

Food Protection Manager Certification Committee Report

**Joyce Jensen, REHS, CP-FS
Committee Chair**



CITY ATTORNEY • DEPARTMENT OF PUBLIC HEALTH

NEWS RELEASE

FOR IMMEDIATE RELEASE

TUESDAY, AUGUST 25, 2009

CONTACTS:

- **Matt Dorsey** for the Office of the City Attorney..... (415) 554-4662
- **Eileen Shields** for the Department of Public Health..... (415) 554-2507

Food Safety Certifications Invalidated for Hundreds of Restaurants

Certification holders will have 60 days to be re-tested, re-certified

SAN FRANCISCO (Aug. 25, 2009)—Today, the San Francisco Department of Public Health (DPH) will be notifying 345 San Francisco restaurants that their certification for food safety managers will no longer be recognized as valid as a result of inappropriate testing and certification procedures. Officials from DPH also informed state and county public health authorities throughout California of at least 183 additional restaurants outside of San Francisco whose certifications are similarly affected. Another 78 certifications whose holders list no address have also been identified.



April 9-14

the
**Conference
for FOOD
PROTECTION**

2010

Composition of FPMCC Sub-Group

- **Work Group Facilitator – John Marcello**
- **ANSI – Roy Swift**
- **ANSI-CFP Liaison – Lee Cornman**
- **CFP FPMCC Chair – Joyce Jensen**
- **CFP FPMCC Vice Chair - Jeff Hawley**
- **National Registry FSP – Larry Lynch**
- **National Restaurant Association – Kate Piche**
- **Prometric – Ken Walters**

PROBLEM SOLVING PROCESS

STEP 1 – Developing a Clear Problem Statement

STEP 2 – Analyzing the Problem

STEP 3 – Generating Potential Solutions

STEP 4 – Selecting the Solution

STEP 5 – Implementing the Solution

STEP 6 – Evaluating the Solution

Example of Work Group “Homework” Assignment

- **Assignment for certification providers and ANSI**
 - Submit a list of the documented types of security breaches, from the most prominent to the least. Be as specific as possible in identifying the problem/security issue.
 - Identify how the certify body was notified of the security breach
 - What was the method of test administration and details of how it occurred?
 - Identify other potential security/test administration challenges that are not contained in your list of documented security breaches but may have a potential to present significant challenges to the certification process if not appropriately addressed. List them in order of significance from your perspective (specific problems, providing case studies, with details identifying the components involved.)
- **Assignment for workgroup members that are not providers:**
 - Complete item (4) from the above section

SUMMARY

DOCUMENTED COMPLAINTS OF CERTIFIED FOOD PROTECTION MANAGER EXAM SECURITY BREACHES

| Professionalism Credibility & Training Of Proctors | No. | Handling of Exam Packages Shipping Irregularities | No. | Location (Site) Irregularities | No. | Breach of Providers Test Administration Protocols/Requirements | No. |
|-----------------------------------------------------------------------------------|-----|------------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------|-----|
| Proctor applying under different names | 2 | All booklets or answer sheets not submitted | 7 | Candidate violated test center requirements | 2 | All candidates given same form of exam | 6 |
| Proctoring own exam | 1 | Submitted copied test booklets | 1 | Packing and Shipping Incidents (lost exams by carrier; inventory errors by administrator) | 52 | Insertion of exam in companies new hire packets | 1 |
| Proctor shredded test booklets | 1 | UPS lost or destroyed exam shipments | 3 | Administrator certification not approved by certification provider | 1 | Computer Based Testing incidents (suspect security breach by the candidate) | 4 |
| Abnormal pass rates | 1 | Exams identified as not shipped with exam order | 1 | Priority/Regular Mail Incidents (administrated ships the package untraceable vs. traceable carrier) | 1 | Creation of an Answer Key/Copying of Completed Answer Sheets | 1 |
| Suspected cheating and cancellation of administration privileges | 6 | Missing exams; incomplete exam returns, past due exam/expired exams | 59 | Examination Locations Failure to Conform to Established Standards | 1 | Creation/Submission of Blank Counterfeit Answer Sheets Before Exam Administration | 1 |
| Examinee cheating with crib sheet | 1 | Failure to Seal Exam Booklets | 1 | The Lack of Accommodations for an ADA Examinee | 1 | Duplication/Faxing of the Examination | 1 |
| Issuance of fake certificates | 1 | Improper Packaging For Returning Examinations | 1 | | | Failure to Collect and Inspect ID | 1 |
| Disclosure of Test Items to Examinees and Failure to Comply with Cease and Desist | 1 | Failure to Ship Examination Materials Within 24 Business Hours of Examination Date | 1 | | | Failure to Distribute Certificates to Examinees | 1 |
| Disclosure of Test Items to Examinees | 1 | | | | | Failure to Give Clear Instructions to Examinees | 1 |
| Self Administration of the Examination | 1 | | | | | Failure to Grade Online Examinations Within 24 Hours | 1 |
| | | | | | | Failure to Monitor Examinees While Exam Was in Progress | 1 |

