (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #4 final report (attached PDF)

4. **PSC Issue #4 Maintenance and Posting of the Self-Assessment Tool (SA Tool)**
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #1 final report (see attached PDF)
5. PSC Issue #5 Continuation of Issue 2018 II-014 PSC2
   a. List of content documents submitted with this Issue:
   b. List of supporting attachments:
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #1 final report (see attached PDF)

6. PSC Issue #6 Amend Standard 2 Appendix B-1 format
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report (see attached PDF)
      (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft
      (3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft

7. PSC Issue #7 Amend Std 2 curriculum to replace select courses with updates
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report (see attached PDF)
      (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B2 Allergens IFPTI Course Profile (see attached PDF)
      (3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B17 Laws Regulations IFPTI Course Profile (see attached PDF)
      (4) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B23 Public Health Principles IFPTI Course Profile (see attached PDF)
      (5) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B25 Sampling IFPTI Course Profile (see attached PDF)
      (6) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B26 Sanitation Practices IFPTI Course Profile (see attached PDF)

8. PSC Issue #8 Amend Standard 2 to include additional “pre” and “post” topics
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report (see attached PDF)
      (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B8 Environmental Hazards IFPTI Course Profile (see attached PDF)
      (3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B12 Integrated Food Safety System IFPTI Course Profile (see attached PDF)
      (4) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B15 Jurisdiction IFPTI Course Profile (see attached PDF)
      (5) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B16 Labeling IFPTI Course Profile (see attached PDF)
      (6) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B19 Pest Control IFPTI Course Profile (see attached PDF)
      (7) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B20 Plumbing IFPTI Course Profile (see attached PDF)
9. **PSC Issue #9 Amend Std 2 to increase the time for completion of Steps 1-4**
   a. **List of content documents submitted with this Issue: None**
   b. **List of supporting attachments:**
      (1) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report (see attached PDF)
      (3) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: Manufactured Food Regulatory Program Standards (see https://www.fda.gov/MFRPS)

10. **PSC Issue #10 Amend CFP Training Manual to add Quality Program Elements**
    a. **List of content documents submitted with this Issue: None**
    b. **List of supporting attachments:**
       (1) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report (see attached PDF)
       (2) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: PSC Subcommittee #3 Charge 3 Quality Elements Cross-referenced (attached Word document)
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**Subcommittee #1 Issue 2018 II-013 & Issue 2018 II-014**

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| Presentations finalized and submitted to Executive Director | X X X X X X X X X X |

The image contains a table with tasks and their statuses. Each task is marked with a checkmark in the appropriate column, indicating its completion status.
| Power Point presentation developed and provided to CFP Executive Director for posting on the CFP web-site | all/subcommittees chair | X |
| AV needs for session submitted to CFP Executive Director | Subcommittee chair | X |
| Progress report to PSC chair | Subcommittee chair | X | X | X | X | X | X | X | X |
Crosswalk - Requirements for Foodborne Illness Training Programs Based on Standard 5

Introduction:

The 2014 – 2016 Interdisciplinary Foodborne Illness Training Committee (IFITC) was charged with developing a Crosswalk that would identify areas where training programs could be compared to Standard 5 of the Voluntary National Retail Food Regulatory Program Standards. Using the FSMA 205 C (1) Phases of a Food Incident Response CIFOR/RRT/MFRPS/VNRFRPS Crosswalk as a base, the Committee revised the Crosswalk to compare additional training programs that were identified. In addition to the training programs identified in the CIFOR/RRT/MFRPS/VNRFRPS Crosswalk, the IFITC also reviewed:

1. National Environmental Health Association (NEHA) course “I-FITT-RR”


The resulting Crosswalk now identified the content of all the training programs and indicated, using a table format, how these compared to Standard 5. This Crosswalk is called Crosswalk – Requirements for Foodborne Illness Training Programs Based on Standard 5.

The Committee also recognized that in the process of determining gaps the Crosswalk could now have an expanded purpose of (1) identifying available resources related to Foodborne Illness Training; (2) setting a content baseline for the development of Foodborne Illness Training Programs; (3) establishing some consistency for training programs as a whole. The Committee considered this a more powerful interpretation of the first Charge and as such did not include any references to best practices.
The Committee also agreed that this document will be useful to regulators, academics and NGO’s when new training programs are being considered especially as it would introduce consistency, a much needed component in Foodborne Illness Training Programs.

In 2016-2018, the Program Standards Committee (PSC) was now charged with maintaining the document. The document was updated with current references for the training materials.

In 2018 – 2020, the PSC used this Crosswalk to identify essential education content of foodborne disease outbreak training programs and update the Crosswalk with additional information. Courses added to the document are CDC EHS e-Learning on Environmental Assessment of Foodborne Illness Outbreaks, FDA Food Related Emergency Exercise Bundle (FREE-B0, IS-305: Environmental Health Training in Emergency Response (EHTER) Awareness Level, NEHA Certified Foodborne Outbreak Investigator Credential (CFOI) and Integrated Food Safety Center of Excellence (CoE) Webinar Series.

The resulting Crosswalk now identifies the content of all the training programs as indicated, using a table format, comparing them to Standard 5. In the interest of saving space, identified “Tools” that did not have a correlating “Reference” to the Standard 5 element being evaluated were removed from the Standard 5 element listing.

Industry Related Sources

The PSC reached out to 50 industry food safety professionals to determine whether or not any companies had developed their own internal training system for investigating foodborne illnesses. We were unable to find any company that have developed their own comprehensive internal training system for investigating foodborne illnesses. There are a variety of documents from public resources, such as from state and federal agencies to teach the basics of investigations. For the most part, the PSC feels that industry needs to be knowledgeable enough to determine if the illness was related to the food that was served or sold and if there was a breakdown in safe food handling practices. Additionally, the industry needs to be as informed as the sanitarians or epidemiologists investigating the outbreak.

**Acronyms Used:**

**RRT:** Rapid Response Team  
**CIFOR:** Council to Improve Foodborne Outbreak Response
MFRPS: Manufactured Food Regulatory Program Standards
IAFP: International Association of Food Protection
NASDA: National Association of State Departments of Agriculture – Food Emergency Response Plan Template
NEHA Epi-Ready: National Environmental Health Association
NEHA I-FITT-RR: Industry-Foodborne Illness Investigation Training and Recall Response
CDC – Center for Disease Control
VNRFRPS: Voluntary National Retail Food Regulatory Program Standards – Standard 5
CDC EHS: Centers for Disease Control Environmental Health Specialist
NEHA (CFOI): National Environmental Health Association Certified Foodborne Outbreak Investigator credential *NOTE: The CFOI procedures relate to policies that are part of the exam for purposes of obtaining the credential. Therefore the applicability of the CFOI to Standard 5 is limited.
IFSCOE: Integrated Food Safety Center of Excellence
CoE: Center of Excellence
EATS: Environmental Assessments Training Series - EATS 102 is a training program designed to reinforce the lessons learned in EATS 101 by providing 4 additional scenarios. The training does reinforce how to perform an environmental investigation and the roles for different team members. It does not necessarily provide written guidelines for a program to incorporate into their procedures.
EHTER: Environmental Health Training in Emergency Response **NOTE: EHTER is a face-to-face introductory course designed to provide an overview of potential environmental health topics and guidance that an EH professional may encounter in a disaster situation (primarily focused on natural disasters). It does not address foodborne illness.
STANDARD 5 - Voluntary National Retail Food Regulatory Program Standards

1. Investigative procedures.

a. The program has written operating procedures for responding to and /or conducting investigations of foodborne illness and food-related injury*. The procedures clearly identify the roles, duties and responsibilities of program staff and how the program interacts with other relevant departments and agencies. The procedures may be contained in a single source document or in multiple documents.

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<th>Tool</th>
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<td>NASDA Version 4.0 August 2011</td>
<td>III, V, VI, VII, IX, X</td>
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<td>NEHA Epi-Ready. Foodborne Illness Response Strategies. Edition 2012</td>
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<td>Module 1 Building a Partnership: Who and Why?</td>
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<td>NEHA (CFOI)</td>
<td>*Performing Environmental Assessment</td>
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<td>IFSCOE</td>
<td>The CoE’s are integral to quantitative analysis of foodborne illness investigation. The Crosswalk does more than simply identify the content of the training content but makes it easy to access track and verify through certification.</td>
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<td>EATS</td>
<td>Lessons 1-4. All four scenarios provide information on the roles and responsibilities of the investigation team in an outbreak. The material is presented in an e-learning formatted and participants are not provided with written guidelines for further use.</td>
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<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>Information contained in the Resource, Lead planner and Facilitator's guidelines are provided depending on scenario.</td>
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b. The program maintains contact lists for individuals, departments, and agencies that may be involved in the investigation of foodborne illness, food-related injury* or contamination of food.

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NEHA I-FITT-RR

Module 1 Building a Partnership: Who and Why?

EATS

NEHA, in collaboration with CDC’s Environmental Health Services Branch, the National Network of Public Health Institutes (NNPHI), EATS provides training on the role of environmental assessments in the broader context of outbreak investigations and the food safety system.

Food Related Emergency Exercise Bundle (FREE)

Several of the scenarios provide contact lists for appropriate contacts on federal level, websites where key information can be gathered.

c. The program maintains a written operating procedure or a Memorandum of Understanding (MOU) with the appropriate epidemiological investigation program/department to conduct foodborne illness investigations and to report findings. The operating procedure or MOU clearly identifies the roles, duties, and responsibilities of each party.

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>II.A.</td>
</tr>
<tr>
<td></td>
<td>Chapter 1</td>
</tr>
<tr>
<td>CIFOR</td>
<td>3.1</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.3.1.1</td>
</tr>
<tr>
<td>NASA Version 4.0 August 2011</td>
<td>V, VI, IX, XIII</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 1 Building a Partnership: Who and Why?</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Module 4 Epidemiologic Investigation</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>The trainings are subject based.</td>
</tr>
<tr>
<td></td>
<td>The modules would help a jurisdiction to develop the MOU’s with the appropriate program/department.</td>
</tr>
<tr>
<td>d. The program maintains logs or databases for all complaints or referral reports from other sources alleging food-related illness, food-related injury* or intentional food contamination. The final disposition for each complaint is recorded in the log or database and is filed in or linked to the establishment record for retrieval purposes.</td>
<td></td>
</tr>
<tr>
<td>Tool</td>
<td>Reference</td>
</tr>
<tr>
<td>RRT</td>
<td>II.E.</td>
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</tr>
<tr>
<td>IAFP</td>
<td>Page 2,3,4 Example logs: page 139-140</td>
</tr>
<tr>
<td>NASA Version 4.0 August 2011</td>
<td></td>
</tr>
<tr>
<td>NEHA Epiready. Foodborne Illness Response</td>
<td>Module 2</td>
</tr>
<tr>
<td>Tool</td>
<td>Reference</td>
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<td>----------------------</td>
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<tr>
<td>RRT</td>
<td>Chapters 9, 10, 11 &amp; 13 (pg.212) Subsection D</td>
</tr>
<tr>
<td>CIFOR</td>
<td>Chapter 4, 4.3, Chapter 5</td>
</tr>
<tr>
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<tr>
<td>IAFP</td>
<td>Page 3-11</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 2 How Do You Recognize a Foodborne Illness?</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Yes the methodologies are covered in the COE</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>Similar procedures are referenced throughout the scenarios</td>
</tr>
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</table>

**e. Program procedures describe the disposition, action or follow-up and reporting required for each type of complaint or referral report.**

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapters 9, 10, 11 &amp; 13 (pg.212) Subsection D</td>
</tr>
<tr>
<td>CIFOR</td>
<td>Chapter 4, 5</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.5</td>
</tr>
<tr>
<td>NEHA (CFOI)</td>
<td>Detecting Outbreaks</td>
</tr>
</tbody>
</table>

**f. Program procedures require disposition, action or follow-up on each complaint or referral report alleging food-related illness or injury within 24 hours.**

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapters 9, 10, 11 &amp; 13 (pg.212) Subsection D</td>
</tr>
<tr>
<td>CIFOR</td>
<td>Chapter 4, 5</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.5</td>
</tr>
</tbody>
</table>

**g. The program has established procedures and guidance for collecting information on the suspect food’s preparation, storage or handling during on-site investigations of food-related illness, food-related injury*, or outbreak investigations.**

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapters 9, 10, 11 &amp; 13 (Page 212) Subsection D</td>
</tr>
<tr>
<td>CIFOR</td>
<td>Chapter 4, 5</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.5</td>
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<tr>
<td>IAFP</td>
<td>Pages 41-45</td>
</tr>
<tr>
<td>NEHA Epi-</td>
<td>Module 3, 5, 8</td>
</tr>
<tr>
<td>Tool</td>
<td>Reference</td>
</tr>
<tr>
<td>------</td>
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</tr>
<tr>
<td>RRT</td>
<td>Chapter 6, 10</td>
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<tr>
<td>CIFOR</td>
<td>3.1, 3.10, 6.3</td>
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<tr>
<td>MFRPS</td>
<td>5.5</td>
</tr>
<tr>
<td>IAFP</td>
<td>Pages 99-103</td>
</tr>
<tr>
<td>NASDA Version 4.0 August 2011</td>
<td>V, VI, IX</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>The established procedures are referenced and explained throughout several of the scenarios.</td>
</tr>
</tbody>
</table>

i. Program procedures provide guidance for the notification of appropriate state and/or federal agencies when a complaint involves a product that originated outside the agency’s jurisdiction or has been shipped interstate.
<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapters 9, 10, 11</td>
</tr>
<tr>
<td>CIFOR</td>
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</tr>
<tr>
<td>MFRPS</td>
<td>5.3</td>
</tr>
<tr>
<td>IAFP</td>
<td>Pages 34-41</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 3 Environmental Assessment Exercise</td>
</tr>
<tr>
<td>CDC Foodborne Illness Outbreak Environmental Assessments</td>
<td>Lesson 2</td>
</tr>
<tr>
<td>NEHA (CFOI)</td>
<td>Reviewing Investigation Findings</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>An example: Evaluation of Nebraska Foodborne Illness and Outbreak Response Using the Council to Improve Foodborne Outbreak and Response (CIFOR) Proposed Performance Measures 01/11/2017</td>
</tr>
<tr>
<td>EATS</td>
<td>Lessons 1-4. The training focuses on understanding how the foodborne illness could have occurred and identifying the contributing factors.</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>Covered under several modules detailing the foodborne illness investigation.</td>
</tr>
</tbody>
</table>

2. Reporting Procedures
   a. Possible contributing factors to the food-related illness, food-related injury* or intentional food contamination are identified in each on-site investigation report.

b. The program shares final reports of investigations with the state epidemiologist and reports of confirmed foodborne disease outbreaks*
<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapters 3, 6, 13</td>
</tr>
<tr>
<td>CIFOR</td>
<td>4.2, 4.3, 4.4, 9.1</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.5</td>
</tr>
<tr>
<td>IAFP</td>
<td>Page 75</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 7 Final Report &amp; Recovery</td>
</tr>
<tr>
<td>CDC</td>
<td>Lesson 8</td>
</tr>
<tr>
<td>Foodborne Illness Outbreak Environmental Assessments</td>
<td></td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Yes</td>
</tr>
<tr>
<td>EATS</td>
<td>Lessons 1-4. The training includes reporting on findings from the investigation</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>Sharing of final reports is outlined within the scenarios</td>
</tr>
</tbody>
</table>

3. Laboratory Support Documentation

a. The program has a letter of understanding, written procedures, contract or MOU acknowledging, that a laboratory(s) is willing and able to provide analytical support to the jurisdiction’s food program. The documentation describes the type of biological, chemical, radiological contaminants or other food adulterants that can be identified by the laboratory. The laboratory support available includes the ability to conduct environmental sample analysis, food sample analysis, and clinical sample analysis.

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>CIFOR</td>
<td>4.2, 4.3, 4.4, 9.1</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.3.3.4</td>
</tr>
<tr>
<td>IAFP</td>
<td></td>
</tr>
<tr>
<td>NASDA Version 4.0 August 2011</td>
<td>VI</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 5 Collecting Samples and Laboratory Testing</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Yes</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>Lab documentation procedures are shared during the scenarios.</td>
</tr>
</tbody>
</table>

b. The program maintains a list of alternative laboratory contacts from which assistance could be sought in the event that a food-related
emergency exceeds the capability of the primary support lab(s) listed in paragraph 3.a. This list should also identify potential sources of laboratory support such as FDA, USDA, CDC, or environmental laboratories for specific analysis that cannot be performed by the jurisdiction's primary laboratory(s).

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>CIFOR</td>
<td>4.2, 4.3, 4.4, 9.1</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.5</td>
</tr>
<tr>
<td>NASDA Version 4.0 August 2011</td>
<td>VI</td>
</tr>
<tr>
<td>NEHA (CFOI)</td>
<td>Collecting Samples</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Yes</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>The scenarios presented in the modules address these issues.</td>
</tr>
</tbody>
</table>

4. Trace-back Procedures

a. Program management has an established procedure to address the trace-back of foods implicated in an illness, outbreak or intentional food contamination. The trace-back procedure provides for the coordinated involvement of all appropriate agencies and identifies a coordinator to guide the investigation. Trace-back reports are shared with all agencies involved and with CDC.

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapter 9</td>
</tr>
<tr>
<td>CIFOR</td>
<td>5.2</td>
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<tr>
<td>MFRPS</td>
<td>5.3.3.3</td>
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<tr>
<td>IAFP</td>
<td>Forms J 1, 2 &amp; 3 (pg. 154-154)</td>
</tr>
<tr>
<td>NASDA Version 4.0 August 2011</td>
<td>VI, IX</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 8 Food Recalls</td>
</tr>
<tr>
<td>CDC Foodborne Illness Outbreak Environmental Assessments</td>
<td>Lesson 7</td>
</tr>
<tr>
<td>NEHA (CFOI)</td>
<td>Conducting Product Tracing</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Yes</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>Lab documentation procedures are shared during the scenarios.</td>
</tr>
</tbody>
</table>

5. Recalls

a. Program management has an established procedure to address the recall of foods implicated in an illness, outbreak or intentional food contamination.
<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapter 12</td>
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<tr>
<td>CIFOR</td>
<td>5.2.4.1.1</td>
</tr>
<tr>
<td>MFRPS</td>
<td>5.3.2.2</td>
</tr>
<tr>
<td>NASDA Version 4.0 August 2011</td>
<td>VI, IX</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 8 Food Recalls</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>The scenarios presented in the modules address these issues.</td>
</tr>
</tbody>
</table>

b. When the jurisdiction has the responsibility to request or monitor a product recall, written procedures equivalent to 21 CFR, Part 7 are followed.

c. Written policies and procedures exist for verifying the effectiveness of recall actions by firms (effectiveness checks) when requested by another agency.

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapter 12</td>
</tr>
<tr>
<td>CIFOR</td>
<td>5.2</td>
</tr>
<tr>
<td>NASDA Version 4.0 August 2011</td>
<td>VI, IX</td>
</tr>
<tr>
<td>NEHA I-FITT-RR</td>
<td>Module 8 Food Recalls</td>
</tr>
<tr>
<td>Food Related Emergency Exercise Bundle (FREE)</td>
<td>The scenarios presented in the modules address these issues.</td>
</tr>
</tbody>
</table>

6. Media Management

a. The program has a written policy or procedure that defines a protocol for providing information to the public regarding a foodborne illness outbreak or food safety emergency. The policy/procedure should address coordination and cooperation with other agencies involved in the investigation. A media person is designated in the protocol.
7. Data Review and Analysis

a. At least once per year, the program conducts a review of the data in the complaint log or database and the foodborne illness and food-related injury* investigations to identify trends and possible contributing factors that are most likely to cause foodborne illness or food-related injury*. These periodic reviews of foodborne illnesses may suggest a need for further investigations and may suggest steps for illness prevention.

b. The review is conducted with prevention in mind and focuses on, but is not limited to, the following:
   1) Foodborne Disease Outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Foodborne Disease Outbreaks* in a single establishment;
   2) Foodborne Disease Outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Disease Outbreaks* in the same establishment type;
   3) Foodborne Disease Outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Foodborne Disease Outbreaks* implicating the same food;
4) Foodborne Disease outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Foodborne Disease Outbreaks* associated with similar food preparation processes;
5) Number of confirmed foodborne disease outbreaks*;
6) Number of foodborne disease outbreaks* and suspect foodborne disease outbreaks*;
7) Contributing factors most often identified;
8) Number of complaints involving real and alleged threats of intentional food contamination; and
9) A number of complaints involving the same agent and any complaints involving unusual agents when agents are identified.

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
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<tbody>
<tr>
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<td>Chapters 13 &amp; 14</td>
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<tr>
<td>CIFOR</td>
<td>4.3, Chapter 8</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Campylobacter Outbreak at a Colorado Correctional Facility A Foodborne Outbreak Investigation Case Study [Available at the COE in Colorado]</td>
</tr>
</tbody>
</table>

c. In the event that there have been no food-related illness or food-related injury* outbreak investigations conducted during the twelve months prior to the data review and analysis, program management will plan and conduct a mock foodborne illness investigation to test program readiness. The mock investigation should simulate a response to an actual confirmed foodborne disease outbreak* and include on-site inspection, sample collection, and analysis. A mock investigation must be completed at least once per year when no foodborne disease outbreak* investigations occur.

<table>
<thead>
<tr>
<th>Tool</th>
<th>Reference</th>
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</thead>
<tbody>
<tr>
<td>RRT</td>
<td>Chapter 8</td>
</tr>
<tr>
<td>IFSCOE</td>
<td>Mock scenarios are part of the investigative process</td>
</tr>
</tbody>
</table>
# FTE DATA CALCULATION

Calculate productive hours per year for an employee doing 100% food inspections

<table>
<thead>
<tr>
<th>Information For One Employee</th>
<th>Hours/Year</th>
<th>Hours/Day</th>
<th>Total Hours</th>
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<tbody>
<tr>
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<td></td>
<td></td>
</tr>
<tr>
<td>Local Holiday Hours Per Year</td>
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<tr>
<td>Local Vacation Leave Hours Per Year</td>
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</tr>
<tr>
<td>Local Sick Leave Hours Per Year</td>
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<td></td>
</tr>
<tr>
<td>Local Family-Personal Leave Hours Per Year</td>
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<tr>
<td>Travel Time For Inspection</td>
<td>2080</td>
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<td>Administrative Work (in-office work)</td>
<td>2080</td>
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<td></td>
</tr>
<tr>
<td>Break time</td>
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<tr>
<td>Others</td>
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</table>

## Productivity Factoring Per Year

<table>
<thead>
<tr>
<th>Productivity Factoring Per Year</th>
<th>Hours/Year</th>
<th>Hours/Day</th>
<th>Total Hours</th>
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<tbody>
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<td>Professional Development</td>
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<tr>
<td>Others</td>
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## Personal Development Time Per Year

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<th>Hours/Year</th>
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<tr>
<td>Others</td>
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## Productive Annual FTE Hours Per Year (FTE Conversion Factor)

<table>
<thead>
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<th>Productive Annual FTE Hours Per Year (FTE Conversion Factor)</th>
<th>Hours/Year</th>
<th>Hours/Day</th>
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<tbody>
<tr>
<td>2080</td>
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</tbody>
</table>

### FOOD SAFETY INSPECTION HOURS PER YEAR

<table>
<thead>
<tr>
<th>Position Title</th>
<th>Percent of time spent on food inspections</th>
<th>Number of Employees</th>
<th>Total Hours</th>
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</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
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</tbody>
</table>

| Total Food Safety Inspection Hours | 0 |

<p>| Total Current FTE | 0.00 |</p>
<table>
<thead>
<tr>
<th>Actual working days</th>
<th>Actual working weeks</th>
</tr>
</thead>
<tbody>
<tr>
<td>260</td>
<td>52</td>
</tr>
<tr>
<td>Type of Food Safety Inspection</td>
<td># of Food Safety Inspections</td>
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<tr>
<td>-------------------------------</td>
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</tr>
<tr>
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<tr>
<td>Total</td>
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</table>
## STANDARD 8’s REQUIRED FTE FOR YOUR JURISDICTION

<table>
<thead>
<tr>
<th></th>
<th>Low Risk Establishments</th>
<th>Frequency of Low Risk Est Inspections Per Year</th>
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</thead>
<tbody>
<tr>
<td>Routine and Permitting</td>
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</tr>
<tr>
<td>Follow Up Inspections/Reinspections</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foodborne Illness Complaints</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
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</table>

### Total Number of Required Inspections

<table>
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<tbody>
<tr>
<td>Median Hours Spent Per Inspection</td>
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<td>Total Inspection Time</td>
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</table>

### Total Required FTE

### Standard 8.1 Staffing Level

Sources
- 2017 Subcommittee # 2 - Survey 1 and 2
- 2019 Pilot Study
<table>
<thead>
<tr>
<th>Moderate Risk Establishments</th>
<th>Frequency of Moderate Risk Est Inspections Per Year</th>
<th>High Risk Establishments</th>
<th>Frequency of High Risk Est Inspections Per Year</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2.00</td>
<td></td>
<td>3.00</td>
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<td></td>
<td>0</td>
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*Standard not met*
Draft CFP Training Manual Revision

This mock-up includes proposed language in red to be added to the CFP Training Manual, pgs. 7-8, to better align Standard 2 with Standard 4:

**PERFORMANCE ELEMENTS**

The *CFP Training Plan and Log* contains a total of 23 “performance elements” within the six (6) inspection training areas.

I. Pre-Inspection – (2 Performance Elements)

- Has the required equipment and forms to conduct the inspection.
- Reviews establishment file for the [current risk category assigned](#), previous inspection report, complaints on file, and if applicable, required HACCP Plans or documents supporting the issuance of a variance.

II. Inspection Observations and Performance – (7 Performance Elements)

- Provides identification as a regulatory official to the person in charge, confirming agency authority for the inspection, and stating the purpose of the visit.
- Has knowledge of the jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.
- Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food and verify the establishment is assigned the correct risk category.
- Obtains immediate corrective action for out of compliance employee practices and management procedures essential to the safe storage, preparation and service of food.
- Correctly assesses the compliance status of other regulations (Good Retail Practices) that are included in the jurisdiction’s prevailing statutes, regulations, and/or ordinances.
- Verifies correction of out of compliance observations identified during the previous inspection. [Discusses options for the long-term control of risk factors.](#)
- Correctly uses inspection equipment during the joint inspection.
IV. Written Communication – (3 Performance Elements)

- Completes inspection form per the jurisdiction’s administrative procedures (e.g., observations, corrective actions, public health reasons, applicable code references, **options for the long-term control of risk factors**, compliance dates).
- Includes with the inspection report any compliance or regulatory documents identified or cross-referenced in written statements (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices).
- Presents the inspection report, and when necessary cross-referenced documents, to the person in charge.
### I. Pre-Inspection

2. Reviews establishment file for the **current risk category assigned**, previous inspection report, complaints on file, and if applicable, required HACCP Plans or documents supporting the issuance of a variance.

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewed previous inspection report noting documented out of compliance observations and comments.</td>
<td>JFT/OD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed establishment file for complaint reports.</td>
<td>JFT/OD</td>
<td></td>
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<tr>
<td>Reviewed establishment file for documentation indicating a need for a HACCP Plan.</td>
<td>JFT/OD</td>
<td></td>
<td></td>
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<tr>
<td>Reviewed establishment file for documentation of food production or processes operating under a variance issued by the jurisdiction.</td>
<td>JFT/OD</td>
<td></td>
<td></td>
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<tr>
<td>Reviewed establishment file for documentation indicating the assigned risk category.</td>
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</table>

Addresses Standard 4 - Quality Assurance Program Element III

### II. Inspection Observations and Performance (continued)

3. Uses a risk-based inspection methodology to correctly assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food and **verify the establishment is assigned the correct risk category**.

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verified Demonstration of Knowledge of the person in charge.</td>
<td>JFT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified approved food sources (e.g., food from regulated food processing plants; shellfish documentation; game animal processing; parasite destruction for certain species of fish intended for raw consumption; receiving temperatures).</td>
<td>JFT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified food safety practices for preventing cross-contamination of ready-to-eat food.</td>
<td>JFT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified food contact surfaces are clean and sanitized, protected from contamination from soiled cutting boards, utensils, aprons, etc., or raw animal foods</td>
<td>JFT</td>
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<td></td>
</tr>
<tr>
<td>Verified the restriction or exclusion of ill employees. Verified no bare hand contact with ready-to-eat foods (or use of a preapproved, alternative procedure)</td>
<td>JFT</td>
<td></td>
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</tr>
<tr>
<td>Verified employee handwashing.</td>
<td>JFT</td>
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<tr>
<td>Verified cold holding temperatures of foods requiring time/temperature control for safety (TCS food), or when necessary, verified that procedures are in place to use time alone to control bacterial growth and toxin production.</td>
<td>JFT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified date marking of ready-to-eat foods TCS food held for more than 24 hours.</td>
<td>JFT</td>
<td></td>
<td></td>
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<tr>
<td>Verified cooking temperatures to destroy bacteria and parasites.</td>
<td>JFT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified hot holding temperatures of TCS food or when necessary, that procedures were in place to use time alone to prevent the outgrowth of spore-forming bacteria.</td>
<td>JFT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified cooling temperatures of TCS food to prevent the outgrowth of spore-forming or toxin-forming bacteria.</td>
<td>JFT</td>
<td></td>
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<tr>
<td>Verified reheating temperatures of TCS food for hot holding.</td>
<td>JFT</td>
<td></td>
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<tr>
<td>Verified the availability of a consumer advisory for foods of animal origin served raw or undercooked.</td>
<td>JFT</td>
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<tr>
<td>Identified food processes and/or procedures that require a HACCP</td>
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</table>
Plan per the jurisdiction’s regulations.

Verified the establishment is assigned the correct risk category, and when necessary, informs the supervisor when the establishment is not in the proper risk category.

Addresses Standard 4 - Quality Assurance Program Element III

II. Inspection Observations and Performance (continued)

<table>
<thead>
<tr>
<th>6. Verifies correction of out of compliance observations identified during previous inspection. <strong>Discusses options for the long-term control of risk factors.</strong></th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verified correction of out of compliance observations identified during the previous inspection.</td>
<td>JFT</td>
<td></td>
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<tr>
<td>Discussed options for the long-term control of risk factors with establishment managers when the same out-of-control risk factor occurs on consecutive inspections (e.g., risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP plans).</td>
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Addresses Standard 4 - Quality Assurance Program Element IX

IV. Written Communication

<table>
<thead>
<tr>
<th>1. Completes inspection form per the jurisdiction’s administrative procedures (e.g., observations, corrective actions, public health reasons, applicable code references, <strong>options for the long-term control of risk factors</strong>, compliance dates).</th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer Initials</th>
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</thead>
<tbody>
<tr>
<td>Used correct inspection form.</td>
<td>JFT</td>
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<tr>
<td>Completed a legible report.</td>
<td>JFT</td>
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<tr>
<td>Accurately documented observations made during inspection.</td>
<td>JFT</td>
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<tr>
<td>Completed inspection form in accordance with jurisdiction’s administrative procedures.</td>
<td>JFT</td>
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<tr>
<td>Cited correct code provisions/rules/regulations.</td>
<td>JFT</td>
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<tr>
<td>Documented immediate corrective action for out-of-compliance foodborne illness contributing factors and Food Code Interventions (listed in Section II, Item 3).</td>
<td>JFT</td>
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<td>Documented time frames for correcting each out of compliance observation.</td>
<td>JFT</td>
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<tr>
<td>Documented that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections.</td>
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Addresses Standard 4 - Quality Assurance Program Element XVIII
COMMITTEE NAME: Program Standards Committee – Subcommittee #1

DATE OF FINAL REPORT: 10/31/2019

COMMITTEE ASSIGNMENT: ☐ Council I  ☒ Council II  ☐ Council III  ☒ Executive Board

REPORT SUBMITTED BY: Andre C. Pierce

COMMITTEE ACTIVITIES:


2. Overview of committee activities: Subcommittee #1 (Issue # 2018 II-013 & Issue # 2018 II-014) – The PSC co-vice chair, Andre Pierce took the lead on scheduling subcommittee meetings. His work got the subcommittee on track to complete the assigned charges by the deadline. Members of the committee developed a survey related to partial achievement that was sent to VNRFRPS enrolled jurisdictions in North Carolina and Texas. There were 47 respondents- 91% were local jurisdictions. The results showed that most jurisdictions would like some way to track their partial achievement of standards for internal purposes only. Only three of the 47 respondents wanted a public facing website to report. Nearly half (49%) of the respondents had not heard about the tracking spreadsheet. The committee used the data to develop the position that the tracking spreadsheet is a useful tool for internal self-reporting and needs to be marketed, rather than having a public website for reporting. The issue will reflect these discussions and will close this charge. Additionally, the subcommittee discussed the value of plan review to support behaviors that reduce the occurrence of foodborne illness risk factors.

3. Charges COMPLETED and the rationale for each specific recommendation:
   a. 2018 II-013 #1 – The subcommittee determined through a survey that jurisdictions need tools to report progress on compliance with the Retail Program Standards to their boards, councils and other policy makers. The self-assessment tool is adequate for presenting data internally. The subcommittee developed an issue asking FDA to maintain and publish the SA Tool
   b. 2019 II-013 #2 – The subcommittee determined there is minimal burden to maintain and post the SA Tool on the FDA website
   c. 2018 II-014 #1 - The subcommittee determined through a survey that jurisdictions need tools to report progress on compliance with the Retail Program Standards to their boards, councils and other policy makers. The self-assessment tool is adequate for presenting data internally. The subcommittee developed an issue asking FDA to maintain and publish the SA Tool

4. Charges INCOMPLETE and to be continued to next biennium:
   a. 2018 II-014 #3 – The subcommittee recommends continuation of Issue 2018 II-014, charge 1, to have the FDA work with the Program Standards Committee (PSC) to incorporate plan review in the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS).
COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:

X No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. **PSC Issue #4 Maintenance and Posting of the Self-Assessment Tool (SA Tool)**
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      (1) Subcommittee #1 Final Report (see attached PDF)
      (2) Draft 2017 VNFRFRPS Self-Assessment Audit Form (see attached PDF)

2. **PSC Issue #5 Continuation of Issue 2018 II-014 PSC2**
   a. List of content documents submitted with this Issue:
      (1) Subcommittee #1 Final Report (see attached PDF)
      (2) Preliminary Plan Review Proposal
COMMITTEE NAME: Program Standards Committee – Subcommittee #2 (Re-evaluation of Standard 8 Staffing Levels)

DATE OF FINAL REPORT: October 21, 2019 Date amended: 12/3/2019

COMMITTEE ASSIGNMENT: ☐ Council I ☐ Council II ☐ Council III ☒ Executive Board

REPORT SUBMITTED BY: Michael Schaffer & Peri Pearson, Subcommittee Co-Chairs

COMMITTEE CHARGE(S):

Issue # 2018 II-018

1. Continue to collaborate with the FDA internal Program Standards working group on modifying the “description of Requirements” for “Staffing Level” in Standard 8 of the FDA Voluntary National Retail Food Regulatory Program Standards (VNRFRPS);

2. Use the supporting attachments listed in the 2016-2918 Program Standards Committee, Standard 8 Subcommittee report as the foundation to establish as more statistically sound logic model for the FTE/Inspection ratio and provide the new calculation/formula to be used by a VNRFRPS enrollee to assess the Standard 8 “Staffing Level”;

3. Propose amendments to Standard 8 of the VNRFRPS and the CFP guidance document titled “standard 8 Staffing Level Assessment workbook” and accompanying “Instruction Guide” to incorporate the outcomes of Charges 1 and 2; and

4. Report back committee finding and recommendations to the 2020 Biennial Meeting.

COMMITTEE WORK PLAN AND TIMELINE:

The Standard 8 Subcommittee was established by the Program Standards Committee to address the specific charges in Issue #2016 II-020. Michael Schaffer is the submitter of Issue #2016 II-020. The 2018-2020 subcommittee is continuing the work started in 2016. Mr. Schaffer is a local regulator and Ms. Pearson is a State Regulator, other members of this subcommittee include one (1) local regulator, two (2) industry representatives, two (2) FDA consultants, and one (1) CDC consultant. Subcommittee activities have been conducted by conference calls and emails. A great deal of work was accomplished by Mr. Schaffer and his team with Harris County Public Health. Their work included surveys of Retail Program Standards enrollees, data compilation, statistical analysis, and providing graphic representations of data and data analysis, as well as conducting a Pilot Study to the subcommittee. Subcommittee documents were posted to the Subcommittee #2 workgroup folder on FoodSHIELD for review during conference calls.

COMMITTEE ACTIVITIES:

1. Dates of committee meetings or conference calls:
   Subcommittee #2 met eight (6) times by conference call: February 19, 2019; March 19, 2019; May 13, 2019; June 18, 2019; October 17, 2019; and October 21, 2019.

2. Overview of committee activities:
   The proposed model for Standard 8 staffing level assessment, developed by Mr. Schaffer’s team with assistance from this (and the 2016-2018) PSC subcommittee, was presented for Subcommittee review. The proposed change provides three options for assessing staffing levels including one which removes the range (280-320 inspections/FTE) and is based on data obtained through surveys conducted by the 2016-18 Subcommittee. The presentation and document are available in the Food Shield Subcommittee #2 Folder. FDA continues to express concern that the proposed changes to Standard 8 staffing levels do not adhere to the "Best Practice" approach that the Standards promote and does not present a uniform staffing level standard. The voting members of Subcommittee #2 support the proposed changes. Mr. Sudler, FDA CIFSAN, agreed to contact a FDA statistician and set up a meeting with Mr. Schaffer to further evaluate the most appropriate use of the data (primarily data related to times assigned to inspection categories). However, we have not been notified of a meeting with an FDA statistician to date.

   In August 2019, Subcommittee #2 met with the Program Standards Committee to discuss the work that had been completed to date. A key decision made on the call was to pilot the proposed model with a pool of health departments across the nation. In September 2019, Subcommittee #2 conducted a pilot study of a proposed staffing level evaluation model as decided by the Program Standards Committee. The study consisted of sending a survey to health departments in order to obtain staffing level data and use the proposed model to analyze this data. Harris County Public Health led the study. The Subcommittee shared the result of the Pilot Results with the subcommittee members to get their feedback before drafting an issue requesting modification of the criteria for assessing staffing levels in Standard 8 for consideration by the 2020 CFP.
3. **Charges COMPLETED and the rationale for each specific recommendation:**
   
a. **Charge 1 has been completed.** We have continued to discuss the proposed model with various FDA members. The FDA members agree that the current assessment tool for staffing level was designed on unrealistic logic based on no known data, making the ratio that passes or fails a jurisdiction in the tool inappropriate. However, there is no consensus on if the new proposed model that has been designed with real data and statistical robustness should modify and/or replace the ratio of the current tool. One main concern is that it does not represent “best practice” from their perspective as the proposed model is derived from real world data of what jurisdictions “currently” do and not what they “should” do. To try to alleviate this concern we’ve demonstrated that the methodology creating the proposed model sought to use data focused more heavily from high performing jurisdictions (i.e., ones that met more standards) but statistical testing verified that high performing jurisdictions had no significantly different data than lower performing ones. To keep the effort to make the proposed model something for jurisdictions to strive to meet, we discussed best practices with high performing jurisdictions and used data from our research that sought to capture what jurisdictions should aim for. The FDA members continue to be hesitant if the proposed model should be used to modify and improve the current assessment tool.

b. **Charge 2 has been completed.** In order to verify that the proposed model was statistically sound, Subcommittee #2 worked with Dr. Matthew Koslovsky, a Post-Doctoral Research Associate from Rice University focusing in Biostatistics. He reviewed and approved the below methodology used to create the proposed model. This model was created by using data provided by 105 health departments. The logic behind the proposed model requires that food establishments be categorized by risk level (low, moderate, and high). The first step in creating the proposed model was to analyze if the inspection times and frequencies provided by the health departments were significantly related to the number of standards a health department had met. This was important, since the number of standards a health department met was the only information indicating their performance level. If health departments that met more standards had significantly different inspection times and frequencies than those that did not, it would have been better to only use those values. Statistical analysis demonstrated that there was no significant relationship between the number of standards a health department met and their responses related to inspection time and frequency. Due to this, it was considered sufficient to use either the average or median inspection time and frequency values of all respondents. Further statistical analysis confirmed that the average and median inspection frequency and time values were significantly different for each risk category. In other words, inspection time and frequency was lower for low-risk establishments and was higher for high-risk establishments. Lastly, it was decided that the median, not the average, should be used to remove the effects of extreme values. This was important as the median prevents outliers such as jurisdictions that are inspecting establishments fewer times a year than the FDA recommends, or conducting inspections too fast or too slow as deemed reasonable, from influencing the standardized values in the model. The proposed model works by removing the inspection-to-FTE ratio and instead calculates how many FTEs a health department should have. It does this by first using a formula based on standardized inspection times and frequencies based on risk categories to calculate the total inspection hours for each jurisdiction. It automatically divides this total by the FTE productive hours calculated in the current model to obtain the number of FTEs the health department should have. Lasty, it “passes” the health department if the number of FTEs they currently have is greater than or equal to the number of FTEs the jurisdiction should have. If the health department currently has an equal or greater number of FTEs, as calculated by the proposed model, then the health department would be considered sufficiently staffed; consequently, that health department would meet Standard 8. In order to determine if the proposed model would work in a self-audit, we conducted a pilot study from August to September 2019. The details of the pilot can be reviewed in the supporting document “Standard 8 Re-Evaluation of Staffing Level Model Pilot Study Report”.

c. **Charge 3 has been completed.** On October 21, 2019, the members of Subcommittee #2 held a vote to determine the proposed amendments to the Standard 8 of the VNFRFRPS and the CFP guidance document. The voting members decided to recommend including both the current and proposed amendment tool to assess compliance for Standard 8. The jurisdiction conducting the self-audit will have the option of using either of the assessments tools to determine compliance for staffing level resources.

d. **Charge 4 has been completed.** The subcommittee has devised a recommendation to propose an amendment to the Standard 8 “Staffing Level” FTE/Inspection Ratio criteria. The majority of the subcommittee voting members decided to amend Standard 8 to include the proposed model assessment tool as a secondary option to determine compliance. The intent of the recommendation will not be to weaken the Standard but to provide a secondary assessment tool that measures practical performance of the enrollee against the Standard.

4. **Charges INCOMPLETE and to be continued to next biennium:**
   
a. None

**COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:**

☒ No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.
LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

a. List of content documents submitted with this Issue: None
b. List of supporting attachments:
   (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 – Proposed Model (see attached PDF)
   (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #2 final report (attached Word)
   (5) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 Summary (see attached PDF)
   (6) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 PowerPoint (see attached PDF)
recommendations. Periodic reports will be prepared and submitted in February 2019, July 2019, and October 2019, in accordance with the CFP national framework courses to evaluate for discussion with the group. Polls will be forwarded via email, as needed, to voting members to finalize workgroup material and reviewing documents, during monthly meetings. The committee’s regulatory members will be assigned portions of the September 2019. Workgroup documents will be shared via FoodSHIELD and attached to calendar invitations. WebEx will be used for presenting master calendar.

COMMITTEE WORK PLAN AND TIMELINE:

COMMITTEE ACTIVITIES:

Overview of committee activities:


b. The conference call on December 19, 2018 was used to review the committee charges, determine the timeline for addressing the charges, and it was decided that FoodSHIELD will be used for document sharing. The conference call on January 9 addressed charge 1, and a list of training, evaluation and/or certification courses available to food safety inspection officers was developed. The conference call on January 23, 2019 addressed charge 3, and the committee started work on a document of the twenty Standard 2, steps 1 through 4. Conference calls March 13, 2019 through July 17, 2019 to review the IFPTI framework courses. Four teams were assembled with one industry and one regulatory member. Each team was assigned four courses to review (one per month) for its usefulness, whether there is any missing content, and if it should be implemented as “pre” or “post” coursework in the current VNRFRPS Standard 2 curriculum in Appendix B-1. The conference call on August 14, 2019 reviewed the list of charge 1 initiatives for training, certification, and evaluation of food inspection officers, charge 2a, and the recommendations received at that point, i.e. add, replace, or no action and indicating “pre” or “post” coursework. The conference call on September 11, 2019 continued discussion of group recommendations and discussed charge 3. Insufficient number of voting members on the call prohibited voting. On October 2, 2019, the final conference call was held. The group voted on majority of potential issues for charge 2a and charge 3. Voting continued electronically on October 4, 2019. The results of the vote were
2. **Charges COMPLETED and the rationale for each specific recommendation:**

a. Charge 1: The committee discussed initiatives (existing, new, or under development) involving the training, evaluation and/or certification available to Food Safety Inspection Officers (FSIO) in their respective jurisdictions (see attachment PSC subcommittee #3 Charge 1 Training Evaluation and Certification Initiatives).

b. Charge 2a: The Committee reviewed 26 Integrated Food Safety System Basic Curriculum courses for Food Protection Professionals provided by the International Food Protection Training Institute (IFPTI) (see attachments PSC subcommittee #3 Charge 2 IFPTI Course Review and Integrated Food Safety System (IFSS) Food Protection Professionals Curriculum Framework). Courses B7 Emergency Response and B19 Pest Control were under development and not available for review. After the team’s review, the committee discussed the training and voted on whether to (1.) replace existing Standard 2 curriculum in appendix B-1 with the IFPTI course, (2.) add the IFPTI course to existing Standard 2 curriculum in appendix B-1, or (3.) do not include the IFPTI course in existing Standard 2 curriculum in appendix B-1 (“no action”). The committee recommends the following changes to existing Standard 2 (Appendix B-1):

i. Reformat Appendix B-1 into a table with training topics in one column and courses which fulfill the curriculum topics in another column. The current formatting implies the course listed is the only course that will fulfill the training requirement. The proposed format better shows that other courses may be used if deemed equivalent by the regulatory jurisdiction. It is anticipated that there may be accessibility issues with ComplianceWire courses in the future and other comparable courses may be needed as substitutions. Attachment PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft demonstrates suggested changes to Appendix B-1 using current Standard 2 curriculum; Attachment PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft demonstrates suggested changes to Appendix B-1 with all proposed issues below incorporated.

ii. IFPTI Course B2 (CC8029W): Replace FD252, Allergen Management in “post” curriculum. This course is a significant upgrade in course content providing more relevant and up to date information.

iii. IFPTI Course B8 Environmental Hazards (CC8024W): Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new (Food Safety Inspection Officer’s) FSIO’s baseline knowledge.

iv. IFPTI Course B12 Integrated Food Safety System (CC8018W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

v. IFPTI Course B15 Jurisdiction (CC8037W): Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

vi. IFPTI Course B16 Labeling (CC8038W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

vii. IFPTI Course B17 Laws, Regulations, Policies, & Procedures (CC8039W): Replace FDA35, Basic Food Law for State Regulators in “pre” courses. This course is a significant upgrade in course content providing more relevant and up to date information.

viii. IFPTI Course B19 Pest Control: Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

ix. IFPTI Course B20 Plumbing: Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

x. IFPTI Course B22 Professionalism (CC8025W): Add to “pre” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xi. IFPTI Course B23 Public Health Principles (CC8026W): Replace FDA36, “Public Health Principles” in “pre” courses. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xii. IFPTI Course B24 Recalls (CC8041W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xiii. IFPTI Course B25 Sampling (CC8035W): Replace MIC13, Aseptic Sampling, in the pre-requisite curriculum. This course is a significant upgrade in course content providing more relevant and up to date information.

xiv. IFPTI Course B26 Sanitation Practices (CC8032W): Replace MIC15, Cleaning & Sanitizing, in “pre” courses. This course is a significant upgrade in course content providing more relevant and up to date information.

xv. IFPTI Course B27 Traceability (CC8042W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

xvi. IFPTI Course B28 Transportation (CC8036W): Add to “post” curriculum. The committee agrees this is an important topic, not currently covered in Standard 2 curriculum, necessary for new FSIO’s baseline knowledge.

c. Charge 2b: The committee reviewed the time frame for completion of Standard 2, Steps 1 through 4, for new hires or staff newly assigned to regulatory retail food protection programs. The committee voted on February 16, 2019 to increase the timeframe from 18 to 24 months to align with Standard 2 of the Manufactured Food Regulatory Program Standards and to provide adequate time for standardization of staff.

d. Charge 3: The committee reviewed the twenty quality assurance program elements in Standard 4 of the VNRFRPS. It was determined that all but three elements are contained in the CFP Field Training Manual, Training Plan and Log. To better align with
training in Standard 2 (attachment PSC subcommittee #3 Charge 3 Quality Elements Cross-referenced), the committee recommends adding the following three missing elements to the CFP Field Training Manual, Training Plan and Log:

i. Standard 4 Performance Element III: “Verifies that the establishment is in the proper risk category and that the required inspection frequency is being met. Informs the supervisor when the establishment is not in the proper risk category or when the required frequency is not met.” Add “Reviewed establishment file for documentation indicating the assigned risk category” to CFP Training Manual Section I Pre-inspection, #2. Reviews establishment file for previous inspection report, complaints on file, and if applicable, required HACCP Plans or documents supporting the issuance of a variance by the agency. Also add “Verified the establishment is assigned the correct risk category, and when necessary, informs the supervisor when the establishment is not in the proper risk category.” to CFP Training Manual Section II Inspection Observations and Performance, #3 Uses a risk-based inspection methodology to correctly assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food.

ii. Standard 4 Performance Element IX: “Discuss options for the long-term control of risk factors with establishment managers, when the same out-of-control risk factor occurs on consecutive inspections, in accordance with the jurisdiction’s policies. Options may include, but are not limited to; risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP plans.” Add “Discussed options for the long-term control of risk factors with establishment managers when the same out-of-control risk factor occurs on consecutive inspections (e.g., risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP plans)” to CFP Training Manual Section II Inspection Observations and Performance, #6 Verifies correction of out of compliance observations identified during previous inspection.

iii. Standard 4 Performance Element XVIII: “Documents that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections. Options may include, but are not limited to, risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP Plans.” Add “Documented that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections” to CFP Training Manual Section IV Written Communication, #1 Completes inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).

