

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 by 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.

Risk Category	Number of Establishments	Inspection Frequency ¹	Average Inspection Time (does not include travel) ²	Reinspection frequency ³	FBI Inspection Frequency ⁴	Other Frequency ⁵
Low	1,000	1	45 minutes	15%	1%	10%
Medium	2,000	2	75 minutes	15%	1%	10%
High	1,000	3	120 minutes	15%	1%	10%

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 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 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

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 inspections²¹ 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.

Risk category	Number in inventory	Inspection frequency	Average inspection time (includes travel) ²²	Reinspection frequency
High	1,000	12 months	7.2 hours	10%
Medium	2,000	18 months	5.7 hours	10%
Low	1,000	24 months	4.2 hours	10%

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 = **15.5 FTEs**

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.

²⁰ Inspection times based on calculations presented in "DHHS Office of Inspector General's FDA Oversight of State Food Firm Inspections" dated June 2000.