PROBLEMATIC AREA I – PROFESSIONAL CREDIBILITY AND TRAINING OF PROCTORS

| Document Complaint of Exam Security Breach | CFP Standard/Requirement |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proctor applying under different names | 5.7 The <i>certification organization</i> shall enter into a formal agreement with the <i>test administrators/proctors</i> and shall assess and monitor the performance of <i>test administrators</i> and <i>proctors</i> in accordance with all documented procedures and agreements. The formal agreement shall include, at a minimum, provisions that relate to code of conduct, conflict of interest and a statement of consequences for breach of the agreement. |
| Proctoring own exam | Section 5.7 (see Standard Section above) |
| Proctor shredded test booklets | Section 5.7 (see Standard Section above) 5.8 Item & Examination Exposure. The <i>certification organization</i> must demonstrate it has controlled for item and examination exposure. An exposure plan must take into account the number of times a test item and <i>examination form</i> /version is administered, that no <i>examination form</i> is retained for any test administration or by any <i>test administrator/proctor</i> for more than 90 days; and that at all times it can account for all copies of all used and unused <i>examination forms</i> before being returned to the <i>certification organization</i> . |
| Abnormal pass rates | Section 5.7 (see Standard Section above) 5.10 The <i>certification organization</i> must provide procedures to be followed in any instance where the security of a <i>food safety certification examination</i> is, or is suspected to be, breached. Included must be specific procedures for handling and for reporting to the <i>accrediting organization</i> , any suspected or alleged cheating incidents, lost or stolen booklets, intentional or unintentional divulging of test items by examinees or test administration personnel, or any other incidents perceived to have damaged the security of the examination or any of its individual items. Corrective actions to guard against future security breaches must be established and implemented. Documentation of corrective actions and their effectiveness must be made available to the accreditation body. |
| Suspected cheating and cancellation of administration privileges | Sections 5.7 and 5.10 (see wording for Standard Sections listed on previous page) |
| Examinee cheating with crib sheet | Section 5.10 (see wording for Standard Section listed on previous page) |

PROBLEMATIC AREA II – HANDLING EXAM PACKAGES / SHIPPING IRREGULARITIES

| Document Complaint of Exam Security Breach | CFP Standard/Requirement |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All booklets or answer sheets not submitted | <p>4.15 Security. The <i>certifying organization</i> will demonstrate that procedures are developed and implemented to assure that individual items, <i>item banks</i>, <i>food safety certification examinations</i> presented in all media (printed, taped and computerized), test answer sheets and candidate scores are and remain secure. Demonstration shall include an overall examination security plan that covers each step in the examination development and administration process beginning with examination and item development and including, but not limited to, transportation, administration, personnel, physical security, and disposition of secure materials.</p> <p>4.17 Specific Procedures for Examination Administration. <i>Certification organizations</i> must specify procedures for administering all <i>food safety certification examinations</i> in a standard manner in order to assure that all candidates are provided with the opportunity to perform according to their level of <i>competency</i> and to assure comparability of scores. Procedures must include, but not be limited to:</p> <ul style="list-style-type: none"> e. specification of security procedures to assure lack of exposure of test items to unauthorized persons during testing and to prevent theft of examination items or booklets, <p>5.8 Item & Examination Exposure. The <i>certification organization</i> must demonstrate it has controlled for item and examination exposure. An exposure plan must take into account the number of times a test item and <i>examination form</i>/version is administered, that no <i>examination form</i> is retained for any test administration or by any <i>test administrator/proctor</i> for more than 90 days; and that at all times it can account for all copies of all used and unused <i>examination forms</i> before being returned to the <i>certification organization</i>.</p> <p>5.19 Scoring and Reporting Requirements. Completed answer sheets and test booklets (used and unused) must be shipped by the <i>test administrator</i> according to the <i>certification organization's</i> written security procedures.</p> |

