

## Conference for Food Protection – Committee Periodic Report

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**COMMITTEE NAME:** Program Standards (PSC), Subcommittee 3

**DATE OF REPORT:**  Final subcommittee report

**Date submitted:** 10/31/2019

**Date amended (if applicable):** 12/3/2019

**Date accepted by Executive Board:** [Click here to enter a date.](#)

**COMMITTEE ASSIGNMENT:**  Council I  Council II  Council III  Executive Board

**REPORT SUBMITTED BY:** *Christine Sylvis, Co-Chair and Kenesha Williamson, Co-Chair*

**COMMITTEE CHARGE(S):**

**Issue # 2018-II-019**

Collaborate with the FDA Office of Training Education and Development (OTED) and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to:

1. Continue review of all 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 findings and recommendations to the 2020 Biennial Meeting of the Conference for Food Protection.

**COMMITTEE WORK PLAN AND TIMELINE:**

An introductory meeting in December 2018 followed by bi-weekly meetings January - February 2019 then monthly meetings through September 2019. Workgroup documents will be shared via FoodSHIELD and attached to calendar invitations. WebEx will be used for presenting workgroup material and reviewing documents, during monthly meetings. The committee's regulatory members will be assigned portions of the national framework courses to evaluate for discussion with the group. Polls will be forwarded via email, as needed, to voting members to finalize recommendations. Periodic reports will be prepared and submitted in February 2019, July 2019, and October 2019, in accordance with the CFP master calendar.

**COMMITTEE ACTIVITIES:**

**1. Overview of committee activities:**

- a. Dates of committee conference calls: 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.
- 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 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 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

emailed on October 14.

**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 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.
- 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

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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

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- 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
- r.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Integrated Food Safety System (IFSS) Food Protection Professionals Curriculum Framework
- 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
- u.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B23 Public Health Principles IFPTI Course Profile
- v.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B25 Sampling IFPTI Course Profile
- w.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: B26 Sanitation Practices 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
- ee.** 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
- ii.** 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-december-2019>)
- jj.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: VNRFRPS, Standard 3 (see <https://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-december-2019>)
- kk.** 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-december-2019>)
- ll.** 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/>)

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- mm.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Manufactured Food Regulatory Program Standards (see <https://www.fda.gov/MFRPS>)
- nn.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Draft CFP Training Manual Revision
- oo.** See Issue titled: Report – 2018-2020 Program Standards Committee; Attachment title: Draft Attachment A – CFP Training Plan and Log Revision (attached Word document)