Constitution and Bylaws and Procedures Committee
Report to Executive Board

Date: December 7, 2007

Prepared by: Jane Griffith, Chair

Committee charge:

The Constitution and Bylaws/Procedures Committee shall submit recommendations to improve Conference administrative functions through proposals to amend the Constitution and Bylaws. The Committee shall review proposed memoranda of understanding and ensure consistency among the memoranda of understanding, the Conference Procedures manual, the Constitution and Bylaws and other working documents. The Committee shall report all recommendations to the Board prior to Council II deliberation and shall follow the direction of the Board.

Committee Members:

<table>
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<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Phone #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jane Griffith</td>
<td>Wawa,Inc</td>
<td>610-358-8180</td>
</tr>
<tr>
<td>Barbara Gerzonich</td>
<td>NY, Dept of Health</td>
<td>518-402-7600</td>
</tr>
<tr>
<td>Ellen Laymon</td>
<td>Oregon, Dept of Agriculture</td>
<td>503-986-4725</td>
</tr>
<tr>
<td>Larry Eils</td>
<td>NAMA</td>
<td>312-346-3700</td>
</tr>
<tr>
<td>Paul Panico</td>
<td>Retired</td>
<td>740-927-0889</td>
</tr>
<tr>
<td>Marsha Robbins</td>
<td>HACCPplus</td>
<td>602-395-9164</td>
</tr>
<tr>
<td>Steve Grover</td>
<td>Burger King Corp.</td>
<td>305-378-3410</td>
</tr>
<tr>
<td>Kevin Smith</td>
<td>FDA</td>
<td>301-346-2149</td>
</tr>
<tr>
<td>Ralph Stafko</td>
<td>FSIS-USDA</td>
<td>202-690-6592</td>
</tr>
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Progress Report:

Following the 2006 Conference for Food Protection Biennial Meeting, the Committee reviewed and discussed changes to the Constitution and Bylaws 2006; and the Conference Procedures 2006 document as per the Conference charge. All committee meetings were conducted by conference calls and e-mail communications.

The Committee focused on three areas for revisions to the documents including 1) inclusion of Executive Treasurer and changes in the Executive Board members and responsibilities, 2) updates and clarification on CFP protocols and position descriptions; and 3) correction to the documents to ensure procedural consistency.

These updates and revisions have generated an initial list of over 20 issues which the Committee is reviewing to determine where several issues can be bundled to reduce the total number of Issues to be submitted.

A brief review of the Issues from the Constitution and Bylaws 2006 are: the inclusion of the Executive Treasurer position and job responsibilities, and the impact to the Executive Director responsibilities; clarification of membership duration; addition of Ex-Officio members to the Executive Board; clarification of duties of the Council and Committee Chairs; updated Program Chair responsibilities; and changes to the Conference time lines.

For the Conference Procedures, Issues include: the clarification of when an Issue can be rescinded by the submitter; clarification on the process to reassign an Issue to another Council; additional clarification on providing background materials to a Council; definition of the ad hoc and Standing Committees, and revision of timelines for Issue submission and FDA response to Conference Issues.

Other Issues to be submitted include updating both the title page of both documents to include the new Executive Director’s contact information, and the adoption of the MOU from the USDA.

I have attached the draft list of Issues for the Executive Board’s reference. The Committee will continue to work with this list to consolidate and reduce the number of submitted Issues.
**Requested Board (or other) Actions:**

Please acknowledge this report as submitted

**Recommendation(s) for future charge:**

The Committee should be charged as follows from the 2008 Conference meeting:

1. Update and revise the documents with Issues approved by the Assembly.
2. Further define and clarify the role of the regulatory agencies on Councils and Committees.
Conference for Food Protection  
Constitution and Bylaws/Procedures Committee

To: Conference for Food Protection  
Executive Board
From: Jane Griffith, Chair, Constitution and Bylaws Committee
Re: Submitted Issues
Date: January 12, 2008

Committee Charge: Shall submit recommendations to improve Conference administrative functions through proposals to amend the Conference for Food Protection (CFP) Constitution and Bylaws. The Committee shall review proposed memoranda of understanding and ensure consistency among the memoranda of understanding, the Conference Procedures Manual, the CFP Constitution and Bylaws, and other working documents. The Committee shall report all recommendations to the Executive Board prior to Council II deliberation and shall follow the direction of the Executive Board.