PROBLEMATIC AREA III – LOCATION SITE IRREGULARITIES

| Document Complaint of Exam Security Breach | CFP Standard/Requirement |
|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Candidate violated test center requirements</p> | <p>5.16 Site Requirements. Sites chosen for administering <i>food safety certification examinations</i> must conform to all legal requirements for safety, health, and accessibility for all qualified candidates. Additionally, the accommodations, lighting, space, comfort, and work space for taking the examination must allow all candidates to perform at their highest level of <i>competency</i>.</p> <p>5.17 Requirements at each site include but are not limited to:</p> <ul style="list-style-type: none"> a. accessibility in accordance with requirements of the Americans with Disabilities Act must be available for all qualified examinees, whether it be the main site for an administration or in an alternative site meeting all other requirements of the main site; b. all sites must conform to all fire safety and occupancy codes of the jurisdiction in which they are located; c. there must be sufficient spacing between each examinee in the area in which the actual testing is conducted, or other appropriate and effective methods, to preclude any examinee from viewing another examinee's test; d. acoustics must allow each examinee to hear instructions clearly, using an electronic audio system if necessary; e. lighting at each examinee's work space must be adequate for reading fine print; and f. ventilation and temperature must be appropriate for health and comfort of examinees. |

PROBLEMATIC AREA IV

BREACH OF PROVIDERS TEST ADMINISTRATION REQUIREMENTS

| Document Complaint of Exam Security Breach | CFP Standard/Requirement |
|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All candidates given same form of exam | <p>5.4 Test Administrator and Proctor Qualifications, Training and Duties. <i>Certification organizations must specify the responsibilities of test administrators and of proctors, set minimum criteria for approval of test administrators and for proctors, and provide suitable programs of training to enable persons to meet those criteria. Responsibilities, duties, qualifications and training of test administrators and proctors must be directed toward assuring standardized, secure examination administration and fair and equitable treatment of examinees. Policies and procedures for taking corrective action(s) when any test administrator or proctor fails to meet job responsibilities must be implemented and documented.</i></p> <p>5.8 Item & Examination Exposure. <i>The certification organization must demonstrate it has controlled for item and examination exposure. An exposure plan must take into account the number of times a test item and examination form/version is administered, that no examination form is retained for any test administration or by any test administrator/proctor for more than 90 days; and that at all times it can account for all copies of all used and unused examination forms before being returned to the certification organization.</i></p> |
| Insertion of exam in companies new hire packets | <p>5.7 <i>The certification organization shall enter into a formal agreement with the test administrators/proctors and shall assess and monitor the performance of test administrators and proctors in accordance with all documented procedures and agreements. The formal agreement shall include, at a minimum, provisions that relate to code of conduct, conflict of interest and a statement of consequences for breach of the agreement</i></p> <p>Section 5.8 – (see wording for Standard Section in the item listed above)</p> |
| Computer Based Testing incidents (suspect security breach by the candidate) | <p>6.7 <i>Evidence of security in the computer-based testing environment must 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.</i></p> |

RECOMMENDED SOLUTIONS/POTENTIAL OPTIONS

PROBLEMATIC AREA I PROFESSIONAL CREDIBILITY & RAINING OF PROCTORS

| | RECOMMENDATIONS/ OPTIONS | IMPACT | Duplicate (D) or Ranking # |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| 1 | More in-depth and consistent examination administration training of proctors with identifiable learning outcomes that stresses the importance of the proctor to maintain standardization and validity of the examination. Should have a performance examination with it. | Training and testing (performance) will further emphasize the strict and important role of the proctor and should lessen test administration problems. This will also increase the professionalism so they will take pride in what they do. Issuance of certificates will be more controlled and accounted for if one entity is involved. The direct control will increase accountability and consistency. | |
| 2 | Centralize issuance of certificates and create certificates that are more difficult to reproduce. | | |
| 3 | Proctors must be under the direct control of the certification body. | | |
| 4 | Train local resources with proctor experience. | | |
| 5 | View an online ANSI/CFP approved proctor training DVD and tracked they have completed electronically | It will provide the same process and criteria for each provider as well as uniformity for ANSI to audit It will hold eliminate proctors that are not in it for the right reasons by making additional hopes to go through and pay fee Most importantly it will hold the proctors accountable to understanding their responsibilities as they will have to recert annually and pass an online proctor certification. | |
| 6 | Provide a proctor policy and procedure document and a sign off that is was read and understood in addition to the required NDA. | | |
| 7 | Proctor TO complete 3 standard documents ANSI/CFP approved a) application b) nondisclosure agreement 3) an online quiz/exam based upon the training DVD and the proctor manual and provide a proctor certification as we do with our testing centers | | |
| 8 | Repeat this process annually from their original approved date | | |
| 9 | Set a standard proctor application fee and annual renewal fee that is the same for all providers to offset costs of implementing a more labor and resource intensive process. Application fee \$500 annual renewal fee \$100 | | |