3. **Status of charges still pending** and activities yet to be completed:
   a. N/A

**COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:** ☒ No requested action at this time

**ATTACHMENTS:**

1. **Content Documents:** None

2. **Supporting Attachments (OPTIONAL):** ☐ Not applicable
   a. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #1 Minutes 12 19 2018
   b. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #2 Minutes 1 09 2019
   c. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #3 Minutes 1 23 2019
   d. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #4 Minutes 2 06 2019
   e. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #5 Minutes 3 13 2019
   f. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #6 Minutes 4 10 2019
   g. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #7 Minutes 5 8 2019
   h. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #8 Minutes 6 12 2019
   i. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #9 Minutes 7 17 2019
j. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #10 Minutes 8 14 2019

k. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #11 Minutes 9 11 2019

l. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Meeting #12 Minutes 10 2 2019

m. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 1 Training Evaluation and Certification Initiatives

n. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft

o. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft

p. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 2 IFPTI Course Review

q. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 3 Quality Elements Cross-referenced


s. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B2 Allergens IFPTI Course Profile

t. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B17 Laws Regulations IFPTI Course Profile


x. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 2 Appendix B-1 (see https://www.fda.gov/media/86752/download)
y. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B8 Environmental Hazards IFPTI Course Profile

z. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B12 Integrated Food Safety System IFPTI Course Profile

aa. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B15 Jurisdiction IFPTI Course Profile

bb. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B16 Labeling IFPTI Course Profile

cc. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B19 Pest Control IFPTI Course Profile

dd. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B20 Plumbing IFPTI Course Profile

e. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B22 Professionalism IFPTI Course Profile

ff. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B24 Recalls IFPTI Course Profile

gg. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B27 Traceability IFPTI Course Profile

hh. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B28 Transportation IFPTI Course Profile


See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Manufactured Food Regulatory Program Standards (see https://www.fda.gov/MFRPS)


COMMITTEE NAME: Program Standards Committee subcommittee #4

DATE OF FINAL REPORT: October 23, 2019 Date amended: 12/3/2019

COMMITTEE ASSIGNMENT: ☐ Council I ☑ Council II ☐ Council III ☑ Executive Board

REPORT SUBMITTED BY: James Mack, Chair

COMMITTEE CHARGE(S):

Issue # 2018 II-020 PSC 8
1. Maintaining the "Crosswalk - Requirements for Foodborne Illness Training Programs" document as a resource for content baseline for foodborne illness training
2. Evaluating the following references for inclusion in the Crosswalk document
3. Reporting back any findings and recommendations to each biennial meeting of the Conference for Food Protection.

COMMITTEE WORK PLAN AND TIMELINE:

1. See the Program Standards Committee Work Plan

COMMITTEE ACTIVITIES:

1. Dates of committee meetings or conference calls: PSC subcommittee #4 (Issue # 2018 II-020) held a conference call on December 6, 2018. A second call was scheduled for January 23, 2019 but was postponed due to the federal government shutdown. The subcommittee chair reached out to team members individually to discuss progress on their assigned tasks throughout 2019.

2. Overview of committee activities: The subcommittee had discussions regarding the use of the Crosswalk – Requirements for Foodborne Illness Training Programs (Crosswalk) document for Standard #5. In addition, updating previous resources identified, such as CIFOR, occurred in 2019. EATS 102 was evaluated as a resource. EATS 101 is already a resource, so there was no need to review EATS 101. Subcommittee members continued to identify resources and report at the subcommittee meetings. Emphasis was on industry private sector courses. Four of the eight resources currently identified were reviewed for accuracy in order to maintain the Crosswalk document. Pending resources were reviewed against the Crosswalk document, to verify that the reference citations were still accurate. On February 11, 2019, the PSC committee chair reached out to FDA to request Pathlore access to non-regulatory subcommittee members for purposes of materials review related to the subcommittee charges. The subcommittee chair worked directly with the subcommittee members throughout the biennium as they worked on reviewing their assigned resources. The Crosswalk document was updated with the new resources that were reviewed.

3. Charges COMPLETED and the rationale for each specific recommendation:
   a. Charge 1 – The Crosswalk document was revised to include updated information.
   b. Charge 2 – Additional references were evaluated and included in the Crosswalk document.
   c. Charge 3 – This report and associated Issue submission complete this charge.

4. Charges INCOMPLETE and to be continued to next biennium: None

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:

☑ No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. PSC Committee Issue #3 Posting updated Crosswalk
   a. List of content documents submitted with this Issue: None
   b. List of supporting attachments:
      (1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #4 final report (see attached Word document)
      (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Crosswalk-Requirements for Foodborne Illness Training Programs Based on Standard 5 2019 (see attached Word document)
COMMITTEE NAME: Program Standards Committee subcommittee #5

DATE OF FINAL REPORT: October 24, 2019
Date amended: 12/3/2019

COMMITTEE ASSIGNMENT: ☐ Council I ☒ Council II ☐ Council III ☒ Executive Board

REPORT SUBMITTED BY: Carrie Pohjola and Bridget Sweet, Co-Chairs

COMMITTEE CHARGE(S):
Issue # 2018 II-021 Amend VNFRFRPS-Standard 4-Uniform Inspection Program. The Program Standards Committee was charged to address the Voluntary National Retail Program Standards (VNFRFRPS), Program Standard No. 4-Uniform Inspection Program to:
1. Research a new model, solution and/or recommendation that will allow large and small jurisdictions to have the same statistical compliance requirements
2. Amend audit requirements to include randomized selection of files to be reviewed
3. Report back to the 2020 Biennial meeting of the Conference for Food Protection its findings and recommendations.

COMMITTEE WORK PLAN AND TIMELINE:
1. See the Program Standards Committee Work Plan

COMMITTEE ACTIVITIES:
1. Dates of committee meetings or conference calls: PSC subcommittee #5 (Issue #2018 II-021) held conference calls on January 2, 2019, January 30, 2019, February 14, 2019, and February 28, 2019 with biweekly calls scheduled from this date on.
2. Overview of committee activities:
The committee has met via conference call twice (1-2-2019 and 1-30-2019). Conference calls are now scheduled bi-weekly beginning 2-14-2019. Time was spent reviewing Standard 4. Committee members reached out to larger jurisdictions who are enrolled in the standards and have indicated that they have met Standard 4 and the burden of conducting the 3 field exercises with applicable file review over the 5 years. Those agencies that responded were Tri-County Health in Colorado and Florida Dept. of Business and Professional Regulation. The committee is also reviewing the statistical methodology for Standard 4 as well as discussing with the FDA statistician the percentage of each quality element for compliance to be 75%. The committee also reached out to the original submitter, Veronica Bryant, for further clarification on the issue submitted which she provided. Finally, the committee will be reviewing the instructions for auditors and the possibility of random sampling and a randomly selected sample size as opposed to the auditor reviewing all records for each applicable field exercises. The committee met again via phone conference on 2-14-2019 and 2-28-2019 to further discuss the issue. Marc Boyer, CFSAN math statistician, joined the call on 2-14-19 and provided Statistical Methodology and Explanation of the Statistical Model for Standard 4 which is attached. It was decided at the 2/28/2019 meeting by Robert Sudler to submit the issue via questions to the Clearinghouse and to suspend meetings until the Clearinghouse was able to address the questions. The questions submitted can be found in the attached document, Clearinghouse Submission.

On 6/21/1019, further clarification of the Clearinghouse Submission questions were provided to Robert Sudler by Carrie Pohjola (Clearinghouse Submitter) to bring forth to the Clearinghouse group for consideration. Clarification provided for Question 1 was the requirements for the person completing the field exercises and applicable file review to assess the 20 Quality Elements. In addition, clarification for Question 2 was provided on file review of the auditor of an agencies self-assessment and the required file review involved assessing if Standard 4 is being met by an agency. Clarification was provided from the Clearinghouse on Standard 4 and the response is attached.

With regard to the issue of file review of all files during the self-assessment audit of Standard 4 the committee discussed and interpreted, after extensive review of the standard documentation, that file review is not required by the auditor but can be requested upon discretion.

3. Charges COMPLETED and the rationale for each specific recommendation:
   a. Charge 1 – Based on the information provided by the FDA Statistician, small and large jurisdictions already have the same statistical compliance requirements. (See Standard 4 – Statistical Methodology attached PDF)
   b. This charge was related to the review of files during an audit. This was discussed and interpreted, after extensive review of the standard documentation, that file review is not required by the auditor. The auditor can request a random number of files to review, upon their discretion.
   c. Charge 3 – this report serves as completion of this charge.

4. Charges INCOMPLETE and to be continued to next biennium: None

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:
☒ No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE: None
ATTACHMENTS:
1. Content Documents: No draft content documents submitted at this time

2. Supporting Attachments
   a. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: CFP PSC Subcommittee CWG Questions (see attached PDF)
   b. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: CWG Standard 4 Response (see attached PDF)
   c. See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 4 – Statistical Methodology (see attached PDF)
Program Standards Committee Online Supporting Documents

(1) Issue 2018 II-018 (see page 27 http://www.foodprotect.org/media/biennialmeeting/council-ii-final-issue-recommendations-1.pdf)


(5) Standard 2 Appendix B-1 (see https://www.fda.gov/media/86752/download)


(10) Manufactured Food Regulatory Program Standards (see https://www.fda.gov/MFRPS)
Standard 8 Staffing Level

Purpose of Standard 8 staffing level section:

*Standard 8 Section 1. Staffing Level* requires a health department (HD) to demonstrate that they have the staff “necessary to support an inspection and surveillance system that is designed to reduce risk factors and other factors known to contribute to foodborne illness”

Current criteria to pass Standard 8:

A HD currently meets this standard if they demonstrate an inspection to FTE ratio range of 280-320 inspections per FTE. The Conference for Food Protection (CFP) developed an assessment tool and instruction guide that can be used by a HD if desired. If not the HD has to calculate their inspection to FTE ratio through their own method and see if it falls within the required range.

Problem with inspection to FTE ratio range:

It has been agreed upon by subcommittee that this range is problematic as it’s based on the idea that every inspection should take 4 hours. The subcommittee has also agreed that a range is problematic as it allows for an adequately staffed health department to fail the standard as they could fall below the range.

Recommendations:

We are recommending removing the range and allowing HDs to demonstrate to independent auditors that they are adequately staffed in a more appropriate way. The following are the 3 options we think are reasonable that a HD can use to demonstrate staffing levels.

1. A HD can use their own method they feel is appropriate for them to demonstrate adequate staffing levels

2. A HD can use the current assessment tool (with inspection to FTE section removed) developed by CFP to assess if they’re adequately staffed

3. A health department can use the updated CFP assessment tool that calculates staffing levels by risk category
   a. Using the updated vs. current assessment tool may make it easier for a HD to prove to their auditor that they are adequately staffed because:
      i. It has a section that calculates how many FTEs a HD should have based on risk categories (current assessment does not do this)
      ii. It then automatically compares how many FTEs a health department currently has with how many they should have (the current assessment only calculates current FTE, so it may be challenging to convince an auditor that a current calculated FTE # demonstrates a HD to be adequately staffed)
Updated CFP Assessment Tool

The following is an example of how to use the updated assessment tool to calculate if a health department is adequately staffed.

Discussion on Table 1. The risk category column is broken into three categories, the minimum required by Standard 8. The number of establishments will be unique to each health department. The rows in the remaining columns show values that are based off of survey data of 100 local and state health departments throughout the country (see footnotes for more details). A HD should feel free to use these values or input ones that more appropriately fit their organization.

Table 1.

<table>
<thead>
<tr>
<th>Risk Category</th>
<th>Number of Establishments</th>
<th>Inspection Frequency</th>
<th>Average Inspection Time (does not include travel)</th>
<th>Reinspection frequency</th>
<th>FBI Inspection Frequency</th>
<th>Other Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>1,000</td>
<td>1</td>
<td>45 minutes</td>
<td>15%</td>
<td>1%</td>
<td>10%</td>
</tr>
<tr>
<td>Medium</td>
<td>2,000</td>
<td>2</td>
<td>75 minutes</td>
<td>15%</td>
<td>1%</td>
<td>10%</td>
</tr>
<tr>
<td>High</td>
<td>1,000</td>
<td>3</td>
<td>120 minutes</td>
<td>15%</td>
<td>1%</td>
<td>10%</td>
</tr>
</tbody>
</table>

Step 1. Calculate available annual inspection time per full time equivalent (FTE) using assessment tool. 1200 hours a year will be used for this example.

Step 2. Calculate number of FTE currently available at health department. This # is calculated in the current and updated assessment tools.

Step 3. Calculate total number of hours required to inspect each risk category. Formula for calculating # of inspection hours per risk type below (low risk type used for example):

\[
(1000 \text{ establishments x 1 inspection a year} = 1000 \text{ inspections}) + (1000 \text{ establishments x 15 % reinspections a year} = 150 \text{ inspections}) + (1000 \text{ establishments x 1% FBI inspections a year} = 10 \text{ inspections}) + (1000 \text{ inspections x 10% other inspections a year} = 100 \text{ inspections}) = 1260 \text{ inspections a year x 45 minutes an inspection} = 945 \text{ hours a year}
\]

Medium risk = 4520 inspections a year x 75 minutes = 5650 hours

High Risk = 3260 inspections a year x 120 minutes =6520 hours

Total inspection time = 945 + 5650 + 6520 = 13,115 inspection hours a year

Step 4. Calculate number of FTE’s required

13,115 total inspection time hours /1200 inspection hours available per FTE = 10.93 FTEs

Step 5. Calculate if health department is adequately staffed

If FTEs currently available >= 10.93 FTEs that a HD should have then that HD is adequately staffed

---

1 Median inspection frequencies of 100 health departments from 2017 survey
2 Median inspection times of 100 health departments from 2017 survey
3 Median reinspection frequency %s of 60 health departments form 2017 survey
4 Median food borne illness inspection frequency %s of 60 health departments from 2017 survey
5 Final % value still being calculated, 10% being used for this demonstration
Appendix 8.2 Calculation for determining a required number of inspectors

This appendix is an example of how to calculate the number of field staff required to conduct inspections\textsuperscript{19} of food plants. The data in the following table will vary significantly based on local or regional conditions. The State program may use the risk categories and inspection frequencies found in the statement of work for the food contract as a basis for determining the required number of inspectors.

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Number in inventory</th>
<th>Inspection frequency</th>
<th>Average inspection time (includes travel)</th>
<th>Reinspection frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td>1,000</td>
<td>12 months</td>
<td>7.2 hours</td>
<td>10%</td>
</tr>
<tr>
<td>Medium</td>
<td>2,000</td>
<td>18 months</td>
<td>5.7 hours</td>
<td>10%</td>
</tr>
<tr>
<td>Low</td>
<td>1,000</td>
<td>24 months</td>
<td>4.2 hours</td>
<td>10%</td>
</tr>
</tbody>
</table>

1. Calculate available annual inspection time per full time equivalent (FTE).

For example, the State agency determines that after allowances for annual leave, sick leave, holidays, training, administrative time, and other activities each State program FTE has 1200 hours available for conducting inspections.

2. Calculate the number of hours required to inspect establishments in each risk category.

Formula for high risk establishment inspection time:
1000 firms x 100% coverage = 1000 inspections + 10% reinspection = 1100 total inspections per year x 7.2 hours = 7920 hours

Formula for medium risk establishment inspection time:
2000 firms x 66.6% coverage = 1333 inspections + 10% reinspection = 1466 total inspections per year x 5.7 hours = 8356 hours

Formula for low risk establishment inspection time:
1000 firms x 50% coverage = 500 inspections + 10% reinspection = 550 inspection total inspections x 4.2 hours = 2320 hours

3. Calculate the number of FTE’s required.

Formula:
7920 hours for high risk + 8356 hours for medium risk + 2320 hours for low risk = 18596 inspection hours required / 1200 inspection hours available per FTE = \textbf{15.5 FTEs}\textsuperscript{20}

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\textsuperscript{19} Includes routine surveillance, reinspections, complaint or outbreak investigations, compliance follow-up investigations, risk assessment reviews, process reviews, and other direct establishment contact time such as on-site training.

\textsuperscript{20} Inspection times based on calculations presented in “DHHS Office of Inspector General’s FDA Oversight of State Food Firm Inspections” dated June 2000.
Standard 8
Current Standard 8 Model

• **Purpose regarding staffing levels:**
  - Assesses the adequacy of a health department’s staffing levels, by calculating if it has an inspection to FTE ratio within the specified FDA range
    - The range is 280 – 320 inspections per inspector

• **Problem 1:**
  - This range was created with the belief that every food inspection regardless of establishment type would take 4 hours. This is problematic as health departments (HD) have establishments that vary by type and risk category making the required time to complete inspections also vary.

• **Problem 2:**
  - The very existence of a range creates the possibility that a HD can appear to be overstaffed. This creates the potential for that HD to have an inspection to FTE ratio that goes below the bottom value of the 280-320 range (thus making the HD fail to meet the standard). Standard 8 is evaluating if a HD has the “necessary” staff to perform the required number of inspections. If a HD has a unique need and the resources available to hire more staff than Standard 8 would require, it is not consistent with the intent of this standard to fail them.
The Logic Behind the 280-320 FTE Inspections Per Year Range

- VNRFRPS Clearinghouse Work Group agreed that 1,120 – 1,280 inspection hours a year per one FTE “represents a reasonable range” of annual productive hours -VNRFRPS 2019 https://www.fda.gov/media/86864/download

- This then “allows for the same unit of measure to be applied to all jurisdictions regardless of their procedures and processes” -VNRFRPS 2019 https://www.fda.gov/media/86864/download
The Logic Behind the 4 Hour Inspection

<table>
<thead>
<tr>
<th>150 establishments a year per inspector</th>
<th>2 inspections a year</th>
<th>300 inspections</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 hours devoted to each establishment a year</td>
<td>150 establishments a year per inspector</td>
<td>1200 inspection hours a year</td>
</tr>
<tr>
<td>1200 inspection hours a year</td>
<td>300 inspection</td>
<td>4 hours an inspection</td>
</tr>
</tbody>
</table>
Potential Problem with these Figures

• **150 establishments a year per inspector** came from the 1961 International City Managers’ Association the *Administration of Community Health Services* [https://babel.hathitrust.org/cgi/pt?id=mdp.39015072177739&view=1up&seq=177](https://babel.hathitrust.org/cgi/pt?id=mdp.39015072177739&view=1up&seq=177) book sharing that “there is no widely accepted formula on which to base the number of staff persons” but that “some local agencies” use 150

• **2 inspections a year** came from the *1976 Food Service Sanitation Manual* [https://babel.hathitrust.org/cgi/pt?id=umn.31951002840720j&view=1up&seq=29](https://babel.hathitrust.org/cgi/pt?id=umn.31951002840720j&view=1up&seq=29) that acknowledges the above 150 establishment number and adds without justification that “a minimum of two inspections of each establishment per year is required”

• **8 hours devoted to each establishment** comes from the *1997 FDA Food Code* [https://wayback.archive-it.org/7993/20170113023657/http:/www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm054458.htm](https://wayback.archive-it.org/7993/20170113023657/http:/www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm054458.htm) which suggests “8 to 10 hours be allocated per establishment year” also without evidence or clear reasoning

**Conclusion:** There appears to be no strong justification for any of these values based on real data and research making it problematic that they are the criteria from which the 4 hour inspection time is based
Our Solution

It is more accurate to assess a health department’s staffing levels by:

1. categorizing establishments into 3 risk categories: low, moderate, high
2. use a standardized frequency each risk type should be inspected a year
3. use a standardized inspection time required for each risk type
4. calculate how many FTEs it “should” take to complete all of these inspections.
5. calculate how many FTEs the health department “currently” has
6. If the health department currently has an equal or greater number of FTEs than our new standard would require they would be considered sufficiently staffed

Note: The inspection to FTE ratio and the range which sets the standard would no longer be needed and would be removed from the Standard 8 Staffing Level assessment
Why Categorize Establishments

- Standard 8 states that a “process should exist for the regulated food establishments to be grouped into at least 3 categories based on food safety risk” – VNRFPS 2019 https://www.fda.gov/media/86864/download

- The FDA recommends categorizing food establishments into risk categories because:
  - “By focusing inspections on the control of foodborne illness risk factors, inspectors can be assured that they are making a great impact on reducing foodborne illness” – FDA Food Code 2017 https://www.fda.gov/food/fda-food-code/food-code-2017
  - “Studies have shown that the types of food served, the food preparation processes used, the volume of food, and the population served all have a bearing on the occurrence of foodborne illness risk factors in retail and foodservice establishments” – FDA Food Code 2017
  - “With limited resources, creating a variable inspection frequency for each category will allow inspection staff to effectively spend more time in high risk establishments that pose the greatest potential risk of causing foodborne illness.” – FDA Food Code 2017
Follow Other FDA Recommended Inspection Standards

• FDA’s Manufactured Food Regulatory Program Standards 2016

Appendix 8.2: Calculation for determining a required number of inspectors
https://www.fda.gov/media/100421/download

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Number in inventory</th>
<th>Inspection frequency</th>
<th>Average inspection time (includes travel)</th>
<th>Reinspection frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td>12 months</td>
<td>7.2 hours</td>
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<tr>
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<td>18 months</td>
<td>5.7 hours</td>
<td>10%</td>
<td></td>
</tr>
<tr>
<td>Low</td>
<td>24 months</td>
<td>4.2 hours</td>
<td>10%</td>
<td></td>
</tr>
</tbody>
</table>

• Formula: (high risk inspection hours + medium risk + low risk = total inspection hours required/1200 inspection hours) = # FTEs required

• Note: Average Inspection times came from Department of Health and Human Services https://oig.hhs.gov/oei/reports/oei-01-98-00400.pdf study of 37 states’ inspection. 5.7 hours was the state average with a standard deviation of 1.5.
How Our FTE Model Categorizes

1. Following FDA recommendations it would require that a health department (HD) group their establishments into 3 risk categories: **low, moderate, and high risk**

2. If a HD is unsure how to put their current risk category scale into a 3 category model, refer to Annex 5 – Risk Categorization of Food Establishments Table [https://www.fda.gov/media/110822/download](https://www.fda.gov/media/110822/download). In this table there are 4 risk categories with descriptions. Risk category 1 would be low risk. Risk category 2-3 would be moderate risk. Risk category 4 would be high risk.

3. If a HD **only has 2 risk categories** put them in the most appropriate categories out of low, moderate, or high. E.g. low and high, moderate and high, etc
<table>
<thead>
<tr>
<th>Risk 1: Examples include most convenience store operations, hot dog carts, and coffee shops. Establishments that serve or sell only pre-packaged, non-time/temperature control for safety (TCS) foods. Establishments that prepare only non-TCS foods. Establishments that heat only commercially processed, TCS foods for hot holding. No cooling of TCS foods. Establishments that would otherwise be grouped in Category 2 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk 2: Examples may include retail food store operations, schools not serving a highly susceptible population, and quick service operations. Limited menu. Most products are prepared/cooked and served immediately. May involve hot and cold holding of TCS foods after preparation or cooking. Complex preparation of TCS foods requiring cooking, cooling, and reheating for hot holding is limited to only a few TCS foods. Establishments that would otherwise be grouped in Category 3 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors. Newly permitted establishments that would otherwise be grouped in Category 1 until history of active managerial control of foodborne illness risk factors is achieved and documented.</td>
</tr>
<tr>
<td>Risk 3: An example is a full service restaurant. Extensive menu and handling of raw ingredients. Complex preparation including cooking, cooling, and reheating for hot holding involves many TCS foods. Variety of processes require hot and cold holding of TCS food. Establishments that would otherwise be grouped in Category 4 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors. Newly permitted establishments that would otherwise be grouped in Category 2 until history of active managerial control of foodborne illness risk factors is achieved and documented.</td>
</tr>
<tr>
<td>Risk 4: Examples include preschools, hospitals, nursing homes, and establishments conducting processing at retail. Includes establishments serving a highly susceptible population or that conduct specialized processes, e.g., smoking and curing; reduced oxygen packaging for extended shelf-life.</td>
</tr>
</tbody>
</table>
Creating the Standard for Frequency and Inspection Time by Risk Category

Methodology:

• In 2017 HCPH surveyed 390 health departments (HD) across the country asking them for average inspection times and frequencies per the 3 risk categories. 100 complete responses were received.

• To create a standard we categorized these HDs by the # of standards they achieved and evaluated if HDs with more standards met had inspection times and frequencies different from HDs with less standards met.

• *Statistical techniques demonstrated* that there was *no relationship* between the # of standards a HD achieved and their times or frequencies.

• Thus there is no rational for emphasizing inspection times of HDs that passed more standards from the data we obtained.

• Therefore it made the most sense to use the average or median inspection times and frequencies per risk category of all the HDs that responded as a standard. Now these values would be based on real data from a diverse group of HDs.
Plots of # of Standards Met by Inspection Times and Frequencies Demonstrating no Relationship,
Bivariate Linear Regression Results and Correlation Coefficients

<table>
<thead>
<tr>
<th>Independent Variable</th>
<th>Dependent Variable</th>
<th>P-Value</th>
<th>Pearson's Correlation Coefficient</th>
</tr>
</thead>
<tbody>
<tr>
<td># Stds. Met</td>
<td>Low Risk Freq.</td>
<td>0.67</td>
<td>-0.05</td>
</tr>
<tr>
<td># Stds. Met</td>
<td>Low Risk Time</td>
<td>0.15</td>
<td>0.15</td>
</tr>
<tr>
<td># Stds. Met</td>
<td>Mod Risk Freq.</td>
<td>0.49</td>
<td>0.07</td>
</tr>
<tr>
<td># Stds. Met</td>
<td>Mod Risk Time</td>
<td>0.27</td>
<td>0.11</td>
</tr>
<tr>
<td># Stds. Met</td>
<td>High Risk Freq.</td>
<td>0.24</td>
<td>0.12</td>
</tr>
<tr>
<td># Stds. Met</td>
<td>High Risk Time</td>
<td>0.54</td>
<td>0.06</td>
</tr>
</tbody>
</table>

Note:
Statistically Significant Relationship = P-Value < .05

Pearson's Correlation Coefficient: Perfect positive relationship = 1, Perfect negative relationship = -1
Creating Standard Inspection Times by Risk Category

- **Median**
  - Low Risk: 45 minutes
  - Mod Risk: 75 minutes
  - High Risk: 120 minutes

- **Average**
  - Low Risk: 50 minutes
  - Mod Risk: 85 minutes
  - High Risk: 125 minutes
Creating Standard Inspection Frequencies by Risk Category

**Median**
- Low Risk: 1 insp.
- Mod Risk: 2 insp.
- High Risk: 3 insp.

**Average**
- Low Risk: 1.14 insp.
- Mod Risk: 1.84 insp.
- High Risk: 2.68 insp.
Calculating How Many FTEs a Health Department “currently” has

• Note: This process uses the current Standard 8 model developed by the FDA with the sections devoted to the inspection to FTE ratio removed

• The model now only needs to:
  1. calculate the annual productive hours of one FTE
  2. calculate the total food inspection hours the health department currently conducts
  3. divide the total food inspection hours by the annual productive hours of one FTE to calculate how many overall FTEs the health department “currently” has

\[
\text{Total food inspection hours} / \text{one FTE’s annual productive hours} = \text{Total FTEs}
\]
Calculating “current” FTEs

### FTE DATA CALCULATION

Calculate productive hours per year for an employee doing 100% food inspections

<table>
<thead>
<tr>
<th>Information For One Employee</th>
<th>Hours/Year</th>
<th>Hours/Day</th>
<th>Total Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual FTE Hours Per Year: Industry Standard</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Holiday Hours Per Year</td>
<td>80</td>
<td>0</td>
<td>80</td>
</tr>
<tr>
<td>Local Vacation Leave Hours Per Year</td>
<td>104</td>
<td>104</td>
<td>104</td>
</tr>
<tr>
<td>Local Sick Leave Hours Per Year</td>
<td>78</td>
<td>78</td>
<td>78</td>
</tr>
<tr>
<td>Local Family-Personal Leave Hours Per Year</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Productivity Factoring Per Year

<table>
<thead>
<tr>
<th>Activity</th>
<th>Hours/Year</th>
<th>Total Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travel Time For Inspection</td>
<td>1.5</td>
<td>1477</td>
</tr>
<tr>
<td>Administrative Work (in-office work)</td>
<td>192</td>
<td>1285</td>
</tr>
<tr>
<td>Training Time</td>
<td>20</td>
<td>1265</td>
</tr>
<tr>
<td>Others</td>
<td>0</td>
<td>1265</td>
</tr>
</tbody>
</table>

### Personal Development Time Per Year

<table>
<thead>
<tr>
<th>Activity</th>
<th>Hours/Year</th>
<th>Total Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuing Education Hours</td>
<td>12</td>
<td>1253</td>
</tr>
<tr>
<td>Others</td>
<td>0</td>
<td>1253</td>
</tr>
</tbody>
</table>

### Productive Annual FTE Hours Per Year (FTE Conversion Factor)

- **Total Food Safety Inspection Hours**: 40186
- **Total Local FTE**: 32.1

**Actual working days**: 227.25

**Actual working weeks**: 45.45
Calculating How Many FTEs a Health Department “should” have

• Note: this process would be incorporated into the current Standard 8 model

• The steps of the new process are below:

1. A health department will input the number of establishments they have into each of the 3 risk categories of the table

2. The table will automatically calculate how many inspections should be conducted for each risk category using the inspection frequency values from the survey

3. The table will then automatically calculate how many total hours are required to complete these inspections using the inspection time values from the survey

4. The table will lastly divide these total inspection hours by the annual productive hours of one FTE (this value is already calculated in the previous section) to calculate how many overall FTEs the health department “should” have
Calculating “required” FTE

<table>
<thead>
<tr>
<th>Standard 8's REQUIRED FTE FOR YOUR JURISDICTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Risk Establishment</td>
</tr>
<tr>
<td>------------------------</td>
</tr>
<tr>
<td>Routine and Permitting</td>
</tr>
<tr>
<td>Follow Up Inspections/Re-inspections (15%)</td>
</tr>
<tr>
<td>Foodborne Illness Complaints (1%)</td>
</tr>
<tr>
<td>Other (10%)</td>
</tr>
<tr>
<td>Median Hours Spent Per Inspection</td>
</tr>
<tr>
<td>Total Inspection Time</td>
</tr>
<tr>
<td>Total Required FTE</td>
</tr>
</tbody>
</table>

Standard 8 Criteria

Notes:
- Frequency of inspections - 2017 HCPH Survey 1 (100 responses)
- Median Hours Spent Per Inspection - 2017 HCPH Survey 1 (100 responses)
- Follow Up Inspections % (out of total # inspections) - 2017 HCPH Survey 2 (60 responses)
- Foodborne Illness Complaints % (out of total # inspections) - 2017 HCPH Survey 2 (60 responses)
- Other % (out of total # inspections) E.g. from Standard 8 Staffing Level Assessment Workbook, pg. 10 - complaints, outbreak investigations, risk assessment reviews, process reviews, variance process reviews, final construction inspections and “other direct establishment contact time”
Meet or Not Meet Standard 8

• As demonstrated on previous slide, once the Standard 8 model is completed it will automatically calculate if a health department meets or does not meet the standard. E.g. below.

Jurisdiction X “should” have 5 FTE
Jurisdiction X “currently” has 4 FTE

should have > currently have  

Jurisdiction Y “should” have 20 FTE
Jurisdiction Y “currently” has 23 FTE

should have <= currently have
How Do Our Surveyed HDs Do?

Surveyed HDs, n=91

- 75% Meet Standard
- 25% Not Meet Standard
Recommendation #1

• A HD can use their own method
• A HD can use the current assessment tool
• A HD can use the new proposed assessment tool that calculates staffing levels by risk category
Recommendation #2

• Use the new proposed model to determine staffing level
  ◦ Option 1: use the standardized values from the survey
  ◦ Option 2: use values that the HD determines to be appropriate for their program
Recommendation #3

• Pilot the new proposed model among HDs for a period of time
Conclusion

• The standard 4 hour inspection time needs to be updated

• Our survey demonstrates that inspection times and frequencies vary by risk category

• An *inspection to FTE ratio* is not necessary to assess a HD’s staffing levels, in fact it creates the potential for failing a health department that is sufficiently staffed
Standard 8 Re-Evaluation of Staffing Level Model

Pilot Study Report

Subcommittee #2

Program Standards Committee

Conference for Food Protection

October 2019
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Background

Regulatory food safety programs residing within health departments (State and Local) across the country are responsible for conducting food safety inspections for retail food establishments within their respective jurisdictions. These regulatory programs are required to abide by the regulations set forth, at a minimum, by the Food and Drug Administration (FDA) through the FDA Food Code. The FDA, in an effort to achieve uniformity, developed the Voluntary National Retail Food Regulatory Standards (VNRFRPS). The Retail Program Standards allow health departments to enroll and audit the effectiveness of their program. There are a total of 9 standards designed to assist regulatory food safety programs to improve and enhance the services they provide to protect the public.

Issue #2016 II-020

In 2016, an issue (#2016 II-020) was submitted to the Conference for Food Protection (CFP), regarding the ineffectiveness of a model used to determine compliance for Standard 8 (Fig. 1). Standard 8 assesses the regulatory food safety programs’ level of Program Support and Resources. There are 12 items by which a health department conducts self and verification audits to see if they comply with Standard 8. According to a survey from the National Association of County Health Officials (NACCHO), there is a low percentage of health departments (<10%), that are able to complete Standard 8. Usually the reason for not meeting the standard is due to Item 8.1: Staffing Level. This item evaluates if a food safety program has sufficient full-time equivalent (FTE) staff to conduct food inspections. The model calculates if a health department is fully staffed using an inspection-to-FTE ratio. In order to meet Standard 8, the health department must fall into a specific range of 280-320 inspections -per inspector per year. The problems regarding the logic behind the ratio have been explained previously (see Appendix; Item A: Standard 8 Staffing Level).

The charges addressed in the first issue #2016 II-020 were evaluated by Conference for Food Protection, 2016-2018 Program Standards Committee, Standard 8 Subcommittee. The goal was to propose a new model, focused on risk-based inspections that would more accurately assess a health department’s staffing levels. In 2017, the subcommittee surveyed 390 health departments across the country and collected data on average inspection times and frequencies by risk category. In total, 105 complete responses were received which were used to create a new data-driven model.
Issue #2018 II-018

In 2018, following the work of the Standard 8 Subcommittee, more recommendations were submitted to CFP regarding the initial issue (#2016 II-020). The proposed solutions were accepted by CFP in 2018 and a new issue and subcommittee were created, Issue #2018 II-018 evaluated by Subcommittee #2. The new subcommittee was responsible for addressing the following charges:

(1) Continue to collaborate with the FDA internal Program Standards working group on modifying the “description of Requirements” for “Staffing Level” in Standard 8 of the VNFRFPS;

(2) Use the supporting attachments listed in the 2016-2918 Program Standards Committee, Standard 8 Subcommittee report as the foundation to establish as more statistically sound logic model for the FTE/Inspection ratio and provide the new calculation/formula to be used by a VNFRFPS enrollee to assess the Standard 8 “Staffing Level”;

(3) Propose amendments to Standard 8 of the VNFRFPS and the CFP guidance document titled “Standard 8 Staffing Level Assessment workbook” and accompanying “Instruction Guide” to incorporate the outcomes of Charges 1 and 2; and

(4) Report back committee findings and recommendations to the 2020 Biennial Meeting.

Pilot Study

In August 2019, Subcommittee #2 met with the Program Standards Committee to discuss the work that had been completed on the new model development to date. A key decision made on the call was to pilot the proposed model with a pool of health departments across the nation. In September 2019, Subcommittee #2 conducted a pilot study of a proposed staffing level evaluation model as decided by the Program Standards Committee. The study consisted of sending a survey to health departments in order to obtain staffing level data and use the proposed model to analyze this data. A local health department led the study and the following report provides details on the Standard 8 Pilot Study.
Methodology

Validation of the Proposed Model

In order to verify that the proposed model was statistically sound for the Pilot Study, Subcommittee #2 worked with Dr. Matthew Koslovsky, a Post-Doctoral Research Associate from Rice University focusing in Biostatistics. For his detailed C.V., see Appendix; Item B: Dr. Koslovsky-CV. He reviewed and approved the below methodology used to create the proposed model. This model was created by using data provided by 105 health departments. The logic behind the proposed model requires that food establishments be categorized by risk level (low, moderate, and high). The first step in creating the proposed model was to analyze if the inspection times and frequencies provided by the health departments were significantly related to the number of standards a health department had met. This was important, since the number of standards a health department met was the only information indicating their performance level. If health departments that met more standards had significantly different inspection times and frequencies than those that did not, it would have been better to only use those values. Statistical analysis demonstrated that there was no significant relationship between the number of standards a health department met and their responses related to inspection time and frequency. Due to this, it was considered sufficient to use either the average or median inspection time and frequency values of all respondents (Table 1). Further statistical analysis confirmed that the average and median inspection frequency and time values were significantly different for each risk category. In other words, inspection time and frequency was lower for low-risk establishments and was higher for high-risk establishments. Lastly, it was decided that the median, not the average, should be used to remove the effects of extreme values. Detailed data analysis including tests and p-values can be made available upon request.
Table 1: Median Inspection Times/Frequencies by Number of Standards Met

<table>
<thead>
<tr>
<th># Standards Met</th>
<th>0</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6 or more</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Jurisdictions</td>
<td>n = 22</td>
<td>n = 17</td>
<td>n = 19</td>
<td>n = 17</td>
<td>n = 11</td>
<td>n = 11</td>
<td>n = 8</td>
</tr>
<tr>
<td><strong>Median Inspection Time in Hours</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Low Risk</td>
<td>0.815</td>
<td>0.75</td>
<td>0.75</td>
<td>0.69</td>
<td>0.75</td>
<td>0.75</td>
<td>1</td>
</tr>
<tr>
<td>Moderate Risk</td>
<td>1.105</td>
<td>1.5</td>
<td>1</td>
<td>1.375</td>
<td>1.5</td>
<td>1.25</td>
<td>1.585</td>
</tr>
<tr>
<td>High Risk</td>
<td>1.875</td>
<td>2.5</td>
<td>1.75</td>
<td>2</td>
<td>2</td>
<td>1.75</td>
<td>2</td>
</tr>
</tbody>
</table>

| **Median Inspection Frequency per Year** |       |       |       |       |       |       |           |
| Low Risk        | 1     | 1     | 1     | 1     | 1     | 1     | 1         |
| Moderate Risk   | 2     | 2     | 2     | 2     | 2     | 2     | 2         |
| High Risk       | 2     | 3     | 3     | 2.67  | 3     | 3     | 3         |

**Sampling & Recruitment**

In order to include health departments already involved in the Program Standards Committee, a mixture of non-random and random sampling was used. As shown in Figure 2, a total of 44 health departments were contacted to participate in the pilot. Of the 44 jurisdictions contacted, 13 were already involved with the Program Standards Committee and were aware of the purpose of the Pilot Study, the remaining 31 were chosen randomly from the list of original participants of the 2017 survey or were referred by an ineligible jurisdiction. Of the 40 eligible health departments, 22 consented to participate. Of the 22 consented health departments, 18 provided data, and 4 were not able to complete the survey. A total of 19 jurisdictions were included in the study once the local health department leading the study added their own data.
Data Collection

Participating health departments were given the option of providing the requested staffing level data either via a 1) weblink to a SurveyMonkey questionnaire (see Appendix; Item C: Survey) or 2) phone call as a guided interview with one of the Pilot Study team members. SurveyMonkey was chosen as the platform for collecting data in order to have an organized database of participant’s responses. Participants were also provided a guidance document (see Appendix; Item D: Guidance Document) with useful definitions and descriptions to help interpret the questions and provide the appropriate data in the correct format. Upon recruitment, participating departments had one month (from August 30th until September 30th) to either complete the questionnaire on SurveyMonkey or schedule and complete through a phone call.
Survey Details

The survey aimed to collect data necessary to determine the total productive hours per FTE, total inspection hours each health department currently conducts, the total inspection hours each health department should be conducting, the total current FTE and the total required FTE. To determine the total productive hours for each jurisdiction, the survey included questions about the time spent traveling to inspections, conducting administrative work, and professional development as well as time spent on breaks, holiday, and vacation. To have a better understanding of total productive hours, the survey asked each jurisdiction to list all types of Environmental Health Specialist (EHS) employees (such as managers, supervisors, and regular EHS staff) and include the average percent of time that each employee spends on food inspections. A second objective of the survey was to obtain data which would allow us to observe each jurisdiction’s method of categorizing inspections, as well as the average time spent on food-borne illness, routine, and other types of inspections.

Comparing Models

Participant data was taken from the SurveyMonkey database and moved to an Excel workbook where it was organized to review staffing levels for each health department. First, the data was run through the current Standard 8 model (see Appendix, Item E: Standard 8 - Assessment Workbook). By doing this, we obtained the current FTE and inspection-to-FTE ratio for each health department. If a health department falls above or below the ratio, then the health department does not meet Standard 8. We then determined which departments “passed” or “failed” to meet the staffing level requirements using the current Standard 8 model.

The data was then analyzed using the proposed Standard 8 model (see Appendix, Item F: Standard 8 - Proposed Model Workbook). The proposed model works by removing the inspection-to-FTE ratio and instead calculates how many FTEs a health department should have. It does this by first using a formula based on standardized inspection times and frequencies based on risk categories to calculate the total inspection hours for each jurisdiction. It automatically divides this total by the FTE productive hours calculated in the current model to obtain the number of FTEs the health department should have. Lastly, it “passes” the health department if the number of FTEs they currently has is greater than or equal to the number of FTEs the HD should have. If the health department currently has an equal or greater number of FTEs, as calculated by the proposed model, then the health department would be considered sufficiently staffed; consequently, that health department would meet Standard 8. Finally, we checked which health departments “passed” or “failed” to meet the staffing level requirements using the proposed Standard 8 model.
Pilot Results

Jurisdiction Characteristics

A total of 16 States were represented in the Pilot Study. Of the 19 health departments, 16 jurisdictions were Local Health Departments, and the remaining 3 were State Health Departments or Agencies. After organizing the data, we observed each health department’s characteristics such as total EHS employees, total inspections in a year, and total establishments in their jurisdictions (Table 2). Sizes of participating departments varied substantially, with the lowest number of EHS employees being 2 and the highest 99.

Table 2: Employees, total inspections, and total establishments per jurisdiction

<table>
<thead>
<tr>
<th>Total Employees</th>
<th>Total Inspections</th>
<th>Total Establishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>512</td>
<td>128</td>
</tr>
<tr>
<td>2</td>
<td>144</td>
<td>109</td>
</tr>
<tr>
<td>4.6</td>
<td>764</td>
<td>585</td>
</tr>
<tr>
<td>6</td>
<td>464</td>
<td>303</td>
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<td>6</td>
<td>488</td>
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<td>7</td>
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<td>16</td>
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<tr>
<td>21.1</td>
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<td>29.75</td>
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<td>17463</td>
<td>8568</td>
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<tr>
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<td>8830</td>
</tr>
<tr>
<td>99</td>
<td>47216</td>
<td>25300</td>
</tr>
</tbody>
</table>

Current Model v Proposed Model

When analyzing the data using the current model, all (100%) of the participating health departments failed Item 8.1: Staffing Level. Of the 19 health departments, 5 fell below the established ratio of 280-320 inspections per FTE (Fig. 3). Falling below the ratio indicates that the health department is “overstaffed”; that is, each EHS is assigned too few
inspections per year. The remaining 14 health departments fell above the ratio and were considered “understaffed”; in other words, each EHS is assigned too many inspections per year. A major problem with the current ratio is that health departments who are “overstaffed” should actually be considered sufficiently staffed, with each EHS assigned an attainable number of inspections to complete per year. If the 5 health departments who were “overstaffed” were not restricted by the ratio, they would have “passed” Standard 8, indicating a compliance rate of about 26%. The ratio seems to penalize health departments who have too many EHS.

Figure 3: “Understaffed” and “Overstaffed” departments based on current model

When analyzing the data using the proposed model, 10 (52.6%) health departments “passed” Item 8.1: Staffing Level. The model was able to confirm that those 10 health departments currently had an equal or greater number of EHS employees required to complete the inspections in their jurisdictions. The remaining 9 (47.4%) health departments “failed” to meet item 8.1. The model was able to confirm that those 9 health
departments currently had a lower number of EHS employees required to complete the inspections in their jurisdictions.