Committee Members: Committee members remain unchanged since the December report.

Committee Report: Since the December report the committee’s attention has been identifying changes to the CFP Constitution and Bylaws and to the Conference Procedures Manual. As a result the committee has written 29 Issues and submitted them to the Conference for acceptance and consideration by Council II. These Issues are as follows:

- CB 1 – Constitution and Bylaws/Procedures Committee Report
- CB 2 – CFP Constitution – The adoption of the Memorandum of Understanding between CFP and AFDO
- CB 3 – CFP Constitution – Amend Article II, Section 1
- CB 4 – CFP Constitution – Amend Article III; Article IV; and Article V
- CB 5 – CFP Constitution – Amend Article III, Section 4
- CB 6 – CFP Constitution – Amend Article IV
- CB 7 – CFP Constitution – Amend Article V, Section 7
- CB 8 – CFP Constitution – Amend Article VI
- CB 9 – CFP Constitution – Amend Article VII, Section 3
- CB 10 – CFP Constitution – Amend Article VIII
- CB 11 – CFP Constitution – Amend Article IX
- CB 12 – CFP Constitution – Amend Article IX, new Section 7
- CB 13 – CFP Constitution – Amend Article XII, Section 6, Subsection 2
- CB 14 – CFP Constitution – Amend Article XV, Section 2
- CB 15 – CFP Constitution – Amend Article XVII, Section 1, Subsection 4
- CB 16 – CFP Constitution – Amend Article XIX, Section 1
- CB 17 – CFP Constitution – Amend Appendix – Executive Board Member Listing
- CP 18 – CFP Procedures – Amend IV
- CP 19 – CFP Procedures – Amend IV.D.2
- CP 20 – CFP Procedures – Amend IV.E
- CP 21 – CFP Procedures – Amend IV.G
- CP 22 – CFP Procedures – Amend V.C.2
- CP 23 – CFP Procedures – Amend V.5
- CP 24 – CFP Procedures – Amend VII.B
- CP 25 – CFP Procedures – Amend VIII
- CP 26 – CFP Procedures – Amend VIII.C
- CP 27 – CFP Procedures – Amend VIII.G.2
- CP 28 – CFP Procedures – Amend IX.3
- CP 29 – CFP Procedures – Amend VIII.E

Requested Action: The Constitution and Bylaws Committee requests acknowledgement of this report detailing the status of these proposed changes to the CFP Constitution and Bylaws and to the Conference Procedures Manual.
August 23, 2006

Trevor Hayes, Executive Director of CFP
And
Elizabeth Nut, Program Chair 2008 CFP

As co-chairs of the Association of Food and Drug Officials (AFDO) Retail Food Committee we would like to thank you for the opportunity to revise the Memorandum of Understanding between the Association of Food and Drug Officials and the Conference for Food Protection (CFP). Our past President, Marion Aller and our current President, Charlene Bruce are excited about the opportunities this new MOU provide for both of our organizations.

Informal communication between AFDO and CFP committees will be a key to successful implementation of our new agreement. As co-chairs of the Retail Food Committee we will take responsibility to work with other AFDO committee chairs to inform them of work that is happening on all CFP committees. After the August, 2006 CFP Board meeting, we will contact CFP committee chairs to learn what charges they will be working on during the 2008 conference and will share with committees from both organizations those charges that may overlap with or are associated with charges that are assigned to AFDO committees. By doing this we hope to achieve collaboration that benefits both AFDO and CFP. We can also facilitate teleconferences to promote collaborative efforts.

We would appreciate it if you could provide your committee chairs with our contact information. Lisa Wright has provided us with the 2008 committee chair contact information.