ORLANDO MEETING OUTCOMES

(Outlining a Strategic Direction)

Identified Short-Term Objectives for improvement of the entire testing process based on logistics, acceptability, cost, technology, and complexity to:

- ▶ Enhance procedures & accountability of:
 - a. Test Administrators,
 - b. Proctors, and
 - c. Certification Organizations

- ▶ Formalize a management system that creates systematic, continuous improvement process through:
 - a. Document Control
 - b. Internal Audits
 - c. Management Review

ORLANDO MEETING OUTCOMES

(Outlining a Strategic Direction)

Identified Long-Term Objectives:

- ▶ Eliminate the inherent conflict of interest within the testing process
- ▶ Meet all applicable nationally accepted personnel certification standards

Work Group Recommendations for Changes to Standards

- **EXAM DEVELOPMENT** - quarterly have a minimum of 2 exam forms based on 1000 item bank
- **TEST ADMINISTRATORS ROLES AND RESPONSIBILITIES** - clearly delineate all test administrators roles and responsibilities
- **TRAINING OF TEST ADMINISTRATORS** - require the certification organization to provide a training program for Test Administrators based on learning objectives that reflect their roles/responsibilities

Work Group Recommendations for Changes to Standards

- **VERIFICATION OF TEST ADMINISTRATORS** – require certification organization to notify ANSI when test administrator has been excluded
- **EXAM ITEM EXPOSURE** – require certification organizations to have a system to track all examinations (exam booklets/answer sheets)
- **EXAM SHIPPING/HANDLING** – restructure Standards so it includes provisions for ensuring secure shipping & handling of exams for both the certification organizations and the test administrators

Work Group Recommendations for Changes to Standards

- **TEST SITES** – require a private room accessible only to test administrators and examinees during test administration
- **CERTIFICATES** – require certification organizations to have a system to provide verification to the current validation of individual certificates
- **ADVERTISING STANDARDS** – test administrator, cannot make, nor have an affiliation with any organization that makes, statements or claims such as guarantees of passing the exam

Work Group Recommendations for Changes to CFP Standards

- **MANAGEMENT SYSTEMS** – add a new section to the Standards that contains requirements for the implementation of management systems that include the following three components:
 1. Document Control
 2. Internal Audits
 3. Management Review



April 2010 2012 (January 5, 2012 draft)

Conference for Food Protection

Standards for Accreditation of Food Protection Manager Certification Programs

As Amended by at the 2010 2012 Biennial Meeting of the Conference for Food
Protection

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 is 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.

FDA NEWS RELEASE - October 22, 2010

“FDA Deputy Commissioner for Foods Michael R. Taylor cited the retail food industry’s recent progress in key areas as well as room for improvement, based on the findings released today from FDA’s 10-year study tracking the retail industry’s efforts to reduce five key risk factors.”

- “In looking at the data, it is quite clear that ***having a certified food protection manager on the job makes a difference,***” Taylor said. “Some states and localities require certified food protection managers already, and many in the retail industry employ them voluntarily as a matter of good practice. We think it should become common practice.”

Food Protection Manager Certification Committee Issues

1. Report – Food Protection Manager Certification Committee (FPMCC)

- FPMCC Final Report
- *Standards for Accreditation of Food Protection manager Certification Programs*
- *Food Protection Manager Certification Committee Bylaws*
- ANSI / Certification Providers Workgroup Report
- FPMCC Member Roster

Food Protection Manager Certification Committee Issues

2. Standards – Strengthening Exam Security

- Recommended Solution to Issue 2012 11-014

3. Standards – Non-substantive Revisions

4. FPMCC Bylaw Revision

5. FPMCC Bylaw Non-Substantive Revisions

6. FPMCC – New and Continuing Charges

Please ask me or any FPMCC
member if you have any
questions or concerns regarding
any of these issues.