When looking at the data more closely, there were a few interesting results that were observed between the jurisdictions that “failed” (n=9) and those who “passed” (n=10) the proposed model (Table 3). On average, jurisdictions who “passed” had less FTEs (8.6 vs 15.3), fewer employee position categories (3.2 vs. 4.2), and less food establishments categorized as high risk (24% vs 38%). Jurisdictions who “passed” also had, on average, more total productive hours (1337 vs. 1043) and more employees who dedicated a higher percent of their time to food inspections. Alternatively, jurisdictions that “failed” spent more time, on average, on travel (61 vs. 23 min/day) and administrative work (93 vs. 71 min/day). Another interesting observation was that of the 10 jurisdictions that “passed” in the proposed model, half (5) originally fell above the 280-320 ratio (overstaffed) and half fell below (understaffed).

Table 3: Differences of Jurisdictions who “Passed” or “Failed” the Proposed Model

<table>
<thead>
<tr>
<th></th>
<th>Total FTE</th>
<th>Total Productive Hours</th>
<th>Average travel time</th>
<th>Average administrative time</th>
<th>Average inspection/FTE ratio</th>
<th>Average &quot;high-risk&quot; establishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passing</td>
<td>8.6</td>
<td>1337</td>
<td>23 min/day</td>
<td>71 min/day</td>
<td>334</td>
<td>24%</td>
</tr>
<tr>
<td>Failing</td>
<td>15.3</td>
<td>1043</td>
<td>61 min/day</td>
<td>93 min/day</td>
<td>543</td>
<td>38%</td>
</tr>
</tbody>
</table>

Discussion

When using the proposed model, the number of jurisdictions who met Item 8.1: Staffing Level, increased by half (0% to 52%). If the jurisdictions who were “overstaffed” (5) based on the current model were not limited by the inspection-to-FTE-ratio, the number of jurisdictions meeting Item 8.1: Staffing Level in the proposed model would have only increased from 26% to 52%. This shows that using the ratio to evaluate staffing levels severely limits the ability to meet Standard 8. Further, the increase in passing rate between the current and proposed models would not have been as high if the ratio was not used.

This provides additional evidence that the current inspection-to-FTE ratio is an inadequate method to assess staffing levels. According to a survey by NACCHO, health departments reported completing Standard 1 (55%), Standard 3 (51%), Standard 6 (46%), and Standard 7 (49%). Similarly, the completion rate based on the proposed model (52%) can be considered comparable to the rates for other Program Standards. The characteristics observed among the participating health departments demonstrate the variability between health departments. We acknowledge that the proposed model cannot take into consideration all of the different factors that can impact staffing level. However, we believe the proposed model is a more reasonable and logical method to calculate staffing level.
For detailed contact information on the Pilot Study team refer to Appendix, Item G: Pilot Study Team Roster. Refer any questions/comments on the Pilot Study to any of the team members. Data can be made available upon request.

**Recommendations**

On October 21, 2019, the voting members from Subcommittee #2 voted to recommend a modification for Standard 8 to include adding the new proposed model assessment tool as an alternative method to determine compliance. Each jurisdiction that is completing a self-audit will have the option of either using the current or proposed model assessment tools. The intent of the recommendation is not to weaken the Standard, but to provide a secondary assessment tool that can measure practical performance of the enrollee against the Standard. This recommendation has been submitted as an issue for consideration in the Conference for Food Protection 2020 Biennial Meeting.
Appendix

Purpose of Standard 8 staffing level section:

Standard 8 Section 1. Staffing Level requires a health department (HD) to demonstrate that they have the staff “necessary to support an inspection and surveillance system that is designed to reduce risk factors and other factors known to contribute to foodborne illness”

Current criteria to pass Standard 8:

A HD currently meets this standard if they demonstrate an inspection to FTE ratio inspection-to-FTE ratio range of 280-320 inspections per FTE. The Conference for Food Protection (CFP) developed an assessment tool and instruction guide that can be used by a HD if desired. If not the HD has to calculate their inspection to FTE ratio through their own method and see if it falls within the required range.

Problem with inspection to FTE ratio range:

It has been agreed by subcommittee that this range is problematic as it is based on the idea that every inspection should take 4 hours. There are two major problems we have identified with the inspection-to-FTE ratio:

Problem 1:

• This range was created with the belief that every food inspection regardless of establishment type would take 4-hours. This is problematic as health departments have establishments that vary by type and risk category making the required time to complete inspections also vary.

Problem 2:

• The very existence of a range creates the possibility that a HD can appear to be overstaffed. This creates the potential for that HD to have a ratio that goes below the bottom value of the 280-320 range (thus making the HD fail to meet the standard).
The logic behind the 4-hour inspection

Problems with these numbers

- **150 establishments a year per inspector** came from the 1961 International City Managers’ Association’s Administration of Community Health Services [https://babel.hathitrust.org/cgi/pt?id=mdp.39015072177739&view=1up&seq=177](https://babel.hathitrust.org/cgi/pt?id=mdp.39015072177739&view=1up&seq=177) book sharing that “there is no widely accepted formula on which to base the number of staff persons” but that “some local agencies” use 150

- **2 inspections a year** came from the 1976 Food Service Sanitation Manual [https://babel.hathitrust.org/cgi/pt?id=umn.31951002840720j&view=1up&seq=29](https://babel.hathitrust.org/cgi/pt?id=umn.31951002840720j&view=1up&seq=29) that acknowledges the above 150 establishment number and adds without justification that “a minimum of two inspections of each establishment per year is required”

- **8 hours devoted to each establishment a year** comes from the 1997 FDA Food Code [https://wayback.archive-it.org/7993/20170113023657/http:/www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm054458.htm](https://wayback.archive-it.org/7993/20170113023657/http:/www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm054458.htm) which suggests “8 to 10 hours be allocated per establishment year” also without evidence or clear reasoning

**Conclusion:** There appears to be no strong justification for any of these values based on real data and research making it problematic that they are the criteria from which the 4-hour inspection time is based.
Proposed Model Assessment Tool

The following is an example of how to use the updated assessment tool to calculate if a health department is adequately staffed.

Discussion on Table 1. The risk category column is broken into three categories, the minimum required by Standard 8. The number of establishments will be unique to each health department (HD). The rows in the remaining columns show values that are based off of survey data of 100 local and state health departments throughout the country (see footnotes for more details). A HD should feel free to use these values or input ones that more appropriately fit their organization.

Table 1.

<table>
<thead>
<tr>
<th>Risk Category</th>
<th>Number of Establishments</th>
<th>Inspection Frequency</th>
<th>Average Inspection Time (does not include travel)</th>
<th>Reinspection frequency</th>
<th>FBI Inspection Frequency</th>
<th>Other Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>1,000</td>
<td>1</td>
<td>45 minutes</td>
<td>15%</td>
<td>1%</td>
<td>10%</td>
</tr>
<tr>
<td>Medium</td>
<td>2,000</td>
<td>2</td>
<td>75 minutes</td>
<td>15%</td>
<td>1%</td>
<td>10%</td>
</tr>
<tr>
<td>High</td>
<td>1,000</td>
<td>3</td>
<td>120 minutes</td>
<td>15%</td>
<td>1%</td>
<td>10%</td>
</tr>
</tbody>
</table>

**Step 1. Calculate available annual inspection time per full time equivalent (FTE) using assessment tool.** 1200 hours a year will be used for this example.

**Step 2. Calculate number of FTE currently available at health department.** This # is calculated in the current and updated assessment tools.

**Step 3. Calculate total number of hours required to inspect each risk category.** Formula for calculating # of inspection hours per risk type below (low risk type used for example):

(1000 establishments x 1 inspection a year = 1000 inspections) + (1000 establishments x 15 % reinspections a year = 150 inspections) + (1000 establishments x 1% FBI inspections a year = 10 inspections) + (1000 inspections x 10% other inspections a year = 100 inspections) = 1260 inspections a year x 45 minutes an inspection = 945 hours a year

Medium risk = 4520 inspections a year x 75 minutes = 5650 hours

High Risk = 3260 inspections a year x 120 minutes =6520 hours

Total inspection time = 945 + 5650 + 6520 = 13,115 inspection hours a year

**Step 4. Calculate number of FTE’s required**

13,115 total inspection time hours /1200 inspection hours available per FTE = 10.93 FTEs

**Step 5. Calculate if health department is adequately staffed**

If FTEs currently available >= 10.93 FTEs that a HD should have then that HD is adequately staffed

---

1 Median inspection frequencies of 105 health departments from 2017 survey
2 Median inspection times of 105 health departments from 2017 survey
3 Median reinspection frequency %s of 60 health departments form 2017 survey2
4 Median food borne illness inspection frequency %s of 60 health departments from 2017 survey2
5 Final % value still being calculated, 10% being used for this demonstration
Matthew D. Koslovsky, PhD

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Houston, TX 77005 mkoslovsky12@gmail.com
http://mkoslovsky.blogs.rice.edu
https://github.com/mkoslovsky
(512) 786-6187

RESEARCH INTERESTS

Theory and Methods: Bayesian modeling, variable selection, graphical models, nonparametric Bayes, statistical computing, multistate Markov models, R package development, varying-coefficient models, hidden Markov models, variational inference

Application: cancer prevention, smoking behaviors, mental health, addiction, physical activity, nutrition, microbiome, mHealth, ecological momentary assessment, intensive longitudinal data, environmental health, human health and performance in space

EDUCATION

The University of Texas Health Science Center, Houston, TX
Doctor of Philosophy, Biostatistics, GPA: 4.0/4.0 Dec 2016
· Minor: Health Promotions and Behavioral Sciences
· Title: Deterministic Bayesian variable selection developments for binary outcomes · Advisor: Michael D. Swartz, PhD

The University of Texas, Austin, TX
Bachelor of Science, Mathematics Aug 2011
· Concentration: Scientific Computation

EXPERIENCE

Rice University, Houston, TX
Post-Doctoral Research Associate March 2018 - Current
· NSF/RTG Post-Doctoral Fellowship in Data Science
· Advisor: Marina Vannucci, PhD

KBRwyle, Houston, TX
Biostatistician July 2016 - March 2018
· Human Health and Performance Contract
· Johnson Space Center

The University of Texas Health Science Center, Houston, TX
Pre-Doctoral Fellow Jan 2015 - Dec 2016
· National Cancer Institute Pre-Doctoral Fellowship
· Cancer Education and Career Development Program
Pre-Doctoral Trainee Aug 2013 - Jan 2015
· National Institutes of Health Pre-Doctoral Traineeship

*Science Systems and Applications, Inc.*, Hampton, VA
Summer Intern May 2014 - Aug 2014
· DEVELOP National Program
· Langley Research Center

*National Space Biomedical Research Institute*, Houston, TX
Summer Apprentice May 2013 - Aug 2013
· Biostatistics Laboratory · Johnson Space Center

*Cancer Prevention and Research Institute of Texas*, Austin, TX
Summer Intern May 2010 - Oct 2010
· University of Texas School of Public Health
· Biostatistics Department

**TEACHING EXPERIENCE**

*University of Texas Health Science Center*, Department of Biostatistics and Data Science
Lecturer (Ad Hoc), Foundations of Biostatistics (PH1690) Fall 2019
Lecturer (Ad Hoc), Foundations of Biostatistics (PH1690) Summer 2019
· Student evaluation of overall effectiveness - 4.86/5.0
Teaching Assistant, Theory of Biostatistics II (PH1911) Spring 2016
Teaching Assistant, Linear Models (PH1915) Fall 2015

**PUBLICATIONS**

Submitted/In Progress


3. Koslovsky, M.D., H’ebert, E.T., Businelle, M.S., & Vannucci, M. An efficient Bayesian varying-coefficient modeling approach for behavioral mHealth data. (Submitted)


5. Koslovsky, M.D., Liang, M.†, & Vannucci, M. A Bayesian hidden Markov model for accommodating social desirability bias in mHealth data. (In Progress)


† indicates PhD student in Dr. Vannucci’s research group at Rice University ‡ indicates equal contribution

Statistical Methodology


Applications


Proceedings


PRESENTATIONS


AWARDS

• Dr. M. Stewart West Memorial Scholarship, 2015
• UTHealth Division of Biostatistics Travel Award, 2015
• Richard D. Remington Memorial Student Scholarship, 2014
• Robert. H Bigelow Endowed Scholarship, 2013
MENTORING
• Yefei Zhang, UTHealth, PhD Biostatistics candidate, Dissertation Committee, 01/2017-Current
• Scott Liang, Rice University, PhD Statistics student, Co-mentor, 03/2019-Current
• James Warner, Rice University, Rice Undergraduate Data Science Summer Program, 2018
• Karan Adams, Rice University, Rice Undergraduate Data Science Summer Program, 2018
• Stoyan Komitov, Rice University, Rice Undergraduate Data Science Summer Program, 2018
• Alex Aguilar, Rice University, PhD Statistics candidate, NASA Summer Intern, 2018
• Austin Vo, University of Central Florida, NASA Summer Intern, 2017
• UTHealth New Student Mentor, Fall 2013

COMPUTER
Languages & Software: R, C++, Rcpp, Shiny, \LaTeX, STATA, SAS, WinBUGS

SKILLS

PROFESSIONAL
AFFILIATION
• American Statistical Association, 2015 – Current

PROFESSIONAL
SERVICE
• Biometrical Journal, Biometrics, Biostatistics, Nature Communications

Board Member
• Johnson Space Center IRB

Board Member
• Conference for Food Protection: Program Standards Committee, KBRwyle, NASA

CONTINUING
SERVICE
• HACASA - Short Course “Randomized Clinical Trials replacing Traditional Analyses with Better Alternatives,” Houston, TX, May 2018
• Joint Statistical Meetings - Short Course “Network Meta-Analysis,” Baltimore, MD, Aug 2017
• NASA Human Research Program Investigator’s Workshop - “A New Dawn: Enabling Human Space Exploration,” Galveston, TX, Jan 2017
• Technology Collaboration Center - “Omics Workshop,” Houston, TX, Spring 2017
• Tableau Conference 2016 - Tableau Classroom Training- “Tableau Desktop II,” Austin, TX, Fall 2016
• ENAR - Short Course “An Introduction to Statistical Machine Learning,” Austin, TX, Spring 2016
• ENAR - Tutorial Session - “Data Visualizations in R with shiny and ggplot2,” Austin, TX, Spring 2016
• ENAR - Tutorial Session - “High Performance Computing with R,” Austin, TX, Spring 2016
• ASA Biopharmaceutical Section FDA - Industry Statistics Workshop - “Equivalence and Similarity Testing,” Washington, DC, Fall 2015
• ASA Biopharmaceutical Section FDA - Industry Statistics Workshop - “Designing Observational Comparative Studies Using Propensity Score Methodology in Regulatory Settings,” Washington, DC, Fall 2015
• Joint Statistical Meetings - “Adaptive Methods for Modern Clinical Trials,” Seattle, WA, Summer 2015
• UT Summer Statistics Institute - “Introduction to Mixed Models with Applications,” Austin, TX, Summer 2015
• UT Summer Statistics Institute - “Big Data Analytics,” Austin, TX, Summer 2015
REFERENCES

Marina Vannucci, PhD  
Noah Harding Professor of Statistics  
Department of Statistics  
Rice University

Michael D. Swartz, PhD  
Associate Professor  
Department of Biostatistics and Data Science  
University of Texas Health Science Center at Houston

Wenyaw Chan, PhD  
Professor  
Department of Biostatistics and Data Science  
University of Texas Health Science Center at Houston

Michael Businelle, PhD  
Associate Professor  
Oklahoma Tobacco Research Center  
The University of Oklahoma Health Sciences Center

Alan H. Fieveson, PhD  
Lead of Biostatistics Laboratory  
Johnson Space Center  
NASA
Standard 8 Pilot Survey

Subcommittee #2 established by the Program Standards Committee is conducting a survey to pilot a model evaluating the staffing requirements as outlined by Standard 8 of the Voluntary National Retail Food Regulatory Program (FDA). The purpose of this survey is to collect the necessary data to conduct a staffing level audit for your Health Department.

You will need to use the guidance documented provided to assist you in filling out the information on the survey.

1. Please provide your name and jurisdiction

2. On average, how many hours per year do EHS (Environmental Health Specialist) employees spend on the following:
   (If not applicable, please answer "N/A")
   - Holiday
   - Vacation
   - Sick leave
   - Family/Personal leave

3. On average, how many hours per year do your EHS employees spend on the following:
   (If not applicable, please answer "N/A")
   - Traveling to/from inspections
   - Administrative work
   - Break time
   - Professional development (training, continuing education)
4. Please list all employees who conduct food safety inspections using the following format:

**Title of position, % of time dedicated to food safety inspections, number of this type of employee in your health department**

Example: Environmental Health Specialist-Training, 60%, 12

(If less than 6 positions, please answer "N/A" for empty boxes)

Position 1
Position 2
Position 3
Position 4
Position 5
Position 6

5. Please provide the total number of inspections related to food safety conducted for your department's entire jurisdiction in one year.

6. How many of each of the following establishments does your department conduct inspections on?

(If not applicable, please answer "N/A")

Low-risk
Moderate-risk
High-risk

7. How many routine inspections were conducted in 2018?
8. How many permitting inspections were conducted in 2018?

*9. What is the average time spent conducting each of the following inspections in your department?

(If not applicable, please answer "N/A")

*Note: Please specify when using hours or minutes.

Follow-ups/reinspections

Food-borne illness complaints

Complaint investigations

Outbreak investigations

Compliance follow-up inspections

Risk assessment reviews

Process reviews

Variance process reviews

Final construction inspections

Other
INSTRUCTIONS FOR PROVIDING DATA REQUESTED FOR PILOT

Guidance Notes:
These notes are intended to guide the survey process by providing you with definitions, examples, and instructions on how to answer the survey questions. We also suggest where you might find the information needed if you do not have it readily available. Use the checklist provided on Page 3 ensure you have all the information to fill this survey.

Question 1:
“Holiday, Vacation, Sick Leave, Family Personal Leave” - These hours may vary by seniority of staff or other factors, please provide the best average for a 100% full-time EHS staff. Your Human Resources department may be a good resource to obtain some of this information.

Question 2:
“Traveling to/from inspections” - Districts vary in size and therefore this number will be different across health departments. Please use a best estimate or average time for a full-time equivalent EHS staff.

“Administrative work” - This includes any office time and administrative work an EHS employee does outside of food inspection. This does NOT include completing the inspection report.

“Professional development” - This includes things like training and continuing education.

Question 3:
“Employees who conduct food safety inspections” - For this question, we ask that you take time to consider all of the employees that conduct food safety inspections. Most health departments have inspectors whose time is dedicated solely to food safety, but have others that may dedicate only a small percentage of their time to food. For example, supervisors may conduct inspections, but only dedicate about 10% of their time to this. Use as many rows as needed to list all types of employees who conduct food inspections, even if their job titles are similar. For example:

1. EHS I, 80%, 15
2. EHS II, 60%, 5
3. EHS Supervisor, 40%, 2
4. EHS Manager, 5%, 1

Question 4:
“Total number of inspections” - Inspections are defined as routine inspections, re-inspections, complaint investigations, outbreak investigations, compliance follow-up inspections, risk assessment reviews, process reviews, variance process reviews, foodborne illness complaint response, final construction inspections and other direct establishment contact time
such as on-site training that is performed by the field inspection staff. (Standard 8 Staffing Level Assessment Workbook: Instruction Guide, page 10).

**Question 5:**

“Low - Moderate - High Risk” - Do your best to categorize all of your establishments into low, moderate, and high risk categories.

- If you have more than three categories, attempt to distribute your establishments into the categories provided.
- If you currently use fewer than three categories (Example: Low and High), then only provide the number of establishments for those categories and leave the unused one blank.
- If you do not already have a process in place to categorize food establishments in your jurisdiction, the FDA Food Code has a recommended guide to assist with categorizing, refer to Annex 5, Table 1 (Page 4 of this document). You can also review a recommendation of how to categorize your establishments below:

1. **Low risk establishments** = Examples include most convenience store operations, or establishments that sell pre-packaged or non-TCS (temperature control for safety) food.
2. **Moderate risk establishments** = Examples may include retail food store operations. They may have a limited menu. Most products are prepared/cooked and served immediately.
3. **High risk establishments** = Examples include full service restaurants. Extensive menu and handling of raw ingredients. Complex preparation including cooking, cooling, and reheating for hot holding involves many TCS foods.

**Question 6 & 7:**

“Routine Inspections” - A full review and evaluation of a food establishment’s operations and facilities to assess its compliance with food safety law, at a planned frequency determined by the regulatory authority. This does not include re-inspections and other follow-up or special investigations.

“Permitting Inspections” - A review of a food establishment’s operations and facilities to determine if a permit will be issued for the establishment to operate.

**Question 8:**

“Average time” - For each category determine the time spent on the activity from beginning to end, plus any writing and delivering reports if applicable. For example, for follow-up/re-inspections: average time = (inspection start to finish) + writing and delivering report. Leave blank if category is not applicable to your jurisdiction.
CHECKLIST

Before starting the survey please gather all information mentioned on the below checklist. It is vital to the success of this pilot study that you try and obtain as accurate of information as possible.

*Note: Annual Non-Inspection Hours and Annual Productive Hours are for an EHS employee dedicated to 100% food inspections. While there may be some variation in these hours per employee please provide the best possible average.*

<table>
<thead>
<tr>
<th>Annual Non-Inspection Hours</th>
<th>Annual Productive Non-Food Inspection Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>❑ Holiday</td>
<td>❑ Travel time to and from inspections</td>
</tr>
<tr>
<td>❑ Vacation</td>
<td>❑ Administrative work (not including inspection reports)</td>
</tr>
<tr>
<td>❑ Sick Leave</td>
<td>❑ Break time (lunch, break, etc.)</td>
</tr>
<tr>
<td>❑ Family/Personal Leave</td>
<td>❑ Professional development (training, continuing education)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EHS or Related Positions</th>
<th>Other Inspection Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>❑ A list of all types of EHS personnel or related positions (ANYONE who conducts a food establishment inspection)</td>
<td>❑ Total number of food safety inspections conducted in 2018</td>
</tr>
<tr>
<td>❑ % of time dedicated to food safety inspections for all above position types</td>
<td>❑ List of all food establishments in your jurisdiction</td>
</tr>
<tr>
<td>❑ # of employees in each position</td>
<td>❑ How many routine/permitting inspections were conducted in 2018</td>
</tr>
<tr>
<td></td>
<td>❑ Average time spent conducting follow-up/re-inspections, food-borne illness complaints, and other</td>
</tr>
</tbody>
</table>
## Annex 5, Table 1. Risk Categorization of Food Establishments

<table>
<thead>
<tr>
<th>RISK CATEGORY</th>
<th>DESCRIPTION</th>
<th>FREQUENCY #/YR</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Examples include most convenience store operations, hot dog carts, and coffee shops. Establishments that serve or sell only pre-packaged, non-time/temperature control for safety (TCS) foods. Establishments that prepare only non-TCS foods. Establishments that heat only commercially processed, TCS foods for hot holding. No cooling of TCS foods. Establishments that would otherwise be grouped in Category 2 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors.</td>
<td>1</td>
</tr>
<tr>
<td>2</td>
<td>Examples may include retail food store operations, schools not serving a highly susceptible population, and quick service operations. Limited menu. Most products are prepared/cooked and served immediately. May involve hot and cold holding of TCS foods after preparation or cooking. Complex preparation of TCS foods requiring cooking, cooling, and reheating for hot holding is limited to only a few TCS foods. Establishments that would otherwise be grouped in Category 3 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors. Newly permitted establishments that would otherwise be grouped in Category 1 until history of active managerial control of foodborne illness risk factors is achieved and documented.</td>
<td>2</td>
</tr>
<tr>
<td>3</td>
<td>An example is a full service restaurant. Extensive menu and handling of raw ingredients. Complex preparation including cooking, cooling, and reheating for hot holding involves many TCS foods. Variety of processes require hot and cold holding of TCS food. Establishments that would otherwise be grouped in Category 4 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors. Newly permitted establishments that would otherwise be grouped in Category 2 until history of active managerial control of foodborne illness risk factors is achieved and documented.</td>
<td>3</td>
</tr>
<tr>
<td>4</td>
<td>Examples include preschools, hospitals, nursing homes, and establishments conducting processing at retail. Includes establishments serving a highly susceptible population or that conduct specialized processes, e.g., smoking and curing; reduced oxygen packaging for extended shelf-life.</td>
<td>4</td>
</tr>
</tbody>
</table>
### FTE DATA CALCULATIONS

Program Description and Supporting Information:

#### FOOD SAFETY PROGRAM FTE HOURS PER YEAR

<table>
<thead>
<tr>
<th>Annual FTE Hours Per Year: Industry Standard</th>
<th>2080</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Holiday Hours Per Year</td>
<td></td>
</tr>
<tr>
<td>Local Vacation Leave Hours Per Year</td>
<td></td>
</tr>
<tr>
<td>Local Sick Leave Hours Per Year</td>
<td></td>
</tr>
<tr>
<td>Local Family-Personal Leave Hours Per Year</td>
<td></td>
</tr>
</tbody>
</table>

#### Annual FTE Hours Per Year: Local Inspector 2080

- Productivity Factoring
- Personal Development Time

Productive Annual FTE Hours Per Year (FTE Conversion Factor): Local Inspector 2080

#### FOOD SAFETY INSPECTION HOURS PER YEAR

<table>
<thead>
<tr>
<th>Position Category</th>
<th>Food Safety Inspection Hours</th>
<th>Number of Employees</th>
<th>Total Food Safety Inspection Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Total Food Safety Inspection Hours: 0
Other Local Inspector EH Inspection Hours: 0
Actual Food Safety Inspection Hours: 0
Total Local FTE: 0.0

### INSPECTION-TO-FTE RATIO

In accordance with Standard 8 Self-Assessment Guidance provided in the January 2011 version of the Program Standards, the Inspection-to-FTE Ratio must fall between 280 and 320.

| Local program number of Food Safety Inspections | 0 |
| Local program number of FTEs                   | 0.0 |

Inspection-to-FTE RATIO: #DIV/0!
**FTE DATA CALCULATION**

Calculate productive hours per year for an employee doing 100% food inspections

<table>
<thead>
<tr>
<th>Information For One Employee</th>
<th>Hours/Year</th>
<th>Hours/Day</th>
<th>Total Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual FTE Hours Per Year: Industry Standard</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Holiday Hours Per Year</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Vacation Leave Hours Per Year</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Sick Leave Hours Per Year</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Family-Personal Leave Hours Per Year</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Productivity Factoring Per Year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Travel Time For Inspection</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative Work (in-office work)</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Break time</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Others</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personal Development Time Per Year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Professional Development</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Others</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Productive Annual FTE Hours Per Year (FTE Conversion Factor)</td>
<td>2080</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**FOOD SAFETY INSPECTION HOURS PER YEAR**

<table>
<thead>
<tr>
<th>Position Title</th>
<th>Percent of time spent on food inspections</th>
<th>Number of Employees</th>
<th>Total Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Total Food Safety Inspection Hours: 0
Total Current FTE: 0.00

**STANDARD 8's REQUIRED FTE FOR YOUR JURISDICTION**

<table>
<thead>
<tr>
<th>Low Risk Establishments</th>
<th>Frequency of Low Risk Est Inspections Per Year</th>
<th>Moderate Risk Establishments</th>
<th>Frequency of Moderate Risk Est Inspections Per Year</th>
<th>High Risk Establishments</th>
<th>Frequency of High Risk Est Inspections Per Year</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Routine and Permitting</td>
<td>1.00</td>
<td>2.00</td>
<td>3.00</td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Follow Up Inspections/Reinspections</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foodborne Illness Complaints</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>

Total Number of Required Inspections: 0
Total Required FTE: 0.00

Standard 8.1 Staffing Level: Standard not met

Sources:
- 2017 Subcommittee #2 - Survey 1 and 2
- 2019 Pilot Study
PILOT STUDY TEAM

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ACKNOWLEDGEMENTS

The Pilot Study Team would like to thank all members from Subcommittee #2 and the Program Standards Committee for their feedback and suggestions. Their input and expertise was invaluable throughout the process to develop a recommended solution to the Standard. Special thanks to the 18 jurisdictions who took the time and effort to provide the data necessary to drive this Pilot Study.

*Riddhi Patel conducted the 2017 survey and originally developed the proposed model from which all this work was based on.
An issue was submitted during the 2018 Biennial Conference for Food Protection with regard to individuals conducting field exercises. Background information regarding this issue submission is as follows:

When conducting a Standard 4 audit for jurisdictions; the auditor must ensure that the jurisdiction meets the applicable requirements. At this time, there is no consideration for performing an audit on larger jurisdictions. Jurisdiction sizes are only taken into consideration in calculating the program effectiveness. There are jurisdictions in the country that have over 100 inspectors not within their first 18 months of training as part of their food program. This means that an auditor will have to verify that at least 300 field reviews and the applicable file reviews are conducted and that they meet the requirements listed. This creates an undue hardship on the auditor and should be re-examined. In Standard 1, 2, and 6, there is a statistical model utilized to pull a random sampling of the content to be reviewed, with which the auditor can then use to determine whether the jurisdiction meets the requirements. It is recommended that for jurisdictions with over 20 inspectors performing foodservice or retail food inspection work, a similar statistical measure be provided or allowed to determine whether the jurisdiction meets the Standard.

Currently, there is no specification requiring an auditor to verify that the individual(s) performing the field reviews have been conducted by someone that has completed Steps 1-3 in Standard 2, and is recognized by the program manager as having the field experience and communication skills necessary to train new employees.

Should the auditor then verify the training records, affidavits, certificates, etc... for those individual(s) that are performing the field reviews? If so, it is recommended that a field evaluator course, track, and/or certificate be established to demonstrate Steps 1-3 of Standard 2 have been completed. This will be especially beneficial when auditing large jurisdictions with many individual(s) performing the field reviews. Although the Retail Program Standards are voluntary, and auditors volunteer, performing an audit is highly time consuming and any means to make this process more efficient would be beneficial.

Questions:

1. **When conducting the field exercises and applicable file review for Standard #4, does the evaluator need to be trained in Standard #2, Trained Staff?**
2. **Does an auditor need to review all field exercise files for all staff when conducting a verification of Standard #4?**
AUDITOR VERIFYING STANDARD 2 TRAINING

Key Words: STD-02, STD-04, Field Exercises, Verification Audit, File Review

**Issue Description**

**Background**

Currently there are no specifications that require an auditor to verify that the individual(s) performing the field reviews of other staff members has completed Steps 1-3 in Standard 2. Would this require the auditor to verify via training records, affidavits, and the like, that the individual(s) performing the field reviews has completed these steps? If so, is it recommended that a field evaluator course, track, and/or certificate be established to demonstrate Steps 1-3 of Standard 2 have been completed. This will be especially beneficial when auditing large jurisdictions with many individual(s) performing the field reviews.

**Rationale**

**Question/Problem**

When conducting the field exercises and applicable file review for Standard #4, does the staff member conducting the review need to be trained in Standard #2, Trained Staff? Does an auditor need to verify that this training has occurred?

**Response from Clearinghouse**

The Standard 4 Self-Assessment Instructions and Worksheet states that field reviews must be conducted by someone who has:

A) Completed Steps 1-3 in Standard 2; and

B) Recognized by the program manager as having the field experience and communication skills necessary to train new employees.

Currently there are no requirements that an auditor verify that staff members conducting field reviews with other employees have completed steps 1-3 in Standard 2. An auditor is not required to verify additional paperwork related to any Standard 2 criteria when conducting the Standard 4 verification audit.
Update: EXPLANATION OF THE STATISTICAL MODEL for STANDARD 4

The criteria used for evaluating the inspectional performance of jurisdictions have changed resulting in the need to update the statistical model. Previously in large jurisdictions (jurisdictions with 10 or more inspectors) the evaluation is based on direct oversight of two inspections per inspector, with respect to 10 items of performance. There will now be 20 items on performance instead of 10.

Using the previous statistical model and assumptions, a team achieving 88 percent at each inspection would pass the evaluation 75 percent of the time. Therefore, this 88 percent level of performance was used as a simple representation of a team that is good enough that we want them to have a good chance of passing, but not so good that they would not find it advantageous to improve. But now with 20 items instead of 10 a jurisdiction with 88 percent level of performance would pass only 59% of the time. This would fail too many high performing jurisdictions.

Large jurisdictions (jurisdictions with 10 or more inspectors) the evaluation is based on direct oversight of three inspections per inspector, with respect to 20 items of performance. With the additional inspections evaluated the 88 percent performing jurisdiction will pass 75% of the time.

Evaluation of performance of small jurisdictions

A statistical issue was to determine a reasonable standard for those jurisdictions with less than 10 inspectors. When the sample gets this small, the relative error in the estimated fractions gets so large that the “each of 20 items rule” will fail good programs too frequently. Therefore, the 88 percent level of performance at each inspection was the feature of the standard that was kept constant in designing the sample sizes for the smaller jurisdictions.

In jurisdictions with less than 10 inspectors, the statistical solution is to group all of the individual ratings, disregarding the individual items. For 5 inspectors we would review 5 x 3 = 15 inspections, with respect to all 20 items combined. This gives 300 observations. It is not possible to make a total observation test mimic exactly a 10 item test, but the minimum passing rates will be about as stringent as the 75 percent for each of 10 aspects test:

For 4 to 9 inspectors, conduct three co-inspections for each inspector. Chart 4-1 shows the lowest total passing score out of the complete set of combined items that would give at least a 75 percent chance of passing for a team with an 88 percent chance of getting any particular observation correct. For a team of three or less, it is recommended that extra oversight inspections be performed to produce a total of 12 inspections. This is an intuitive judgment call that any set smaller than 12 could randomly turn out to be odd enough to produce an unfair rating.
<table>
<thead>
<tr>
<th># of inspectors</th>
<th># inspections needed</th>
<th># of items needed to be marked IN compliance in order to meet Standard 4 criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;4</td>
<td>12 minimum</td>
<td>200 (out of 240 possible Items)</td>
</tr>
<tr>
<td>4-9</td>
<td>3 per inspector</td>
<td>4 inspectors = 200 (out of 240 possible Items)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 inspectors = 252 (out of 300 possible Items)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 inspectors = 303 (out of 360 possible Items)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7 inspectors = 355 (out of 420 possible Items)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 inspectors = 407 (out of 480 possible Items)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9 inspectors = 459 (out of 540 possible Items)</td>
</tr>
</tbody>
</table>

**NOTE:**
1. These minimum inspection program assessment criteria are comparable to the 75% IN Compliance rate for each of the ten inspection program areas for jurisdictions with 10 or more inspectors.

**Example:**
*For 6 inspectors, there will be 3 field visits per inspector = 18 visits*
*18 visits X 20 Items per visit = 360 Total Possible Items*
Survey Metrics

Date Metrics

<table>
<thead>
<tr>
<th>Start Date</th>
<th>14-Mar-19</th>
</tr>
</thead>
<tbody>
<tr>
<td>End Date</td>
<td>4-Mar-29</td>
</tr>
</tbody>
</table>

Deployment Metrics

<table>
<thead>
<tr>
<th>Sent</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivered</td>
<td>0</td>
</tr>
<tr>
<td>Bounced</td>
<td>0</td>
</tr>
</tbody>
</table>

Response Metrics

| Completed | 47 |
| Unique Access Rate | 0.00% |
| Incomplete | 0 |
| Incomplete Incl. in Report | 0 |

Bar Graph Report

Q 1  Is your jurisdiction enrolled in the FDA Voluntary National Retail Food Regulatory Program Standard (VNRFRPS)?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>46</td>
<td>97.87%</td>
</tr>
<tr>
<td>No</td>
<td>1</td>
<td>2.13%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>

Total Responses 47

Q 2  Are you a member or user of FoodShield?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>36</td>
<td>76.60%</td>
</tr>
<tr>
<td>No</td>
<td>11</td>
<td>23.40%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>

Total Responses 47

Q 3  Have you ever audited another jurisdiction’s self-assessment for meeting a Standard of the VNRFRPS?
### Q 4
If you have audited another jurisdiction's self-assessment for meeting a Standard of the VNRFRPS, how challenging was it (time, resources) was it to conduct the audit?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Value</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 - No Audits</td>
<td>13</td>
<td>0</td>
<td>27.66%</td>
</tr>
<tr>
<td>1 - Easy</td>
<td>3</td>
<td>1</td>
<td>6.38%</td>
</tr>
<tr>
<td>2</td>
<td>4</td>
<td>2</td>
<td>8.5%</td>
</tr>
<tr>
<td>3</td>
<td>6</td>
<td>3</td>
<td>12.77%</td>
</tr>
<tr>
<td>4</td>
<td>2</td>
<td>4</td>
<td>4.26%</td>
</tr>
<tr>
<td>5 - Very Challenging</td>
<td>4</td>
<td>5</td>
<td>8.5%</td>
</tr>
<tr>
<td>Did Not answer</td>
<td>15</td>
<td>NULL</td>
<td>31.91%</td>
</tr>
</tbody>
</table>

**Total Responses** 47

**Weighted Score 1.78**

### Q 5
If you have NOT audited another jurisdiction's self-assessment for meeting a Standard of the VNRFRPS, would you be willing to audit another jurisdiction's self-assessment of a Standard?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>22</td>
<td>46.81%</td>
</tr>
<tr>
<td>No</td>
<td>12</td>
<td>25.53%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>13</td>
<td>27.66%</td>
</tr>
</tbody>
</table>

**Total Responses 47**

### Q 6
Would you be willing to audit a partial achievement (individual elements) of a Standard?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>33</td>
<td>70.21%</td>
</tr>
<tr>
<td>Answer</td>
<td>Responses</td>
<td>Percentage</td>
</tr>
<tr>
<td>--------</td>
<td>-----------</td>
<td>------------</td>
</tr>
<tr>
<td>Yes</td>
<td>32</td>
<td>68.09%</td>
</tr>
<tr>
<td>No</td>
<td>15</td>
<td>31.91%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>

Total Responses 47

**Q 7** My jurisdiction wants the option to have recognition for meeting part of a Standard in the VNRFRPS

### Answer Responses Percentage

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approval from governing agency/local authority</td>
<td>8</td>
<td>17.02%</td>
</tr>
<tr>
<td>National recognition</td>
<td>3</td>
<td>6.38%</td>
</tr>
<tr>
<td>Gratification of achievement within your agency</td>
<td>17</td>
<td>36.17%</td>
</tr>
<tr>
<td>None</td>
<td>8</td>
<td>17.02%</td>
</tr>
<tr>
<td>My organization is not interested in partial recognition</td>
<td>3</td>
<td>6.38%</td>
</tr>
<tr>
<td>Money</td>
<td>3</td>
<td>6.38%</td>
</tr>
<tr>
<td>Other (Please specify)</td>
<td>4</td>
<td>8.51%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>1</td>
<td>2.13%</td>
</tr>
</tbody>
</table>

Total Responses 47

**Q 8** What benefits would partial recognition provide your organization?

**Q 9** Are you familiar with the VNRFRPS progress tracking spreadsheet draft (PS2017_SA_Audit_Form_Draft.xlsx) ?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>24</td>
<td>51.06%</td>
</tr>
<tr>
<td>No</td>
<td>23</td>
<td>48.94%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>

Total Responses 47
Q10 Is your organization a state or local jurisdiction?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local</td>
<td>43</td>
<td>91.49%</td>
</tr>
<tr>
<td>Federal</td>
<td>1</td>
<td>2.13%</td>
</tr>
<tr>
<td>Tribal</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>State/Territory (Please specify)</td>
<td>3</td>
<td>6.38%</td>
</tr>
<tr>
<td>(Did not answer)</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>

Total Responses 47
Reasons for including plan review in Voluntary National Retail Food Regulatory Program Standards

Programs standards exist to evaluate if the regulatory program is effectively controlling and/or reducing foodborne illness risk factors through periodic assessment of existing programs to identify if improvement is needed.

Plan review identifies if the proposed or remodeled establishment will have adequate facilities, systems, and equipment to safely store, prepare and serve food.

Lack of plan review or incomplete plan review may result in conditions that contribute to foodborne illness, such as a lack of proper equipment to properly store or hold food at safe temperatures, unsanitary conditions that promote pest infestation, contamination from employees, raw animal foods, unclean food contact surfaces, etc.

Requirement Summary:

Food establishment plan review is recognized as an important food program component that allows:

- Regulatory agencies to ensure that food establishments are built or renovated according to current regulations or rules.
- Industry to establish an organized and efficient flow of food.
- Regulatory agencies to eliminate code violations prior to construction.

Description of Requirement:

Competency of personnel conducting the plan review

- Training
- Continuing Education

For all new and substantially remodeled establishments [defined in program regulations]

Outcome:

Regulatory agency reviews all plans for food establishments to determine compliance with applicable sections of the Food Code, or local regulations. If the regulatory program does not have resources to conduct plan review or if the agency does not have jurisdiction over plan review, indicate if there another agency within the jurisdiction that provides this service (such as when the inspecting agency does not issue the food safety license).

Documentation:

Plan review process and required documentation requested from applicants

Subjects/areas reviewed for each plan, including but not limited to:
• Appropriate facilities to prepare food safely
• Systems to prevent foodborne illness and injury
• Adequate space and equipment for all CCPs in the flow of food
• Plumbing systems – safe water and waste water disposal; appropriate backflow prevention; adequate supply of hot water; size and location of dish washing sinks and machines; drain boards; removal of grease – trap or interceptor; sewage disposal; produce washing/food preparation sink; utility sink
• Prevention of cross-contamination (areas and/or time for preparation of raw and ready-to-eat foods)
• Adequate numbers and capacity of food storage and production equipment
• Proper hygiene – hand washing sinks are provided in all necessary areas and are easily-accessible
• Menu review to identify HACCP process flows
• Cleaning and maintenance of facilities, premises and equipment; equipment on legs or sealed to the floor
• Chemical storage locations
• Waste storage and removal
• Electrical system – capacity; adequate lighting and shielded
• HVAC – ventilation to remove grease, odors and moisture – kitchen and restrooms
• Prevention of conditions that contribute to pest infestation
• Approved food service equipment – NSF or similarly-approved
• Adequate storage for clean utensils, food, linens, single-service articles and equipment
• Adequate storage for employee personal belongings, locker rooms, restrooms

Documentation of all plan reviews (approval, conditional, denial) within specified time frame in standardized format.

Reviewer – checks x % for compliance.
Hello Group,

Here are the minutes from the kickoff call (12/19/2018):

- Greeting and antitrust statement.
  > Attendance was taken at the start of the call.

- Proposed calendar for calls is 1/9, 1/23, 2/6 then second Wednesdays of the subsequent months (3/13, 4/10, 5/8, 6/12, 7/10, 8/14) which concludes on September 11th. We’d also like to ask for flexibility, as we may need to include additional calls in the coming months. If we are all in agreement with the proposed schedule of calls, calendar invitations will be sent out by the end of this week.

  > 1/09 - Review Charge 1
  > 1/23 - Review Charge 3
  > 2/06 - Review Charge 2. David Read will review the IFPTI group work for Charge 2.

- Discuss procedures/Food Shield access and use. Meeting minutes will be posted on our Food Shield workgroup page within 48 hours of our calls.

  > Angie Cyr sent out the Food Shield usernames and passwords from that website on November 5th. Confirmed successful access to the workgroup documents.

- Goals/Review the charges assigned to this subcommittee. Subcommittee reports will be prepared and submitted according to the CFP master calendar. The first of which is due by 2/09/2018.

  > The charges under the issue 2018 II-019 were reviewed with the group and explained briefly.
  > David Read gave an update on his work specifically reviewing the regulatory training program. He shared the website to reference his group work, https://ifpti.org/retail-food-framework/
  > To prepare for the upcoming call, the group was asked to review the documents uploaded to Food Shield. Pages 2,3, 19-25 of the 2017 Program Standards Committee Report are pertinent to us, as we continue reviewing the issue.

Call Participants (8)
DeBrena Hilton
Adam Kramer
Amanda Douglas
Christine Sylvis
Matthew Walker
Kenesha Williamson
David Read
Katey Kennedy
Hello Group,

Here are the minutes from the call (1/09/2019):

- **What are some current initiatives used for training food safety inspection officers?**
  Mark – Standard 2 training curriculum, review of codes specific to Iowa, and all staff attend FD 218 risk based inspection methods, FD 312 special processes, and FD 215 managing retail food safety.
  Matt – Compliance Wire for special processes training.

- **What is the difference between Compliance Wire and Pathlore?**
  David – FDA moved away from Compliance Wire and started using Pathlore going forward. They migrated their learning management system.
  DeBrena – Tulsa uses their state agency partners to present the same FDA courses. Sometimes the FDA specialist will present and the State will present a portion of the course.

- **Which of the FDA courses has the course in a box instructor material available?**
  Christine - Several districts are burdened with the cost of hosting the instructor, paying the course fees, etc.
  Some customized internal trainings are given on report writing and fine points of the inspection process.
  Modeled after the old FD 170 course.
  FDA website does offer several additional online courses (food defense, allergens, basics of auditing, etc.) and Pathlore has some new courses which have just been added.

- **What subjects do we feel the courses do not address?**
  In-house trainings have been developed to train FSIOs on report writing, applying HACCP, etc. because it is difficult to receive the feedback on understanding from the online courses.
  DeBrena – Tulsa has been doing some in-house consistency / standardization training activities to ensure the district is monitoring for uniformity of assessment and marking. They use the web-based Kahoot polling software for staff tabletop exercises.
  Christine - In Southern Nevada, they also give their team more intense plumbing system training and review of HACCP principles.
  Districts are also bringing in Meat and Poultry inspection bureau partners to cover cross-jurisdictional matters.
  Food Safety Centers of Excellence offers foodborne illness training and EATS 101 and portions of 102.
  DeBrena – Tulsa is currently working with Epi to develop some new training for foodborne illness exercises. They have developed a PowerPoint to present various scenarios the inspectors will encounter.
  Adam – They gave the new staff approximately a dozen different mock scenarios and practice entering the report and role playing with retail operators.
  Christine – Southern Nevada uses a similar method as part of the report writing training.

- **What is meant by non-traditional food outlets on the retail food curriculum framework?**
  It is the current verbiage used in place of “ethnic foods”.
  DeBrena – To address non-traditional food outlets, they use the ethnic foods presentation from FDA.
  AFDO has some resources on ethnic foods, shared kitchens, cottage foods, catering, etc.
How does everyone address temporary food events whether large scale or small scale? Are there formal training courses or materials offered?
DeBrena – Tulsa has a temporary events coordinator to help with planning and permitting. Oklahoma has a full classroom setting training course and an on-site training. Northern Arizona University has a public education course for food safety basics. Applications include camping and emergency situations.

- **What are the current initiatives for certification of FSIOs?**
  Melissa – Uses both the managers and inspector HACCP certification programs available through the International HACCP Alliance. Environmental assessments team is sent to root cause analysis training from ASQ (American Society for Quality).
  Christine – Southern Nevada uses the 40hr Haswoper trainings.
  Melissa – Recommends inspectors take an ANSI approved food safety manager training to obtain CFPM certification. She would like to see consistency in the requirements for FSIOs maintaining CEUs. (NCBRT) - National Center for Biomedical Research and Training Academy - Counterterrorist Course is available, as well as EHTER training for environmental health & emergency preparedness strike teams.