If you have any suggestions or recommendation on how to facilitate or make this process a smooth one, please let us know.

Thanks for your assistance in reviving the MOU.

Ellen Laymon
Oregon Department of Agriculture
635 Capitol St NE, Salem, Oregon 97301
503-986-4725 elaymon@oda.state.or.us

Ron Klein
Alaska Department of Environmental Conservation
555 Cordova Street, Anchorage, Alaska 99501
907-269-7583 rklein@dec.state.ak.us

111th ANNUAL CONFERENCE • June 16 - 20, 2007 • San Antonio, TX
MEMORANDUM OF UNDERSTANDING
BETWEEN
THE ASSOCIATION OF FOOD AND DRUG OFFICIALS
AND
THE CONFERENCE FOR FOOD PROTECTION

It is to the advantage of the Association of Food and Drug Officials (AFDO) and the Conference of Food Protection (CFP) to enter into a Memorandum of Understanding for the purpose of establishing and continuing dialogue and information sharing related to food safety and food defense. Enhancing communication will help to protect the citizens of the United States from foodborne illness and also promote food defense efforts between the two associations.

To this end, the following activities are proposed:

1. The Board of Directors of AFDO and the Executive Board of CFP will engage in an ongoing effort to share information related to food safety and food defense as each organization develops draft position statements, issue papers, resolutions, strategies, reports, and related documents.

2. Each organization will share with the other any significant dialogue held with federal counterparts (FDA, USDA/FSIS, CDC, etc.) which may result in a final position related to a national food safety or food defense issue. Necessarily excluded would be information in confidence obtained through specific federal credentialing.

3. In order to minimize duplication of effort, each organization will work together in a timely manner when feasible to solve food safety and food defense related problems that affect the memberships of both associations.

4. Information will be shared regarding meeting times and locations (including future meeting dates and sites). CFP shall share with AFDO the important Conference deadlines such as that for Issue submission.

5. Both organizations shall include the Presidents and/or Executive Directors in general membership information emails to ensure that each may in turn distribute these to their respective organizations.

6. Each organization shall ensure that the organizations are listed on the other’s web sites as a “food safety” link.
This Memorandum of Understanding becomes effective upon signing and will remain in effect until renegotiated or terminated by either party.

Charles Bruce
President
Association of Food and Drug Officials

Elisa A. Nett
Chair
Conference for Food Protection

DATE 3/23/06

DATE  May 1, 2007
Standing Committee: Issue Committee Report

Date of Report: December 7, 2007

Submitted By: Vicki Everly, Issue Committee Chair

Committee Charges:

Constitutional Charge
Article XIV, Section 1
The Issue Committee shall review all Issues submitted at least ninety (90) days before the Conference meeting. The Issue Committee shall assign for Council deliberation those Issues that have met the Issue acceptance criteria specified in the Conference Procedures Manual. Issue assignments shall be made in accordance with Article XII, Section 1, Subsection 1; Section 2, Subsection 1; and Section 3, Subsection 1.

Additional Charges from 2006 Conference
1. Maintain and enhance Issue submission website, including:
   a. update of computer program;
   b. development of instructions for web based program;
   c. posting of revised Issue instructions and submission procedures; and
   d. establishment of Issue Chair and Executive Assistant web links.
2. Finalize Issue procedures, including:
   a. Issue review, criteria, and committee instructions;
   b. Conference timeline;
   c. Issue Attachment Policy; and
   d. Council instructions.
3. Develop instructions for Committee Reports submitted with Issues, including:
   a. procedure and timeline for submission to Council Chairs; and
   b. procedure for submittal of Committee reports.
4. Research and recommend a “branding policy” for accepting and rejecting Issues and attachments.

