

**Committee Final Reports are considered DRAFT until acknowledged by Council or accepted by the Executive Board**

**COMMITTEE NAME: Program Standards Committee (PSC)**

**DATE OF FINAL REPORT: October 31, 2019 Date amended: 12/3/2019**

**COMMITTEE ASSIGNMENT:  Council I  Council II  Council III  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/](https://www.cdc.gov/nceh/ehs/elearn/ea_fio/) b) FDA Food Related Emergency Exercise Bundle (FREE-B)

- <https://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295902.htm>[CA(1] (updated URL: <https://www.fda.gov/food/food-defense-tools-educational-materials/food-related-emergency-exercise-bundle-free-b>) c) IS-305: Environmental Health Training in Emergency Response (EHTER) Awareness Level <https://training.fema.gov/is/> d) NEHA Certified Foodborne Outbreak Investigator Credential (CFOI) <http://neha.org/professional-development/credentials/certified-foodborne-outbreak-investigator-cfoi-credential> e) Integrated Food Safety Center of Excellence (CoE) Webinar Series <https://www.coefoodsafetytools.org/AllCoEProducts.aspx> (updated URL: <https://www.coefoodsafetytools.org>); and
3. Reporting back any findings and recommendations to each biennial meeting of the Conference for Food Protection.

### **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.
- d. PSC subcommittee #1 (Issue 2018 II-013 & 2018 II-014) held conference calls on February 19, 2019, March 21, 2019, May 1, 2019, May 30, 2019 and June 27, 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.
- f. PSC subcommittee #3 (Issue # 2018 II-019) held conference calls on December 19, 2018, January 9, 2019, January 23, 2019, February 6, 2019, March 13, 2019, April 10, 2019, May 8, 2019, June 12, 2019, July 17, 2019, August 14, 2019, September 11, 2019 and October 2, 2019. Dates of electronic votes: February 16, 2019 and October 4, 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 sign up 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. Maribeth 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 1<sup>st</sup> Draft* demonstrates suggested changes to Appendix B-1 using current Standard 2 curriculum; Attachment *PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2<sup>nd</sup> 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.
- I. 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