- **What are some current initiatives for the evaluation of food safety inspection officers?**
  Districts are referencing the individual training logs, the CFP training manual, and using the assessment forms from Standard 4. There are several documents in Food Shield which have been developed by districts for general evaluations.

Call Participants (9)
DeBrena Hilton
Adam Kramer
Amanda Douglas
Christine Sylvis
Matthew Walker
Kenesha Williamson
David Read
Melissa Vaccaro
Mark Speltz
Hello Group,

Here are the minutes from the call (1/23/2019):

The group discussed gaps and alignment between Standard 2 and Standard 4, using our workgroup’s Standard 4 QA Elements and Training Courses table:
Mark – Reviewed the CFP training plan to double check for elements which are not line items in the training log. Proposed updating the CFP training manual with our findings. We need the CFP manual to mirror those elements.
Christine – She asked four new staff members go through the elements to identify which areas were not part of the required training. Considers most jurisdictions to have an internal review of the basics of inspection.
Mark – Trying to address individualistic policies in a national curriculum will be difficult. Ultimately, how do we address individual procedural trainings?
Dave – Some of this looks like a best practices list. Much of these elements will be addressed during standardization.
Christine – FDA considers standardization to be a qualitative assessment of an inspector’s training and not a training program itself.

Do the districts approach new inspector training with standardization in view?
Melissa – Yes. We make sure they will be able to pass standardization.

Element 3 - How do the districts train staff to understand why risk type is assigned, how to recognize changes in the operation which affect risk type assignment, or identification of an incorrectly permitted facility?
Mark – In alignment with Standard 3, Iowa uses customized training to address basics of inspection.
Melissa – Districts have custom training to support methods of risk-based inspection course.
DeBrena - Digital health department lists the facilities and their corresponding risk types.
Mark – We will need to proceed with caution on proposing that instructor led FD courses be included in the Standard 2 requirement. Some of the courses are not offered very frequently and some may be discontinued.
Dave – Recommends we refrain from listing names of courses or listing “equivalent courses”. He recommends we focus on the competency areas. He recalls changes to the standard 2 curriculum were discouraged during the last two conferences.
Mark – Maybe all we need to propose for standard 4 is that we create an addendum which lists optional courses.
Dave - Changes to the curriculum may not be worthwhile right now, given that the curriculum framework project is still underway.

What if an inspector felt those trainings were not adequate? What other resources are used to support?
Some of the digital health department systems call out repeat violations to the inspector. This element requires long term coaching and communication training as a support. Additional support is provided in having the inspector demonstrate competencies.

Group assignment – We reviewed the table of twenty quality elements with trainings identified in the right column. The regulatory members of the group were asked to provide the table to recently hired staff and obtain feedback for discussion on or before our next discussion of charge #3. Review the standard 2 curriculum.
Resources – IFPTI page and Google FDA ORAU and Pathlore will provide access to the current curriculum.

Christine – David, how does the retail food framework fit into the food industry framework?

David – It is still being built with the intention of making the introductory courses an adequate starting point for any individual working in food protection. Christine will set up a WebEx and allow David to present the information during our discussion of charge #2.

Call Participants (9)
DeBrena Hilton
Christine Sylvis
Matthew Walker
Kenesha Williamson
Amanda Douglas
Mark Speltz
Melissa Vaccaro
Adam Kramer
David Read
Hello Group,

Here are the minutes from the call (2/06/2019):

- **WebEx presentation on the national curriculum framework from IFPTI:**
  Dave provided the group some background information on how the integrated food safety system content was developed and updated us on current progress. There has been recurrent feedback from the food industry regarding the consistency and standardization of inspectors. The FDA website has some additional resources available to learn more about the Partnership for Food Protection. A set of competencies was created to ensure all food protection professionals have a robust foundation of knowledge to equip them to fulfill their job roles. The framework itself provides a way of organizing the collection of competencies across all learning experiences for the field of food protection. The base level of the framework contains the entry level or general competencies pertinent to all food protection professionals. The framework is also divided into food protection program areas such as retail food or manufactured food. The next level of the framework contains more specialized content areas or advanced knowledge. When using the framework ([http://incs.ifpti.org/](http://incs.ifpti.org/)), more information on each competency can be accessed by clicking the icon directly below the title of the individual content area. There are assessments within the framework content areas which are currently do not have an established pass or fail rating.

  **Can anyone set up an account on IFPTI’s website? If regulators access the assessment from the Pathlore website, is there a certificate which can be generated from the activity?**
  Yes, anyone within the regulatory field can access the assessments without cost through Pathlore. The framework is designed to allow a user to take the assessments without having taken the courses. The user may choose to retest.

- **The group discussed Charge #2:**
  **Does the group consider the Standard 2 (steps 1-4) completion time frame of 18 months adequate?**
  Matt - Yes. The time frame does seem generous. Perhaps we could recommend that the 90% could be scaled for jurisdictions of different staff sizes. Consider jurisdictions with less than 10 inspectors.
  DeBrena – Turnover does interfere with the standardization time frame. Steps 1 through 3 have been met within the eighteen months consistently within Tulsa.
  Katey – We need to consider the rationale for any recommendation that parameters be scaled for jurisdictions who serve smaller populations.

  **What is the background or history as to whether the 18-month time frame was introduced to synchronize with the standard for manufactured food?**
  For manufactured food standard, the time frame is 24 months.
  DeBrena- The six-month differential between the manufactured food standard and the retail food standard may be an allowance for the small jurisdiction size.
  Christine – The time frame issue could be separate from the staff size and may be attributed to the availability of the standardization official.
  It seems we all agree to recommend increasing the completion time frame for steps 1-4 to 24 months. The motion will be forwarded to the voting members of this subcommittee via email.

  **Are there gaps or recommendations for change(s) to the Standard 2 curriculum?**
Dave – FDA has been funding the development of the IFSS framework. There is a potential transition to supplementing or replacing the ORAU courses with the framework in the future. If we are considering changes to the curriculum, we may want to identify specific content areas and not courses themselves.

The group is encouraged to explore the framework and complete some of the assessments, in preparation for our March meeting.

Dave - If you want to use the INCS assessment process please click the link below, then click in one of the brown boxes to the right of the entry box on the lower part of the curriculum framework which brings up the detailed framework content areas. Then on the full framework page click on one of the basic brown color content areas to go to the course description and competencies, next click the blue Take Assessment button that takes you to the login page. Click on create account and fill in the requested information.

http://incs.ifpti.org/Frameworks/Home

Call Participants (7)
DeBrena Hilton
Amanda Douglas
Christine Sylvis
Matthew Walker
Kenesha Williamson
David Read
Katey Kennedy
Hello Group,

Here are the minutes from the call (3/13/2019):

We discussed the content areas below. To prepare for our future meetings, we asked that regulatory members access the assigned coursework through Pathlore, review the framework competencies, and complete (7) assessments each for the basic curriculum content areas. Industry members were asked to explore the competencies as well on the IFPTI website. Industry members now have a regulatory partner with whom they will share the assignments for the applicable content areas. As we’re all reviewing the material, let’s consider its usefulness, whether there is any missing content, and how it would be implemented as “pre” or “post” coursework to replace ORA U. Appendix B of Standard 2 was attached to the March meeting invitation. Partner discussions prior to meetings are encouraged. For our March 13th meeting, the top row assignments were reviewed.

<table>
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<tr>
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Having reviewed the initial courses assigned, what feedback do you have?

Amanda and Mark – B15 Jurisdiction. We thought the course gave a good overview of the subject and was well designed to provide the information in a logical order. The course does not have slide numbers, so as with regards to feedback we have provided the slide header:

- Unit 1 – Foundations State & Local Jurisdiction Authority. Suggest a change to a word in the paragraph that states food ‘consumed’, suggest changing to food ‘sold or distributed’. It would be inaccurate to describe food purchased at a retailer and then consumed at a home just across the state line as intrastate commerce.

- Unit 3 – Activities under the State Retail Food Program. It states FDA develops the Retail Food Program, we felt that the CFP process develops with input/oversight from FDA.

- The Exam at the end of the course only provides a score, it does not let you know which questions you got incorrect. This could help determine what part of the course you may need to retake etc.

Mark – On AFDO’s website, the courses are cross-referenced. There was not much interactive content within the course. The lack of interactive features seems like a step back considering the way that online coursework is developed today. The terminology is bridged from the manufacturing content. Violative is commonly used in manufacturing regulation. We scheduled an hour. However, we had to move through the content more quickly toward the end.

Christine and Kenesha – B1 Regulatory Foundations. Upon logging into Pathlore, it was a little confusing trying to determine which course was correct. So, having a cross-reference would be helpful. Slide numbers would have been helpful. The very first course was long. Providing a projected time frame would be helpful. The content includes a lengthy history on how the law and enforcement actions were developed. It was nice to see a great list of tips for training new inspectors on when to involve a supervisor and how to think critically during the inspection. Program standards were mentioned. There was some terminology which was concerning for new inspectors to be translating this knowledge to the retail food industry. For example: the word violative seems to have been used interchangeably with “hazardous” or “priority”. The coursework frames were not very interactive. Perhaps the relevant terminology could have been hyperlinked throughout the course instead of being featured at the beginning. The knowledge checks and final exam does not give a detailed performance summary. It just gives a score.

DeBrena – B8 Environmental Hazards. For someone just starting out, the course content is pretty basic. I agree with the comments that have been shared. I will contact Melissa to continue reviewing B8.

Matt – B22 Professionalism. The material was divided into six units. It was a lot of reading with a few pictures. They did provide a few good examples. It seems this would be a good fit for the “pre” courses. But, it would not be a replacement for the existing standard content. There was some overlapping content. Overall, the content was refreshing. It took around 45 mins to complete.
How long did it take to complete the courses?
Christine – The regulatory foundations course seemed to require approximately 1.5hrs be scheduled to complete it.
Katey – Within Appendix B of Standard 2, there are time estimates for completion of coursework.

Do we recommend adding this content to the Standard 2 curriculum as a replacement or supplement?
Mark – It is difficult to say. Is the new curriculum framework intended to replace the Standard 2 curriculum? If so, what is the intended time frame?
Katey – I will get those answers and update the group.

Call Participants (9)
DeBrena Hilton
Adam Kramer
Katey Kennedy
Christine Sylvis
Matthew Walker
Kenesha Williamson
Robert Sudler
Mark Speltz
Amanda Douglas
Hello Group,

Here are the minutes from the call (4/10/2019):

We discussed the content areas below. As we all continue reviewing the material, let’s consider its usefulness, whether there is any missing content, and how it would be implemented as “pre” or “post” coursework to replace FDA ORA U.

<table>
<thead>
<tr>
<th>Date</th>
<th>Content Area</th>
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The group continued discussion on course reviews. Feedback is focused on making key comparisons between the IFPTI curriculum framework and standard 2 curriculum. Ultimately, we will need to make recommendations for replacement or supplement.
Christine and Kenesha – B2 Allergens. The course seemed much shorter than the initial course, B1. The U.S. recognized allergens and allergens recognized overseas were explained well. The link for the full list of tree nuts did not lead us to the correct FDA page. We had to google search the FALCPA list to access the correct FDA page. There is currently no allergens course in the standard 2 curriculum.

Dave – The courses are now under review to make improvements where needed. It has been determined that the courses will be made to be more interactive. We should also keep in mind that the courses are created to be introductory for regulators.

DeBrena – B8 Environmental Hazards. It was a good foundation for new regulatory staff. Again, it would be helpful to have slide numbers and a recap on the overall performance. It would be better for the module to provide a quick reference to the correct answer instead of just displaying the word “correct” when the right selection was chosen. The content seemed to be more geared toward manufacturing. In unit 2, it would be better to explain that Norovirus is the number one cause of viral foodborne illness cases. In unit 4, the photos do not match the content being discussed. The subject was food safety instead of workplace safety. The photos should support that.

DeBrena - B10 HACCP. The term validity. Videos in unit 4. FSMA. Recall information could have been more in depth versus the existing standard 2 HACCP content. The majority of standard 2 HACCP bullet points were covered. The course took roughly 1 hr. The two video clips were a nice inclusion. However, the videos did not adequately explain the concepts.

- Unit 1 – Foundations – is course content geared towards Retail Food or Manufacturing? Many of the examples and pictures emphasize manufacturing. We also suggest adding radiological hazard language in the opening slides. Also, be consistent with use of Radiological throughout if it is going to be used and mirror FSMA rules.
- Unit 2 – Virus slide. Suggest rewording or structuring slide so that it is clear that Norovirus in the #1 cause. Currently worded that viruses in general are the number one cause of illness in US.
- Unit 3 – Suggest adding more retail food pictures to balance out all the manufacturing pictures. Assessment Knowledge Check 1 – sampling question not covered very well in module.
- Unit 4 – Food Safety Plans: personnel safety pictures used instead of food safety symbolic pictures. Control Factors: expound more on why source is important as a control factor. GRAS definition clarification needed that explains that GRAS is a chemical or substance added to food.
- Course Assessment – Question 9: is the question asking about pre or post packaging. Needs to be reworded so that its clear.
- Note: B9 Food/Feed Defense Awareness. The course could not be found in Pathlore. On the IFPTI course list menu, no course number is listed. Dave checked into it and found that the course does exist. But, the course was not provided on Pathlore.
Amanda and Mark – B16 Labeling.

Course Overall:
- No slide numbers or time to complete course/sections.
- inconsistency on knowledge base confirmation on whether a question was answered correctly.
- There were a few videos (a little basic), but not sure if they were positioned correctly i.e. they seemed to introduce a new topic, would prefer an intro slide prior to the video.
- Some of the label images were too small to read, even on a large screen.
- The course did seem very long.

Course Design:
- The course design may benefit from being aligned under regulated areas i.e. Human Food – FDA / FSIS, Dietary Supplements, and Animal feed and then having the specific topics under each area i.e. regulations, label requirements, etc. this could help with repetition, flow and refresher training. It is a lot of information for a new employee, especially if they are not responsible for a certain regulated area i.e. animal feed, the information becomes irrelevant.
- The competency flow did not align with the course, so by having it aligned under regulated areas could help better align it.

Specific Course Feedback:
- Unit 1 – Label Vs Labeling Slide. Include supplement labeling on a website
- Unit 2 – Labeling components required allergy information is referencing ‘Produced in a facility that processes peanuts’ which is not required
- Unit 2 - Labeling components trail mix labeling confusing
- Unit 3 – Labeling laws referencing outdated FDA 2013 Food code

Dave – One of the reasons that the course covers both food and animal feed is because of the regulatory oversight for those areas. The course is more general education for anyone entering the food regulation field. The course is being revised as well.

Matt - B23 Public Health Principles. The course did a great job covering the content. I recommend it as a replacement for FDA36. It is lengthy at seven units in total. However, the content is relevant and interesting. The course gave a lot of good examples to explain the principles. While there is not much interactivity, it does not necessarily need it. Both courses have the same name and align well. Reviewed FDA36 and B23 side by side to gather feedback.

To prepare for the next call, the group was asked to revisit the standard 2 online courses to better support analysis of content alignment.

Call Participants (9)
DeBrena Hilton
Katey Kennedy
Christine Sylvis
Matthew Walker
Kenesha Williamson
Robert Sudler
Amanda Douglas
David Read
Adam Kramer
Hello Group,

Here are the minutes from the call (5/08/2019):

Call Participants (7)
Christine Sylvis
Matthew Walker
Ed Robinson (visitor)
Kenesha Williamson
Robert Sudler
David Read
Adam Kramer

We discussed the content areas below. As we all continue reviewing the material, let’s consider its usefulness, whether there is any missing content, and how it would be implemented as “pre” or “post” coursework to replace FDA ORA U.

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The group continued discussion on course reviews. Feedback is focused on making key comparisons between the IFPTI curriculum framework and standard 2 curriculum. Ultimately, we will need to make recommendations for replacement or supplement.

Christine and Kenesha – B3 Biological Hazards. There was very little about thermal processing as a control for biological hazards. Standard 2 gave more detail on microbiology. We recommend splitting the course due to its length.

Unit 1 - Pathogens vs Spoilage Organisms slide mentions that off-flavors are a characteristic of food compromised by the outgrowth of pathogens. This should be included under the spoilage organism column.

Sampling slides mention the term “for-cause” sampling. Where does this wording come from? The message could be rephrased to better represent circumstances such as traceback investigations for foodborne illness or precautionary circumstances. Also, the regulatory sampling slide gives the impression that the regulator will be completing the sampling in manufacturing environments.

Unit 2 – Aflatoxins slide mentions some effects of carcinogens. But, the slide does not explain that aflatoxins are carcinogens. Perhaps the previous slides could have included a brief explanation that many aflatoxins are considered carcinogenic.

Other Mycotoxins slide mentions that fumonisins consumption can be fatal. But, it is unclear as to whether that fatality is found in humans or just horses and swine. Also, are humans becoming affected through consumption of swine or the rice and corn directly?

Toxin-Mediated Infection slide does not explain that the terms toxicoinfection and toxin-mediated infection are interchangeable.

Examples of Incubation Periods slide uses a bullet point format to provide the information. This may have been better as a data table.

Biofilm slide could have included a nice tie-in to the messages about sampling, as L. monocytogenes is difficult to remove from a facility due to biofilms.

Unit 3 – Food Packaging slide provides an explanation of MAP below the bullet points for both MAP and general ROP without connecting the explanation directly to MAP.

Vectors: Humans slide contains a photo of a food handler correctly wearing gloves and using a utensil to handle food. It would be better to show bare hand contact.

Unit 4 – Listeria slide shows a photo of a drain cover in a pool. This should be a floor drain photo within a food establishment.

Food Contact Surfaces slide uses the terms direct and indirect food-contact surfaces. This is not in alignment with the terms food-contact surface and nonfood contact surface used in retail food.
Unit 5 – Several slides continued to mention only MAP as a type of packaging which can aid in the control of pathogenic growth.

Controlling campylobacter slide has the bacteria name misspelled in two of the sentences.

Estimated time to complete the course: approx. 2 hrs.

Dave – The photos and graphics were done by persons who do not have a food safety background. The photos are still being reviewed. The special processes topic is explored further in the retail food section.

DeBrena – B10 HACCP. Unit 2: Record Review for Accuracy – consider changing “validity” wording. Too much like verification vs validation and makes you think you are talking about validations whereas the slide is discussing verification. Overall comment: Verification vs Validations needs better disused and language on slides needs to stay true their meaning.

Unit 4: Videos? Seem out of place, not necessary, too short if they are going to be used. Would be better if video clips provided snippet of each of the 7 steps of HACCP instead of just 2.

Unit 5: Laws Regulations and Guidance: suggest creating stand-alone paragraph to explain implementation of FSMA. Need better clarification of State Agriculture programs, USDA, FDA, State and local oversight and co-regulation. Also, better explanation of FSMA (food safety plans) vs HACCP.

Assessment question—there was a question for recall procedure. We felt this was not adequately covered in module for use as a question. Recall information could have been more in depth versus the existing standard 2 HACCP content. The majority of the standard 2 HACCP bullet points were covered. The course took roughly 1 hr. The two video clips were a nice inclusion. However, the videos did not adequately explain the concepts.

Dave – Most of the questions/issues have been addressed for the HACCP course. As for FDA 16, 17, and 18, some of the HACCP coursework was existing. So, the IFPTI course is intended to blend all three and replace them.

Amanda and Mark – B17 Laws, Regulations, Policies, & Procedures. We do not have any significant feedback. We thought the course was well aligned with the competencies and covered all the topics. As stated on previous calls the content is a little dry, and we believe in future the courses will have more interaction.

Matt - B24 Recalls. Basics of it were useful. The course included videos. Nice change. The use of subtitles was also great from an accessibility aspect. If we were to add it to the curriculum, it should be included in the post courses. It would be good for a new EHS to get this intro to recalls, though not all jurisdictions are involved in issuing recalls.

Dave – Some new EHS can be involved in recall verification checks via phone call or site visits.

To prepare for the next call, the group was asked to revisit the standard 2 online courses to better support analysis of content alignment.
Hello Group,

Here are the minutes from the call (6/12/2019):

We discussed the content areas below. As we all continue reviewing the material, let’s consider its usefulness, whether there is any missing content, and how it would be implemented as “pre” or “post” coursework to replace FDA ORA U.

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<td>B8 Environmental Hazards, B15 Jurisdiction, B22 Professionalism</td>
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<tr>
<td>4/10</td>
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<td>DeBrena Hilton w/ Melissa Vaccaro</td>
<td>B9 Food / Feed Defense Awareness, B16 Labeling, B23 Public Health Principles</td>
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<td>Mark Speltz w/ Amanda Douglas</td>
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<td>B4 Biosecurity, B11 Imports</td>
<td>Matt Walker</td>
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<td>B7 Emergency Response, B14 Investigation Principles</td>
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<td>B21 Preventive Controls, B28 Transportation</td>
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</table>
Christine and Kenesha - B4 Biosecurity. Currently, there is no biosecurity in the currently curriculum. So, this content would be an addition. It’s more in depth than we consider to be necessary. Overall, it seemed to have been designed for manufacturing instead of food service. Several case studies were included. That is beneficial for the learner.

Unit 1

At the beginning of the Unit 1, the definition of biosecurity is very broad. It seems to reference what we understand to be the basics of food protection within retail/restaurant environments. Is it the best definition? Is this term more widely used in manufacturing?

Three parts of a facility’s biosecurity plan: exclusion, management, and containment. All of which should be SOPs for the facility.

Unit 2

The definition for fomite includes living and non-living matter. I understood fomites to be inanimate objects or materials which can become contaminated and transfer pathogens.

Explanations for food processing were nicely worded. Nice use of plain language to differentiate between harvest/slaughter and processing.

Unit 3

Biosecurity zone slide defines a controlled access point as the third point. However, it would be better suited as the first definition because personnel would have to enter controlled or restricted zones through this point of access.

The slides which describe the types of PPE need some additional wording to relate the subject to its significance in the prevention of contamination within a facility or operation.

Is the term enhanced inspection interchangeable with the term investigation as an inspection type? This was included on the slide which described how inspectors should protect themselves.

Unit 4

The slide which discusses the importance of planning for the regulatory visit includes a non-working link to the FDA Investigations Operations Manual. The distinction between disinfection and sanitizing needs to be better explained. The material did not include an explanation of communicating breaches within the sanitation chain as part of the recall protocol.

Unit 5

The FDA Investigation Operations Manual link at the beginning on unit 5 did navigate to the correct webpage. The knowledge check question 2 seems to assess whether the learner has read the material at the provided links to both the FDA and USDA documents. The slide with those links could be improved by including a brief explanation of the main focuses of those two.
documents. FDA being routine operations and USDA being emergency preparedness and response to adverse events.

DeBrena - B11 Terminology. – The slide which explains the term custom(s) broker includes the abbreviation CBP. The phrase CBP custody is used but is not explained until later slides. At which point, CBP is defined as Customs and Border Protection. The text under the example figure for Harmonized Tariff Schedule Code has very low resolution and is difficult to read. Unit 5 includes a “Real World Applications” video on investigations which took a very long time to load. Upon completing the final unit, there was no button available on screen to navigate to the actual course assessment. FD251 references imports. So, the material presented in the module is covered there. We do not recommend the material replace FD251. Course completion time was 47 mins.

Mark – B18 Personal Safety. It sounds like there is some redundant material in other courses regarding PPE. We noticed that the course provided specific instructions on how an inspector should execute personal safety rather than describing the types of PPE. It mentioned that an inspector should reach out to a facility in advance to determine what types of hazards to personal safety may be there. The buddy system for entering coolers and freezers was also mentioned for personal safety reasons. However, there may not always be more than one inspector conducting the inspection. Ladder safety was also included. We considered the content to be focused on more OSHA recommendations than necessary for the food protection field. Examples of hazard signage and PPE requirement signage was very useful. The content should be more of an overview and could be confusing. Basics of inspection course, FDA 38, includes a brief inclusion of personal safety by informing the inspector of appropriate clothing, shoes, head cover.

Christine – Our jurisdiction does not allow our inspectors to operate or disassemble the facility’s equipment such as a dish machine. So, we address it through internal training as well.

Mark – An overall awareness is helpful. In Iowa, we follow a similar approach. Our team are not OSHA specialists. So, recognizing signage is good.

Adam – If the module used the term MSDS was used, the information should be updated to SDS.

Amanda – One of the assessment questions was related to chemical safety. I believe it used the term SDS.

Matt – B25 Sampling. Aseptic sampling and chain of custody was explained. The FDA operations manual was referenced. Unit 3 includes a three-minute video with subtitles to demonstrate how to collect aseptic samples. The video is step by step and well done. The overall quality of the module is good. I recommend it being added to Standard 2 in the post coursework. I would not recommend it as a replacement because it is more comprehensive. FIO4, Foodborne Illness Investigations 4: Conducting a Food Hazard Review, covers the sampling content as post coursework. FIO4 does a better job of describing how prepare for sampling visit in advance. However, that component is not necessary for the IFPTI content. Approximately 60 mins to complete it.
On the next meeting, we will review our workgroup’s charges, progress, and timeline. Please review the tracking sheet and provide recommendations for the courses assigned.

Call Participants (7)
Mark Speltz
Adam Kramer
Amanda Douglas
Matt Walker
DeBrena Hilton
Christine Sylvis
Kenesha Williamson
Hello Group,

Here are the minutes from the call (7/17/2019):

We discussed the content areas below. As we all continue reviewing the material, let’s consider its usefulness, whether there is any missing content, and how it would be implemented as “pre” or “post” coursework to replace FDA ORA U.

<table>
<thead>
<tr>
<th>Date</th>
<th>Content Areas</th>
<th>Assignees</th>
<th>Matt Walker</th>
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We started the call with review of our charges, progress, and timeline:

Christine - We have a good start on charge 1. The updated list of charge 1 initiatives is being reviewed today on WebEx. What started as just a table has been changed to a list similar to Appendix B-1.

**FD 170, is the course available? While checking some of the course links listed on Appendix B-1, we found several non-working links.**

Robert – FDA is aware that several links on Appendix B-1 are no longer functional. Course numbers have also changed for a few of the listings. FD 170 is available. It just has a different path. The updated Appendix B-1 is not yet published.

**Epi-Ready, is this an online or instructor led course?**

Dave and Matt – Centers of Excellence administered the course in our jurisdictions. It was between 2 and 2.5 days of training.

**I-FIIT-RR, is this for regulators?**

Kenesha – The course is a free NEHA workshop online. Companies can host a self-funded workshop for their teams. It is a one-day training.

**Reviewed charge 2. In review of this charge, we discussed the course review worksheet relative to charge 2a.**

We will send out copies of the course review worksheet to everyone. The worksheet will be included in the final report. Each group of reviewers will need to make sure the recommendations column is accurate and complete. Forward the updates to Kenesha.

Charge 2b is complete. The timeline for completing Standard 2, Steps 1 through 4, was recommended to increase from 18 months to 24 months.

**With only two meetings left, we want to complete charges 2a and 3.**

To complete our charges within the remaining two meetings: (1) we will have brief recaps of course notes; (2) groups will send notes directly to Kenesha; (3) the August meeting will cover charge 2a; and (4) the September meeting will cover charge 3.

Amanda and Mark – B19 Pest Control. The course was not available for review. It is still under development.

Melissa – B12 Integrated Food Safety System. Our group did not have a chance to complete the course yet. We will have the notes before the next meeting.

Christine and Kenesha – B5 Communication. We did not have time to review the current Standard 2 course for comparison. We will cross reference it before the next meeting.
Dave – There is a new B20 Plumbing course that is currently being reviewed. The B20 course from the PFP workgroup is currently not available on the IFPTI website.

Dave will give the reviewers access to the new plumbing course. This will be Mark, Amanda, and Matt.

Please continue reviewing the course review worksheet and provide recommendations for the courses assigned.

Call Participants (8)
Robert Sudler
Christine Sylvis
Kenesha Williamson
Dave Read
Amanda Douglas
Melissa Vaccaro
Adam Kramer
Matt Walker
Hello Group,

Here are the minutes from the call (8/14/2019):

We started the call with a review of the recommendations we have so far, i.e. add, replace, or no action and indicating “pre” or “post”. The course review worksheet was displayed via WebEx.

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Kenesha – Everyone’s updates were received and loaded into the master worksheet that we are reviewing today.

Christine – B1 Regulatory Program Foundations. We still need to go back and review the existing Standard 2 content for cross-reference. B2 Allergens does have an existing course in the post curriculum. FD 252. We will review it before adding our recommendations on these two courses. B4 Biosecurity is currently not in the curriculum. We recommend no action because it is very geared to manufacturing.
DeBrena – B8 Environmental Hazards. We added comments indicating adjustments we would like to see before recommending addition of the course. We will go back to take another look to see what the specific modifications would be. We will do so for B8 through B13.

Mark and Amanda – B16 Labeling. We recommended no action in its current condition. We like the topic of labeling to be included in curriculum. We’d consider recommending addition, if course is revamped. B20 Plumbing we found to be the same as the old course. We contacted Dave Read on this.

Matt – B20 Plumbing. Dave provided a link to some of the new frames which worked for me.

Mark – Since pest control and plumbing content are not currently in Standard 2, we recommend adding them.

Katey – Those content areas may have been excluded because there were no formal courses available. So, if they are available now, that will be helpful.

Matt – B24 Recalls. I recommended no action here because the content may not be very useful. Most jurisdictions do not handle recalls. B26 Sanitation Practices is a good replacement for MIC 15. It would be good to have inspectors seeing this before taking the plan review course.

Mark and DeBrena recommend including B24 Recalls as good information for exposure. Katey reminded that Standard 5 does include handling recalls.

During the next meeting, we will complete our discussions of charge 2a and charge 3 and we will finalize our committee’s recommendations by voting.

Updated workgroup docs will be sent out before the next meeting: Workgroup Doc 3 – Updated IFPTI course review worksheet; Workgroup Doc 6 – Table of Standard 4 quality elements updated with CFP Training Manual references; Workgroup Doc 7 – CFP Training Manual with notes added on pages 7 and 8 identifying Standard 4 quality elements.

Call Participants (7)
Christine Sylvis
Kenesha Williamson
Mark Speltz
Amanda Douglas
Matt Walker
DeBrena Hilton
Katey Kennedy
Hello Group,

Here are the minutes from the call (9/11/2019):

**We continued discussing Charge 2a (identifying any gaps and recommendations for changes to Standard 2 curriculum)**

Christine – We were unable to access the FD252 allergens course and make our recommendation. The link on the FDA website is not valid. When word searching for allergens course, the search results only provide the Pathlore course. The link for the current Communication Skills for Regulators course in Appendix B is also no longer valid. We also could not find the emergency response course listed on AFDO’s GenEds list.

Mark – In the 2015 Appendix B, there is different link. The link is class.ucanr.edu instead of class.ucanr.org. On the FDA site, there is a separate link for the Communication Skills course.

Dave – Given that many of the existing Compliance Wire courses are 10+ years old, it’s not likely that FDA will continue those courses. The course review sheet includes several recommendations not to replace the existing curriculum. So, we will need to consider this. Also, it is uncertain whether FDA will continue with using Pathlore as its learning management system.

Christine – Perhaps we need to connect with FDA on the implications of our recommendations based on their ultimate plans for the courses.

Mark – Discussed the accessibility of the coursework. Many of the course names and numbers had to be cross-referenced back to the IFPTI site. The course names are often not consistent.

Dave – The update and release of the courses are being completed at a rate of one per month. The process involves a workgroup of subject matter experts who develop the courses for FDA. That work has been completed. Now the look and feel of the courses is being updated. Once that is complete, the courses are given to FDA. Be mindful to cite content areas instead of specific course numbers to be removed. Ultimately, the general education for all food inspectors will come into alignment with integrated food safety under FSMA. Exposure to the additional knowledge is good for all.

**Discussed Charge #3 and the updated Workgroup Doc 6 - Standard 4 Elements Table.**

Christine – The Basics of Inspection course really touches on majority of the quality elements. Many of the quality elements are drafted from the CFP training manual. Quality Element 3 is not.

Mark – Since risk type and inspection frequency are varied by jurisdiction, it seems appropriate to have this addressed by the inspector’s training plan under additional jurisdictional competencies.
Christine – Element 7 would not be met by jurisdictions which do not use the IN/OUT/N/O/N/A format for their inspections, if we are just considering report writing.

All – Element 7 is really covered through the training plan parts 2 and 3 of Inspection Observations and Performance. We will update Workgroup Doc 6 to include our feedback from today’s call for the quality elements table. The correlation between Standard 2 and 4 is in the CFP training manual. It has not been updated since 2008.

Due to low participation on last week’s call, we are setting up another call for the first week in October. Hopefully, everyone can attend. Our group needs to vote on the committee’s suggested changes to Standard 2 and discuss issue submissions.

Call Participants (4)
Christine Sylvis
Kenesha Williamson
Mark Speltz
Dave Read
Final Meeting

Here are the minutes from the call (10/02/2019):

During the meeting, the group discussed all pending items. We connected with Angie Cyr for some clarifications prior to the meeting. Dave Read cautioned the group to consider that courses which are not recommended become unavailable. CFP meets once every two years. Also, many of the new courses are designed with the intention to increase the learner’s competency and not mimic the course design of the past. Christine reviewed the language of our charge as it relates to the standard 2 curriculum.

The 5 (out of 7) voting members on the call voted on the committee’s suggested changes to Standard 2. Pending items for today’s vote:

- Each topic/class added to Standard 2, Appendix B1 will require an individual issue submission with reasoning why it should be included (Charge 2A)
- Change in format of Standard 2, Appendix B1 will require an issue submission (Charge 2A)
- Change of date for Standard 2 post training will require and issue submission with reasoning why (Charge 2B)
- Changes to CFP Training Manual to align Standard 4 with Standard 2 – each addition will require an individual issue submission with reasoning why (Charge 3)

Voted Actions for IFPTI courses

B8 Environmental Hazards (CC8024W) – Add to the pre-coursework
Pending B10 HACCP (CC8033W) – Additional feedback needed from reviewers; Vote via Survey Monkey
B12 Integrated Food Safety System (CC8018W) – Add to post-coursework
Pending B13 Inspections, Compliance, & Enforcement (CC8019W) - Additional feedback needed from reviewers; Vote via Survey Monkey
Pending B14 Investigation Principles (CC8020W) - Additional feedback needed from reviewers; Vote via Survey Monkey
B15 Jurisdiction (CC8037W) – Replace FDA 35 in the pre-coursework
Pending B16 Labeling (CC8038W) - Additional feedback needed from reviewers; Vote via Survey Monkey
B17 Laws, Regulations, Policies, & Procedures (CC8039W) – Add to pre-coursework
B19 Pest Control (under development) – Add to pre-coursework
B20 Plumbing CC8001W (under development) – Add to pre-coursework
B22 Professionalism (CC8025W) – Add to the pre-coursework
B23 Public Health Principles (CC8026W) – Replace FDA 36 in pre-coursework
B24 Recalls (CC8041W) – Add to post-coursework
B25 Sampling (CC8035W) – Replace MIC13 in the pre-coursework
B26 Sanitation Practices (CC8032W) – Replace MIC15 in the pre-coursework
B27 Traceability (CC8042W) – Add to post-coursework
B28 Transportation (CC8036W) – Add to post-coursework
Updates to the CFP Training Manual were reviewed. The group agreed to recommend that Traceability, Recalls, and Transportation be included with Integrated Food Safety System under a header of the same name in “post” coursework.

Christine Sylvis will be an issue submitter. We need volunteers to be co-issue submitters. Issue submitters will need to attend the biennial meeting to discuss the issue and answer any questions from Council. Also, we can have up to (2) issue submitters per issue. As of today, we will have approximately 20 issues.

Next, we will complete our final report, vote on remaining items, and coordinate volunteers for issue submission through Survey Monkey.

Pending Vote

1. B10 HACCP (CC8033W) course recommendation
2. B13 Inspections, Compliance, & Enforcement (CC8019W) course recommendation
3. B14 Investigation Principles (CC8020W) course recommendation
4. B16 Labeling (CC8038W) course recommendation
5. Add to CFP Training Manual Section 1 Pre-inspection, #2 Reviews establishment file for previous inspection report, complaints on file... (review current risk category) and Section II Inspection observations and performance #3 Uses a risk-based inspection methodology to correctly assess regulations... (verifies risk category is correct based on inspection observations)
6. Add to CFP Training Manual Section II Inspection Observations and Performance, #6 addresses violations on previous inspection being corrected
7. Add to CFP Training Manual Section IV. Written Communication, #1. Completes inspection form per jurisdiction’s administrative procedures addresses violations on previous inspection being corrected

Call Participants (8)
Kenesha Williamson
Christine Sylvis
Adam Kramer
Mark Speltz
Dave Read
Amanda Douglas
Matt Walker
Katey Kennedy
Charge 1: Initiatives (existing, new, or under development) involving the training, evaluation and/or certification available to Food Safety Inspection Officers (FSIO):

**Training – Existing**

**ORAU Pre**
- Public Health Principles FDA 36
- Overview of Microbiology MIC01
- Food Microbiological Control 2A: Gram-Negative Rods MIC02
- Food Microbiological Control 2A: Gram-Positive Rods and Cocci MIC03
- Food Microbiological Control 2A: Foodborne Viruses MIC04
- Food Microbiological Control 4: Foodborne Parasites MIC05
- Food Microbiological Control: Mid-Series Exam MIC16
- Food Microbiological Control 5: Controlling Growth Factors MIC06
- Food Microbiological Control 6: Control by Refrigeration and Freezing MIC07
- Food Microbiological Control 7A: Control by Thermal Processing MIC08
- Food Microbiological Control 7B: Control by Pasteurization MIC09
- Food Microbiological Control 10: Aseptic Sampling MIC13
- Basic Food Law for State Regulators FDA35
- Basics of Inspections: Beginning an Inspection FDA38
- Basics of Inspections: Issues and Observations FDA39
- Communication Skills for Regulators

**ORAU Post**
- An Introduction to Food Security Awareness MIC10
- Food Microbiological Control 8: Technology-based Food Processes MIC11
- Food Microbiological Control 9: Natural Toxins MIC12
- Basics of HACCP: Overview of HACCP FDA16
- Basics of HACCP: Prerequisite Programs and Preliminary Steps FDA17
- Basics of HACCP: Prerequisite Programs and Preliminary Steps FDA18
- Foodborne Illness Investigations 1: Collecting Surveillance Data FI01
- Foodborne Illness Investigations 2: Beginning an Investigation FI02
- Foodborne Illness Investigations 3: Expanding the Investigation FI03
- Foodborne Illness Investigations 4: Conducting a Food Hazard Review FI04
- Foodborne Illness Investigations 5: Epidemiological Statistics FI05
- Foodborne Illness Investigations 6: Final Report FI06
- Food Allergens FD252 *(Course must be accessed through http://class.ucanr.edu/)*
FEMA courses can be accessed at: http://training.fema.gov/IS/NIMS.asp

- Introduction to Incident Command System **IS-100.C**
- ICS for Single Resources and Initial Action Incidents **IS-200.C**
- NIMS an Introduction **IS-700.B**

**FDA ComplianceWire**
- Food Code Chapter 7: Poisonous and Toxic Materials FD112 Food Code (FDAFC01)
- Food Code Chapter 1: Purpose and Definitions FD112 Food Code (FDAFC02)
- Food Code Chapter 3: Part I FD112 Food Code (FDAFC03)
- Food Code Chapter 5: Water, Plumbing, and Waste FD112 Food Code (FDAFC04)
- Food Code Chapter 3: Part II FD112 Food Code (FDAFC05)
- Food Code Chapter 3: Part III FD112 Food Code (FDAFC06)
- Food Code Chapter 2: Supervision FD112 Food Code (FDAFC07)
- Food Code Chapter 4: Part I FD112 Food Code (FDAFC08)
- Food Code Chapter 6 FD112 Food Code (FDAFC09)
- Food Code Chapter 4: Part II FD112 Food Code (FDAFC10)
- Food Code Chapter 8: Enforcement and Annex 1 FD112 Food Code (FDAFC11)
- HACCP (CC8033W)
- Employee Hygiene: Food Service (FOOD1)
- HACCP (FOOD5)
- Preventing Microbial Cross-Contamination (FOOD3)

**IFPTI Courses on ComplianceWire**
- Regulatory Program Foundations (CC8021W)
- Allergens (CC8029W)
- Biological Hazards (CC8028W)
- Biosecurity (CC8023W)
- Communication Skills (CC8011W) **Course must be accessed through FDA Pathlore at: (https://orauportal.fda.gov/stc/ora/psciis.dll?linkid=675280&mainmenu=ORA&top_frame=1)**
- Data & Information Systems (CC8017W)
- Environmental Hazards (CC8027W)
- HACCP (CC8033W)
- Imports (CC8034W)
- Integrated Food Safety System (CC8018W)
- Inspections, Compliance, & Enforcement (CC8019W)
- Investigation Principles (CC8020W)
- Jurisdiction (CC8037W)
- Labeling (CC8038W)
- Laws, Regulations, Policies, & Procedures (CC8039W)
- Personal Safety (CC8031W)
• Preventive Controls (CC8040W)
• Professionalism (CC8025W)
• Public Health Principles (CC8026W)
• Recalls (CC8041W)
• Sampling (CC8035W)
• Sanitation Practices (CC8032W)
• Traceability (CC8042W)
• Transportation (CC8036W)

FDA Pathlore
• Fermentation at Retail (FD8009W)
• Curing, Smoking, Drying of Meat, Poultry and Fish and the Processing of Fermented Sausages (FD8005W)
• Reduced Oxygen Packaging at Retail (FD8004W)
• Juicing at Retail (FD8008W)
• Shellfish Tanks at Retail (FD8007W)
• Custom Processing of Meats at Retail (FD8006W)
• HACCP (CC8033W)
• Plumbing Controls for Commercial Food Establishments (CC8001W)
• Pest Control in Food Establishments (FD180W100)

Instructor Led Courses
• FD112 – Food Code
• FD218 - Risk-Based Inspection Methods in Retail
• FD204 - Temporary Food Establishments
• FD207 – Plan Review for Food Establishments
• FD312 - Special Processes at Retail
• FD215 - Managing Retail Food Safety
• ER310 - Food Safety Issues in the Event of Disasters
• EPI-Ready in person training through (NEHA/Centers of Excellence)
• AFDO – Environmental Sampling in Retail Food Facilities

Training – New
• CDC EATS 101
• CDC EATS 102

Training – Under Development
• FD170 – Application of Inspection and Investigation Techniques
• IFPTI Pest Control
• IFPTI Plumbing
• IFPTI Emergency Response
In-house training provided by State/Local Health Departments:

- Report writing
- State-specific
- Software
- Compliance and enforcement
- Risk-based inspection methods
- HACCP (application)
- Plumbing/backflow
- Consistency training (marking under same number)
- Meat/poultry inspection
- Scenario/mock inspection/role playing
- Ethnic Food Book
- Temporary Food Establishment training
- Mobile Vending training
- NAU Back Country Excursions
- Food Service During Disasters

Training Resources

- AFDO Ethnic Food CD/App
- AFDO Salvage Food
- AFDO Dented Cans
- AFDO Incubator (Community/Shared) Kitchens
- AFDO Cottage Food
- Centers of Excellence (COE) food safety tools

Evaluation

- CFP Training manual forms for new hires
- Standard 4 - 20 Quality Elements
- Standardization

Certification

- NEHA Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS)
- NEHA Certified Professional - Food Safety (CPFS)
- NEHA Certified Foodborne Outbreak Investigator (CFOI)
- HACCP Alliance – Certified HACCP Manager
- NSF – Certified HACCP Manager
- ASQ (American Society for Quality) Root Cause Analysis Training
- 40 Hour HAZWOPER
- ANSI Food Safety Manager
Program Standard #2

APPENDIX B-1: Curriculum for Retail Food Safety Inspection Officers

For state, local & tribal regulators to register on-line for free access to web courses, go to:
http://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm121831.htm

Pre-requisite (“Pre”) curriculum courses
(to be completed during the 25 joint inspection period AND prior to conducting any independent inspections)

<table>
<thead>
<tr>
<th>CURRICULUM TOPICS</th>
<th>COURSES WHICH FULFILL CURRICULUM TOPICS</th>
</tr>
</thead>
<tbody>
<tr>
<td>PUBLIC HEALTH PRINCIPLES</td>
<td></td>
</tr>
<tr>
<td>1. Public Health Principles</td>
<td>FDA36 (90)</td>
</tr>
<tr>
<td>MICROBIOLOGY</td>
<td></td>
</tr>
<tr>
<td>1. Overview of Microbiology</td>
<td>MIC01 (60)</td>
</tr>
<tr>
<td>2. Gram-Negative Rods</td>
<td>MIC02 (60)</td>
</tr>
<tr>
<td>3. Gram-Positive Rods &amp; Cocci</td>
<td>MIC03 (90)</td>
</tr>
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<td>4. Foodborne Viruses</td>
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<td>5. Foodborne Parasites</td>
<td>MIC05 (90)</td>
</tr>
<tr>
<td>6. Mid-Series Exam</td>
<td>MIC16 (30)</td>
</tr>
<tr>
<td>7. Controlling Growth Factors</td>
<td>MIC06 (90)</td>
</tr>
<tr>
<td>8. Control by Refrigeration &amp; Freezing</td>
<td>MIC07 (60)</td>
</tr>
<tr>
<td>9. Control by Thermal Processing</td>
<td>MIC08 (90)</td>
</tr>
<tr>
<td>10. Control by Pasteurization</td>
<td>MIC09 (90)</td>
</tr>
<tr>
<td>11. Aseptic Sampling</td>
<td>MIC13 (90)</td>
</tr>
<tr>
<td>12. Cleaning &amp; Sanitizing</td>
<td>MIC15 (90)</td>
</tr>
<tr>
<td>PREVAILING STATUTES, REGULATIONS, ORDINANCES</td>
<td></td>
</tr>
<tr>
<td>1. Basic Food Law for State Regulators</td>
<td>FDA35 (60)</td>
</tr>
<tr>
<td>2. Basics of Inspection: Beginning an Inspection</td>
<td>FDA38 (90)</td>
</tr>
<tr>
<td>5. FDA Food Code</td>
<td>NOTE: Specific state/local laws &amp; regulations to be addressed by each jurisdiction</td>
</tr>
<tr>
<td>COMMUNICATION SKILLS</td>
<td></td>
</tr>
<tr>
<td>1. Communication Skills for Regulators</td>
<td>CC 8011W (60) Note: Course can be accessed through FDA Pathlore at: (<a href="https://orauportal.fda.gov/stc/ORot/sciis.dll?linkid=675280&amp;mainmenu=ORA&amp;top_frame=1">https://orauportal.fda.gov/stc/ORot/sciis.dll?linkid=675280&amp;mainmenu=ORA&amp;top_frame=1</a>)</td>
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http://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm121831.htm
## Curriculum ("Post") courses

*(to be completed any time prior to Food Code Standardization AND within 18 months of hire or assignment to the regulatory retail food program)*

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<thead>
<tr>
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<tr>
<td>1. Control by Retorting</td>
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<td>3. Natural Toxins</td>
<td>MIC12 (90)</td>
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<tr>
<td><strong>HACCP</strong></td>
<td></td>
</tr>
<tr>
<td>1. Overview of HACCP</td>
<td>FDA16 (60)</td>
</tr>
<tr>
<td>2. Prerequisite Programs &amp; Preliminary Steps</td>
<td>FDA17 (60)</td>
</tr>
<tr>
<td>3. The Principles</td>
<td>FDA18 (60)</td>
</tr>
<tr>
<td><strong>ALLERGEN MANAGEMENT</strong></td>
<td></td>
</tr>
<tr>
<td>1. Food Allergens</td>
<td>FD252 (60)</td>
</tr>
<tr>
<td><strong>EPIDEMIOLOGY</strong></td>
<td></td>
</tr>
<tr>
<td>1. Collecting Surveillance Data</td>
<td>FI01 (90)</td>
</tr>
<tr>
<td>2. Beginning the Investigation</td>
<td>FI02 (90)</td>
</tr>
<tr>
<td>3. Expanding the Investigation</td>
<td>FI03 (90)</td>
</tr>
<tr>
<td>4. Conducting a Food Hazard Review</td>
<td>FI04 (90)</td>
</tr>
<tr>
<td>5. Epidemiological Statistics</td>
<td>FI05 (90)</td>
</tr>
<tr>
<td>6. Final Report</td>
<td>FI06 (30)</td>
</tr>
<tr>
<td><strong>EMERGENCY MANAGEMENT</strong></td>
<td></td>
</tr>
<tr>
<td>1. Introduction to Incident Command System</td>
<td>IS-100.C, Introduction to Incident Command System, (180) ICS-100 or IS-100 for FDA</td>
</tr>
</tbody>
</table>

( ) Average time in minutes required to take the course, 60 minutes equals .1 CEU, 90-120 minutes equals .2 CEUs

Estimated total hours for “Pre” courses are 42 hours.
Estimated total hours for “Post” courses are 26 hours.
Estimated total hours for completion of all Program Standard #2 coursework are 68 hours.
### Program Standard #2

APPENDIX B-1: Curriculum for Retail Food Safety Inspection Officer

**Pre-requisite (“Pre”) curriculum courses**
*(to be completed during the 25 joint inspection period AND prior to conducting any independent inspections)*

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<tr>
<td><strong>ENVIRONMENTAL HEALTH FOUNDATIONS</strong></td>
<td></td>
</tr>
<tr>
<td>1. Public Health Principles</td>
<td>CC8026W&lt;sup&gt;®&lt;/sup&gt;</td>
</tr>
<tr>
<td>2. Environmental Hazards</td>
<td>CC8024W&lt;sup&gt;®&lt;/sup&gt;</td>
</tr>
<tr>
<td>3. Jurisdiction</td>
<td>CC8037W&lt;sup&gt;®&lt;/sup&gt;</td>
</tr>
<tr>
<td>4. Pest Control</td>
<td>[IFPTI Course under development]</td>
</tr>
<tr>
<td>5. Plumbing</td>
<td>CC8001W [IFPTI Course under development]</td>
</tr>
<tr>
<td><strong>MICROBIOLOGY</strong></td>
<td></td>
</tr>
<tr>
<td>1. Overview of Microbiology</td>
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<td>MIC09&lt;sup&gt;C&lt;/sup&gt; (90)</td>
</tr>
<tr>
<td>11. Sampling</td>
<td>CC8035W&lt;sup&gt;®&lt;/sup&gt;</td>
</tr>
<tr>
<td>12. Sanitation Practices</td>
<td>CC8032W&lt;sup&gt;®&lt;/sup&gt;</td>
</tr>
<tr>
<td><strong>PREVAILING STATUTES, REGULATIONS, ORDINANCES</strong></td>
<td></td>
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<tr>
<td>1. Laws, Regulations, Policies, &amp; Procedures</td>
<td>CC8039W&lt;sup&gt;®&lt;/sup&gt;</td>
</tr>
<tr>
<td>2. Basics of Inspection: Beginning an Inspection</td>
<td>FDA38&lt;sup&gt;C&lt;/sup&gt; (90)</td>
</tr>
<tr>
<td>3. Basics of Inspection: Issues &amp; Observations</td>
<td>FDA39&lt;sup&gt;C&lt;/sup&gt; (90)</td>
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<td>5. FDA Food Code (NOTE: Specific state/local laws &amp; regulations to be addressed by each jurisdiction)</td>
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<td><strong>COMMUNICATION SKILLS</strong></td>
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<tr>
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<td>CC8011W (60) NOTE: Course must be accessed through FDA Pathlore at: (https://</td>
</tr>
</tbody>
</table>
## Professionalism

1. Professionalism  |  CC8025W

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**Curriculum ("Post") courses**

*(to be completed any time prior to Food Code Standardization AND within 18 months of hire or assignment to the regulatory retail food program)*

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<td></td>
</tr>
<tr>
<td>1. Food Allergens</td>
<td>CC8029Wp</td>
</tr>
<tr>
<td><strong>EPIDEMIOLOGY</strong></td>
<td></td>
</tr>
<tr>
<td>1. Collecting Surveillance Data</td>
<td>FI01C (90)</td>
</tr>
<tr>
<td>2. Beginning the Investigation</td>
<td>FI02C (90)</td>
</tr>
<tr>
<td>3. Expanding the Investigation</td>
<td>FI03C (90)</td>
</tr>
<tr>
<td>4. Conducting a Food Hazard Review</td>
<td>FI04C (90)</td>
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<td>5. Epidemiological Statistics</td>
<td>FI05C (90)</td>
</tr>
<tr>
<td>6. Final Report</td>
<td>FI06C (30)</td>
</tr>
<tr>
<td><strong>INTEGRATED FOOD SAFETY SYSTEM</strong></td>
<td></td>
</tr>
<tr>
<td>1. Integrated Food Safety System</td>
<td>CC8018Wp</td>
</tr>
<tr>
<td>2. Imports</td>
<td>CC8034Wp</td>
</tr>
<tr>
<td>3. Recalls</td>
<td>CC8041Wp</td>
</tr>
<tr>
<td>4. Traceability</td>
<td>CC8042Wp</td>
</tr>
<tr>
<td>5. Transportation</td>
<td>CC8036Wp</td>
</tr>
<tr>
<td><strong>EMERGENCY MANAGEMENT</strong></td>
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</tr>
<tr>
<td>2. ICS for Single Resources and Initial Action Incidents</td>
<td>IS-200C, ICS-200 (180)</td>
</tr>
<tr>
<td>3. NIMS an Introduction</td>
<td>IS-700.B, ICS 700 (180)</td>
</tr>
</tbody>
</table>
Average time in minutes required to take the course, 60 minutes equals .1 CEU, 90-120 minutes equals .2 CEUs

Course available on Pathlore
Course available on ComplianceWire

Estimated total hours for “Pre” courses are XX hours.
Estimated total hours for “Post” courses are XX hours.
Estimated total hours for completion of all Program Standard #2 coursework are XX hours
B1 Regulatory Program Foundations (CC8021W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to the elements of feed and food regulatory programs.

a) Goal: The student will be able to exhibit introductory knowledge, skills, and abilities related to the elements of feed and food regulatory programs.

b) Scope: Topics covered in this course include foundations, laws and regulations, feed/food protection agencies, program standard areas, IFSS, mutual reliance (recognition and reciprocity).

Committee Review: Slide numbers would have been helpful. The very first course was long. Providing a projected time frame would be helpful. The content includes a lengthy history on how the law and enforcement actions were developed. It was nice to see a great list of tips for training new inspectors on when to involve a supervisor and how to think critically during the inspection. Program standards were mentioned. There was some terminology which was concerning for new inspectors to be translating this knowledge to the retail food industry. For example: the word violative seems to have been used interchangeably with “hazardous” or “priority”. The coursework frames were not very interactive. Perhaps the relevant terminology could have been hyperlinked throughout the course instead of being featured at the beginning. The knowledge checks and final exam does not give a detailed performance summary; it just gives a score.

Committee Recommendation: No action

B2 Allergens (CC8029W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to food allergens, controls and regulatory requirements.

(a) Goal: Discuss the control of allergens in relation to food safety.

(b) Scope: This course will cover introductory knowledge, skills, and abilities related to food allergens, controls, and regulatory requirements. Topics include foundations of allergens, labeling requirements, FSMA, control measures, and educational resources.

Committee Review: This course is currently under revision by IFPTI. The U.S. recognized allergens and allergens recognized overseas were explained well. The link for the full list of tree nuts did not lead us to the correct FDA page. We had to google search the FALCPA list to access the correct FDA page.

Committee Recommendation: We recommend replacing FD252, Allergen Management in “post” courses with this course.

B3 Biological Hazards (CC8028W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to biological hazards, focusing on sources of contamination, growth factors, and control methods.

Committee Review:
Unit 1
- Pathogens vs Spoilage Organisms slide mentions that off-flavors are a characteristic of food compromised by the outgrowth of pathogens. This should be included under the spoilage organism column.
• Sampling slides mention the term “for-cause” sampling. Where does this wording come from? The message could be rephrased to better represent circumstances such as traceback investigations for foodborne illness or precautionary circumstances. Also, the regulatory sampling slide gives the impression that the regulator will be completing the sampling in manufacturing environments.

**Unit 2**

• Aflatoxins slide mentions some effects of carcinogens. But, the slide does not explain that aflatoxins are carcinogens. Perhaps the previous slides could have included a brief explanation that many aflatoxins are considered carcinogenic.
• Other Mycotoxins slide mentions that fumonisin consumption can be fatal. But, it is unclear as to whether that fatality is found in humans or just horses and swine. Also, are humans becoming affected through consumption of swine or the rice and corn directly?
• Toxin-Mediated Infection slide does not explain that the terms toxicoinfection and toxin-mediated infection are interchangeable.
• Examples of Incubation Periods slide uses a bullet point format to provide the information. This may have been better as a data table.
• Biofilm slide could have included a nice tie-in to the messages about sampling, as L. monocytogenes is difficult to remove from a facility due to biofilms.

**Unit 3**

• Food Packaging slide provides an explanation of MAP below the bullet points for both MAP and general ROP without connecting the explanation directly to MAP.
• Vectors: Humans slide contains a photo of a food handler correctly wearing gloves and using a utensil to handle food. It would be better to show bare hand contact.

**Unit 4**

• Listeria slide shows a photo of a drain cover in a pool. This should be a floor drain photo within a food establishment.
• Food Contact Surfaces slide uses the terms direct and indirect food-contact surfaces. This is not in alignment with the term food-contact surface and nonfood contact surface used in retail food.

**Unit 5**

• Several slides continued to mention only MAP as a type of packaging which can aid in the control of pathogenic growth.
• Controlling campylobacter slide has the bacteria name misspelled in two of the sentences. Estimated time: approx. 2 hrs.

**Committee Recommendation:** Standard 2 curriculum microbiology section covers these topics, no need to replace.

**B4 Biosecurity (CC8023W)**

**FDA Pathlore Course Description:** Introductory knowledge, skills, and abilities related to controlling disease transmission between people, animals, and plants. There are six modules in this course.
Committee Review:

Unit 1
At the beginning of the Unit 1, the definition of biosecurity is very broad. It seems to reference what we understand to be the basics of food protection within retail/restaurant environments. Is it the best definition? Is this term more widely used in manufacturing?
Three parts of a facility’s biosecurity plan: exclusion, management, and containment. All of which should be SOPs for the facility.

Unit 2
The definition for fomite includes living and non-living matter. I understood fomites to be inanimate objects or materials which can become contaminated and transfer pathogens. Explanations for food processing were nicely worded. Nice use of plain language to differentiate between harvest/slaughter and processing.

Unit 3
Biosecurity zone slide defines a controlled access point as the third point. However, it would be better suited as the first definition because personnel would have to enter controlled or restricted zones through this point of access.

The slides which describe the types of PPE need some additional wording to relate the subject to its significance in the prevention of contamination within a facility or operation. Is the term enhanced inspection interchangeable with the term investigation as an inspection type? This was included on the slide which described how inspectors should protect themselves.

Unit 4
The slide which discusses the importance of planning for the regulatory visit includes a non-working link to the FDA Investigations Operations Manual. The distinction between disinfection and sanitizing needs to be better explained. The material did not include an explanation of communicating breaches within the sanitation chain as part of the recall protocol.

Unit 5
The FDA Investigation Operations Manual link at the beginning on unit 5 did navigate to the correct webpage. The knowledge check question 2 seems to assess whether the learner has read the material at the provided links to both the FDA and USDA documents. The slide with those links could be improved by including a brief explanation of the main focuses of those two documents. FDA being routine operations and USDA being emergency preparedness and response to adverse events.

Committee Recommendation: Currently, there is no biosecurity in the curriculum. It’s more in depth than we consider to be necessary. Overall, it seemed to have been designed for manufacturing instead of food service. Several case studies were included. That is beneficial for the learner. We do not recommend addition.

B5 Communication Skills (CC8030W)
FDA Pathlore Course Description:
Introductory knowledge, skills, and abilities related to effective communication in the regulatory field.
(a) Goal: Discuss the skills required for an effective communicator in the regulatory field. 
(b) Scope: Inspectors can expect to be introduced to the basic knowledge, skills, and abilities related to effective communication in the regulatory field. Topics discussed include foundations, specific communication skills (oral, written, effective listening, feedback, etc.), situational awareness, agency policies on communication, and educational resources.

Committee Review:
**Unit 1**
A slide mentions that an inspector may need to use the services of a translator. Should this say interpreter rather than a translator?

**Unit 2**
The slides which describe assertive communication as the preferred style for regulators contradict themselves. While assertiveness was described as a tool to achieve mutual respect and understanding, one of the slides gave a recommendation to use “I” statements. For example, “I would like to begin the tour so that we can finish by 5 pm”.

**Unit 3**
Several of the situational awareness photos need to be replaced with photos which better suit the content.

Some of the course exam questions were poorly worded. For example, the question asks if one should contact a supervisor if the facility operators is perceived to be lying is poorly worded.

Committee Recommendation:
Covers many of the same topics as “Communication Skills for Regulators” currently required in “pre” courses which seems more applicable for retail food establishments. Recommend no action.

**B6 Data & Information Systems (CC8017W)**
**FDA Pathlore Course Description:**
Introductory knowledge, skills, and abilities related to systems used by regulatory agencies to store, process, and manage data and information.

Committee Review: Mostly a basic computer course hardware, software, data, database, mainframe, etc. The Unit 1 foundational information seemed largely irrelevant except for the distinction between data and information and the databases used by health departments and FDA.

Section 4, FDA 20.88 agreements provided useful information new inspectors may not be aware of. Section 2 also provided useful information on social media, but most jurisdictions have internal policies covering this for employees.

The “FOOD Tool” slide in Unit 1 is described as the CDC’s database for foodborne illness outbreak data. Food Outbreak Online Database (FOOD) Tool. Is this still used? Shouldn’t this be NORS (National Outbreak Reporting System)?
The Unit 3 and Unit 4 content does well in supporting the regulator’s training on basics of inspection. These units provided good information on the knowledge a regulator must manage and the access and control of information: Freedom of Information Act, securing and updating passwords, etc. The bulk of the content seems to be common knowledge for new inspectors. Perhaps individuals who are unfamiliar with the internet and web-based applications would find the information beneficial.

Committee Recommendation: Overall, information not recommended to add to Standard 2. Most of this information is general knowledge of computers currently taught in school. Social media, malware, specific databases are usually often covered by jurisdictional internal policies. No action.

B7 Emergency Response
FDA Pathlore Course Description: The course is still under development
Committee Review: N/A
Committee Recommendation: No action

B8 Environmental Hazards (CC8024W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to environmental hazards as sources of contamination, and associated control methods.

Foundations
1. Define relevant terminology
2. Give examples of food and feed products that may be affected by environmental hazards.
3. Describe where to find resources.
4. Describe the consequences of contamination by environmental hazards.
5. Discuss how sampling is used to detect environmental hazards.
6. Give examples of how a milestone event impacted public policy.
7. Give examples of illness caused by environmental hazards.

Environmental Hazards of Concern
1. Identify the categories of environmental hazards.
2. Give examples of each category of environmental hazard.
3. Associate environmental hazards with products or processes.

Sources and Pathways
1. Discuss how environmental hazards contaminate products and processes.
2. Describe vectors of contamination.
3. Give examples of food contamination sources.
4. Give examples of feed contamination sources.
5. Differentiate between intentional and unintentional contamination.

Control Factors
1. Explain the concept of acceptable levels of exposure.
2. Describe best management practices that are used to prevent spread of environmental hazards.
3. Give examples of preventive controls.
4. Describe control point monitoring.
5. Explain why source is important as a control factor.
6. Discuss response options for contamination

Duration
Unit 1: Foundations - 23 minutes
Unit 2: Environmental Hazards of Concern – 21 minutes
Unit 3: Sources and Pathways – 38 minutes
Unit 4: Factors – 11 minutes
Estimated time = 1 hour and 33 minutes

Committee Review:

Unit 1
Foundations – is course content geared towards Retail Food or Manufacturing? Many of the examples and pictures emphasize manufacturing. We also suggest adding radiological hazard language in the opening slides. Also, be consistent with use of Radiological throughout if it is going to be used and mirror FSMA rules.

Unit 2
Virus slide. Suggest rewording or structuring slide so that Norovirus is clearly the #1 cause. Currently worded that viruses in general are the number one cause of illness in US.

Unit 3
Suggest adding more retail food pictures to balance out all the manufacturing pictures. Assessment Knowledge Check 1 – sampling question not covered very well in module.

Unit 4
Control Factors Slide – Food Safety Plans: personnel safety pictures used instead of food safety symbolic pictures.

Control Factors: expound more on why source is important as a control factor. GRAS definition clarification needed that explains that GRAS is a chemical or substance added to food.

Course Assessment – Question 9: is the question asking about pre or post packaging. Needs to be reworded so that its clear.

Overall, we thought courses were good foundation for new regulatory staff. We also thought that it would be helpful for the modules to have slide number to be able to reference slides later. We concur with others that the exams at the end of the courses should provide feedback on questions that were missed so that the “student” learns the correct information. The assessments taken during each unit would also be better if the answer was reiterated why it was correct or why the answer chosen was incorrect. We like that a description pops up when hovering over photos.

Committee Recommendation: Good introduction to hazards, add to “pre” courses.

B9 Food / Feed Defense Awareness
FDA Pathlore Course Description: N/A
Committee Review: Unable to review this module because the course was not submitted by the course developer, is not on Pathlore or in the course catalog. Dave Read checked into it and found that the course does exist, but the course was not provided on Pathlore.
Committee Recommendation: No action

B10 HACCP (CC8033W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to the hazard analysis and critical control points (HACCP) system. There are five modules in this course.

Committee Review:
Unit 2
Record Review for Accuracy – consider changing “validity” wording. Too much like verification vs validation and makes you think you are talking about validations whereas the slide is discussing verification. Overall comment: Verification vs Validations needs better disused and language on slides needs to stay true their meaning.

Unit 4
Videos. Seem out of place, not necessary, too short if they are going to be used. Would be better if video clips provided snippet of each of the 7 steps of HACCP instead of just 2.

Unit 5
Laws Regulations and Guidance: suggest creating stand-alone paragraph to explain implementation of FSMA. Need better clarification of State Agriculture programs, USDA, FDA, State and local oversight and co-regulation. Also, better explanation of FSMA (food safety plans) vs HACCP.
Assessment question—there was a question for recall procedure. We felt this was not adequately covered in module for use as a question.

Committee Recommendation: Comparable to current “post” HACCP series (FDA16-18). If possible, merge with current courses. Recommend no action.

B11 Imports (CC8034W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to the regulation of feed and food products grown, produced or manufactured outside of or returned to the US.
a) Goal: The student will be able to apply knowledge of import requirements.
b) Scope: The topics in this course include foundations, acts and regulations, entry process, inspection, investigation, compliance and enforcement actions, import fraud.

Committee Review: The slide which explains the term custom(s) broker includes the abbreviation CBP. The phrase CBP custody is used but is not explained until later slides. At which point, CBP is defined as Customs and Border Protection. The text under the example figure for Harmonized Tariff Schedule Code has very low resolution and is difficult to read. Unit 5 includes a “Real World Applications” video on investigations which took a very long time to load. Upon completing the final unit, there was no button available on screen to navigate to the actual course assessment. FD251 references imports, so the material presented in the module is covered there. Course completion time was 47 mins.
Committee Recommendation: We do not recommend the material replace FD251, An Introduction to Food Security Awareness, but differing information is important; add to “post” courses to supplement FD251.

B12 Integrated Food Safety System (CC8018W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to the concept of a national collaborative and cooperative network of federal, state, local, tribal, and territorial feed and food protection agencies working in concert to protect the U.S. human and animal food supply.

(a) Goal: Describe how collaborative interrelationships of regulatory agencies promote and protect public health in a global environment.

(b) Scope: This course will cover introductory knowledge, skills, and abilities related to the concept of a national collaborative and cooperative network of federal, state, local, tribal, and territorial feed and food protection agencies working in concert to protect the U.S. human and animal food supply. Topics include foundations of IFSS, stakeholders, mutual reliance, and program standards.

Committee Review:
Reading – reading description of images not helpful stating same thing as image that is presented.

“Example” images – throughout presentation – placeholders?
Module covered the basic foundations of an IFSS and identified the stakeholders. Also covered mutual reliance between stakeholders and covered the different program standards. 35 minutes to complete.

Committee Recommendation: Add to “post” course work.

B13 Inspections, Compliance, & Enforcement (CC8019W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to ensuring regulatory compliance through inspection and enforcement activities.

a) Goal: The student will be able to explain compliance activities as they relate to the safety of feed and food programs.

b) Scope: Topics in this course will include Foundations, Jurisdiction, inspection classifications, Inspection tools, Inspection techniques, Pre-inspection, Inspection process, post inspection, enforcement measures

Committee Review: Would be nice to be able to modify and brand to individual jurisdictional procedures.

Introductory knowledge, skills, and abilities related to ensuring regulatory compliance through inspection and enforcement activities. We have covered foundations, jurisdiction, inspection classification, inspection tools, inspection techniques, pre-inspection, inspection process, post-inspection, and enforcement measures.

Committee Recommendation: Only replace if the FDA 38, 39 & Communication can be merged with this course. No action.
B14 Investigation Principles (CC8020W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to conducting an investigation of a food safety-related event.
   a) Goal: The student will be able to describe an investigation.
   b) Scope: Topics covered in this course include foundations, communication, agency collaboration, investigation skills pre-investigation, investigation, post-investigation.

Committee Review: Example of Collaborating on Releasing Information, Released Early-
“EXAMPLE image” used – also on the following:
Unit 3- Examples of Potentially Involved Agencies
Unit 5 -Commodity Research Example One, two
Unit 6 -Observational Evidence Example

Exam - Question 5, not clarified in reading material:
The Incident Command System (ICS) is:
   a) A flexible system that allows agencies the ability to innovate as necessary.
   b) A rigid system.

After successful completion of exam, suggest providing a reference slide or information to inform learner of correct choices for the incorrect selections that were made.

Committee Recommendation: Some material covered in FDA38 – Basics of Inspection course; no action.

B15 Jurisdiction (CC8037W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to various regulatory agencies and their authority over feed and food.
   a) Goal: The student will be able to describe which agencies have authority to conduct specific regulatory activities.
   b) Scope: The topics covered in this course include foundations, law, crossing boundaries, inter-agency agreements.

Committee Review: We thought the course gave a good overview of the subject and was well designed to provide the information in a logical order. The course does not have slide numbers, so as with regards to feedback we have provided the slide header:

Unit 1
Foundations State & Local Jurisdiction Authority. Suggest a change to a word in the paragraph that states food ‘consumed’, suggest changing to food ‘sold or distributed’. It would be inaccurate to describe food purchased at a retailer and then consumed at a home just across the state line as intrastate commerce.

Unit 3
Activities under the State Retail Food Program. It states FDA develops the Retail Food Program, we felt that the CFP process develops with input/oversight from FDA.
The Exam at the end of the course only provides a score, it does not let you know which questions you got incorrect. This could help determine what part of the course you may need to retake etc.

On AFDO’s website, the courses are cross-referenced. There was not much interactive content within the course. The lack of interactive features seems like a step back considering the way that online coursework is developed today. The terminology is bridged from the manufacturing content. Violative is commonly used in manufacturing regulation. We scheduled an hour. However, we had to move through the content more quickly toward the end.

Committee Recommendation: Add to “pre” courses.

**B16 Labeling (CC8038W)**

FDA Pathlore Course Description:
Introductory knowledge, skills, and abilities related to labeling requirements, and the components of feed and food product labels.

a) Goal: The student will be able to explain label requirements.
b) Scope: The topics covered in this course include foundations, labeling laws and regulations, labeling components, feed, food.

Committee Review:

**Course Overall:**
- No slide numbers or time to complete course/sections.
- inconsistency on knowledge base confirmation on whether a question was answered correctly or not.
- There were a few videos (a little basic), but not sure if they were positioned correctly i.e. they seemed to introduce a new topic, would prefer an intro slide prior to the video.
- Some of the label images were too small to read, even on a large screen.
- The course did seem very long.

**Course Design:**
- The course design may benefit from being aligned under regulated areas i.e. Human Food – FDA / FSIS, Dietary Supplements, and Animal feed and then having the specific topics under each area i.e. regulations, label requirements, etc. this could help with repetition, flow and refresher training. It is a lot of information for a new employee, especially if they are not responsible for a certain regulated area i.e. animal feed, the information becomes irrelevant.
- The competency flow did not align with the course, so by having it aligned under regulated areas could help better align it.

**Unit 1**
Label Vs Labeling Slide. Include supplement labeling on a website

**Unit 2**
Labeling components required allergy information is referencing ‘Produced in a facility that processes peanuts’ which is not required
- Labeling components trail mix labeling confusing

**Unit 3**
Labeling laws referencing outdated FDA 2013 Food code
Committee Recommendation: No action in current condition. Like the topic of labeling to be included in curriculum; consider addition if course is revamped.

B17 Laws, Regulations, Policies, & Procedures (CC8039W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to the system of federal, state, and local laws that provide the authority to regulate feed and food, and associated policies and procedures.
  a) Goal: The student will be able to employ legal authorities when conducting regulatory activities.
  b) Scope: The topics covered in this course include foundations, constitution, law, regulation, policy, procedures, guidance.

Committee Review: We do not have any significant feedback. We thought the course was well aligned with the competencies and covered all the topics. As stated on previous calls the content is a little dry, and we believe in future the courses will have more interaction.

Committee Recommendation: Replace FDA35, Basic Food Law for State Regulators in “pre” courses.

B18 Personal Safety (CC8031W)
FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to hazards encountered by regulators, and appropriate protective actions to mitigate hazards.
  (a) Goal: Choose safe practices based on assessment of risk.
  (b) Scope: This course will provide introductory knowledge, skills and abilities related to hazards encountered by regulators as well as appropriate protective actions to mitigate hazards. Specific topics include foundations of personal safety, chemical hazards, equipment hazards, physical/environmental hazards, miscellaneous hazards, safety equipment, and educational resources.

Committee Review: It sounds like there is some redundant material in other courses regarding PPE. We noticed that the course provided specific instructions on how an inspector should execute personal safety rather than describing the types of PPE. It mentioned that an inspector should reach out to a facility in advance to determine what types of hazards to personal safety may be there. The buddy system for entering coolers and freezers was also mentioned for personal safety reasons. However, there may not always be more than one inspector conducting the inspection. Ladder safety was also included. We considered the content to be focused on more OSHA recommendations than necessary for the food protection field. Examples of hazard signage and PPE requirement signage was very useful. The content should be more of an overview and could be confusing. Basics of inspection course, FDA 38, includes a brief inclusion of personal safety by informing the inspector of appropriate clothing, shoes, head cover.

Committee Recommendation: Given that the material is not covered, it would not replace the current curriculum; no action.

B19 Pest Control (under development)
IFPTI Course Description: Explain how pest activity can impact food safety. Discuss pests of significance to human and animal health. Discuss the importance of facility design for pest control. Describe sanitation practices for pest control. Discuss detection of pests. Discuss how pest management is used to control pests.

Committee Review: This course is currently under development and unable to review. However, this topic is important for new inspectors.

Committee Recommendation: Recommend adding to “pre” courses.

B20 Plumbing (CC8001W - under development)

FDA Pathlore Course Description: This one-hour online course provides information on plumbing controls used in commercial food establishments to protect the potable water supply from contamination. The course consists of 4 lessons: Course Introduction, Cross-Connection Fundamentals, Physical and Mechanical Backflow Prevention, Protection for Drains, Wells, and Septic Systems.

This online course is a prerequisite for several OTED face-to-face courses designed to increase knowledge in identifying plumbing issues in food manufacturing facilities when conducting food GMP inspections. The commodity specific face-to-face course will increase skills and ability to interpret industry situations related to conducting food GMP inspections by FDA investigators/State inspectors.

Committee Review: B20 Plumbing is still in development but appears to be largely complete; I was provided with PDFs of the storyboards and narration for this review. This course includes significant improvements over the other courses I reviewed, having expanded accessibility features, narration, and knowledge checks that include 4+ answers. Some knowledge checks had “choose all that apply” options or asked the participant to choose the correct diagram to match the concept described. The photos and diagrams are matched for backflow prevention devices and other fixtures, which is helpful. I would consider this course a big upgrade from CC8001W.

The course has 5 units: Foundations, Water Source, Wastewater Systems, Backflow Prevention and Jurisdictional Authority. It provides a rationale for proper plumbing, citing an example from the EPA Cross-Connection Control Manual. (Kool-Aid that got mixed with a now-banned pesticide; it would have been prevented with a backflow prevention device.) The material identifies the differences between public and private water supplies, informing the regulator as to which questions to ask. B20 also covers preventing cross-connections, air gaps, maintenance, transport, and so on.

Committee Recommendation: Add to the Standard 2 pre-requisite curriculum. As an aside, it could also replace CC8001W as the pre-requisite for FD207 Plan Review.

B21 Preventive Controls (CC8040W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to measures implemented by feed and food manufacturing facilities to ensure feed and food safety.

a) Goal: The student will be able to describe the principles of preventive controls.
b) Scope: Topics covered in this course include foundations, food safety plans, hazard
Committee Review: The course is geared towards manufacturing and could confuse if used for retail.
- Course flows well.
- Knowledge checks were good.

Unit 6 - Validation question incorrect. “Verification” should be the wording. Screenshot below:

- Final Exam – Q9 wording is confusing.
- Final exam does not state which question was answered incorrectly

Committee Recommendation: Not applicable to retail food; no action.

B22 Professionalism (CC8025W)

FDA Pathlore Course Description
Introductory knowledge, skills, and abilities related to ethics, integrity, and personal conduct during job-related activities.

(a) Goal: The student will be able to exhibit the use of integrity and positive interpersonal conduct in the performance of professional and personal activities.

(b) Scope: Topics covered in this course include foundations, ethics, conduct, personal management, communication, and interpersonal skills.

Committee Review: The coursework is divided into 6 units: Foundations, Ethics, Conduct, Personal Management, Communications and Interpersonal Skills. It defines professionalism, explains its value and the rationale for regulators to act with integrity and the accountability to the public.

The course includes straightforward and relevant scenarios for situations where a regulator could fail to conduct themselves appropriately and how to avoid even the perception of improper conduct. This content is largely text but includes illustrations and photos on most slides.
Each unit has a pair of questions at the end; they are not difficult, only requiring the participant to choose between 2 options. That said, they do underscore important concepts and prevent the participant from just clicking through the course on auto-pilot. The 10-question assessment at the conclusion is similar and provides a final percentage upon completion.

The course required about 45 minutes to complete.

Committee Recommendation: Add to the “pre” curriculum courses.

B23 Public Health Principles (CC8026W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to how regulatory agencies promote health and prevent and control feed- and food-related illness.

a) Goal: The student will be able to discuss basic public health concepts.

b) Scope: Topics in this course include foundations, assessment, policy development, education and outreach, disease mitigation, emerging health issues, feed/food safety professional’s role in public health.

Committee Review: The course covers 7 units: Foundations, Assessment, Policy Development, Education and Outreach, Disease Mitigation, Emerging Health Issues and the Regulator’s Role in Public Health. I reviewed FDA36 and B23 side-by-side to compare the content between the courses. I recommend B23 as a replacement for FDA36; it covers the much of the same material but is designed to be more relevant to a regulator working in food safety.

The course provides good examples to explain each of the principles. Rather than recount the history of John Snow versus cholera (FDA36), B23 cites more contemporary examples, including “mad cow disease” in Great Britain and E. coli O157:H7 at Jack in the Box in 1993. These examples are used to describe subsequent changes in public policy.

The course required about 75 minutes to complete. It follows the same format as B22, with text, illustrations and photos on most slides. The 10-question assessment at the end includes questions binary questions similar to those found in B22.

Committee Recommendation: Replace FDA36, “Public Health Principles” in “pre” courses.

B24 Recalls (CC8041W)

FDA Pathlore Course Description: Introductory knowledge, skills, and abilities related to the process of removing a product from commerce.

a) Goal: The student will be able to describe the recall process in regulatory programs.

b) Scope: Topics covered in this course include foundations, risk assessment, documentation, communications, recall process, product disposition.

Committee Review: The course has 6 units: Foundations, Risk Assessment, Documentation, Communications, Recall Process and Product disposition. Units 1 and 2 each include a subtitled video, which is a nice addition and a nod to accessibility. Useful distinctions, like the difference between recalls and market withdrawals, and adulteration versus misbranding, are explained throughout the course. The information is relevant for state regulatory agencies that monitor recalls and notify local jurisdictions, and for those agencies that assist in verifying that a product is being removed. However, local jurisdictions are not always involved in recalls (and the course helpfully points out that local health departments don’t typically have the authority to initiate a
recall). As a newer state regulator, I felt the content was useful in many instances, and was my first exposure to some of the information.

I am tentatively recommending that B24 be added, unless we are finding that too many courses are being added and not enough are being removed or replaced. I am concerned about adding an unnecessary burden to inspectors by including this in the Standard 2 curriculum if it does not pertain to their normal duties. It required about 70 minutes to complete.

Committee Recommendation: Add to the “post” curriculum courses.

B25 Sampling (CC8035W)
FDA Pathlore Course Description:
Introductory knowledge, skills, and abilities related to feed and food sample collection, and the role of the laboratory.

a) Goal: The student will be able to employ sampling protocols when collecting samples.
b) Scope: Topics covered in this course include foundations, sampling methodology, procedures, laboratory.

Committee Review: B25 has just 4 units: Foundations, Sampling Methodology, Procedures and Laboratory. It defines integrity and validity in regard to sampling, describing the rationale in collecting and documenting samples that are legally and scientifically defensible. Aseptic sampling and chain of custody is explained. The course references the FDA Inspections Operations Manual as a resource for determining how much of a sample is required to be representative. (Maybe include a link that to that manual?)

Unit 3 includes a three-minute video with subtitles to demonstrate how to collect aseptic samples. The shots throughout the video are framed well and allow the viewer to clearly see each step as it is demonstrated. FI04, Foodborne Illness Investigations 4: Conducting a Food Hazard Review, covers the some of this sampling content but is more focused on preparing (logistics and interviewing) for the site visit. B25 is more analogous to MIC13. It took approximately 60 minutes to complete.

Committee Recommendation: Replace MIC13, Aseptic Sampling, in the pre-requisite curriculum.

B26 Sanitation Practices (CC8032W)
FDA Pathlore Course Description:
Introductory knowledge, skills, and abilities related to cleaning, sanitizing, and disinfecting, and the importance of facility and equipment sanitary design.

(a) Goal: Describe the importance of sanitary design and practices.
(b) Scope: This course will consist of introductory knowledge, skills and abilities related to cleaning, sanitizing and disinfecting as well as the importance of facility and equipment sanitary design. Topics include foundations of sanitation, cleaning, sanitizing, disinfecting, sanitary engineering, and educational resources.

Committee Review: The course consists of 6 units: Foundations, Cleaning, Sanitizing, Disinfecting, Sanitary Engineering and Sources/Routes of Contamination. It addresses construction materials, contact and non-contact surfaces, the distinction between cleaning and sanitizing, proper layout and so on. The material addresses the limitations and thresholds for different methods of sanitization (chemical, thermal, radiation). It also identifies barriers to
effective cleaning and sanitization. The course took about 75 minutes to complete, but it might be more like 90 minutes for someone new to the material.

Committee Recommendation: Replacing MIC15, Cleaning & Sanitizing, in the Standard 2 Pre-requisite curriculum; it’s a significant upgrade across the board. Also, this course covers a lot of the fundamentals for FD207 Plan Review and may be a suitable pre-requisite for that course.

B27 Traceability (CC8042W)
FDA Pathlore Course Description:
Introductory knowledge, skills, and abilities related to tracking feed and food throughout the supply chain.

a) Goal: The student will be able to describe the role of traceability in feed and food programs.

b) Scope: Topics covered in this course include foundations, preliminary review, supply chain, documentation, communication, technology.

Committee Review: This course has 6 units: Foundations, Preliminary Review, Supply Chain, Documentation, Communication and Technology. It 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. (Or a traceforward…) It has some overlap with the Foodborne Illness Investigations series. But, it is distinct and focused enough that it would not replace any of them. It seems most relevant to epidemiologists; most of the local jurisdictions I work with have epidemiological staff and perhaps one inspector that is crossed-trained on epi.

Unit 3:
Supply Chain has a 2-minute video, subtitled, that describes a traceability study, followed by a traceback diagram. The diagram might be better served as a larger image (expandable or clicking to enlarge), as it is difficult to see at the current resolution. Some images have the option of clicking a line of text to read a description of the image.

Like B24 (Recalls), this course has useful information for all regulators, but I am unsure as to how necessary it would be for regulators that work on teams with trained epidemiologists. It took about 75 minutes to complete.

Committee Recommendation: Add to “post” curriculum.

B28 Transportation (CC8036W)
FDA Pathlore Course Description:
Introductory knowledge, skills, and abilities related to preventing contamination of feed and food during transport.

a) Goal: The student will be able to describe how transportation affects feed and food safety.

b) Scope: Topics in this course include foundations, transportation methods, inspections, security, product safety.

Committee Review: The course contains 5 units: Foundations, Transportation Methods, Inspections, Security and Product safety. It required about 90 minutes to complete.
The first section includes a 4-minute video (subtitled) on the importance of transportation. Unit 2 includes a 2-minute video on a *Salmonella enteritidis* outbreak that sounds like it is referencing the Schwan’s incident investigated in Minnesota. The video and header indicate the outbreak happened in 1984, but the well-known outbreak occurred in 1994. A minor detail; is this an error? Also found a typo in Unit: Product Safety on the Air Distribution Exchange slide in the heading.

The Security unit has useful information on chain of custody. The content is well-written and includes examples from relevant outbreaks. It appears to be more pertinent to manufactured foods and agriculture, rather than retail foods. Much of the content (pest control, HACCP, temperature control) that would be applicable to retail food inspections is covered in other courses.

*Committee Recommendation:* Add to “post” curriculum.
### Performance Element

<table>
<thead>
<tr>
<th>#</th>
<th>Performance Element</th>
<th>CFP Training Manual</th>
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<tbody>
<tr>
<td>1</td>
<td>Has required equipment and forms to conduct the inspection.</td>
<td>Pre-inspection</td>
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<td>2</td>
<td>Reviews the contents of the establishment file, including the previous inspection</td>
<td>Pre-inspection</td>
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<td></td>
<td>report, reported complaints on file, and, if applicable, required HACCP Plans or</td>
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<td>documents supporting the issuance of a variance.</td>
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<td>3</td>
<td>Verifies that the establishment is in the proper risk category and that the</td>
<td>Needs to be added under Pre-inspection #2 (review current risk category) and Inspection observations and performance #3 (verifies risk category is correct based on inspection observations)</td>
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<td>required inspection frequency is being met. Informs the supervisor when the</td>
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<td>establishment is not in the proper risk category or when the required frequency is</td>
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<td>not met.</td>
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<td>4</td>
<td>Provides identification as a regulatory official to the person in charge and states</td>
<td>Inspection observations and performance</td>
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<td>the purpose of the visit.</td>
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<td>5</td>
<td>Interprets and applies the jurisdiction’s laws, rules, policies, procedures, and</td>
<td>Inspection observations and performance</td>
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<td>regulations required for conducting retail food establishment inspections.</td>
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<td>6</td>
<td>Uses a risk-based inspection methodology to conduct the inspection.</td>
<td>Inspection observations and performance</td>
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<td>7</td>
<td>Accurately determines the compliance status of each risk factor and Food Code</td>
<td>Joint inspections during training process/ Section II Inspection Observations and Performance &amp; Section III Inspection Observations and Performance</td>
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<td>intervention (i.e., IN compliance, OUT of compliance, Not Observed, or Not</td>
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<td></td>
<td>Applicable).</td>
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<td>8</td>
<td>Obtains corrective action for out-of-compliance risk factors and Food Code</td>
<td>Inspection observations and performance</td>
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<td>interventions in accordance with the jurisdiction’s policies.</td>
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<td>9</td>
<td>Discuss options for the long-term control of risk factors with establishment</td>
<td>Section II Inspection Observations and Performance, #6 addresses violations on</td>
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<td></td>
<td>managers, when the same out-of-control risk factor occurs on consecutive inspections,</td>
<td>previous inspection being corrected, what if they were not</td>
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<td>in accordance with the jurisdiction’s policies. Options may include, but are not</td>
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<td>limited to; risk control plans, standard operating procedures, equipment and/or</td>
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<td>facility modification, menu modification, buyer specifications, remedial training,</td>
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<td>or HACCP plans.</td>
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<td>corrected and long-term control is needed? Needs to be added to Inspection Observations and Performance, #6</td>
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<td>10.</td>
<td>Verifies correction of out-of-compliance observations identified during the previous inspection.</td>
<td>Inspection observations and performance</td>
</tr>
<tr>
<td>11.</td>
<td>Conducts an exit interview that explains the out-of-compliance observations, corrective actions, and timeframes for correction, in accordance with the jurisdiction’s policies.</td>
<td>Oral communication</td>
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<td>12.</td>
<td>Provides the inspection report and, when necessary, cross-referenced documents, to the person in charge or permit holder, in accordance with the jurisdiction’s policies.</td>
<td>Written communication</td>
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<td>13.</td>
<td>Demonstrates proper sanitary practices as expected from a food service employee.</td>
<td>Professionalism</td>
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<td>14.</td>
<td>Completes the inspection form per the jurisdiction’s policies (i.e. observations, public health reasons, applicable code reference, compliance dates).</td>
<td>Written communication</td>
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<td>15.</td>
<td>Documents the compliance status of each risk factor and intervention (IN, OUT, NA, NO).</td>
<td>Implied in written communication?</td>
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<td>16.</td>
<td>Cites the proper code provisions for risk factors and Food code interventions, in accordance with the jurisdiction’s policies.</td>
<td>Written communication</td>
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<td>17.</td>
<td>Documents corrective action for out-of-compliance risk factors and Food code interventions in accordance with the jurisdiction’s policies.</td>
<td>Written communication</td>
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<tr>
<td>18.</td>
<td>Documents that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections. Options may include, but are not limited to, risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP Plans.</td>
<td>Section IV. Written Communication, 1. Completes inspection form per jurisdiction’s administrative procedures Needs to be added</td>
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<tr>
<td>19.</td>
<td>Compliance or regulatory documents (i.e. exhibits, attachments, sample forms) are accurately completed, appropriately cross-referenced within the inspection report, and included with the inspection report, in accordance with the jurisdiction’s policies.</td>
<td>Written communication</td>
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<td>20.</td>
<td>Files reports and other documentation in a timely manner, in accordance with the jurisdiction’s policies.</td>
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<td>Transportation</td>
<td>Food Safety</td>
<td>Produce</td>
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</tbody>
</table>
B2 Allergens

**Definition:** An overview of food allergens, including labeling requirements, preventive controls, and societal impact.

**Topic Area TLO:** Discuss the control of allergens in relation to food safety.

**Topic Area ELOs:**
- Explain the risks of allergen exposure.
- Identify major food allergens.
- Describe potential routes of allergen cross-contact.
- Use agency resources to evaluate allergen controls.
- Explain allergen labeling requirements.

<table>
<thead>
<tr>
<th>Unit 1: Foundations</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition:</strong> Food allergens related to food programs.</td>
<td>The regulator has a knowledge or awareness of the existence of allergens.</td>
</tr>
<tr>
<td><strong>TLO:</strong> Discuss foundational information related to major food allergens.</td>
<td>The regulator can define what an allergen is.</td>
</tr>
<tr>
<td><strong>ELOs:</strong></td>
<td>The regulator has a knowledge or awareness of regulations tied to allergens.</td>
</tr>
<tr>
<td>- Define relevant terminology.</td>
<td>The regulator has a knowledge or awareness that allergens have the potential to cause a health hazard.</td>
</tr>
<tr>
<td>- Differentiate food allergy from food intolerance.</td>
<td>The regulator can give examples of some of the major allergens:</td>
</tr>
<tr>
<td>- Discuss the prevalence of food allergy in the United States.</td>
<td>a. List the major food allergens</td>
</tr>
<tr>
<td>- Identify major food allergens as recognized by FDA and USDA.</td>
<td>b. 8 common allergens</td>
</tr>
<tr>
<td>- Give examples of foods deemed major allergens in non-U.S. countries.</td>
<td>a. Name the regulation</td>
</tr>
<tr>
<td>- Discuss the public health significance of food allergens.</td>
<td>b. Undeclared allergens</td>
</tr>
<tr>
<td>- Describe the symptoms of an allergic reaction.</td>
<td>▪ Recalls</td>
</tr>
<tr>
<td>- Describe the treatment of an allergic reaction.</td>
<td>c. Animal feed is exempt</td>
</tr>
<tr>
<td></td>
<td>d. Labeling requirements</td>
</tr>
<tr>
<td></td>
<td>The regulator can discuss the importance of regulating allergens.</td>
</tr>
<tr>
<td></td>
<td>The regulator has a knowledge or awareness of routes of exposure for allergens:</td>
</tr>
<tr>
<td></td>
<td>a. Hygiene hypothesis</td>
</tr>
</tbody>
</table>
• Discuss allergens in relation to recalls.

<table>
<thead>
<tr>
<th>Unit 2: Labeling Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition</strong>: Food labeling requirements pertaining to major food allergens.</td>
</tr>
<tr>
<td><strong>TLO</strong>: Discuss allergen labeling requirements.</td>
</tr>
<tr>
<td><strong>ELOs</strong>:</td>
</tr>
<tr>
<td>• Discuss the purpose of the Food Allergen Labeling and Consumer Protection Act (FALCPA).</td>
</tr>
<tr>
<td>• Give examples of allergen labeling options under FALCPA.</td>
</tr>
<tr>
<td>• Give examples of scientific terms vs. plain language.</td>
</tr>
<tr>
<td>• Give examples of allergen labeling for tree nuts, fish, and crustacean shellfish.</td>
</tr>
<tr>
<td>• Discuss the placement of allergen provisions on food labels.</td>
</tr>
<tr>
<td>• Discuss the use of allergen advisory (“may contain”) statements.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The regulator has knowledge or awareness that allergens must be declared on the label.</td>
</tr>
<tr>
<td>• The regulator has a knowledge or awareness of which allergens must be declared on the label:</td>
</tr>
<tr>
<td>a. Big 8 (USA)</td>
</tr>
<tr>
<td>• The regulator has a knowledge or awareness of different allergen labeling options.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit 3: FSMA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition</strong>: The provisions of FSMA specifically related to major allergens.</td>
</tr>
<tr>
<td><strong>TLO</strong>: Discuss the allergen provisions of the Food Safety Modernization Act (FSMA).</td>
</tr>
<tr>
<td><strong>ELOs</strong>:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The regulator has a knowledge or awareness that because of FSMA, allergens are considered health hazards.</td>
</tr>
</tbody>
</table>
- Discuss “adulterant” in relation to allergens under FSMA.
- Discuss “hazard” in relation to allergens under FSMA.
- Define “food allergen cross-contact”.