- (b.6)** Issue 2018 II-018 (see page 27 <http://www.foodprotect.org/media/biennialmeeting/council-ii-final-issue-recommendations-1.pdf>)
- (b.7)** *2018 Program Standards Committee Final Report*  
[http://www.foodprotect.org/issues/packets/2018Packet/issues/II\\_013.html](http://www.foodprotect.org/issues/packets/2018Packet/issues/II_013.html). See the *Re-evaluation of VNRFRPS Standard 8 Subcommittee Report* and supporting attachments for Standard 8.
- (b.8)** *Standard 8 Summary (see attached PDF)*
- (b.9)** Standard 8 PowerPoint (see attached PDF)
- (b.10)** Voluntary National Retail Food Regulatory Program Standards – Standard 8 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (b.11)** Standard 8 Re-Evaluation of Staffing Level Model Pilot Study Report (see attached PDF)
- (b.12)** CFP PSC Subcommittee CWG Questions (see attached PDF)
- (b.13)** CWG Standard 4 Response (see attached PDF)
- (b.14)** Standard 4 – Statistical Methodology (see attached PDF)
- (b.15)** Partial Achievement Survey (see attached PDF)
- (b.16)** CFP Plan Review Guide (see <http://www.foodprotect.org/media/guide/2016-plan-review-manual.pdf>)
- (b.17)** Preliminary Plan Review Proposal (see attached Word document)
- (b.18)** PSC subcommittee #3 Meeting #1 Minutes 12 19 2018
- (b.19)** PSC subcommittee #3 Meeting #2 Minutes 1 09 2019
- (b.20)** PSC subcommittee #3 Meeting #3 Minutes 1 23 2019
- (b.21)** PSC subcommittee #3 Meeting #4 Minutes 2 06 2019
- (b.22)** PSC subcommittee #3 Meeting #5 Minutes 3 13 2019
- (b.23)** PSC subcommittee #3 Meeting #6 Minutes 4 10 2019
- (b.24)** PSC subcommittee #3 Meeting #7 Minutes 5 8 2019
- (b.25)** PSC subcommittee #3 Meeting #8 Minutes 6 12 2019
- (b.26)** PSC subcommittee #3 Meeting #9 Minutes 7 17 2019
- (b.27)** PSC subcommittee #3 Meeting #10 Minutes 8 14 2019
- (b.28)** PSC subcommittee #3 Meeting #11 Minutes 9 11 2019
- (b.29)** PSC subcommittee #3 Meeting #12 Minutes 10 2 2019
- (b.30)** PSC subcommittee #3 Charge 1 Training Evaluation and Certification Initiatives
- (b.31)** PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 1st Draft
- (b.32)** PSC subcommittee #3 Charge 2 Appendix B-1 Reformatted 2nd Draft
- (b.33)** PSC subcommittee #3 Charge 2 IFPTI Course Review
- (b.34)** PSC subcommittee #3 Charge 3 Quality Elements Cross-referenced
- (b.35)** Integrated Food Safety System (IFSS) Food Protection Professionals Curriculum Framework
- (b.36)** B2 Allergens IFPTI Course Profile
- (b.37)** B17 Laws Regulations IFPTI Course Profile
- (b.38)** B23 Public Health Principles IFPTI Course Profile
- (b.39)** B25 Sampling IFPTI Course Profile
- (b.40)** B26 Sanitation Practices IFPTI Course Profile
- (b.41)** Standard 2 Appendix B-1 (see <https://www.fda.gov/media/86752/download>)
- (b.42)** B8 Environmental Hazards IFPTI Course Profile
- (b.43)** B12 Integrated Food Safety System IFPTI Course Profile
- (b.44)** B15 Jurisdiction IFPTI Course Profile
- (b.45)** B16 Labeling IFPTI Course Profile
- (b.46)** B19 Pest Control IFPTI Course Profile
- (b.47)** B20 Plumbing IFPTI Course Profile



- (b.48) B22 Professionalism IFPTI Course Profile
- (b.49) B24 Recalls IFPTI Course Profile
- (b.50) B27 Traceability IFPTI Course Profile
- (b.51) B28 Transportation IFPTI Course Profile
- (b.52) VNRFRPS, Standard 2 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (b.53) VNRFRPS, Standard 3 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (b.54) VNRFRPS, Standard 4 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (b.55) CFP Training Manual (see <http://www.foodprotect.org/guides-documents/conference-for-food-protection-cfp-field-training-manual-for-regulatory-retail-food-safety-inspection-officers-5-31-13-cfp-update/>)
- (b.56) Manufactured Food Regulatory Program Standards (see <https://www.fda.gov/MFRPS>)
- (b.57) Draft 2017 VNRFRPS Self-Assessment Audit Form

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

- (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: *Draft 2017 VNRFRPS Self-Assessment Audit Form* (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)
- (2) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Preliminary Plan Review Proposal (see attached Word document)
- (3) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: *CFP Plan Review Guide* (see <http://www.foodprotect.org/media/guide/2016-plan-review-manual.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
- (4) See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Standard 2 Appendix B-1 (see <https://www.fda.gov/media/86752/download>)

#### **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)

- (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* (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)
- (2) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: *VNRFRPS, Standard 2* (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (3) 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)
- (3) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: *Draft Attachment A - CFP Training Plan and Log Revision* (attached Word document)
- (4) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: *VNRFRPS, Standard 2* (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (5) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: *VNRFRPS, Standard 4* (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-november-2019>)
- (6) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: *CFP Training Manual* (see <http://www.foodprotect.org/guides-documents/conference-for-food-protection-cfp-field-training-manual-for-regulatory-retail-food-safety-inspection-officers-5-31-13-cfp-update/>)
- (7) See Issue titled: Report - 2018-2020 Program Standards Committee; Attachment title: *Draft CFP Training Manual Revision*