**Unit 4: Control Measures**

**Definition:** Measures by industry to prevent allergen cross-contamination.

**TLO:** Discuss control measures to prevent allergen cross-contact.

**ELOs:**
- Define “allergen threshold”.
- Define “dedicated” in relation to allergen cross-contact.
- Discuss cleaning methods to remove allergen residues.
- Discuss the role of product changeover in relation to allergen cross-contact.
- Discuss the scheduling of processing runs in relation to allergen cross-contact.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator has a knowledge or awareness of various control measures.
- The regulator has a knowledge or awareness of control measures utilized to prevent cross-contact.
- The regulator can name several control measures:
  a. Cleaning
  b. Sanitizing
  c. Physical separation
  d. Dedicated equipment
  e. Labeling
  f. Colored coding
  g. Dedicated facility
  h. Gloves
  i. Air flow controls
  j. Training
- The regulator can explain how control measures prevent cross-contact.
- The regulator can recognize when control measures are not properly implemented.
B17 Laws, Regulations, Policies, & Procedures

**Definition:** Introductory knowledge, skills, and abilities related to the system of federal, state, and local laws that provide the authority to regulate feed and food, and associated policies and procedures.

**Topic Area TLO:** Employ legal authorities when conducting regulatory activities.

**Topic Area ELOs:**
- Discuss legal authorities.
- Differentiate among law, regulations, and ordinances.
- Explain legal authorities to conduct activities.
- Describe administrative protocols.
- Apply authorities to determine compliance.

---

**Unit 1: Foundations**

**Definition:** Base knowledge of laws, regulations, policies and procedures related to feed and food programs.

**TLO:** Differentiate between laws, regulations, policies, and procedures applicable to regulatory activities.

**ELOs:**
- Define relevant terminology.
- Explain the significance of key laws.
- Describe the relationship between laws and regulations.
- Describe how administrative protocols support laws and regulations.
- Describe how model codes can be adopted.

---

**Unit 2: Constitution**

**Definition:** The system of laws, regulations, policies, and procedures related to feed and food programs.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can define key terms:
  - Authority versus agency requirements (example: Congress gives FDA authority in FD&C Act, FDA promulgates regulations to carry out the law)
  - Have awareness of the difference between a law and regulation
- The regulator can describe the relationship of policies and procedures to laws and regulations.
  - Support of regulatory activities (example: relationship of sampling to the law, regulation, policy and procedure)
- Identify regulatory actions your agency may take for non-compliant firms
**TLO**: Describe how constitutional law grants and limits authorities.

**ELOs:**
- Describe how the federal constitution grants and limits agency powers.
- Describe how state constitutions grant and limit agency powers.
- Explain the difference between State and Federal rights and limits.
- Explain due process.
- Explain individual rights guaranteed by the constitution.
- Describe the separation of powers between the executive, legislative, and judicial branches of government.

---

**Unit 3: Law**

**Definition:** The foundational knowledge of the process by which laws are created and how authority is delegated.

**TLO:** Discuss how laws determine regulatory authority.

**ELOs:**
- Describe legislative processes.
- Explain how local

---

**TLO Behavioral Anchors - not all-inclusive**

- The regulator has a basic knowledge or awareness of the constitution:
  - Define Constitutional law
  - Constitution establishes fundamental principles of all laws
  - 3 branches of the federal government
  - Commerce clause (interstate commerce)
    - Grants authority and accountability
- The regulator has a knowledge or awareness of rights of the individual protected under the Constitution:
  - Interpretation of rights example: FD&C Act requires payment for some samples because of the Constitution, other agencies may not
  - Food Law and regulations may require owner giving up rights
  - Seizures, embargoes, stop sales, inspections
- The regulator has a knowledge or awareness of the Federal constitution versus state constitution.
- The regulator has a knowledge or awareness of the delegation of authority.
<table>
<thead>
<tr>
<th><strong>Unit 4: Regulation</strong></th>
<th><strong>TLO Behavioral Anchors - not all-inclusive</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition:</strong> An administrative act or rule, based on law, prescribed by agency authority.</td>
<td>The regulator can explain the relationship between a law and regulation:</td>
</tr>
<tr>
<td><strong>TLO:</strong> Explain how regulations assist agencies to implement laws.</td>
<td>a. What is the difference between a regulation and a law</td>
</tr>
<tr>
<td><strong>ELOs:</strong></td>
<td>b. Regulations provide information about the implementation of laws</td>
</tr>
<tr>
<td>- Identify pertinent regulations that are applicable to regulatory programs.</td>
<td>c. Laws prevail over regulations</td>
</tr>
<tr>
<td>- Explain the general process by which regulations are developed.</td>
<td>d. Regulations are based on the law</td>
</tr>
<tr>
<td>- Describe the FDA cooperative program model regulations.</td>
<td>The regulator has a knowledge or awareness that your agency implements regulations.</td>
</tr>
<tr>
<td>- Describe how regulations are published.</td>
<td>The regulator can list regulations your agency implements.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Unit 5: Policy</strong></th>
<th><strong>TLO Behavioral Anchors - not all-inclusive</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition:</strong> Set of principles formulated or adopted by an agency to influence and determine actions.</td>
<td>The regulator can define a policy.</td>
</tr>
<tr>
<td><strong>TLO:</strong> Describe the purpose of</td>
<td>The regulator can give examples of policies.</td>
</tr>
<tr>
<td></td>
<td>The regulator can provide the basis for consistent implementation or application of the law.</td>
</tr>
<tr>
<td></td>
<td>The regulator can outline legal requirements in plain</td>
</tr>
</tbody>
</table>
**Unit 6: Procedures**

**Definition:** Providing a standard method for conducting activities.

**TLO:** Explain the purpose of procedures used in federal, state, and local regulatory programs.

**ELOs:**
- Describe the process of procedure development.
- Describe the process of procedure implementation.
- Explain the importance of following procedures.
- Explain how procedures are used to obtain compliance.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can define a procedure:
  - a. Series of steps to be followed
  - b. Provides the instruction and/or paperwork to carry out an activity
  - c. Describe how policies will be put into action
  - d. Determines who will do what
  - e. Step by step instructions/guidance
  - f. More detailed than policy
  - g. Identify specific forms or documents
- The regulator can give examples of procedures used in their agency.
- The regulator can describe how procedures benefit the agency:
  - a. Improve time efficiency
  - b. Improves sharing of information
  - c. Efficient use of resources
- Give examples of when to use applicable procedures.

### Unit 7: Guidance

<table>
<thead>
<tr>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>- The regulator can define what is a guidance document is:</td>
</tr>
<tr>
<td>a. Interpretation of regulation</td>
</tr>
<tr>
<td>b. Recommendations, not law or legally binding</td>
</tr>
<tr>
<td>c. Recommendations or instructions on how to meet agency expectations</td>
</tr>
<tr>
<td>d. Guidelines to assist in carrying out regulatory requirements</td>
</tr>
<tr>
<td>e. Regulatory authorities current thinking on a subject or method</td>
</tr>
<tr>
<td>f. Not mandatory</td>
</tr>
<tr>
<td>g. Can be used by industry and regulators</td>
</tr>
<tr>
<td>- The regulator can give an example of guidance documents.</td>
</tr>
<tr>
<td>- The regulator can recognize how their agency uses guidance documents.</td>
</tr>
<tr>
<td>- The regulator can describe the relationship of a guidance document to a regulation.</td>
</tr>
<tr>
<td>- The regulator can describe what guidance documents accomplish:</td>
</tr>
<tr>
<td>a. Support a consistent application of laws, regulations, policies and procedures</td>
</tr>
<tr>
<td>b. Provide additional clarity for vague or gray areas within the regulations</td>
</tr>
<tr>
<td>c. Provides historical and scientific background to regulation and policy</td>
</tr>
<tr>
<td>d. Standardize response to a defined situation</td>
</tr>
<tr>
<td>e. Explain a complex subject or procedure</td>
</tr>
<tr>
<td>f. Clarify laws, regulations, policy and procedures, etc.</td>
</tr>
<tr>
<td>g. Guidance documents often point to additional resources</td>
</tr>
<tr>
<td>h. Help implement best practices</td>
</tr>
<tr>
<td>i. Additional information to support and/or complete an activity</td>
</tr>
<tr>
<td>j. Provide information that can be used to attain and remain in compliance</td>
</tr>
</tbody>
</table>
**Definition:** Introductory knowledge, skills, and abilities related to how regulatory agencies promote health and prevent and control feed- and food-related illness.

**Topic Area TLO (Terminal Learning Objective):** Discuss basic public health concepts.

**Topic Area ELOs (Enabling Learning Objective):**
- Explain public health principles.
- Discuss how public health principles are applied to the food system to protect consumers.
- Explain the relationships among agent, host, and environment with respect to hazards in food.
- Explain the agency’s role to protect consumers.
- Apply public health principles while conducting regulatory activities.

### Unit 1: Foundations

<table>
<thead>
<tr>
<th>Definition: Base knowledge of public health principles and successes related to feed and food programs.</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
</table>
| **TLO:** Discuss public health principles and successes. | - The regulator can describe the goal of public health:  
  a. Promote population health  
- The regulator can give an example of public health programs.  
- The regulator can list the three components of public health:  
  a. Assessment  
  b. Policy development  
  c. Assurance  
- The regulator can describe a public health success. |
| **ELOs:** | - Define relevant terminology.  
- Locate resources.  
- State the goal of public health.  
- Describe the three components of public health.  
- Explain what actions public health professionals take to promote public health.  
- Provide examples of public health  
- Provide examples of public health. |
### Unit 2: Assessment

**Definition:** The evaluation of data to determine the impact from exposure to disease and the effects on public health.

**TLO:** Describe the best practices for public health assessments.

**ELOs:**
- Explain the importance of assessment.
- Explain the role of epidemiology.
- Explain the role of risk factors.
- Discuss the purpose of data collection and analysis.
- Explain the public health implications of a disease.
- Differentiate active and passive surveillance.

---

### TLO Behavioral Anchors - not all-inclusive

- The regulator can discuss the role of epidemiology.
- The regulator can explain the importance of data collection.
- The regulator can discuss the importance of assessment.
- The regulator can describe active surveillance.
- The regulator can describe passive surveillance.

---

### Unit 3: Policy Development

**Definition:** A basic knowledge of policy development.

**TLO:** Describe policy development and implementation.

**ELOs:**
- The regulator can describe how incidents influence public health policy.
- The regulator can discuss how political forces affect public health policy.
- The regulator can give an example of public health policy implementation.
### IFSS Framework – Basic Level Gen Eds

**B23 Public Health Principles**

- Explain how incidents drive policy.
- Explain how research influences policy.
- Explain how stakeholders influence policy.
- Explain how the political process influences policy.
- Explain how policy is implemented.
- Give an example of the implementation of a public health policy.

### Unit 4: Education and Outreach

**Definition:** A description of how the public health professional can be proactive to educate and protect the community.

**TLO:** Describe the use of education and outreach in public health.

**ELOs:**
- Explain the importance of education and outreach.
- Give examples of health communication methods.
- Identify relevant public health issues for outreach.
- Describe populations that would benefit from education and outreach.
- Explain outreach methods for intended

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can describe the importance of education and outreach in public health.
- The regulator can give an example of a public health communication method.
## Unit 5: Disease Mitigation

**Definition:** Basic knowledge of disease mitigation.

**TLO:** Describe approaches to prevent, reduce, or control disease.

**ELOs:**
- Discuss the importance of disease mitigation.
- Discuss disease prevention strategies.
- Explain modes of disease transmission.
- List risk factors that increase susceptibility to disease in populations.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can discuss methods to prevent or control disease.
- The regulator can describe a disease control strategy.
- The regulator can list two means of disease transmission.

## Unit 6: Emerging Health Issues

**Definition:** How emerging health issues can influence public health.

**TLO:** Identify how emerging health issues affect public health.

**ELOs:**
- Describe the concept of emerging health issues.
- Provide an example of how an emerging health issue impacts regulation.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can give an example of an emerging health issue.
- The regulator can describe how an emerging health issue impacts regulation.
### IFSS Framework – Basic Level Gen Eds
#### B23 Public Health Principles

<table>
<thead>
<tr>
<th>health issue has impacted public health policy and regulation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Provide examples of currently emerging health issues.</td>
</tr>
</tbody>
</table>

#### Unit 7: Feed/Food Safety Professional’s Role in Public Health

**Definition:** Basic knowledge of how food regulatory agencies promote public health.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can describe the regulator’s role in promoting public health.
- The regulator can provide an example of how a food safety regulator promotes public health.

**TLO:** Describe the role of the food safety professional in public health.

**ELOs:**

- Describe the contribution of feed/food safety activities to public health.
- Discuss how feed/food safety is influenced by public health.
- Describe the role of feed/food safety professionals in mitigation of public health threats.
- Describe the role of feed/food safety professionals in promoting public health.
- Give an example of how a feed/food safety professional promotes public health.
**Definition:** Introductory knowledge, skills, and abilities related to feed and food sample collection, and the role of the laboratory.

**Topic Area TLO (Terminal Learning Objective):** Employ sampling protocols when collecting samples.

**Topic Area ELOs (Enabling Learning Objectives):**
- Discuss sampling techniques.
- Explain sampling protocols.
- Determine if sample collection is necessary.
- Employ authority to collect samples.
- Apply sampling procedures.

### Unit 1: Foundations

**Definition:** Basic knowledge of sampling related to feed and food programs.

**TLO:** Collect a sample with documentation.

**ELOs:**
- Define sampling terminology.
- Discuss sample collection methods.
- Explain why samples are collected.
- Record required information pertaining to a sample.
- Describe the different types of samples.

### Unit 2: Sampling Methodology

**Definition:** Knowledge needed to collect a sample.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can describe the agency’s policies for sample collection:
  - Chain of custody
  - Documentation
  - Sampling techniques
- The regulator can describe the importance of correct documentation.
- The regulator can independently demonstrate correct sample documentation.
- The regulator can explain the importance of correct documentation:
  - Identification
  - Chain of custody
  - Proper documentation of seal
  - Sample technique documentation
  - Shipping documentation
  - Time
  - Temperature
  - Volume
- The regulator can describe considerations for sampling:
  - Expiration
  - Time restraints
  - Staffing/team
TLO: Discuss the factors to consider when collecting a sample.

**ELOs:**
- Determine equipment to use when collecting samples.
- Explain time related factors when collecting a sample.
- Give examples of key factors used to determine what makes a sample.
- Explain the difference between random and selective sampling.

**Unit 3: Procedures**

**Definition:** A series of steps used to collect a sample.

**TLO:** Explain the procedures utilized when collecting a sample.

**ELOs:**
- Apply official procedures when collecting samples.
- Record information on proper forms.
- Describe chain of custody.
- Give examples of procedures to follow when collecting a sample.

---

**B25 Sampling**

- Method of sampling
  - Representation of the lot
- Equipment
- Sample type
  - Finished product
  - Environmental samples
  - Ingredients
  - Surveillance vs for cause
- Safety
- Enclosed areas
- Aware of your sampling environment
- The regulator can explain the ramifications if sampling factors are not considered:
  - Product contamination
  - Cross contamination
  - Cross contact
  - Enforcement action fails

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can provide information to aid in decision making:
  - To determine the scope of the recall
  - To support the risk assessment
- The regulator can conduct recall audit checks:
  - Verify unsafe products are off the market.
- The regulator can discuss the role of documentation in validation, tracking, and organization:
  - Defensibility
  - Evidence to support a recall
- The regulator can discuss procedures when collecting a sample.
- The regulator can describe agency sampling policy.
- The regulator can discuss personal safety in sampling.
- The regulator can demonstrate sampling procedures.
- The regulator can describe methods related to specific sample types.
- The regulator can demonstrate safe sampling techniques.
### B25 Sampling IFPTI Course Profile

#### IFSS Framework – Basic Level Gen Eds

**B25 Sampling**

- Recognize the importance of expiration dates.
- Discuss issues associated with transport of samples.
- Describe the difference between an aseptic sample and a non-aseptic sample.

---

**Unit 4: Laboratory**

**Definition:** Basic knowledge of laboratory functions pertaining to samples.

**TLO:** Discuss the role of the laboratory in feed/food safety.

**ELOs:**
- Explain the importance of the laboratory.
- Describe lab receiving processes for samples collected.
- Explain the lab results to the stakeholders.
- Recognize the analytical capabilities of laboratories.

---

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can identify the laboratory’s function in feed/food safety:
  - Receive
  - Analyze
  - Report results
  - Interpret results
- The regulator can describe how laboratories use quality control to produce defensible results.
- The regulator can discuss agency policy related to communication with the laboratory.
Definition: Introductory knowledge, skills, and abilities related to cleaning, sanitizing, and disinfecting, and the importance of facility and equipment sanitary design.

Topic Area TLO (Terminal Learning Objective): Describe the importance of sanitary design and practices.

Topic Area ELOs (Enabling Learning Objective):
- Discuss the principles of sanitary design and practices.
- Identify the appropriate use of cleaners, sanitizers, and disinfectants.
- Describe the use of cleaners and sanitizers in specific situations.
- Explain regulatory agency policies in regard to sanitation, design, and employee practices.
- Explain the use of cleaning and sanitizing to control adulterants.

Unit 1: Foundations

<table>
<thead>
<tr>
<th>Definition: Sanitation practices and sanitary design of facilities and equipment.</th>
</tr>
</thead>
<tbody>
<tr>
<td>TLO: Discuss sanitation practices and sanitary design of facilities and equipment.</td>
</tr>
<tr>
<td>ELOs:</td>
</tr>
<tr>
<td>• Discuss sanitary design of facilities and equipment.</td>
</tr>
<tr>
<td>• Discuss the importance of GMPs, GRPs, and GAPs.</td>
</tr>
<tr>
<td>• Describe principles of sanitation.</td>
</tr>
<tr>
<td>• Describe the purpose of SSOPs.</td>
</tr>
<tr>
<td>• Describe the importance of employee sanitation training.</td>
</tr>
<tr>
<td>• Give examples of monitoring records.</td>
</tr>
<tr>
<td>• Discuss water chemistry.</td>
</tr>
</tbody>
</table>

TLO Behavioral Anchors - not all-inclusive

- The regulator can identify three facility sanitary design principles:
  - a. Exterior and upstream considerations
  - b. Piping
  - c. Facility plan review
  - d. Airflow
  - e. Clean ability
  - f. No niches/harborage areas
  - g. Facility design meets the needs of the food sector
  - h. Traffic patterns
  - i. Process flow considerations
  - j. Food contact surfaces made of food compatible materials (Food Code 4-101.11)
  - k. Vermin control
  - l. Water source and quality
- The regulator can identify an equipment sanitary design principle:
  - a. UL
  - b. Cleanable to a microbiological level
  - c. NSF International
  - d. Facility plan review
  - e. Cleanability
  - f. No niches/harborage areas
  - g. 3-A Sanitation Standards, Inc.
  - h. Self-draining
  - i. Accessible for inspection and maintenance
- The regulator can discuss a biological hazard related to sanitary design:
  - a. Minimize bacterial growth
<table>
<thead>
<tr>
<th>B26 Sanitation Practices</th>
</tr>
</thead>
<tbody>
<tr>
<td>b. Transportation as a hazard</td>
</tr>
<tr>
<td>c. Biohazards</td>
</tr>
<tr>
<td>d. Sanitation provides a five (5) log reduction</td>
</tr>
<tr>
<td>e. Validation of cleaning and sanitizing protocols</td>
</tr>
<tr>
<td>f. Environmental hazards</td>
</tr>
<tr>
<td>• The regulator can identify cleaning and sanitizing protocols:</td>
</tr>
<tr>
<td>a. Allergen control</td>
</tr>
<tr>
<td>b. Food safety plan</td>
</tr>
<tr>
<td>c. Sanitation Standards of Operation (SSOPs)</td>
</tr>
<tr>
<td>d. Employee training</td>
</tr>
<tr>
<td>e. Sanitary operational performance</td>
</tr>
<tr>
<td>f. Cleaning vs sanitizing</td>
</tr>
<tr>
<td>g. SOPs describe how sanitation is conducted</td>
</tr>
<tr>
<td>h. Management oversight</td>
</tr>
<tr>
<td>i. Current Good Manufacturing Practices (cGMP), current Good Retail Practices (cGRP), current Good Agriculture Practices (cGAP)</td>
</tr>
<tr>
<td>j. Cross-contamination prevention</td>
</tr>
<tr>
<td>k. Monitoring records</td>
</tr>
<tr>
<td>l. Biofilms</td>
</tr>
<tr>
<td>m. Types of sanitizers</td>
</tr>
<tr>
<td>n. Labels</td>
</tr>
<tr>
<td>o. Hot water</td>
</tr>
<tr>
<td>p. Follow label instructions</td>
</tr>
<tr>
<td>q. Heat</td>
</tr>
<tr>
<td>• The regulator can explain how clean ability impacts sanitization.</td>
</tr>
<tr>
<td>• The regulator can describe how sanitary design, adequate cleaning and sanitizing lead to hazard reduction.</td>
</tr>
</tbody>
</table>

**Unit 2: Cleaning**

**Definition:** The process of removing visible material such as soil, dirt, and organic matter from facilities and equipment.

**TLO Behavioral Anchors - not all-inclusive**

a. The regulator can describe two different types of cleaning:
   a. Cleaning vs sanitizing
   b. High pressure washing
   c. Dustless cleaning methods
### IFSS Framework – Basic Level Gen Eds

#### B26 Sanitation Practices

**TLO:** Discuss the process of removing visible material such as soil, dirt, and organic matter from facilities and equipment.

**ELOs:**
- Describe the factors that affect the efficacy of cleaning agents.
- Explain how water chemistry can affect cleaning agents.
- Discuss types of cleaning agents and their function on soil.
- Describe cleaning methods.
- Explain the importance of following the manufacturer’s directions for use.
- Explain the importance of breaking down equipment for cleaning.

---

#### Unit 3: Sanitizing

**Definition:** Reducing the presence of microorganisms.

**TLO:** Discuss the process of reducing the presence of microorganisms.

**ELOs:**
- Explain the importance of using approved food-grade sanitizers.
- Describe the factors that affect the efficacy of sanitizers.
- Describe the types of

---

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can discuss two concerns with cleaning supply usage:
  - Types of detergents/soaps
  - Contact time
  - Concentration strengths
  - Appropriate cleaning supplies
  - Matching cleaners with intended use
  - Follow label instructions
  - Cleaning solution labeling
  - Material Safety Data Sheets (MSD)
  - Cleaning frequencies
  - Proper storage of chemicals

- The regulator can provide two examples of appropriate cleaning methods.

- The regulator can discuss four concerns with cleaning supply usage.

---

- The regulator can list two considerations for microorganism control:
  - Prescribed treatment matches threat
  - Environmental hazards
  - Importance of cleaning before sanitizing
  - Pathogens of concern
  - Cross contamination (sanitizer residue, overspray, etc.)

- The regulator can describe the concept of how sanitizers work for microorganism control:
  - Types of sanitizers
  - Label instructions
  - Parts per million (PPM)
  - Sanitizer concentrations
  - Methods, chemical, and hot water
  - Contact time
  - Test strips
  - Temperature effects on efficacy
  - Drying
sanitizing agents.
- Discuss the purpose of sanitizers.
- Discuss sanitizers’ requirements for use.
- Describe sanitizing strategies.
- Identify sanitizer test methods.

<table>
<thead>
<tr>
<th>B26 Sanitation Practices</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The regulator can describe three considerations for microorganism control.</td>
</tr>
<tr>
<td>• The regulator can describe proper use of two sanitizers for microorganism control.</td>
</tr>
</tbody>
</table>

### Unit 4: Disinfecting

**Definition:** The use of specialized techniques to destroy or irreversibly inactivate pathogenic microorganisms but not necessarily their spores.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can identify a specialized technique for disinfection:
  a. Oxidation
  b. Ozone
  c. Ultra violet (UV)
  d. Time/temperature/concentration
  e. Potential of hydrogen (pH) control
  f. Irradiation
  g. Membrane technologies
  h. Onsite disinfection generation

- The regulator can distinguish between sanitizing and disinfecting.
- The regulator can discuss a specialized technique for disinfection.

**ELOs:**

- Explain the importance of using approved food-grade disinfectants.
- Describe the factors that affect the efficacy of disinfectants.
- Discuss the purpose of disinfectants.
- Discuss disinfectants’ requirements for use.
- Describe disinfecting strategies.
- Identify disinfectant test methods.
### Unit 5: Sanitary Engineering

**Definition:** The design and construction of facilities and equipment to reduce or prevent contamination and facilitate cleaning and sanitizing.

**TLO:** Discuss how facility and equipment design impacts sanitation.

**ELOs:**
- Discuss the concept of building envelope.
- Discuss the importance of proper equipment layout.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can discuss three equipment design considerations:
  - Appropriate materials
  - Smooth, non-absorbent, easily cleanable construction
  - UL or NSF International certified
  - Non-corrosive and durable
  - Self-draining
  - Biofilms
  - Non-toxic materials
  - No niches
  - Accessibility

- The regulator can describe three sanitary design principles:
  - Appropriate wastewater disposal
  - Biohazard areas
  - Allergen control
  - Employee movement
  - Refuse storage/removal
  - Loading dock design and maintenance
  - Clean rooms
  - Water source
  - Water quality
  - Upstream considerations
  - Emerging pathogens of concern on building design
  - Hygienic compatibility
  - Facility flow, incoming to finished product
  - Exterior considerations
  - Airflow systems
  - Condensation
  - Negative airflow vs positive
  - Pest control
  - Hygienic design of maintenance enclosures
  - Plumbing design and installation

- The regulator can discuss six equipment design considerations.
- The regulator can describe six sanitary design principles.

### Unit 6: Sources and Routes of Contamination

**Definition:** Hazards, practices, and facility/equipment design that may lead to contamination.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can list two improper activities that may lead to contamination:
  - Splash may transfer pathogens (droplet or airborne)
## TLO: Discuss hazards, practices, and facility/equipment design that may lead to contamination.

**ELOs:**
- Discuss potential hazards.
- Explain routes of contamination.
- Describe how people can be a source of contamination.
- Describe how cleaning practices can contribute to contamination.
- Explain the importance of vector control.
- Discuss the water source.

<table>
<thead>
<tr>
<th></th>
<th>B26 Sanitation Practices</th>
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<tbody>
<tr>
<td>b.</td>
<td>Cross contamination</td>
</tr>
<tr>
<td>c.</td>
<td>Allergen cross contact</td>
</tr>
<tr>
<td>d.</td>
<td>Improper cleaning, sanitizing, and disinfecting</td>
</tr>
<tr>
<td>e.</td>
<td>Employee hygiene</td>
</tr>
</tbody>
</table>

- The regulator can list facility/equipment design attributes that may lead to contamination:
  - Improper design of facilities and equipment
  - Improper maintenance of facilities and equipment
  - Hidden niches
  - Airborne contaminants
  - Vector control
  - Water management (standing water, drains)

- The regulator can identify three types of hazards:
  - Chemical, Physical, Microbial hazards

- The regulator can explain how improper activities lead to contamination.
- The regulator can explain how improper design of facility/equipment and maintenance may lead to contamination.
B8 Environmental Hazards

**Definition:** Introductory knowledge, skills, and abilities related to environmental hazards focusing on sources of contamination and associated control methods.

**Topic Area TLO:** Explain the properties of environmental hazards.

**Topic Area ELOs:**
- Discuss the characteristics of environmental hazards.
- Identify categories and examples of environmental hazards.
- Recognize impacts of environmental hazards on animal feed and human food.
- Differentiate among environmental hazards.
- Describe methods to control environmental hazards.

---

<table>
<thead>
<tr>
<th><strong>Unit 1: Foundations</strong></th>
<th><strong>TLO Behavioral Anchors - not all-inclusive</strong></th>
</tr>
</thead>
</table>
| **Definition:** Basic knowledge of environmental hazards related to feed and food products and processes. | - The regulator can define environmental hazards.  
- The regulator has a knowledge or awareness of the effect of environmental hazards:  
  a. Environmental hazards can cause injury, illness, or death in people and animals.  
- The regulator has a knowledge or awareness of the effects of environmental hazards in food and feed:  
  a. Short term and long term  
  b. Name types of injury or illness caused by environmental hazards  
- The regulator can explain the difference between environmental and biological hazards. |
| **TLO:** Describe the effect of environmental hazards in feed and food products and processes. | **ELOs:**  
- Define relevant terminology.  
- Describe where to find resources.  
- Give examples of feed and food products that may be affected by environmental hazards.  
- Give examples of how a milestone event impacted public policy.  
- Describe the consequences of contamination by environmental hazards.  
- Give examples of illness caused by |
### Unit 2: Environmental Hazards of Concerns

**Definition:** Basic knowledge of environmental hazards that can be a risk or threat.

**TLO:** Explain which environmental hazards can adulterate the feed and food supply.

**ELOs:**
- Identify the categories of environmental hazards.
- Give examples of each category of environmental hazard.
- Associate environmental hazards with products or processes.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can name the three categories of environmental hazards that can adulterate feed and food:
  - a. Physical
  - b. Chemical/toxin
    - ▪ Radiological
  - c. Biological
- The regulator can define adulteration.
- The regulator can give examples of each of the three categories of environmental hazards that can adulterate feed and food:
  - a. Physical - glass
  - b. Chemical/toxin – rat poison
  - c. Biological – salmonella, listeria
- The regulator has a knowledge or awareness that there may be allowable limits of various physical, chemical, and biological elements such as:
  - a. Physical – insect parts
  - b. Chemical/toxin – pesticides, aflatoxins
  - c. Biological – coliforms

### Unit 3: Sources and Pathways

**Definition:** Basic knowledge of the sources and pathways that environmental hazards can take in contaminating products and processes.

**TLO:** Explain how products and processes can become contaminated by environmental hazards.

**ELOs:**
- Discuss how environmental
<table>
<thead>
<tr>
<th>IFSS Framework – Basic Level Gen Eds</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Hazards contaminate products and processes.</th>
</tr>
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<tbody>
<tr>
<td><strong>• Differentiate between intentional and unintentional contamination.</strong></td>
</tr>
<tr>
<td><strong>• Describe vectors of contamination.</strong></td>
</tr>
<tr>
<td><strong>• Give examples of food contamination sources.</strong></td>
</tr>
<tr>
<td><strong>• Give examples of feed contamination sources.</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The regulator has a knowledge or awareness that there may be allowable limits of various physical, chemical, and biological elements such as:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>a. Physical – insect parts</strong></td>
</tr>
<tr>
<td><strong>b. Chemical/toxin – pesticides, aflatoxins</strong></td>
</tr>
<tr>
<td><strong>c. Biological - coliforms</strong></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit 4: Control Factors</th>
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</table>

**Definition:** Basic knowledge of methods to control environmental hazards.

**TLO:** Discuss methods used to control environmental hazards.

**ELOs:**

<table>
<thead>
<tr>
<th>Explain the concept of acceptable levels of exposure.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Describe best management practices that are used to prevent spread of environmental hazards.</td>
</tr>
<tr>
<td>Give examples of preventive controls.</td>
</tr>
<tr>
<td>Describe control point monitoring.</td>
</tr>
<tr>
<td>Explain why source is important as a control factor.</td>
</tr>
<tr>
<td>Discuss response options for contamination.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
</table>

| The regulator has a knowledge or awareness that methods exist to control environmental hazards. |
| The regulator can define the terms eliminate, prevent, and control for environmental hazards. |
| The regulator can identify methods that reduce, control, monitor, or eliminate environmental hazards: |
| **a. Proper cleaning and sanitation** |
| **b. Environmental monitoring programs** |
| **c. Sequencing or flushing** |
| **d. Time and temperature controls** |
| **e. Corrective actions** |
| **f. Process flow** |
| **g. Chemical control program** |
**B12 Integrated Food Safety System (IFSS)**

**Definition:** Introductory knowledge, skills, and abilities related to the concept of a national collaborative and cooperative network of federal, state, local, tribal, and territorial feed and food protection agencies working in concert to protect the U.S. feed and food supply.

**Topic Area TLO:** Describe how collaborative interrelationships of regulatory agencies promote and protect public health in a global environment.

**Topic Area ELOs:**
- Discuss the IFSS elements.
- Explain the IFSS.
- Distinguish regulatory roles in a global environment.
- Explain responsibilities and roles that contribute to the IFSS.
- Describe the global food supply system.

### Unit 1: Foundations

**Definition:** Basic knowledge of the IFSS concept, development, and sustainment.

**TLO:** Discuss the origins, mandates, and drivers of the IFSS.

**ELOs:**
- Define relevant terminology.
- Discuss the concept of IFSS.
- Discuss the development of the IFSS.
- Explain IFSS sustainability.
- Discuss the relationship between the IFSS and FSMA.
- Describe the IFSS role throughout the global food/feed supply.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator has a knowledge or awareness of the origin of the IFSS:
  - 50 state meetings
    - Food and Feed Associations
    - FSLTT
  - PFP
- The regulator has a knowledge or awareness of the IFSS mandate:
  - What is FSMA?
    - Briefly describe FSMA
- The regulator has a knowledge or awareness of the IFSS drivers:
  - Collaboration to protect public health
  - Uniformity
- The regulator can describe the timeline of IFSS development.
- The regulator can give examples of FSMA rules.
- The regulator has knowledge or awareness of the need to increase efficiency by leveraging resources across overlapping jurisdictions:
  - Stakeholders
  - Examples of collaboration
    - Cooperative agreements / grant, contracts, MOUs
      - Joint work planning
      - Rapid Response Team
- The regulator knows how the IFSS impacts public health.
Unit 2: Stakeholders

**IFSS Framework – Basic Level Gen Eds**

**Definition:** Government, non-government organizations, and industry with vested interest in the IFSS.

**TLO:** Describe the stakeholders within the IFSS.

**ELOs:**
- Identify the types of stakeholders.
- Describe how stakeholders influence public policy.
- Discuss roles for each type of stakeholder.
- Describe the relationship between the Partnership for Food Protection (PFP) and the IFSS.
- Identify the associations that comprise the Council of Association Presidents (CAP).
- Match feed/food trade associations within their primary target audience.
- Describe the role of feed/food safety alliances.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator has a knowledge or awareness IFSS stakeholders:
  a. Industry
     - Retail
     - Manufacturing
     - Unprocessed
     - Importers
  b. Government
     - FSLTT
     - Military
  c. Laboratories
  d. Representative groups
     - Alliances
     - Organizations
     - Associations

- The regulator has a knowledge or awareness of additional IFSS stakeholders:
  a. Consumers
     - Human Food
     - Animal Food

- The regulator can discuss examples and roles of Industry Associations:
  a. NRA
  b. GMA
  c. AFIA

- The regulator can discuss examples and roles of regulatory associations:
  a. AAFCO
  b. AFDO
  c. NEHA

- The regulator can discuss examples and roles of laboratory associations:
  a. APHL
  b. Private vs government labs

- The regulator can give examples of collaborative partnerships:
  a. NCIMS
  b. ISSC
  c. FSPCA
  d. PSA

- The regulator can give examples of international and domestic partnerships.
- The regulator can discuss examples and roles of laboratory and academia:
  a. Consulting
  b. Process authorities
### Unit 3: Mutual Reliance

**Definition:** Government agency agreements that support mutual reliance.

**TLO:** Discuss how agreements support mutual reliance.

**ELOs:**
- Discuss the use of funding vehicles to support mutual reliance programs.
- Discuss the relationship between formal agreements and the IFSS.
- Discuss the importance of third-party audit programs.
- Describe mutual reliance conducted under cooperative programs.

<table>
<thead>
<tr>
<th>c. Cooperative Extension Services</th>
<th>d. Develop emerging technology</th>
</tr>
</thead>
<tbody>
<tr>
<td>e. Research</td>
<td></td>
</tr>
</tbody>
</table>

- The regulator can describe your role as a stakeholder in the IFSS.
- The regulator can describe how you interact with other stakeholders in the IFSS.

### Unit 4: Program Standards

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can define mutual reliance:
  - a. Sharing of resources
  - b. Improved communication
  - c. Utilizing partner strengths

- The regulator can define agreements:
  - a. Contracts
  - b. Compliance agreements
  - c. Cooperative agreements
  - d. MOUs

- The regulator can explain why mutual reliance is important:
  - a. Efficiency
    - Increased impact
    - Increase work output
  - b. Improved trust
  - c. Share inspectional and lab results
    - Equivalent data
  - d. Interagency cooperation
  - e. Leveraging resources
    - Joint work planning
    - Joint inspections

- The regulator can describe how mutual reliance leads to comparability:
  - a. Training
  - b. Joint exercises
  - c. Uniform enforcement of consumer laws
  - d. Quality regulatory Systems
  - e. Program standards

- The regulator can give examples of different types of agreements:
  - a. Inter-agency
  - b. Industry and agency

- The regulator can discuss how mutual reliance agreements support the IFSS.

### Definition:
Government agency agreements that support mutual reliance.

**TLO:**
Discuss how agreements support mutual reliance.

**ELOs:**
- The regulator has a knowledge or awareness of how program standards affect efficiency and uniformity.
**IFSS Framework – Basic Level Gen Eds**

- The regulator has a knowledge or awareness of the importance of building a quality management system.
- The regulator has a knowledge or awareness of how the standards may help protect public health.
- The regulator has a knowledge or awareness of the focus on prevention.
- The regulator has a knowledge or awareness of whether your program is enrolled in program standards.
- The regulator can explain increased efficiency and uniformity:
  a. Building infrastructure
  b. Mutual reliance
  c. Consistency between agencies
  d. Collaboration
- The regulator can explain the importance of a quality management system:
  a. Continuous improvement
  b. Known standards
  c. Focus on prevention
  d. Legally defensible regulatory system
- The regulator can discuss the impact of standards on the protection of public health:
  a. Faster incident response time
  b. Risk based inspections
  c. Consumer and industry confidence
- The regulator can explain the focus on prevention:
  a. Benefits of risk-based inspections
  b. Importance of sampling
  c. Benefits of uniform program standards (UPS)
  d. Reduction in foodborne illness
# B15 Jurisdiction

**Definition:** Introductory knowledge, skills, and abilities related to various regulatory agencies and their authority over feed and food.

**Topic Area TLO:** Discuss which agencies have authority to conduct specific regulatory activities.

**Topic Area ELOs:**
- Discuss authority for regulatory activities.
- Describe the importance of collaboration with other agencies.
- Determine which agency has authority to conduct specific regulatory activities.
- Identify agency responsibilities related to program area.
- Explain the statutory authority for jurisdiction.

## Unit 1: Foundations

<table>
<thead>
<tr>
<th>Definition:</th>
<th>Base knowledge of jurisdiction authority related to feed and food programs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>TLO:</td>
<td>Describe jurisdictional authority related to feed and food programs.</td>
</tr>
<tr>
<td>ELOs:</td>
<td>Define relevant terminology.</td>
</tr>
<tr>
<td></td>
<td>Describe statutory authority for feed/food regulation.</td>
</tr>
<tr>
<td></td>
<td>Identify jurisdictional responsibilities for feed and food regulated products.</td>
</tr>
<tr>
<td></td>
<td>Discuss differences in federal, state, local, tribal, and territorial jurisdiction.</td>
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<td></td>
<td>Discuss dual-agency jurisdictions.</td>
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<td></td>
<td>Describe the relationships between agencies.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>- The regulator has a knowledge or awareness of their agency’s statutory authority:</td>
</tr>
<tr>
<td>a. Know what you regulate</td>
</tr>
<tr>
<td>b. Know what law your authority comes from</td>
</tr>
<tr>
<td>- The regulator has a knowledge or awareness of state, local, and federal laws and rules associated with the regulator’s feed and food program.</td>
</tr>
<tr>
<td>- The regulator can recognize the difference between a statute and a regulation</td>
</tr>
<tr>
<td>- The regulator can discuss the regulatory implications of overlapping authority.</td>
</tr>
<tr>
<td>- The regulator can differentiate between delegated and statutory authority.</td>
</tr>
<tr>
<td>- The regulator has a knowledge or awareness of when you don’t have authority:</td>
</tr>
<tr>
<td>a. Know where to refer what you don’t regulate</td>
</tr>
<tr>
<td>- Local</td>
</tr>
<tr>
<td>- State</td>
</tr>
<tr>
<td>- Federal</td>
</tr>
<tr>
<td>o Interstate commerce</td>
</tr>
<tr>
<td>- The regulator can list state, local, and federal laws and rules associated with the regulator’s feed and food program:</td>
</tr>
<tr>
<td>a. FD&amp;C Act</td>
</tr>
<tr>
<td>b. State laws and regulations</td>
</tr>
<tr>
<td>c. FSMA</td>
</tr>
<tr>
<td>d. Local ordinances</td>
</tr>
<tr>
<td>- The regulator can cite where the regulator’s authority comes from.</td>
</tr>
</tbody>
</table>
### Unit 2: Law

**Definition:** Base knowledge of the statutes, regulations and ordinances related to feed and food products.

**TLO:** Discuss the creation of laws related to feed and food products.

**ELOs:**
- Describe how laws are created.
- Differentiate between statutes, regulations, and ordinances.
- Describe the difference between interstate, intrastate and international commerce laws.
- Describe statutory authority within each regulatory agency.
- Describe the concept of due process.
- Give examples of statutory limits of regulations.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator has a knowledge or awareness of the origin of laws:
  - a. History of FDA creation in 1906
  - b. Reaction to emerging public health issues
  - c. Special interest
- The regulator has a knowledge or awareness of the development of legislation:
  - a. Different levels of government
  - b. Branches of government
  - c. Legislative process
- The regulator can discuss how science informs laws.
- The regulator can give examples of an emerging health issue that resulted in a regulation change.
- The regulator can discuss “adoption by reference”:
  - a. Food Code
  - b. PMO
  - c. CFRs

### Unit 3: Crossing Boundaries

**Definition:** Base knowledge of interagency collaboration required for cross jurisdictional issues related to feed and food products.

**TLO:** Describe collaborative authority between agencies regulating feed and food products.

**ELOs:**
- Describe collaborative authority between agencies regulating feed and food products.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator has a knowledge or awareness of shared authority:
  - a. More than one agency may have jurisdiction
- The regulator has a knowledge or awareness that one agency will be the lead.
- The regulator can explain the concept of the delegation of authority.
- The regulator can discuss a situation where another agency may also have jurisdiction over a firm that you regulate.
- The regulator can explain that agreements may define
## Unit 4: Inter-agency Agreements

**Definition:** Base knowledge of collaboration required for interagency issues related to feed and food products.

**TLO:** Describe formal agreements between agencies regulating feed and food products.

**ELOs:**
- Describe the purpose of a MOU.
- Discuss the purpose of delegated authority.
- Describe the purpose of cooperative agreements.
- Give examples of interagency agreements.

---

**TLO Behavioral Anchors - not all-inclusive**

- The regulator has a knowledge or awareness of the existence of formal agreements between agencies.
- The regulator has knowledge or awareness that agreements may mandate additional performance requirements:
  - Training
  - Reporting
  - Certifications
- The regulator can give examples of formal agreements:
  - MOUs
    - International
    - Associations
    - OGAs
  - FDA District policy
  - State contract
  - Cooperative agreements
  - State audits
### B16 Labeling

**Definition:** Introductory knowledge, skills, and abilities related to labeling requirements, and the components of feed and food product labels.

**Topic Area TLO:** Explain label requirements.

**Topic Area ELOs:**
- Describe the types of labels.
- Review product labels for regulatory compliance.
- Recognize product-specific label requirements.
- Describe product label requirements.
- Identify product label components.

### Unit 1: Foundations

<table>
<thead>
<tr>
<th>Definition: Basic knowledge of labeling.</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TLO:</strong> Discuss labeling fundamentals.</td>
<td>• The regulator can discuss two purposes of labeling:</td>
</tr>
<tr>
<td></td>
<td>a. Consumer knows what they are purchasing</td>
</tr>
<tr>
<td></td>
<td>b. Comparison between similar products</td>
</tr>
<tr>
<td><strong>ELOs:</strong></td>
<td>c. Deter purchase of undesirable ingredients (allergens)</td>
</tr>
<tr>
<td>o Define relevant terminology.</td>
<td>d. Advertising restrictions</td>
</tr>
<tr>
<td>o Discuss regulatory requirements for labeling.</td>
<td>e. Public health rationale of labeling</td>
</tr>
<tr>
<td>o Discuss the purpose of supplemental labeling.</td>
<td>f. Triggers for recall</td>
</tr>
<tr>
<td>o Locate available resources.</td>
<td>g. Economically motivated adulteration</td>
</tr>
<tr>
<td>o Explain how labels provide consumer information.</td>
<td>h. Traceforward and traceback</td>
</tr>
<tr>
<td>o Explain the purpose for product labeling.</td>
<td>i. Highly susceptible population</td>
</tr>
<tr>
<td></td>
<td>j. Misbranding</td>
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<td></td>
<td>• The regulator can identify three regulatory labeling requirements:</td>
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<tr>
<td></td>
<td>a. Jurisdiction specific requirements</td>
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<td></td>
<td>b. Additives</td>
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<td></td>
<td>c. Bulk labeling vs retail labeling requirements</td>
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<td></td>
<td>d. 21 Code of Federal Register (CFR) 101</td>
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<td></td>
<td>e. Specific instructions</td>
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<td></td>
<td>f. Specifications of graphics</td>
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<td></td>
<td>g. Labels should be legible</td>
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<td></td>
<td>h. All packaged foods should be labeled</td>
</tr>
<tr>
<td></td>
<td>i. Making false health claims</td>
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<td></td>
<td>j. Standards of identity (common names)</td>
</tr>
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<td></td>
<td>k. English</td>
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<tr>
<td></td>
<td>l. Restrictions on product use (between animal species)</td>
</tr>
<tr>
<td></td>
<td>m. Purpose of product (feed and pet food)</td>
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<tr>
<td></td>
<td>n. Guaranteed analysis (feed and pet food)</td>
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<tr>
<td></td>
<td>• The regulator can discuss two requirements for a specific label:</td>
</tr>
<tr>
<td></td>
<td>a. Principle display panel</td>
</tr>
</tbody>
</table>
IFSS Framework – Basic Level Gen Eds

### Unit 2: Labeling Laws and Regulations

**Definition:** Basic knowledge of labeling laws and regulations.

**TLO:** Describe the authority for labeling.

**ELOs:**
- Identify the agency that regulates a commodity.
- Identify the labeling requirements for specific commodities.
- Describe the process for verifying label compliance.
- Identify commodities exempt from labeling requirements.
- Distinguish between agency labeling requirements.
- Explain the recall rationale for improperly labeled products.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can discuss four purposes of labeling.
- The regulator can identify six regulatory requirements for a specific label.
- The regulator can list two labeling authorities:
  - Federal trade commission
  - Food and Drug Administration (FDA)
- The regulator can list two federal acts:
  - Food, Drug and Cosmetic Act (FD & C)
  - Federal Meat Inspection Act (FMIA)
- The regulator can list five labeling authorities.
- The regulator can list four federal acts.

### Unit 3: Labeling Components

**Definition:** Basic knowledge of labeling laws and regulations.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can identify the two required panels:
IFSS Framework – Basic Level Gen Eds

Label requirements.

**TLO:** Describe the components of a label.

**ELOs:**
- Describe required components of a label.
- Discuss label claims.
- Determine if ingredients are approved for use.
- Describe accompanying labeling.
- Explain labeling format requirements.
- Explain the net weight/net quantity of contents requirements.

| a. Principle display panel |
| b. Information panel |
| c. Accompanying information |

| d. The regulator can list three requirements found on the principle display panel. |
| e. Name of food |
| f. Net quantity of contents |
| g. Pictures |
| h. Size of letters (font) |
| i. English language |

| The regulator can list three requirements found on the information panel: |
| a. Manufactured for/distributed by |
| b. Ingredients in plain language |
| c. Colors (Yellow #5, etc.) |
| d. Ingredients listed in order by weight |
| e. Nutrition fact panel |
| f. Serving size |
| g. Allergen declaration |
| h. English language |

| The regulator can list three examples of accompanying information: |
| a. Country of Origin (COOL) |
| b. Sulfites |
| c. Organics |
| d. Safe food handling |
| e. Genetically modified organism (GMO) - may be required labeling in some states |
| f. Claims |
| g. Disclosure (dietary supplements and medical foods) |
| h. Pamphlets (retail) |
| i. Date marking (retail, egg, milk) |
| j. Lot number |
| k. Best if used by |
| l. Keep refrigerated |
| m. Refrigerate after opening |
| n. Unpasteurized juice warning statement (retail) |

| The regulator can explain the importance of three items found on the principle display panel. |
| The regulator can explain the importance of three of the items found on the information panel. |

**Unit 4: Food**

**Definition:** Basic knowledge of food labeling requirements.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can describe an alternate principle display panel.
- The regulator can identify safe handling label on...
**TLO:** Describe the labeling requirements for food.

**ELOs:**
- Identify the principle display panel of a food label.
- Identify the alternate principle display panel.
- Discuss when a handling/holding statement is required.
- Identify food label requirements for susceptible populations.
- Explain the labeling requirements for allergens.
- Identify the labeling requirements for dietary supplements.

packaged raw meat and poultry, and shell eggs.

- The regulator can identify the dietary supplement label:
  a. No unsubstantiated health claims
  b. Disclosure
  c. Supplemental facts
- The regulator can identify the allergen labeling requirements:
  a. Common name
  b. Contains statement
- The regulator can identify a labeling requirement for highly susceptible populations:
  a. Consumer advisory
  b. Label of unpasteurized juices
  c. Infant formula
- The regulator can list a component of the dietary supplement label.
- The regulator can list the eight allergens that require allergen labeling.
- The regulator can identify the three foods listed on a consumer advisory.

### Unit 5: Feed

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can recognize the seven required components of a standard feed label:
  a. Product name
  b. Product purpose statement
  c. Guaranteed analysis
  d. Ingredient statement
  e. Manufacture name & address
  f. Net weight
  g. Feeding directions
- The regulator can recognize the required components of a pet food label:
  a. Seven listed above PLUS:
     - American Association of Feed Control Officials (AAFCO) Nutritional Adequacy Statement, or the AAFCO Nutrient Profile Statement
     - Calorie count
- The regulator can recognize the required components of a pet treat label:
  a. Same as standard label – no American Association of Feed Control Officials (AAFCO) Nutrient Profile required
- The regulator can recognize required components of a medicated feed labels:
  a. Active drug ingredient (name and amount)
  b. Medical purpose
<table>
<thead>
<tr>
<th>c. Caution statement</th>
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</thead>
<tbody>
<tr>
<td>d. Warning statement</td>
</tr>
<tr>
<td>• The regulator has knowledge or awareness of the format (ordering) of the required components of a standard feed label.</td>
</tr>
<tr>
<td>• The regulator can give examples of optional claims/components on a pet food label e.g., claims, advertising.</td>
</tr>
</tbody>
</table>
# B19 Pest Control

**Definition:** The management of pests that can be perceived to be detrimental to the production of safe human food and food for animals.

**Topic Area TLO:** Explain how pest activity can impact food safety.

**Topic Area ELOs:**
- Describe integrated pest management.
- Describe a pest infestation.
- Recognize when to take regulatory action.
- Discuss agency options for dealing with pest issues.
- Describe pest control measures.

### Unit 1: Foundations

**Definition:** Knowledge, skills, and abilities to recognize pests and their significance to human and animal health.

**TLO**:
- Discuss pests of significance to human and animal health.

**ELOs:**
- Give examples of types of pests.
- Differentiate between types of pests.
- Discuss the public health significance of pests.

### TLO Behavioral Anchors - not all-inclusive

- The regulator can give examples of pests:
  - Birds
  - Rodents
  - Insects
  - Animals
- The regulator can discuss pest infestation in a facility:
  - Insects
  - Rodents
- The regulator can discuss the origins of significant pests:
  - Geography
- The regulator can discuss the public health significance of pests:
  - Zoonotic diseases
  - Pests as a vector
- The regulator can identify pests of public health significance:
  - Insects
  - Rodents
- The regulator can explain the public health significance of pests.
- The regulator can give an example of a zoonotic disease:
  - Bird flu
  - Rabies
  - Hanta virus
### Unit 2: Facility Design

**Definition:** Knowledge related to facility design to control pests.

**TLO:** Discuss the importance of facility design for pest control.

**ELOs:**
- Give examples of pest exclusion in facility design.
- Discuss how plant and grounds maintenance will reduce harborage areas.
- Discuss the importance of pesticide storage areas.
- Discuss how pest control station layout would be used in a facility to control pests.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can identify methods of pest exclusion:
  a. Screens
  b. Tight doors
  c. Air curtains
  d. Engineering controls
  e. Strip curtains
- The regulator can discuss the importance of plants and grounds maintenance:
  a. Harborage areas
  b. Weeds
  c. Standing water
  d. Dumpster
  e. Trash disposal
- The regulator can discuss why bait station layout is important.
- The regulator can discuss the importance of proper pesticide storage:
  a. Labeling
  b. Dedicated areas
  c. Locked storage
- The regulator can recognize ineffective methods of pest exclusion:
  a. Torn screen
  b. Short curtains
  c. Improper door fit
- The regulator can recognize the improper placement/location of bait stations.
- The regulator can explain how proper pesticide storage prevents adulteration.

### Unit 3: Sanitation Program

**Definition:** Knowledge, skills, and abilities related to sanitation programs for pest control.

**TLO:** Describe sanitation practices for pest control.

**ELOs:**
- Recognize regulations associated with pest management (GMPs, GAPs, etc.).

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can identify guidance documents, laws, and regulations to develop a sanitation program for pest management:
  a. GMPs
  b. GRPs
  c. GAPs
  d. Defect action levels (allowable limits: wings, legs)
  e. 8 points of sanitation (HACCP)
- The regulator can describe proper labeling and storage of chemicals used for pest control.
- The regulator can describe sanitation methods to control pests.
### IFSS Framework – Basic Level Gen Eds

| GRPs) | • The regulator can use guidance documents, laws, and regulations to develop a sanitation program for pest management:  
|       |   a. GMPPs  
|       |   b. GRPPs  
|       |   c. GAPs  
|       |   d. Defect action levels  
|       | • The regulator can assess proper labeling and storage of chemicals used for pest control.  
|       | • The regulator can give examples of sanitation methods for pest control:  
|       |   a. Cleaning schedule  
|       |   b. Monitoring  
|       |   c. Training (SSOP/prerequisite programs)  
|       |   d. Maintenance of grounds  
|       | • The regulator can recommend ways to prevent adulteration in a given scenario:  
|       |   a. Cross contamination  
|       |   b. Removing food sources  
|       |   c. Closed containers  
|       |   d. Waste removal  

<table>
<thead>
<tr>
<th>Unit 4: Detection</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
</table>
| **Definition:** Knowledge, skills, and abilities to detect pests while conducting regulatory activities.  
| **TLO:** Discuss detection of pests.  
| **ELOs:**  
|   • Recognize evidence of presence of pests.  
|   • Determine what equipment is needed for detection of pests.  
|   • Discuss agency procedures for pest infestation.  
| **•** The regulator can list equipment needed to detect pests:  
|   a. Black light  
|   b. Flashlight  
|   c. Tracking powder  
| **•** The regulator can list agency procedures for addressing pest infestation:  
|   a. Seizure  
|   b. Place product on hold  
|   c. Destruction of product  
| **•** The regulator can list evidence of pest activity.  
| **•** The regulator can use equipment needed to detect pests.  
| **•** The regulator can implement agency procedures for addressing pest infestation:  
|   a. Seizure  
|   b. Place product on hold  
|   c. Destruction of product  
| **•** The regulator can identify evidence of pest activity:  
|   a. Urine stains  
|   b. Rodent droppings  
|   c. Gnawing  
|   d. Nesting materials  
|   e. Odors  

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**B19 Pest Control IFPTI Course Profile**
<table>
<thead>
<tr>
<th>Unit 5: Integrated Pest Management</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The regulator can define integrated pest management.</td>
<td></td>
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<tr>
<td>• The regulator can give examples of effective pest control measures:</td>
<td></td>
</tr>
<tr>
<td>a. Prevention/exclusion</td>
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<td>b. Pesticide application</td>
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<td>c. Bait stations</td>
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<td>d. Fly strips</td>
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<td>e. Traps</td>
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<td>f. Bug zappers</td>
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<tr>
<td>• The regulator can describe why pest control is necessary.</td>
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<tr>
<td>• The regulator can discuss how a pest control plan is used:</td>
<td></td>
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<tr>
<td>a. Training</td>
<td></td>
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<tr>
<td>b. Monitoring</td>
<td></td>
</tr>
<tr>
<td>c. Scheduled treatment</td>
<td></td>
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<tr>
<td>• The regulator can identify some approved pesticides and application methods:</td>
<td></td>
</tr>
<tr>
<td>a. Certified or trained pest control operator</td>
<td></td>
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<tr>
<td>• The regulator can explain how integrated pest management is used to control pests.</td>
<td></td>
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<tr>
<td>• The regulator can recognize when an appropriate control measure is needed.</td>
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<tr>
<td>• The regulator can explain benefits of a pest control plan:</td>
<td></td>
</tr>
<tr>
<td>a. Prevent adulteration of human and animal food</td>
<td></td>
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<tr>
<td>b. Reduction or prevention of economic loss</td>
<td></td>
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<tr>
<td>c. Enhanced regulatory compliance</td>
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<tr>
<td>d. Identify problem area</td>
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</tbody>
</table>
**Definition:** Knowledge, skills, and abilities related to the delivery, distribution or storage of potable and non-potable water in a manufacturing food facility and retail food establishment.

**Topic Area TLO** (Terminal Learning Objective): **Discuss how plumbing affects public health.**

**Topic Area ELOs** (Enabling Learning Objective):
- Explain the significance of plumbing.
- Explain the regulatory significance of water systems.
- Consider water source.
- Discuss agency authority related to plumbing.
- Identify plumbing issues.

<table>
<thead>
<tr>
<th>Unit 1: Foundations</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
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<tbody>
<tr>
<td><strong>Definition:</strong> An introduction to plumbing systems to keep water and food safe.</td>
<td></td>
</tr>
<tr>
<td><strong>TLO:</strong> Discuss key concepts in plumbing.</td>
<td></td>
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<tr>
<td><strong>ELOs:</strong></td>
<td></td>
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<tr>
<td>- Explain the public health significance of plumbing design.</td>
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<tr>
<td>- Identify water source.</td>
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<tr>
<td>- Describe the water system.</td>
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<tr>
<td>- Describe the concept of backflow.</td>
<td></td>
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<tr>
<td>- Differentiate between an indirect and direct connection.</td>
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<tr>
<td>- The regulator can give examples of public health concerns related to poor or improper plumbing designs:</td>
<td></td>
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<tr>
<td>- Hazard</td>
<td></td>
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<tr>
<td>- Connection between safe and unsafe supplies</td>
<td></td>
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<tr>
<td>- Contaminating water source</td>
<td></td>
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<tr>
<td>- Contaminating food</td>
<td></td>
</tr>
<tr>
<td>- The regulator can distinguish between a public and a private water supply.</td>
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<tr>
<td>- The regulator can distinguish between potable and non-potable water.</td>
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<tr>
<td>- The regulator can list some components of a water system:</td>
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<tr>
<td>- Pipes</td>
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<td>- Pumps</td>
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<td>- Tanks</td>
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<td>- Fixtures</td>
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<td>- Source</td>
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<tr>
<td>- The regulator can describe the concept of backflow:</td>
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<tr>
<td>- Back siphonage</td>
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<td>- Back pressure</td>
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<tr>
<td>- Prevention</td>
<td></td>
</tr>
<tr>
<td>- The regulator can recognize examples of public health concerns related to poor or improper plumbing design.</td>
<td></td>
</tr>
<tr>
<td>- The regulator can discuss the significance of a public and private water supply.</td>
<td></td>
</tr>
<tr>
<td>- The regulator can discuss the significance of potable and non-potable water.</td>
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<tr>
<td>- The regulator can elaborate on the concerns of individual water system components.</td>
<td></td>
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<tr>
<td>- The regulator can give an example of indirect and direct connections:</td>
<td></td>
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<tr>
<td>- Air gap</td>
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</table>
### Unit 2: Water Source

**Definition:** Knowledge related to water sources.

**TLO:** Recognize the public health significance of protecting a water source.

**ELOs:**
- Differentiate between public and private water supply systems.
- List well construction considerations.
- Identify types of treatment systems.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can give examples of the public health significance of unprotected water sources:
  - Hazard
  - Connection between safe and unsafe supplies
  - Contaminating water source
  - Contaminating food
- The regulator can differentiate between public and private water supply systems:
  - Municipal or Public
  - Well or Private
  - Other – Spring
- The regulator can list well construction considerations:
  - Pitless adapter
  - Diversion ditches
  - Fencing
  - Drainage
  - Covers or housing
  - Vent screen
  - Dug
  - Drilled
- The regulator can list different types of water treatment systems:
  - UV systems
  - Chlorinator
  - Reverse Osmosis
- The regulator can recognize examples of public health concerns related to unprotected water sources.
- The regulator can match terms with images of water supply systems.
- The regulator can match terms with images of well construction considerations.

### Unit 3: Wastewater System

**Definition:** Knowledge related to wastewater systems.

**TLO:** Discuss wastewater systems.

**ELOs:**
- Identify wastewater systems.
- Differentiate between public and private wastewater systems.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can identify wastewater systems:
  - Public/municipal
  - Private (septic)
- The regulator can give examples of private wastewater systems:
  - Septic
  - Private wastewater treatment plants
  - Holding tanks
### Unit 4: Backflow Prevention

**Definition:** Knowledge of backflow prevention methods.

**TLO:** Discuss methods for preventing contamination.

**ELOs:**
- Define cross connection.
- Discuss methods for preventing cross connections.
- Identify types of backflow prevention devices.
- Discuss considerations for selecting a backflow prevention device.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can define cross connection:
  a. Water
  b. Waste
- The regulator can list methods for preventing cross connections:
  a. Air gap
  b. Air break
  c. Backflow prevention devices
- The regulator can give examples of backflow prevention devices:
  a. Hose bib vacuum break
  b. Dual check valve with an atmospheric vent
  c. Reduced pressure zone backflow preventer (RPZ)
  d. Check valves
  e. Pressure vacuum breakers
- The regulator can list considerations for selecting backflow prevention devices:
  a. Backflow
     - Back pressure
     - Back siphonage
  b. Continuous or non-continuous pressure
  c. Low or high hazard
- The regulator can recognize methods for preventing cross connections.
- The regulator can differentiate between an air gap and an air break.
- The regulator can recognize types of backflow prevention devices.

### Unit 5: Jurisdictional Authority

**Definition:** Knowledge related to agency authority over water, waste water, and plumbing systems.

**TLO:** Describe agency authority.

**ELOs:**
- Identify agency’s authority pertaining to water systems.
- Identify agency’s authority pertaining to wastewater systems.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can identify which agencies may have authority pertaining to water systems:
  a. Local
  b. State
  c. Federal
- The regulator can identify which agencies may have authority pertaining to wastewater systems:
  a. Local
  b. State
  c. Federal
- The regulator can identify which agencies may have authority pertaining to plumbing systems:
  a. Local
  b. State
  c. Federal
- The regulator can list which regulations are used by the
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<thead>
<tr>
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<td><strong>IFSS Framework – Basic Level Gen Eds</strong></td>
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<tr>
<td><strong>B20 Plumbing</strong></td>
</tr>
<tr>
<td>• Identify agency’s authority pertaining to plumbing systems.</td>
</tr>
<tr>
<td>regulator’s jurisdiction.</td>
</tr>
<tr>
<td>• The regulator can list which regulations are used by the regulator’s jurisdiction.</td>
</tr>
</tbody>
</table>
## B22 Professionalism

**Definition:** Introductory knowledge, skills, and abilities related to ethics, integrity, and personal conduct during job-related activities.

**Topic Area TLO:** Exhibit the use of integrity and positive interpersonal conduct in the performance of professional and personal activities.

**Topic Area ELOs:**
- Explain standards for professional conduct.
- Demonstrate professional conduct.
- Distinguish between professional and unprofessional conduct.
- Observe the agency’s ethics and personal conduct policies.
- Apply professionalism to specific situations.

### Unit 1: Foundations

**Definition:** Base knowledge of professionalism related to feed and food programs.

**TLO:** Explain professionalism.

**ELOs:**
- Define relevant terminology.
- Give examples of professional and unprofessional behavior.
- Explain the legal principles of professionalism.
- Explain moral principles of professionalism.
- Discuss the concept of the “perception of impropriety”.

### Unit 2: Ethics

**Definition:** Core knowledge of professional conduct that elicits trust and demonstrates integrity.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can discuss ethics:
  - Treat people fairly and equally
  - Transparency in motivations
  - Make and sound and rational choices
TLO: Discuss the principles of business and personal integrity within the work environment.

ELOs:
- Explain the importance of an agency code of conduct.
- Discuss the components of a code of conduct.
- Explain confidentiality.
- Give examples of conflict of interest.
- Discuss purpose of ethical behavior in a work environment.
- Give examples of ethical and unethical behavior.
- Explain the organization’s values.

- The regulator can describe professional behavior:
  a. Shouldn’t obstruct the work environment
  b. Don’t be selfish in your business relationships
  c. Be a team player
  d. Deliver on time
  e. Represent yourself in a positive way

- The regulator can describe professional credibility:
  a. Authenticity
  b. Honest trustworthy truthful

- The regulator sets a positive example for others.
- The regulator can recognize integrity in ambiguous situations.
- The regulator can demonstrate ethical consistency in actions.

**Unit 3: Conduct**

**Definition:** Expectations of personal behaviors.

**TLO:** Discuss the profession’s expectations of behavior.

**ELOs:**
- Differentiate between acceptable and unacceptable behaviors.
- Give examples of acceptable and unacceptable behaviors.
- Differentiate between objective and subjective behavior.
- Give examples of objective and subjective behavior.
- Differentiate between bias and unbiased behaviors.

- The regulator can discuss agency’s expectation of behavior:
  a. Shouldn’t obstruct the work environment
  b. Don’t be selfish in your business relationships
  c. Be a team player
  d. Deliver on time
  e. Represent yourself in a positive way
  f. Etc.

- The regulator can distinguish between acceptable and unacceptable behavior.
- The regulator has a knowledge or awareness of the regulator’s agency’s policies.
- The regulator can demonstrate consistency in professional behavior.
- The regulator can set a positive example for others.
### Unit 4: Personal Management

**Definition:** The individual’s responsibility for their actions and behaviors.

**TLO:** Discuss the impact of subjective personal behaviors in the workplace.

**ELOs:**
- Explain subjective personal behavior.
- Give examples of subjective personal behaviors.
- Recognize the need to modify subjective personal behaviors.
- Identify resources to address negative subjective personal behaviors.
- Explain the importance of being accountable for actions.
- Identify the components to manage time in the workplace.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can provide examples of subjective behavior that would impact the workplace:
  - Playing inappropriate music
  - Offensive clothing
  - Offensive jokes
  - Offensive language
  - Off color remarks
  - Poor personal hygiene
  - Offensive Tattoo
  - Inappropriate media usage
  - Bullying
  - Body language
- The regulator can provide examples of how those behaviors impact the workplace:
  - Loss production
  - Communication degradation
  - Credibility
  - Contributes to a hostile environment
- The regulator can give examples of appropriate reactions to negative behaviors:
  - Agency
  - Personal
- The regulator can give examples of appropriate action to negative behaviors:
  - Agency
  - Personal

### Unit 5: Communications

**Definition:** Disseminating, receiving, or exchanging information with other individuals in a clear, concise, factual, and courteous manner.

**TLO:** Employ professional

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can give examples of unprofessional communication:
  - Bullying
  - Sexual harassment
  - Inappropriate nonverbal (body language)
  - Etc.
communication skills while conducting work-related activities.

**ELOs:**
- Explain professional communication skills.
- Explain the importance of communicating in a clear, concise, factual, and courteous manner.
- Give examples of communicating in a clear, concise, factual, and courteous manner in the workplace.
- Give examples of unprofessional communications.
- Determine the appropriate communication method for target audience.

- The regulator can explain professional communication skills.
- The regulator can give examples of professional communication:
  a. Active listening
  b. Report writing
  c. Etc.
- The regulator can discern what constitutes professional communications in varying conditions:
  a. Effective and clear communication
     - Emails
     - Reports
     - Phone
     - Etc.
- The regulator can identify different levels of vernacular appropriate for different audiences:
  a. Co-worker
  b. Management
  c. Regulated population
  d. Etc.

<table>
<thead>
<tr>
<th>Unit 6: Interpersonal Skills</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The regulator can identify interpersonal skills in the workplace:</td>
</tr>
<tr>
<td></td>
<td>a. Team player</td>
</tr>
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<td></td>
<td>b. Collaborative</td>
</tr>
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<td></td>
<td>c. Appropriate language</td>
</tr>
<tr>
<td></td>
<td>d. Etiquette</td>
</tr>
<tr>
<td></td>
<td>The regulator can list elements associated with emotional intelligence:</td>
</tr>
<tr>
<td></td>
<td>a. Social awareness</td>
</tr>
<tr>
<td></td>
<td>b. Use appropriate behavior</td>
</tr>
<tr>
<td></td>
<td>c. Cognizant of team morale</td>
</tr>
<tr>
<td></td>
<td>d. Culture awareness</td>
</tr>
<tr>
<td></td>
<td>e. Respect</td>
</tr>
<tr>
<td></td>
<td>f. Play nice in the sand box</td>
</tr>
<tr>
<td></td>
<td>g. Considerate of other</td>
</tr>
<tr>
<td></td>
<td>The regulator can demonstrate interpersonal skills in the workplace:</td>
</tr>
<tr>
<td></td>
<td>a. Problem solving</td>
</tr>
<tr>
<td></td>
<td>b. Decision making</td>
</tr>
<tr>
<td></td>
<td>c. Assertiveness</td>
</tr>
<tr>
<td></td>
<td>d. Negotiation</td>
</tr>
<tr>
<td></td>
<td>The regulator can discuss the importance of emotional intelligence:</td>
</tr>
<tr>
<td></td>
<td>a. Relation to the development of interpersonal</td>
</tr>
<tr>
<td>skills</td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td></td>
</tr>
<tr>
<td>b. For improving interpersonal skills</td>
<td></td>
</tr>
</tbody>
</table>
**Definition:** Introductory knowledge, skills, and abilities related to the process of removing a product from commerce.

**Topic Area TLO** (Terminal Learning Objective): Describe the recall process in regulatory programs.

**Topic Area ELOs** (Enabling Learning Objective):  
- Explain the recall process.  
- Explain why recalls are initiated.  
- Determine when to recommend that a recall may be necessary.  
- Explain agency roles in recalls.  
- Identify components in the recall process.

<table>
<thead>
<tr>
<th>Unit 1: Foundations</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition:</strong> Basic knowledge of recalls related to regulatory programs.</td>
<td>- The regulator can discuss how recalls contribute to maintaining human and animal health.</td>
</tr>
<tr>
<td><strong>TLO:</strong> Describe the importance of recalls.</td>
<td>- The regulator can describe the regulator’s agency’s policies for recalls.</td>
</tr>
<tr>
<td><strong>ELOs:</strong></td>
<td>- The regulator can explain the reasons to initiate a recall:</td>
</tr>
<tr>
<td>- Define key terminology.</td>
<td>a. Enforcement action to keep human and animal food safe</td>
</tr>
<tr>
<td>- Give examples of what could initiate a recall.</td>
<td>b. Remove economic adulteration</td>
</tr>
<tr>
<td>- Explain the differences between recall classifications.</td>
<td>- The regulator can explain the impact if the product isn’t removed.</td>
</tr>
<tr>
<td>- Describe the importance of interagency and industry collaboration.</td>
<td>- The regulator can explain the reasons for a voluntary recall:</td>
</tr>
<tr>
<td>- Explain the need for communication with stakeholders.</td>
<td>a. Process for allowing the producer to take responsibility for not complying with the requirements</td>
</tr>
<tr>
<td>- Explain agency’s plan for removing product from the distributions system.</td>
<td></td>
</tr>
</tbody>
</table>
## Unit 2: Risk Assessment

**Definition:** Process to evaluate information for potential health impact of the product if it remains on the market.

**TLO:** Discuss the importance of risk assessment in product safety assurance.

**ELOs:**
- Explain the importance of risk assessment to determine if a recall is needed.
- Give examples of triggers that could initiate a recall.
- Explain how the potential severity of the hazard affects risk.
- Explain how probability of exposure affects risk.
- Describe how recall classes I, II, III would affect a recall decision.

## Unit 3: Documentation

**Definition:** Records needed when conducting a recall.

**TLO:** Explain the importance of documents needed when conducting a recall.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can provide information to aid in decision making:
  - To determine the scope of the recall
  - To support the risk assessment
- The regulator can conduct recall audit checks:
  - Verify unsafe products are off the market.
- The regulator can discuss the role of documentation in validation, tracking, and organization:
## ELOs:
- Identify documents used to track product movement.
- Give examples of documents that should be reviewed.
- Identify the documents that need to be collected.
- Review documents used to determine the scope of the recall.

## Unit 4: Communications

**Definition:** Information sharing and messaging strategies between agencies and stakeholders.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can describe the communication process with stakeholders while conducting a recall:
  a. Articulate the chain of command
  b. Describe agency's jurisdiction
  c. Describe agency's communication policy
- The regulator can inform stakeholders that there is a recall:
  a. Recall alerts
  b. Inform the regulated population of the necessity
  c. Adapt communication to the stakeholders
  d. List the steps to take a recall
- The regulator can gather information for a recall:
  a. Ask the right questions and document
  b. Active listening
  c. To maintain a better understanding of the situation
- The regulator can give examples of agency communication policies.
- The regulator can discuss the process of assembling a recall team.
- The regulator can explain regulations to substantiate a recall.

## ELOs:
- Describe the importance of interagency and industry communication.
- Explain how communication is coordinated during a recall.
- Identify requirements related to information sharing.
- Describe the roles of regulatory agencies in issuing public communications.
- Explain the importance of sharing lessons learned from recalls.
- Describe media types used to inform stakeholders of a recall.
- Describe the criteria of...
### Unit 5: Recall Process

**Definition:** The process of removing unsafe products from all points of production, distribution, manufacturing, processing, storage, retail, and consumer ownership.

**TLO:** Explain how the recall process is used to remove unsafe products.

**ELOs:**
- Describe how the decision is made to initiate a recall.
- Describe the process of implementing a recall.
- Discuss the importance of notifying the public.
- Describe the process of recall validation.

<table>
<thead>
<tr>
<th>IFPTI Course Profile</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>B24 Recalls</td>
<td>• The regulator can name the conditions that trigger a recall.</td>
</tr>
<tr>
<td></td>
<td>• The regulator can list steps necessary to remove unsafe product from the marketplace.</td>
</tr>
<tr>
<td></td>
<td>• The regulator can identify recall information to share with stakeholders.</td>
</tr>
<tr>
<td></td>
<td>• The regulator can explain how the scope of the recall impacts complexity.</td>
</tr>
<tr>
<td></td>
<td>• The regulator can identify the actions associated with each recall classification.</td>
</tr>
</tbody>
</table>
### B24 Recalls IFPTI Course Profile

**IFSS Framework – Basic Level Gen Eds**

**B24 Recalls**

- Describe the process of determining if a recall should be initiated.
- Describe the process of how a recall would be conducted.
- Explain the process of how relevant stakeholders are notified of a recall.
- Describe how to verify that a recall has been properly conducted by a firm.

<table>
<thead>
<tr>
<th>Unit 6: Product Disposition</th>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Definition:</strong> Ensuring that unsafe products do not reenter the marketplace.</td>
<td>- The regulator can define what disposition means.</td>
</tr>
<tr>
<td><strong>TLO:</strong> Explain the role of product disposition during a recall.</td>
<td>- The regulator can discuss the methods for holding a product.</td>
</tr>
<tr>
<td><strong>ELOs:</strong></td>
<td>- The regulator can define methods of disposition.</td>
</tr>
<tr>
<td>- Explain the importance of product disposition.</td>
<td>- The regulator can discuss the importance of documentation.</td>
</tr>
<tr>
<td>- Give examples of reconditioning products.</td>
<td>- The regulator can explain recall effectiveness checks:</td>
</tr>
<tr>
<td>- Explain when a product needs to be destroyed.</td>
<td>a. Trace back trace forward</td>
</tr>
<tr>
<td>- Describe coordination that may be needed between agencies for product disposition.</td>
<td>b. Collect evidence for disposition validation</td>
</tr>
<tr>
<td>- Describe the verification needed to ensure proper product disposition.</td>
<td>- The regulator can explain how to avoid the reintroduction of unsafe product back into the food chain:</td>
</tr>
<tr>
<td></td>
<td>a. Identify the product and document storage of the product</td>
</tr>
<tr>
<td></td>
<td>b. Witness and document destruction of product</td>
</tr>
<tr>
<td></td>
<td>c. Describe the appropriate security measures</td>
</tr>
</tbody>
</table>
IFSS Framework – Basic Level Gen Eds
B27 Traceability

**Definition:** Introductory knowledge, skills, and abilities related to tracking feed and food throughout the supply chain.

**Topic Area TLO** (Terminal Learning Objective): Describe the role of traceability in feed and food programs.

**Topic Area ELOs** (Enabling Learning Objective):
- Explain product traceforward/traceback concepts.
- Trace the source of a food.
- Explain a product traceback diagram.
- Explain agency roles in traceforward/traceback.
- Identify components of product traceforward/traceback.

---

### Unit 1: Foundations

<table>
<thead>
<tr>
<th>Definition: Basic knowledge of traceability related to feed and food programs.</th>
</tr>
</thead>
</table>

**TLO:** Describe the importance of product tracing.

**ELOs:**
- Define key terminology.
- Explain factors that would initiate a traceforward/traceback.
- Explain the difference between traceforward and traceback.
- Describe the importance of interagency and industry collaboration.
- Describe when traceforward/traceback is utilized.
- Describe the primary functions of CORE.
- Describe the primary function of ICS.

<table>
<thead>
<tr>
<th>TLO Behavioral Anchors - not all-inclusive</th>
</tr>
</thead>
</table>

- The regulator can define what product tracing is:
  a. Difference between tracing (documentation) and tracking (following product)
  b. Define product (ingredient to finished product)
  c. Define trackback and traceforward
- The regulator has knowledge or awareness of the purpose of product tracing:
  a. Find product source, e.g. grower, manufacturer, importer
  b. To ensure safe product
  c. Locate product to remove from commerce
  d. Identifies responsible or accountable party
- The regulator has knowledge or awareness of why product tracing is important:
  a. Provides product manufacturing information
  b. Identify source of product to determine how adulteration occurred
  c. To gather information during outbreaks (jurisdiction, interstate violation responsibility)
  d. Provides information needed for tracking outbreak vehicles
  e. Establishes scope and depth of a situation
  f. Identifies potential impact zone or region
  g. Decreases response time in a recall
- The regulator can give examples of product traceback and traceforward.
- The regulator has knowledge or awareness of the importance of communication in product tracing situations:
### Unit 2: Preliminary Review

**Definition:** Analysis of surveillance data to determine if a traceforward/traceback investigation is warranted.

**TLO:** Identify the critical information from the surveillance reports needed for a traceforward/traceback.

**ELOs:**
- Describe routine surveillance activities that might trigger a traceforward/traceback.
- Describe the importance of time frames when reviewing surveillance reports.
- Identify the potential health risk indicated by surveillance data.
- Describe the subject matter expertise needed to assess surveillance data.
- Explain how the RFR contributes to conducting traceforward/traceback investigations.

### TLO Behavioral Anchors - not all-inclusive

- The regulator has knowledge or awareness of the product tracing process.
- The regulator has an awareness of how products are identified:
  - Production records: date, run time:
  - Labeling info (brand name, ingredients, net weight, etc.)
  - Lot numbers or other identification
  - Product distribution list
  - Firm information (address, key personnel)
  - Manufacturer or grower information
  - Distributor information
  - Shipment info, i.e. trucking company and date shipped
- The regulator has knowledge or awareness of the importance of firm history information:
  - Inspection history
- The regulator has knowledge or awareness of the factors to consider for tracing:
  - Pending imminent health hazards
  - Epi findings or ties to foodborne outbreaks
  - Product/environmental samples
  - Vector and/or vehicle
  - Analysis report
  - Outbreak demographics
  - Target customers
  - Date and location of initial finding (a place to start)
  - Hazard associated with the product
  - Aware of the risk associated with the hazard
  - Foodborne illness reporting
  - Implicated product(s) and associated products
  - Degree of certainty with product
  - Consumer complaints
- The regulator can list factors to consider during product tracing:
  - Process or treatment performed on product
  - Packaging type or material
  - Components of the product
  - Intended use of the product

### Unit 3: Supply Chain

**TLO Behavioral Anchors - not all-inclusive**
**Definition:** The system of moving raw or manufactured products and ingredients from growing/raising, harvesting, processing, and manufacturing and all distribution points to consumption.

**TLO:** Discuss the complexity of traceability throughout the supply chain.

**ELOs:**
- Explain the farm to table concept.
- Describe major transportation systems.
- Describe industry best practices for product traceability.
- Describe how foreign suppliers may affect traceability.
- Explain how to use a traceback diagram to identify potential points of contamination in the supply chain.
- Explain requirements for industry to disclose customer purchases to regulatory agencies.

- The regulator has knowledge or awareness of product flow through the food production chain:
  - Define supply chain and give an example
  - Give examples of food chains
  - List stakeholders to the supply chain
  - Growing, harvesting, packing/processing, shipping, distributing, manufacturing, point of sale
- The regulator has knowledge or awareness of the importance of records:
  - Accurate
  - Legible
  - Accessible
  - Incomplete or missing records (batch, production, shipping)
  - One step forward, one step back
- The regulator has knowledge or awareness of the challenges of traceability:
  - Incomplete or missing product identification
  - An ingredient can be used in multiple products with multiple companies
  - Distribution can be worldwide
  - Language barriers
  - The sheer volume of a production run
  - Shelf life can vary between perishable and shelf stable
- The regulator has knowledge or awareness of the challenges of traceability:
  - Supply chain relations (including regulator)
  - Diversity of operations (examples consolidators, repackers, warehouses, importers, shippers)
  - Distribution can flow through multiple wholesale and retail chains
  - Changing consumer trends
    - Increase in farm to table
    - Increase consumption of raw product
    - Cottage foods
  - Identifying parties responsible for the product (broker, distributor, firm)
  - Proprietary information
  - Firm’s definition of the term “lot” (e.g. produce industry)
  - Global product identification
- The regulator has knowledge or awareness of the jurisdictional issues.
**IFSS Framework – Basic Level Gen Eds**

### B27 Traceability

<table>
<thead>
<tr>
<th><strong>Unit 4: Documentation</strong></th>
<th><strong>TLO Behavioral Anchors - not all-inclusive</strong></th>
</tr>
</thead>
</table>
| **Definition:** The records needed when doing a traceforward/traceback. | • The regulator can give three examples of types of records for determining traceforward and traceback:  
  a. Sanitary transport records  
  b. Signatures  
  c. Invoices/bills of lading  
  d. Production log  
  e. Receipts  
  f. Shipping documents  
  g. Certificates of analysis  
  h. Hazard analysis  
  i. Food safety plan  
  j. Lot number  
  k. Shelf life  
  l. Product label |
| **TLO:** Explain key documents needed for tracing product movement. | • The regulator can explain the importance of regulatory documentation:  
  a. Regulatory notes  
  b. Interview notes  
  c. Photographs  
  d. Product/Process flow diagram  
  e. Sample receipts |
| **ELOs:** | • The regulator can locate relevant agency policies:  
  a. Recall effectiveness checks  
  b. Embargo  
  c. Embargo  |
| • Identify documents used to track product movement.  
• Describe document retention requirements for the industry.  
• Give examples of documents that should be collected.  
• Give examples of key information needed for product tracing.  
• Describe the importance of collecting documents for the timeframes of interest. | • The regulator can give six examples of records for determining traceforward and traceback.  
• The regulator can demonstrate the effective collection of regulatory documentation.  
• The regulator can describe relevant agency policies. |

### Unit 5: Communications

<table>
<thead>
<tr>
<th><strong>Definition:</strong> Information sharing and messaging strategies between agencies and stakeholders during a traceforward/traceback.</th>
<th><strong>TLO Behavioral Anchors - not all-inclusive</strong></th>
</tr>
</thead>
</table>
| **TLO:** Discuss requirements for communication during a traceforward/traceback. | • The regulator can give examples of status communication:  
  a. Keep supervisor apprised  
  b. Email/phone clarifications of assigned tasks  
  c. Keeping firm apprised of progress |
| | • The regulator has knowledge or awareness of the existence of agency policy:  
  a. Proprietary information  
  b. Communication restrictions |

**Definition:** The records needed when doing a traceforward/traceback.
### IFSS Framework – Basic Level Gen Eds

**B27 Traceability**

**ELOs:**
- Describe the importance of interagency/industry communication.
- Explain how communication is coordinated during a traceback.
- Identify requirements related to information sharing.
- Explain how the ICS system is used to facilitate communications.
- The regulator can identify three effective ways of communicating during traceforward and traceback:
  - Interview techniques
  - Memos
  - Can ask clarifying/relevant questions
  - Effective notetaking
  - Speaking to the most responsible person
  - Clear and concise
  - Can follow instructions
  - Logic model (timeline of steps)
- The regulator can identify one record that must be maintained for accuracy:
  - Transport records
  - Supplier list
  - Lot numbers
  - Facility location
  - Accurate contact list
  - Regulatory notes
- The regulator can explain the importance of status communication.
- The regulator can identify a traceforward and traceback communication policy.
- The regulator can role play an effective way of communicating during traceforward and traceback.
- The regulator can identify three records that must be maintained for accuracy.

### Unit 6: Technology

**Definition:** The systems or devices used to enhance traceability.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can list two means of technology used in traceability:
  - Wi-Fi access to real-time answers
  - Global Positioning System (GPS)
  - Electronic records
  - Camera technology
  - Cell phone apps
- The regulator has knowledge or awareness of relevant traceability databases:
  - Reportable food registry
  - Radio-frequency identification (RFID) technology
  - Shopper identification cards
- The regulator can give an example of how technology improves traceability:
  - Ease of exchange
### IFSS Framework – Basic Level Gen Eds

#### B27 Traceability

| of using technology to enhance traceability. | b. Faster verification  
c. Economically motivated adulteration  
d. Finding documentation  
e. Genome sequencing  
|---|---|
| The regulator recognizes the impact of communication outlets on traceability:  
a. Radio/television reporting for consumer safety  
b. Social media  
| The regulator can give an example of how to use technology in traceability.  
The regulator can give an example of a relevant database.  
The regulator can give three examples of how technology improves traceability.  
The regulator can identify communication outlets.  |
**Definition**: Introductory knowledge, skills, and abilities related to preventing contamination of feed and food during transport.

**Topic Area TLO** (Terminal Learning Objective): Describe how transportation affects feed and food safety.

**Topic Area ELOs** (Enabling Learning Objectives):
- Articulate the requirements for protection of product.
- Explain how transportation practices can lead to adulterated product.
- Evaluate whether mishandling of products has occurred.
- Describe jurisdictional authority over transported products.
- Evaluate whether mishandling has resulted in adulterated product.

---

**Unit 1: Foundations**

**Definition**: Basic knowledge of transportation related to feed and food safety.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can describe the role of safe transportation within the food chain.
- The regulator can describe transportation equipment impact on food safety.
- The regulator can discuss the sanitary transportation rule.
- The regulator can discuss key requirements of the sanitary transportation rule:
  - Discuss waivers and exemptions

**TLO**: Describe basic information regarding the role of transportation.

**ELOs**:
- Define relevant terminology.
- Locate resources.
- Describe the importance of transportation.
- Give examples of stakeholders.
- Demonstrate knowledge of transportation regulations.
- Identify agency jurisdiction for transportation.

---

**Unit 2: Transportation Methods**

**Definition**: Description of transportation methods.

**TLO Behavioral Anchors - not all-inclusive**
- The regulator can identify the transportation modes used in food and feed.
### TLO: Discuss transportation options used for feed and food.

#### ELOs:
- Identify transportation modes used in feed/food systems.
- Recognize the mode of transportation suited for specific products.
- Recognize hazards unique to specific modes of transportation.
- Explain the importance of dedicated transportation equipment.
- Discuss required identification of equipment.

- The regulator can discuss considerations in the selection of a transportation mode.

### Unit 3: Inspections

**Definition:** Basic knowledge necessary to conduct inspections of various conveyances.

**TLO:** Discuss the complexity of traceability throughout the supply chain.

**ELOs:**
- Discuss required documentation.
- Describe inspection role in transportation incidents.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can discuss the elements of the inspection process:
  a. Design
  b. Sanitary conditions
  c. Controlled environment
  d. Etc.

- The regulator can explain how the inspection process ensures food transportation safety:
  a. Proper design
  b. Sanitary conditions
  c. controlled environment
  d. Properly maintained
  e. Properly equipped
  f. Stored
  g. Design
  h. Training
  i. Documentation
### IFSS Framework – Basic Level Gen Eds

**B28 Transportation**

- Describe the disposition of damaged products.
- Give examples of disposition of salvaged products.
- Describe procedures for the inspection of specific transportation conveyances.
- Discuss receiving procedures.
- Discuss the importance of maintaining shipping documentation.

#### Unit 4: Security

**Definition:** Basic knowledge of how security measures maintain safe transportation.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can demonstrate knowledge of securing product during transportation:
  - Seals/padlocks
  - Etc.

**ELOs:**

- Discuss the importance of transportation security.
- Identify areas of vulnerability.
- Identify the importance of seals.
- Give examples of security breaches.
- Describe the importance of documentation.

#### Unit 5: Product Safety

**Definition:** Basic knowledge of how to maintain and protect product safety during transportation.

**TLO Behavioral Anchors - not all-inclusive**

- The regulator can demonstrate knowledge of securing product during transportation:
  - Seals/padlocks
**TLO:** Discuss the importance of protecting products during transportation.

**ELOs:**
- Discuss the importance of sanitation practices in transportation.
- Give examples of safe handling methods in feed transportation.
- Discuss the importance of pest control.
- Discuss the importance of environmental control.
- Explain the importance of preventing cross contamination.

b. Etc.

- The regulator can discuss the risks associated with loading, transportation and storage.
Retail Program Standards  Ver 3.0 [Draft]

Self-Assessment / Audit Verification Summary & Gap Analysis

<table>
<thead>
<tr>
<th>Jurisdiction Name:</th>
<th>Report completed by:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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Full Self-Assessment Date: 
Program Standards Version: 2017
Self-Assessment Period 

Table 1 - Summary Table of Progress Towards Meeting the Retail Program Standards

<table>
<thead>
<tr>
<th>MET</th>
<th>NO.</th>
<th>STANDARD TITLE</th>
<th>PROGRESS</th>
<th>STANDARD ELEMENTS*</th>
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</tr>
<tr>
<td>NO</td>
<td>7</td>
<td>INDUSTRY AND COMMUNITY RELATIONS</td>
<td>No elements met</td>
<td>1a 1b</td>
</tr>
<tr>
<td>NO</td>
<td>8</td>
<td>PROGRAM SUPPORT AND RESOURCES</td>
<td>No elements met</td>
<td>1a 2a 2b 3a 3b 4a 4b 4c 4d 4e 4f 4g 4h</td>
</tr>
<tr>
<td>NO</td>
<td>9</td>
<td>PROGRAM ASSESSMENT</td>
<td>No elements met</td>
<td>1a 1b 1c 2a 2b 3a 3b</td>
</tr>
</tbody>
</table>

* Elements that are met are identified by strikethrough text.

Click the below hyperlink link for additional Program Standards guidance, instructions and PDF files located the FDA Retail Food website
http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/ucm245409.htm
## Standard 1: Regulatory Foundation

### Program Self-Assessment and Verification Audit Form

**(January 2017)**

Click the below hyperlink link to open the online PDF version of Standard 1

[Missing Link, Still in Draft Status]

Click the below hyperlink link to open the online PDF version with Instructions

[Missing Link, Still in Draft Status]

### PROGRAM SELF-ASSESSMENT (SA) SUMMARY

<table>
<thead>
<tr>
<th>Printed Name of the Person who conducted the SA:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Self-Assessor’s Title:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Jurisdiction Name:</strong> Enter this field data on the 'Jurisdiction Name' field on the 'Self-Assessment Summary' worksheet page.</td>
<td></td>
</tr>
<tr>
<td><strong>Jurisdiction Address:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Phone / Fax / E-mail:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Date the Standard 1 Self-Assessment was Completed:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>SA indicates the Jurisdiction MEETS the Standard 1 criteria:</strong></td>
<td>NO</td>
</tr>
</tbody>
</table>

*I affirm that the information represented in the Self-Assessment of Standard 1 is true and correct*

**Signature of the Self-Assessor:**

---

### VERIFICATION AUDIT (VA) SUMMARY

<table>
<thead>
<tr>
<th>Printed Name of the Person who conducted the VA:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Verification Auditor’s Title:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Auditor’s Jurisdiction Name:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Auditor’s Jurisdiction Address:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Phone / Fax / E-mail:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Date the Verification Audit of Standard 1 was Completed:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>VA indicates the Jurisdiction MEETS the Standard 1 criteria:</strong></td>
<td></td>
</tr>
</tbody>
</table>

*I affirm that the information represented in the Verification Audit of Standard 1 is true and correct*

**Signature of the Verification Auditor:**

---
## Table 2 - Program Self-Assessment and Verification Audit Table for Standard 1

<table>
<thead>
<tr>
<th>Standard Sub-Elements Criteria</th>
<th>SA MET</th>
<th>Self-Assessor’s Comments</th>
<th>VA MET</th>
<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Assessment of the Program’s Regulatory</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction has documentation that it has performed a side-by-side comparison of its prevailing statutes, regulations, rules and other pertinent requirements against the current published edition of the FDA Food Code or one of the two most recent previous editions of the FDA Food Code.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>b. The jurisdiction’s side-by-side comparison includes an assessment of major Food Code Interventions and Risk Factors, Good Retail Practices, and Compliance/Enforcement Administrative requirements.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. The regulatory foundation assessment clearly identifies the jurisdictions corresponding requirement to the applicable Code Section. The assessment provides a determination as to whether a specific provision in the jurisdiction’s regulation meets the intent of the corresponding FDA Food Code Section.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2. Food Code Interventions and Risk Factors</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction’s initial Food Code assessment indicates that the agency’s regulatory requirements contain at least 9 of the 11 FDA Food Code intervention and risk factor controls. By the third verification audit the jurisdiction’s assessment indicated that the agency’s regulatory requirement contain all 11 of the Food Code invention and risk factor controls. Documentation from: Part I – Self Assessment Worksheet and Part I – Verification Audit Worksheet</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction’s Food Code assessment indicates that the agency has a corresponding requirement for ALL FDA Food Code provisions related to the interventions and risk factor controls. NOTE: Auditor’s random selection of Food Code Intervention and Risk Factor Control Sections confirms the jurisdiction’s assessment that a corresponding requirement is contained in the agency’s rules, regulations, ordinances, code, or statutes.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>3. Good Retail Practices</strong></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
a. The jurisdiction’s initial Food Code assessment indicates that regulatory requirements contain at least 95 percent of the FDA Food Code Good Retail Practices Sections. NOTE: Auditor’s random selection of Good Retail Practices Code Sections confirms the jurisdiction’s assessment that a corresponding requirement is contained in the agency’s code or statutes. Documentation from: Part II – Self-Assessment Worksheet and Part II – Verification Audit Worksheet

4. **Compliance and Enforcement**

   a. The jurisdiction’s initial Food Code assessment indicates that regulatory requirements contain ALL the FDA Food Code Compliance and Enforcement Sections identified in the Standard. NOTE: Auditor’s random selection of Compliance and Enforcement Code Sections confirms the jurisdiction’s assessment that a corresponding requirement is contained in the agency’s code or statutes. Documentation from: Part III – Self Assessment Worksheet and Part III – Verification Audit Worksheet
| General notes Pertaining to the Program Self-Assessment or the Verification Audit |
Standard 2: Trained Regulatory Staff
Program Self-Assessment and Verification Audit Form
(January 2017)

Click the below hyperlink link to open the online PDF version of Standard 2
Missing Link, Still in Draft Status
Click the below hyperlink link to open the online PDF version with Instructions
Missing Link, Still in Draft Status

PROGRAM SELF-ASSESSMENT (SA) SUMMARY

<table>
<thead>
<tr>
<th>Printed Name of the Person who conducted the SA:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-Assessor’s Title:</td>
<td></td>
</tr>
<tr>
<td>Jurisdiction Name:</td>
<td>Enter this field data on the 'Jurisdiction Name' field on the 'Self-Assessment Summary' worksheet page.</td>
</tr>
<tr>
<td>Jurisdiction Address:</td>
<td></td>
</tr>
<tr>
<td>Phone / Fax / E-mail:</td>
<td></td>
</tr>
<tr>
<td>Date the Standard 2 Self-Assessment was Completed:</td>
<td></td>
</tr>
</tbody>
</table>

SA indicates the Jurisdiction MEETS the Standard 2 criteria: NO

I affirm that the information represented in the Self-Assessment of Standard 2 is true and correct

Signature of the Self-Assessor: ____________________________

VERIFICATION AUDIT (VA) SUMMARY

<table>
<thead>
<tr>
<th>Printed Name of the Person who conducted the VA:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Verification Auditor’s Title:</td>
<td></td>
</tr>
<tr>
<td>Auditor’s Jurisdiction Name:</td>
<td></td>
</tr>
<tr>
<td>Auditor’s Jurisdiction Address:</td>
<td></td>
</tr>
<tr>
<td>Phone / Fax / E-mail:</td>
<td></td>
</tr>
<tr>
<td>Date the Verification Audit of Standard 2 was Completed:</td>
<td></td>
</tr>
</tbody>
</table>

VA indicates the Jurisdiction MEETS the Standard 2 criteria: NO

I affirm that the information represented in the Verification Audit of Standard 2 is true and correct

Signature of the Verification Auditor: ____________________________
### Table 3 - Program Self-Assessment and Verification Audit Table for Standard 2

<table>
<thead>
<tr>
<th>Standard Sub-Elements Criteria</th>
<th>SA MET</th>
<th>Self-Assessor’s Comments</th>
<th>VA MET</th>
<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Employee Training Records</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction maintains a written training record for each employee that includes the date of hire or assignment to the agency’s retail food protection program.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction written training record provides documentation that each employee has completed the Standard #2 pre-requisite (“Pre”) training curriculum PRIOR to conducting independent retail food or foodservice inspections.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2. Initial Field Training</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction maintains a written training record that provides confirmation that each employee completed a minimum of 25 joint field training inspections of retail food and/or foodservice establishments (if less than 25 joint field training inspections are performed, written documentation on file that FSIO has successfully demonstrated all required inspection competencies) PRIOR to conducting independent retail food or foodservice inspections</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction maintains a written training record that provides confirmation that each employee successfully completed a field training process similar to that contain in the CFP Field Training Manual provided in Appendix B-2, Standard 2, PRIOR to conducting independent inspections of retail food and/or foodservice establishments.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>3. Independent Inspections / Completion of ALL</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction maintains a written training record that provides confirmation that each employee completed a minimum of 25 independent retail food and/or foodservice inspections PRIOR to field standardization.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction written training record provides documentation that each employee has completed ALL aspects of the Standard #2 training curriculum (“Pre”) and (“Post”) courses PRIOR to field standardization.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>4. Field Standardization</strong></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
### 5. Continuing Education and Training

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>a. The jurisdiction maintains a written training record that provides documentation that each employee successfully completed a Standardization process similar to the ‘FDA Procedures for Standardization’ within 18 months of hire or assignment to the retail food protection program.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction maintains a written training record that provides documentation that each standardized employee has maintained their standardization by performing a minimum of 4 joint inspections with a “training standard” every 3 years.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
General notes Pertaining to the Program Self-Assessment or the Verification Audit
Standard 3: Inspection Program Based On HACCP Principles
Program Self-Assessment and Verification Audit Form
(January 2017)

Click the below hyperlink link to open the online PDF version of Standard 3
Missing Link, Still in Draft Status
Click the below hyperlink link to open the online PDF version with Instructions
Missing Link, Still in Draft Status

<table>
<thead>
<tr>
<th>PROGRAM SELF-ASSESSMENT (SA) SUMMARY</th>
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<tbody>
<tr>
<td>Printed Name of the Person who conducted the SA:</td>
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<tr>
<td>Self-Assessor’s Title:</td>
</tr>
<tr>
<td>Jurisdiction Name: Enter this field data on the 'Jurisdiction Name' field on the 'Self-Assessment Summary' worksheet page.</td>
</tr>
<tr>
<td>Jurisdiction Address:</td>
</tr>
<tr>
<td>Phone / Fax / E-mail:</td>
</tr>
<tr>
<td>Date the Standard 3 Self-Assessment was Completed:</td>
</tr>
<tr>
<td>SA indicates the Jurisdiction MEETS the Standard 3 criteria: NO</td>
</tr>
</tbody>
</table>

I affirm that the information represented in the Self-Assessment of Standard 3 is true and correct
Signature of the Self-Assessor: ________________________________

<table>
<thead>
<tr>
<th>VERIFICATION AUDIT (VA) SUMMARY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Printed Name of the Person who conducted the VA:</td>
</tr>
<tr>
<td>Verification Auditor’s Title:</td>
</tr>
<tr>
<td>Auditor’s Jurisdiction Name:</td>
</tr>
<tr>
<td>Auditor’s Jurisdiction Address:</td>
</tr>
<tr>
<td>Phone / Fax / E-mail:</td>
</tr>
<tr>
<td>Date the Verification Audit of Standard 3 was Completed:</td>
</tr>
<tr>
<td>VA indicates the Jurisdiction MEETS the Standard 3 criteria:</td>
</tr>
</tbody>
</table>

I affirm that the information represented in the Verification Audit of Standard 3 is true and correct
Signature of the Verification Auditor: ________________________________
Table 4 - Program Self-Assessment and Verification Audit Table for Standard 3

<table>
<thead>
<tr>
<th>Standard Sub-Elements Criteria</th>
<th>SA MET</th>
<th>Self-Assessor’s Comments</th>
<th>VA MET</th>
<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Inspection Form Design</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction’s inspection form identifies foodborne illness risk factors and Food Code interventions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction’s inspection form documents actual observations using the convention IN, OUT, NA, and NO.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. The jurisdiction's inspection form documents compliance and enforcement activities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2. Risk Assessment Categories</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. A risk assessment is used to group food establishments into at least 3 categories based on their potential and inherent food safety risks.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>3. Inspection Frequency</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction’s inspection frequency is based on the assigned risk categories.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>4. Written and Implement Corrective Action Policy</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction has a written and implemented policy that requires on-site corrective action for foodborne illness risk factors observed to be out of compliance.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The jurisdiction has a written and implemented policy that requires discussion for long-term control of foodborne illness risk factors.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. The jurisdiction has a written and implemented policy that requires follow-up activities on foodborne illness risk factor violations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>5. Variance Requests</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction has a written and implemented policy on variance requests related to foodborne illness risk factors and Food Code interventions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>6. Verification and Validation of HACCP Plans</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction has a written and implemented policy for the verification and validation of HACCP plans when a plan is required by Code.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>General notes Pertaining to the Program Self-Assessment or the Verification Audit</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Standard 4: Uniform Inspection Program
Program Self-Assessment and Verification Audit Form
(January 2017)

Click the below hyperlink link to open the online PDF version of Standard 4 Missing Link, Still in Draft Status
Click the below hyperlink link to open the online PDF version with Instructions Missing Link, Still in Draft Status

PROGRAM SELF-ASSESSMENT (SA) SUMMARY

| Printed Name of the Person who conducted the SA: | |
| Self-Assessor’s Title: | |
| Jurisdiction Name: Enter this field data on the 'Jurisdiction Name' field on the 'Self-Assessment Summary' worksheet page. |
| Jurisdiction Address: | |
| Phone / Fax / E-mail: | |
| Date the Standard 4 Self-Assessment was Completed: | |

SA indicates the Jurisdiction MEETS the Standard 4 criteria: NO

I affirm that the information represented in the Self-Assessment of Standard 4 is true and correct
Signature of the Self-Assessor: _______________________________

VERIFICATION AUDIT (VA) SUMMARY

| Printed Name of the Person who conducted the VA: | |
| Verification Auditor’s Title: | |
| Auditor’s Jurisdiction Name: | |
| Auditor’s Jurisdiction Address: | |
| Phone / Fax / E-mail: | |
| Date the Verification Audit of Standard 4 was Completed: | |

VA indicates the Jurisdiction MEETS the Standard 4 criteria: NO

I affirm that the information represented in the Verification Audit of Standard 4 is true and correct
Signature of the Verification Auditor: _______________________________
<table>
<thead>
<tr>
<th>Standard Sub-Elements Criteria</th>
<th>SA MET</th>
<th>Self-Assessor’s Comments</th>
<th>VA MET</th>
<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Written Quality Assurance Program Document</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The jurisdiction has a written quality assurance program that covers all regulatory staff that conducts retail food and/or foodservice inspections.</td>
<td></td>
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</tr>
<tr>
<td>b. The jurisdiction periodically conducts an analysis of the results of the quality assurance program to identify quality or consistency problems among the staff in the twenty quality elements.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>c. The jurisdiction’s written quality assurance program describes corrective actions to address an individual retail food program inspector’s performance quality or consistency issues when they are identified.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2. Twenty Quality Assurance Program Elements</strong></td>
<td></td>
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</tr>
<tr>
<td>The jurisdictions quality assurance program provides a method to review or monitor, either individually or programatically, the concepts in the twenty quality elements. The twenty elements follow in I. through XX.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I. The jurisdiction’s quality assurance program assures that each inspector has the required equipment and forms to conduct the inspection.</td>
<td></td>
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</tr>
<tr>
<td>II. The jurisdiction’s quality assurance program assures that each inspector reviews the contents of the establishment file, including the previous inspection report, reported complaints on file, and, if applicable, required HACCP Plans or documents supporting the issuance of a variance.</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>III. The jurisdiction’s quality assurance program assures that each inspector verifies that the establishment is in the proper risk category and that the required inspection frequency is being met, informs the supervisor when the establishment is not in the proper risk category or when frequency is not met.</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>IV. The jurisdiction’s quality assurance program assures that each inspector provides identification as a regulatory official to the person in charge and states the purpose of the visit.</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>V. The jurisdiction’s quality assurance program assures that each inspector interprets and applies the jurisdiction’s laws, rules, policies, procedures, and regulations required for conducting retail food inspections.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
VI. The jurisdiction’s quality assurance program assures that each inspector uses a risk-based inspection methodology to conduct the inspection.

VII. The jurisdiction’s quality assurance program assures that each inspector accurately determines the compliance status of each risk factor and Food Code intervention (i.e., IN compliance, OUT of compliance, Not Observed, or Not Applicable).

VIII. The jurisdiction’s quality assurance program assures that each inspector obtains corrective action for out-of-compliance risk factors and Food Code interventions in accordance with the jurisdiction’s policies.

IX. The jurisdiction’s quality assurance program assures that each inspector discusses options for the long-term control of risk factors with establishment managers when the same out-of-control risk factor occurs on consecutive inspections, in accordance with the jurisdiction’s policies. Options may include, but are not limited to, risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP Plans.

X. The jurisdiction’s quality assurance program assures that each inspector verifies correction of out-of-compliance observations identified during the previous inspection. In addition, follows through with compliance and enforcement in accordance with jurisdiction’s policies.

XI. The jurisdiction’s quality assurance program assures that each inspector conducts an exit interview that explains the out-of-compliance observations, corrective actions, and timeframes for correction, in accordance with the jurisdiction’s policies.

XII. The jurisdiction’s quality assurance program assures that each inspector provides the inspection report and, when necessary, cross-referenced documents, to the person in charge or permit holder, in accordance with the jurisdiction’s policies.

XIII. The jurisdiction’s quality assurance program assures that each inspector demonstrates proper sanitary practices as expected from a food service employee.
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>XIV.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector completed the inspection form per the jurisdiction’s policies (i.e., observations, public health reasons, applicable code reference, compliance dates).</td>
</tr>
<tr>
<td>XV.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector document the status of each risk factor and intervention (IN, OUT, NA, NO).</td>
</tr>
<tr>
<td>XVI.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector cites the proper code provisions for risk factors and Food Code interventions, in accordance with the jurisdiction’s policies.</td>
</tr>
<tr>
<td>XVII.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector documents corrective action for out-of-compliance risk factors and Food Code interventions in accordance with the jurisdiction’s policies.</td>
</tr>
<tr>
<td>XVIII.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector documents that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections. Options may include, but are not limited to, risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP Plans.</td>
</tr>
<tr>
<td>XIX.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector accurately completes compliance or regulatory documents (i.e., exhibits, attachments, sample forms), appropriately cross-references them within the inspection report, and includes them with the inspection report, in accordance with the jurisdiction’s policies.</td>
</tr>
<tr>
<td>XX.</td>
<td>The jurisdiction’s quality assurance program assures that each inspector files reports and other documentation in a timely manner, in accordance with the jurisdiction’s policies.</td>
</tr>
</tbody>
</table>

### 3. Demonstration of Program Effectiveness Using the Statistical Method in Standard 4: Self-Assessment Worksheet

a. The program effectiveness measure documents that 2 self-assessment field reviews were conducted for each employee performing retail food and or foodservice inspection work during the five-year self-assessment period. [New staff who have not completed Steps 1 through 3 of Standard 2 are exempt from this field measurement.]
b. Based on the self-assessment field reviews using the statistical method described in Standard 4: Self-Assessment Worksheet, the jurisdiction’s regulatory staff achieves a rate of 75% on each quality element for jurisdictions with 10 or more inspectors. For jurisdictions with less than 10 inspectors, the achievement rate meets or exceeds the Table 4-1 calculation.
| General notes Pertaining to the Program Self-Assessment or the Verification Audit |
**Standard 5: Foodborne Illness and Food Defense Preparedness and Response**

**Program Self-Assessment and Verification Audit Form**

(January 2017)

Click the below hyperlink link to open the online PDF version of Standard 5

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[Missing Link, Still in Draft Status]

<table>
<thead>
<tr>
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<tbody>
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<tr>
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<tr>
<td><strong>Date the Standard 5 Self-Assessment was Completed:</strong></td>
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<tr>
<td>SA indicates the Jurisdiction MEETS the Standard 5 criteria: NO</td>
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</table>

*I affirm that the information represented in the Self-Assessment of Standard 5 is true and correct*

Signature of the Self-Assessor: _____________________________

<table>
<thead>
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<td><strong>Phone / Fax / E-mail:</strong></td>
</tr>
<tr>
<td><strong>Date the Verification Audit of Standard 5 was Completed:</strong></td>
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<tr>
<td>VA indicates the Jurisdiction MEETS the Standard 5 criteria:</td>
</tr>
</tbody>
</table>

*I affirm that the information represented in the Verification Audit of Standard 5 is true and correct*

Signature of the Verification Auditor: _____________________________
### Table 6 - Program Self-Assessment and Verification Audit Table for Standard 5

<table>
<thead>
<tr>
<th>Standard Sub-Elements Criteria</th>
<th>SA MET</th>
<th>Self-Assessor’s Comments</th>
<th>VA MET</th>
<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Investigation Procedures</strong></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>a. The program has written operating procedures for responding to and/or conducting investigations of foodborne illness and food-related injury that clearly identify the roles, duties, and responsibilities of program staff and how the program interacts with other relevant departments and agencies. (The procedures may be contained in a single source document or in multiple documents.)</td>
<td></td>
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<tr>
<td>b. The program maintains contact lists for individuals, departments, and agencies that may be involved in the investigation of foodborne illnesses, food-related injuries or contamination of food.</td>
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</tr>
<tr>
<td>c. The program maintains a written operating procedure or a Memorandum of Understanding (MOU) with the appropriate epidemiological investigation program/department to conduct foodborne illness investigations and to report findings. The operating procedure or MOU clearly identifies the roles, duties, and responsibilities of each party.</td>
<td></td>
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<tr>
<td>d. The program maintains logs or databases for all complaint or referral reports from other sources alleging food-related illness, food-related injury or intentional food contamination. The final disposition for each complaint is recorded in the log or database and is filed in, or linked to, the establishment record for retrieval purposes.</td>
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</tr>
<tr>
<td>e. Program procedures describe the disposition, action, or follow-up, and reporting required for each type of complaint or referral report.</td>
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</tr>
<tr>
<td>f. Program procedures require disposition, action or follow-up on each complaint or referral report alleging food-related illness or injury within 24 hours.</td>
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</tr>
<tr>
<td>g. The program has established procedures and guidance for collecting information on the suspect foods’ preparation, storage or handling during on-site illness, food-injury, or outbreak investigations.</td>
<td></td>
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</tbody>
</table>
h. Program procedures provide guidance for immediate notification of appropriate law enforcement agencies if at any time intentional food contamination is suspected.

i. Program procedures provide guidance for the notification of appropriate state and/or federal agencies when a complaint involves a product that originated outside the agency’s jurisdiction or has been shipped interstate.

### 2. Reporting Procedures

a. Possible contributing factors to the illness, food-related injury, or intentional food contamination are identified in each on-site investigation report.

b. The program shares final reports of investigations with the state epidemiologist and reports of confirmed disease outbreaks with CDC.

### 3. Laboratory Support Documentation

a. The program has a letter of understanding, written procedures, contract or MOU acknowledging that a laboratory(s) is willing and able to provide analytical support to the jurisdiction’s food program. The documentation describes the type of biological, chemical, radiological contaminants or other food adulterants that can be identified by the laboratory. The laboratory support available includes the ability to conduct environmental, food, and/or clinical sample analyses.

b. The program maintains a list of alternative laboratory contacts from which assistance could be sought in the event that a food-related emergency exceeds the capability of the primary support lab(s) listed in paragraph 3.a. This list should also identify potential sources of laboratory support such as FDA, USDA, CDC, or environmental laboratories for specific analysis that cannot be performed by the jurisdiction’s primary laboratory(s).

### 4. Trace-back Procedures

a. Program management has an established procedure to address the trace-back of foods implicated in an illness, outbreak or intentional food contamination. The track-back procedure provides for the coordinated involvement of all appropriate agencies and identifies a coordinator to guide the investigation. Trace-back reports are shared with all agencies involved and with CDC.

### 5. Recalls
a. Program management has an established procedure to address the recall of foods implicated in an illness, outbreak, or intentional food contamination.

b. When the jurisdiction has the responsibility to request or monitor a product recall, written procedures equivalent to 21 CFR, Part 7 are followed.

c. Written policies and procedures exist for verifying the effectiveness of recall actions by firms (effectiveness checks) when requested by another agency.

### 6. Media Management

a. The program has a written policy and procedure that defines a protocol for providing information to the public regarding a foodborne illness outbreak or food safety emergency. The policy/procedure should address coordination and cooperation with other agencies involved in the investigation. A media person is designated in the protocol.

### 7. Data Review and Analysis

a. At least once per year, the program conducts a review of the data in the complaint log or database and the illness and food-related injury investigations to identify trends and possible contributing factors that are most likely to cause illness or injury. These periodic reviews of multiple complaints and contributing factors may suggest a need for further investigations and may suggest steps for illness prevention.

b. The review is conducted with prevention in mind and focuses on but is not limited to, the following: 1) Multiple complaints on the same establishment; 2) Multiple complaints on the same establishment type; 3) Multiple complaints implicating the same food; 4) Multiple complaints associated with similar food preparation processes; 5) Number of confirmed foodborne disease outbreaks; 6) Number of foodborne disease outbreaks and suspect foodborne disease outbreaks; 7) Contributing factors most often identified; 8) Number of complaints involving real and alleged threats of intentional food contamination; and
<table>
<thead>
<tr>
<th>9) Number of complaints involving the same agent and any complaints involving unusual agents when agents are identified.</th>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>c. In the event that there have been no illness or food-related injury outbreak investigations conducted during the twelve months prior to the trend analysis, program management will plan and conduct a mock foodborne illness or food defense investigation to test program readiness. The mock investigation should simulate response to an actual illness outbreak and include on-site inspection, sample collection and analysis. A mock investigation must be completed at least once per year when no illness outbreak investigations occur.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
General notes Pertaining to the Program Self-Assessment or the Verification Audit
**Standard 6: Compliance and Enforcement**

Program Self-Assessment and Verification Audit Form (January 2017)

Click the below hyperlink link to open the online PDF version of Standard 6 Missing Link, Still in Draft Status

Click the below hyperlink link to open the online PDF version with Instructions Missing Link, Still in Draft Status

### PROGRAM SELF-ASSESSMENT (SA) SUMMARY

| Printed Name of the Person who conducted the SA: |  |
| Self-Assessor’s Title: |  |
| Jurisdiction Name: | Enter this field data on the 'Jurisdiction Name' field on the 'Self-Assessment Summary' worksheet page. |
| Jurisdiction Address: |  |
| Phone / Fax / E-mail: |  |
| Date the Standard 6 Self-Assessment was Completed: |  |

SA indicates the Jurisdiction MEETS the Standard 6 criteria: NO

I affirm that the information represented in the Self-Assessment of Standard 6 is true and correct

Signature of the Self-Assessor: ____________________________

### VERIFICATION AUDIT (VA) SUMMARY

| Printed Name of the Person who conducted the VA: |  |
| Verification Auditor’s Title: |  |
| Auditor’s Jurisdiction Name: |  |
| Auditor’s Jurisdiction Address: |  |
| Phone / Fax / E-mail: |  |
| Date the Verification Audit of Standard 6 was Completed: |  |

VA indicates the Jurisdiction MEETS the Standard 6 criteria: NO

I affirm that the information represented in the Verification Audit of Standard 6 is true and correct

Signature of the Verification Auditor: ____________________________
### Table 7 - Program Self-Assessment and Verification Audit Table for Standard 6

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<th>VA MET</th>
<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Compliance and Enforcement Procedure</strong></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>a. The jurisdiction’s has a written step-by-step compliance and enforcement procedure that describes what actions and tools (forms/documents/interventions) are to be used to achieve compliance.</td>
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<tr>
<td>b. The jurisdiction’s inspection form(s) record and quantify the compliance status of foodborne illness risk factors, <em>Food Code</em> interventions and other serious code violations.</td>
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<tr>
<td><strong>2. Assessment of Effectiveness</strong></td>
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</tr>
<tr>
<td>a. The jurisdiction has written documentation that verifies the review of the effectiveness of the staff’s implementation of the program’s compliance and enforcement procedure that includes a selection of establishment files for review in accordance with the Standard criteria.</td>
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<tr>
<td>b. The jurisdiction has written documentation verifying that at least 80 percent of the sampled files follow the agency’s step-by-step compliance and enforcement procedures and actions were taken to resolve out-of-compliance risk factors recorded on the selected routine inspection in accordance with the Standard criteria.</td>
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</tbody>
</table>
General notes Pertaining to the Program Self-Assessment or the Verification Audit
# Standard 7: Industry and Community Relations

## Program Self-Assessment and Verification Audit Form (January 2017)

Click the below hyperlink link to open the online PDF version of Standard 7
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## PROGRAM SELF-ASSESSMENT (SA) SUMMARY

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<tr>
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<tr>
<td>Date the Standard 7 Self-Assessment was Completed:</td>
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</tr>
</tbody>
</table>

**SA indicates the Jurisdiction MEETS the Standard 7 criteria:** 

**NO**

I affirm that the information represented in the Self-Assessment of Standard 7 is true and correct

Signature of the Self-Assessor: ________________________________

## VERIFICATION AUDIT (VA) SUMMARY

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<td>Date the Verification Audit of Standard 7 was Completed:</td>
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</table>

**VA indicates the Jurisdiction MEETS the Standard 7 criteria:** 

**YES**

I affirm that the information represented in the Verification Audit of Standard 7 is true and correct

Signature of the Verification Auditor: ________________________________
## Table 8 - Program Self-Assessment and Verification Audit Table for Standard 7

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</thead>
<tbody>
<tr>
<td><strong>1. Industry and Consumer Interaction</strong></td>
<td></td>
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<tr>
<td>a. The jurisdiction maintains written documentation confirming that the agency has</td>
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<tr>
<td>sponsored or actively participated in at least one meeting/forum annually, such as</td>
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<td>food safety task forces, advisory boards or advisory committees. Documentation</td>
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<tr>
<td>confirms that offers of participation have been extended to industry and consumer</td>
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<tr>
<td>representatives.</td>
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<tr>
<td><strong>2. Educational Outreach</strong></td>
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<tr>
<td>a. The jurisdiction maintains written documentation confirming that the agency has</td>
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<tr>
<td>sponsored or coordinated at least one educational outreach activity annually</td>
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<tr>
<td>directed at industry; consumer groups; the media; and or elected officials.</td>
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<tr>
<td>Education outreach activities focus on increasing awareness of foodborne illness</td>
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<tr>
<td>risk factors and control methods to prevent foodborne illness and may include</td>
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<tr>
<td>industry recognition programs; web sites; newsletters; Fight BAC campaigns;</td>
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<tr>
<td>food safety month activities; food worker training, consumer surveys, etc.</td>
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<tr>
<td>General notes Pertaining to the Program Self-Assessment or the Verification Audit</td>
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**Standard 8: Program Support and Resources**
*Program Self-Assessment and Verification Audit Form (January 2017)*

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<tr>
<td>SA indicates the Jurisdiction MEETS the Standard 8 criteria:</td>
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*I affirm that the information represented in the Self-Assessment of Standard 8 is true and correct*

Signature of the Self-Assessor: ___________________________

**VERIFICATION AUDIT (VA) SUMMARY**

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| Verification Auditor’s Title:                   |  |
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| Auditor’s Jurisdiction Address:                 |  |
| Phone / Fax / E-mail:                           |  |
| Date the Verification Audit of Standard 8 was Completed: |  |
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</thead>
<tbody>
<tr>
<td><strong>1. Staffing Level – FTEs per Inspections Performed</strong></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>a. The jurisdiction has written documentation, calculations, or a program resource assessment that demonstrated a staffing level of one full-time equivalent (FTE) for every 280-320 retail food program inspections performed.</td>
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<tr>
<td><strong>2. Inspection Equipment</strong></td>
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</tr>
<tr>
<td>a. The jurisdiction can demonstrate through written records, equipment inventories, or actual observations that each retail food program inspector has a head cover, thermocouple, flashlight, sanitization test kit, heat sensitive tapes or maximum registering thermometer and necessary forms and administrative materials.</td>
<td></td>
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<tr>
<td>b. The jurisdiction has a written procedure for obtaining the use of computers, cameras, black lights, light meters, pH meters, foodborne illness kits, sample collection kits, data loggers and cell phones should this equipment not be part of the agency’s general equipment inventory.</td>
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</tr>
<tr>
<td><strong>3. Administrative Program Support</strong></td>
<td></td>
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</tr>
<tr>
<td>a. The jurisdiction has written documentation, calculations or a program resource assessment that demonstrates sufficient equipment is available to support the record keeping system utilized by the program.</td>
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</tr>
<tr>
<td>b. The jurisdiction has a system in place to collect, analyze, retain and report pertinent information required to manage and implement the retail food protection program.</td>
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<tr>
<td><strong>4. Program Resource Assessment</strong></td>
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</tr>
<tr>
<td>a. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #1 – Regulatory Foundation.</td>
<td></td>
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<tr>
<td>b. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #2 – Trained Regulatory Staff.</td>
<td></td>
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</tbody>
</table>
c. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #3 – Inspection Program Based on HACCP Principles.

d. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #4 – Uniform Inspection Program.

e. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #5 – Foodborne Illness and Food Security Preparedness and Response.

f. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #6 – Compliance and Enforcement.

g. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #7 – Industry and Community Relations.

h. The jurisdiction has conducted an assessment to determine if the agency has the budget, staffing and equipment necessary to meet Standard #9 – Program Assessment.
# Standard 9: Program Assessment

**Program Self-Assessment and Verification Audit Form**

(Inventory 2017)

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## PROGRAM SELF-ASSESSMENT (SA) SUMMARY

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<td>Jurisdiction Address:</td>
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<tr>
<td>Phone / Fax / E-mail:</td>
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<tr>
<td>Date the Standard 9 Self-Assessment was Completed:</td>
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<tr>
<td>SA indicates the Jurisdiction MEETS the Standard 9 criteria:</td>
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I affirm that the information represented in the Self-Assessment of Standard 9 is true and correct  
Signature of the Self-Assessor: ____________________________

## VERIFICATION AUDIT (VA) SUMMARY

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<td>VA indicates the Jurisdiction MEETS the Standard 9 criteria:</td>
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I affirm that the information represented in the Verification Audit of Standard 9 is true and correct  
Signature of the Verification Auditor: ____________________________
Table 10 - Program Self-Assessment and Verification Audit Table for Standard 9

<table>
<thead>
<tr>
<th>Standard Sub-Elements Criteria</th>
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<th>Self-Assessor’s Comments</th>
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<th>If NO, why criterion not met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Risk Factor Study</strong></td>
<td></td>
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</tr>
<tr>
<td>a. A study on the occurrence of foodborne illness risk factors has been completed and includes data for each facility type regulated by the jurisdiction collected over the study cycle.</td>
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</tr>
<tr>
<td>b. The data collection form includes items pertaining to the following Center for Disease Control and Prevention (CDC) identified contributing factors to foodborne illness: 1) Food from Unsafe Sources, 2) Improper Holding/Time and Temperature, 3) Inadequate Cooking, 4) Poor Personal Hygiene, and 5) Contaminated Equipment/Protection from Contamination</td>
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<td>c. The data collection form provides for marking actual observations of food practices within an establishment (IN, OUT, NO, and NA).</td>
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<td><strong>2. Report of Analysis and Outcome</strong></td>
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<tr>
<td>a. A report is available that shows the results of the data collection from the jurisdiction’s foodborne illness risk factor study</td>
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<td>b. The report provides quantitative measurements upon which to assess the trends in the occurrence of foodborne illness risk factors over time.</td>
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<td><strong>3. Intervention Strategy</strong></td>
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<tr>
<td>a. A targeted intervention strategy designed to address the occurrence of the risk factor(s) identified in their RISK FACTOR STUDY is implemented and the effectiveness of such strategy is evaluated by subsequent RISK FACTOR STUDIES or other similar tools</td>
<td></td>
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<tr>
<td>b. Documentation is provided of performed interventions, action, or activities designed to improve control of foodborne illness risk factors.</td>
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<tr>
<td>General notes Pertaining to the Program Self-Assessment or the Verification Audit</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
PSC Issue #2 list of supporting attachments


(3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 8 Summary


PSC Issue #3 list of supporting attachments

(1) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Crosswalk-Requirements for Foodborne Illness Training Programs

(2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Program Standards Committee subcommittee #3 final report
PSC Issue #4 list of supporting attachments

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

PSC Issue #5 list of supporting attachments


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

PSC Issue # 6 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: PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft

(3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft

PSC Issue #7 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: B2 Allergens IFPTI Course Profile

(3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B17 Laws Regulations IFPTI Course Profile


PSC Issue #8 list of supporting attachments

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

(2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B8 Environmental Hazards IFPTI Course Profile (see attached PDF)

(3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B12 Integrated Food Safety System IFPTI Course Profile (see attached PDF)

(4) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B15 Jurisdiction IFPTI Course Profile (see attached PDF)

(5) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B16 Labeling IFPTI Course Profile (see attached PDF)

(6) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B19 Pest Control IFPTI Course Profile (see attached PDF)

(7) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B20 Plumbing IFPTI Course Profile (see attached PDF)

(8) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B22 Professionalism IFPTI Course Profile (see attached PDF)

(9) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B24 Recalls IFPTI Course Profile (see attached PDF)

(10) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B27 Traceability IFPTI Course Profile (see attached PDF)

(11) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B28 Transportation IFPTI Course Profile
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


(3) Manufactured Food Regulatory Program Standards (see https://www.fda.gov/MFRPS)
PSC Issue #10 list of supporting documents

(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: PSC Subcommittee #3 Charge 3 Quality Elements Cross-referenced


August 21, 2018

David Lawrence, Chair
Conference for Food Protection
30 Ellicott Court
Martinsville, IN 46151-1331

Dear Mr. Lawrence:

Thank you for your letter of May 21, 2018, transmitting the recommendations made by the Conference for Food Protection (CFP) at its 2018 Biennial Meeting in Richmond, Virginia. The Food and Drug Administration (FDA) values the opportunity to fully participate in the CFP Biennial Meetings and to provide input to the Executive Board and the numerous CFP Committees.

The 2018 Biennial Meeting was productive, with a total of 93 Issues deliberated. FDA appreciates the efforts of all participants in the 2018 Meeting to develop recommendations intended to further food safety and foster cooperation among Federal, State, local, territorial, and tribal agencies and our partners in industry, academia, and consumer groups.

In accordance with the Memorandum of Understanding between FDA and the CFP, I am pleased to respond with FDA’s current positions on the 2018 recommendations for changes to the FDA Food Code or requests for other action by FDA.

**Part I – 2018 Conference Recommendations for Changes to the FDA Food Code**

Your letter identified 25 recommendations by the Assembly of Delegates to change the FDA Food Code or the Annexes. As explained more fully below, FDA *conceptually agrees* with 14 recommendations and *partially concurs* with two recommendations. For nine recommendations, FDA either *non-concurs or will consider* the recommendation before deciding whether a Food Code modification is warranted.

U.S. Food and Drug Administration
Center for Food Safety & Applied Nutrition
5001 Campus Drive
College Park, MD 20740
www.fda.gov
August 8, 2016

Mr. Patrick Guzzle, Chair
Conference for Food Protection
30 Elliott Court
 Martinsville, IN 46151-1331

Dear Mr. Guzzle:

Thank you for your letter dated May 27, 2016 in which you transmitted the recommendations made by the Conference for Food Protection (CFP) at its 2016 Biennial Meeting in Boise, Idaho. By all accounts, the 2016 Meeting was a productive one. The Food and Drug Administration (FDA) appreciates the efforts of all participants in the 2016 Meeting to develop recommendations intended to further food safety and foster cooperation between Federal, state, local, territorial and tribal agencies and our partners in industry, academia, and consumers. FDA values the opportunity to fully participate in the CFP Biennial Meetings and to provide consult to the Executive Board and the numerous CFP Committees.

In accordance with the Memorandum of Understanding between the FDA and the CFP, I am pleased to respond with FDA’s current position on those recommendations that pertain to the FDA Food Code or otherwise recommend action on the part of FDA.

Part 1 – Conference Recommendations for Changes to the FDA Food Code

Your letter identified twenty-five recommendations accepted by the Assembly of Delegates to change the FDA Food Code or the Food Code Annexes.

FDA conceptually agrees with sixteen of the twenty-five final recommendations and anticipates making changes to the Food Code and its Annexes related to the following issues:

2016-I-007 IMC 3 – Amend Food Code 4-602.11 (E) (4) Equipment Cleaning Frequency
2016-I-022 Update the definition of Vending Machines
2016-I-023 Shellfish Retail Record Keeping
2016-I-033 Thawing 3-501.13
2016-I-036 Clarifying Date Marking Disposition
2016-I-042 Towel Drying Exception For Equipment Removed From High-Temp Dish Machines
2016-II-004 Imminent Health Hazard: Modify Enforcement & PIC Duties
2016-II-025 Mandatory Food Protection Manager Certification for Persons in Charge
2016-III-002 LRG 2 - Approval of Listeria Retail Guidance Document
2016-III-014 Bandage, Finger Cot, and Stall contamination
September 5, 2014

Mr. John M. Luker, Chair
e/o Conference for Food Protection
30 Elliott Court
Martinsville, Indiana 46151-1331

Dear Mr. Luker:

Thank you for your letter dated June 17, 2014, in which you transmitted the recommendations made by the Conference for Food Protection (CFP) at its 2014 Biennial Meeting in Orlando, FL. I apologize for the delay in responding.

The Food and Drug Administration (FDA or Agency) appreciates the efforts of meeting participants to develop recommendations intended to further food safety and foster cooperation among federal, state, local, territorial, and tribal agencies, our partners in industry and, academia, and consumers. FDA values the opportunity to fully participate in the CFP Biennial Meetings and to provide advice to the Executive Board and the numerous CFP Committees.

In accordance with the Memorandum of Understanding between FDA and the CFP, I am pleased to respond with FDA’s current position on those recommendations that pertain to the FDA Food Code or otherwise recommend action on the part of FDA.

Part 1 – Conference Recommendations for Changes to the FDA Food Code

Your letter identified 13 recommendations accepted by the Assembly of Delegates to change the FDA Food Code or the Food Code Annexes.

FDA agrees with the final recommendations and anticipates making changes to the Food Code and its Annexes related to the following issues:

- **2014-I-014** Update Sec. 8-201.14 to better agree with NACMCF HACCP Definitions
- **2014-I-020** Duties of Person In Charge- Hot and Cold Holding Monitoring
- **2014-I-030** Equipment and Utensil Cleaning Agent, Availability
- **2014-II-003** Align Competency of Inspectors (8-402.10) with Program Standard 2
- **2014-II-009** Public Website Posting of Inspection Reports
- **2014-III-002** Emergency Action Plan for Retail Food Establishments
- **2014-III-028** Salmonella as a Reportable Illness
Ms. Lori LeMaster, Chair
Conference for Food Protection
2792 Miramar Lane
Lincoln, California 95648-2070

Dear Ms. LeMaster:

Thank you for your letter dated May 29, 2012, in which you transmitted the recommendations made by the Conference for Food Protection (CFP) at its 2012 Biennial meeting in Indianapolis. In accordance with the Memorandum of Understanding between the Food and Drug Administration (FDA) and the CFP, I am pleased to respond with FDA’s current position on those recommendations that pertain to the FDA Food Code or to otherwise recommend action on the part of FDA.

FDA appreciates the efforts of all participants in the 2012 Biennial Meeting who collaborated to develop the recommendations made to FDA that are intended to further food safety and foster cooperation among Federal, state, local, territorial, and tribal agencies and our partners in industry, academia, and consumers.

Part 1 of your letter identified 27 recommendations for changes to the FDA Food Code or the various Food Code Annexes. FDA agrees in principle with almost all of the 27 recommendations and plans to revise the 2013 edition of the Food Code to address those recommendations.

The Part 1 recommendations to which FDA will be giving additional consideration before concurring with the recommendation made by the CFP are identified and discussed in detail below.

Please note that there are additional Part 1 recommendations with which FDA agrees in principle but for which we may not agree with the specific proposed wording for the Food Code changes. In these cases, FDA may modify the recommended text, either to provide clarity or to achieve consistency with the structure or conventions of the Food Code.

2012-I-036 – Designation of Water Temperature at Handwashing Sinks as a Core Item

This recommendation contains two parts. The first part suggests FDA review the priority designation assigned to Section 5-202.12 of the 2009 Food Code based on current science.
The second part makes a specific recommendation to divide that section into subsections and to designate one subsection as a Priority Foundation Item and one subsection as a Core Item. FDA expressed its opinion at the 2012 meeting that, based on a preliminary review of the designations, the current designation is appropriate. Based on the CFP recommendation, FDA agrees to carefully reconsider the designation assigned to Section 5-202.12 using the established criteria for making such designations and to consider recent publications that may inform the process. FDA will make a decision regarding a change to the designation after it completes such a review.

2012-III-08 – Addressing Non-Typhoidal Salmonella in the Food Code

FDA agrees in principle with the CFP recommendation to modify the FDA Food Code to specifically address Non-Typhoidal Salmonella (NTS) and the steps food establishments should take to prevent its transmission by infected food employees. However, before modifying the Food Code to incorporate the suggested revisions, FDA needs to determine the status of NTS on CDC’s “List of Infectious and Communicable Diseases which are Transmitted through the Food Supply,” as CDC is in the process of updating that list. FDA will take into consideration additional information made available by CDC as the agency determines how best to modify the Food Code to address the inclusion of NTS among the pathogens that trigger the need for certain employee health-related preventive controls, as described in the Food Code. FDA will keep the CFP Executive Board and the membership informed of progress on this effort.

2012-III-021- Determining the Disposition of Refrigerated Potentially Hazardous Food above 50°C (41°F)

This recommendation also contains two parts – first to add language to Annex #4 and second to create a committee to review and update the CFP Emergency Action Plan for Retail Food Establishments. FDA supports CFP’s intention to create a CFP Committee to review and update the CFP Emergency Action Plan for Retail Food Establishments to enhance the recommendations for determining the disposition of potentially hazardous foods that have been subject to limited temperature abuse due to the unanticipated interruption of adequate temperature control (such as during emergency power outages). FDA is prepared to participate on that Committee and will carefully consider the recommendations put forward with this CFP issue and subsequent revisions to the CFP Emergency Action Plan document. FDA recognizes the value of having sound recommendations for how food establishments should best manage the potential risks associated with disruptions of temperature control, especially in situations in which consumer access to food may be limited.
FDA is not ready at this time, however, to commit to incorporating the specific recommendations made by CFP into the FDA Food Code or its Annexes. FDA believes further consideration needs to be given to: 1) the various model predictions of microbial growth likely to be associated with unanticipated disruption of proper refrigerated food storage; and 2) what level of monitoring and documentation are appropriate to allow for limited temperature abuse without compromising public safety.

FDA believes the new CFP Committee discussions should closely examine the recommendations in 2012-III-021 and looks forward to assisting in development of enhanced guidance for the industry and public health officials.

2012-III-025 - Dual Step Hand Cleanse-Sanitize Protocol without Water (Note: This title is derived from the original issue submission and is not relevant to the final recommendation.)

This recommendation also contains two parts; one that suggests charges to a CFP committee and one that suggests a Food Code change. FDA agrees with the recommendation that the same CFP committee that is to consider revisions to the CFP Emergency Action Plan for Retail Food Establishments (as described in 2012-III-021 above), should also consider how that document can best address hand hygiene recommendations when natural or man-made disasters make normal handwashing stations impracticable. The recommendation also suggests that FDA modify the Food Code to capture the concept that under catastrophic disaster situations, handwashing requirements should be “in accordance with emergency guidance documents.” Since the Food Code primarily intended to identify appropriate routine preventive controls at retail and does not specifically address all the various food safety implications of a catastrophic disaster situation, FDA does not agree that such recommendations specific to hand washing alone belong in the FDA Food Code. Further, it is not clear to FDA what, if any, “emergency guidance documents” the CFP had in mind when recommending that the Food Code reference such documents. FDA will wait for the new CFP Committee to complete its charge and update the Emergency Action Plan document to include hand hygiene recommendations before considering whether and where to reference those recommendations in the Food Code.

Part 2 of your letter identified 14 recommendations that request FDA take some action other than modification of the FDA Food Code. FDA agrees in principle with all the recommendations in Part 2 of your letter, including four recommendations for improving the National Voluntary Retail Food Regulatory Programs Standards. Your letter also requests FDA to work in various capacities to enhance the information and resources it makes available to the various stakeholder groups that participate in the CFP.
We trust that the CFP membership will recognize that FDA does not have unlimited resources and so must consider each of these recommendations in the context of overall agency priorities. FDA will do its best to keep CFP leadership and its members informed on progress made toward delivering on these recommendations. Allow us to elaborate on a couple CFP Recommendations of note in Part 2 of your letter.

2012-II-027 – Recommendations for Promoting the Field Training Manual

FDA very much appreciates the support shown by CFP for the use of the Field Training Manual for Regulatory Retail Food Safety Inspection Officers. FDA welcomes the suggestions made by CFP to improve access to this resource by regulatory agencies. To be useful, the recommendations in this manual must be tailored to the individual jurisdiction and the priorities of the jurisdiction’s program manager or training officer. Therefore, widespread distribution of the resource without guided instruction may not achieve the desired outcome. Improving inspector training programs and the resources available to them continues to be an important part of FDA’s retail food safety initiative and a focus of activity of FDA’s Regional Retail Food Specialists.

2012-III-029 - Public Release of Food Allergy Resource Document

FDA acknowledges CFP’s renewed request that FDA disseminate useful materials on the control of food allergens at retail. FDA is developing such guidance, and we are considering options for making it available to the public for review and comment. We do so with the understanding that the CFP Food Allergen Committee is no longer an established committee.

We hope this letter provides sufficient information about our positions on the relevant 2012 CFP Recommendations. We look forward to continuing our cooperative relationship with the Conference.

Sincerely,

Michael M. Landa
Director
Center for Food Safety
and Applied Nutrition