Progress Report / Committee Activities:

- Redeveloped online Issue Submission process:
  1) A dedicated Issue Submission page was created on the new CFP website providing information on Issue preparation, submission guidelines, acceptance terms and conditions, Issue “path” from submission to Conference action, and a direct link to the Issue Submission website hosted by Purdue University; work completed by Lisa Wright, CFP Executive Assistant.
  2) The online Issue Submission website was redesigned “from the ground up,” including optimizing code, making it modular for easier updates, and drafting of instructions for website management; work completed by Kevin Hamstra of Purdue University.
  3) Reviewed, edited, and consolidated policy, procedures, and instructions for Issue submission and review.

- Established 2008 Conference timeline to correspond with new constitutional mandates:
  October 2007 Online Issue submission available
  7 December 2007 Committee Reports and prospective Issues due to Council Chairs
  13 January 2008 Issue submission deadline (Constitutionally mandated at 90 days before biennial meeting)
  28 January Target Date to submit Issues to Issue Committee
  1 February Target Date for Issue Committee to finalize Council assignments
  18 February Issue Chair finalizes packets for Executive Director
  3 March Online Issue Packet available (Constitutionally mandated at 40 days before biennial meeting)
• Established Board policy documents; approved and adopted by the Executive Board on August 25, 2007:

**Issue Acceptance Criteria**

To be accepted by the Conference for Food Protection, an Issue must meet all of the following criteria:

4) Be within the jurisdiction of the Conference and concern retail food, food service, retail food stores, and/or vending.

5) Be submitted electronically using the online Issue Submission Form.

6) Be submitted on or before January 13 at 11:59 p.m. EST at which time the Submission Form will be inactivated.* **NOTE:** See the Late Issue Submission Policy.

7) All sections of the Issue Submission Form must be complete and grammatically correct.

8) The name for all acronyms used in the Suggested Solution Section must be spelled out at least once.

9) The Issue must be described completely including its impact on the retail food industry.

10) The food protection or public health aspect must be clearly stated and be easily understood.

11) The suggested solution or rationale must be sufficiently detailed to cover all aspects of the submission. When the recommended solution is to change the wording of an existing document (such as the FDA Food Code or a Conference document), the portion of the document to be changed must be accurately identified and requested changes clearly specified using strikeout to indicate the words to be deleted and underline the newly added text.

12) The Issue and attachments must meet specified size and format limitations. **NOTE:** See Issue Attachment Limitations.

13) Issues may not be commercial in nature. Issues that endorse a brand name or commercial proprietary process will NOT be accepted. **NOTE:** See Commercialism Policy.

14) An Issue submitted by a Conference Committee must conform to additional criteria. **NOTE:** See Additional Criteria for Committee-Submitted Issues.

15) Issues will be reviewed for spelling, grammar, content and clarity; submitter will be provided two (2) opportunities to incorporate recommended changes. Failure to make changes as requested and within a specified time period will result in rejection of the Issue.

16) Revisions to an Issue after the posted deadline will be limited to those requested by the Issue Reviewers.

17) Issues become the property of the Conference for Food Protection once accepted by the Issue Reviewers.

* Date indicated is specific to the 2008 biennial meeting and will be updated for each conference.

**Additional Criteria for Committee-Submitted Issues**

In addition to meeting the Issue Acceptance Policy, the following additional criteria shall apply to Committee-Submitted Issues:

1) At a date approved by the Board (approximately 5 weeks in advance of the Issue submission deadline), all Committee Chairs shall submit to the respective Council Chair:
   a. Prospective Issue(s) for review.
   b. A final Committee report for review and approval; any changes made after this review must be approved by the respective Council Chair. Council Chair will respond to Committee Chair(s) with their comments in time for Issue(s) to be submitted via the online process; Council Chairs will then notify the Issue Committee Chair when their review process is complete.

2) The final Committee report shall be submitted as an attachment to an Issue with the recommended solution to:
   a. “Acknowledge” the Committee report. (Note: Councils should not “accept” or “approve” Committee reports as this implies the entire content of the report has been debated and agreed upon by Council members. Specific elements of the
Committee report that need to be formally debated and approved are to be submitted as separate stand-alone issues.)

b. List any continuation (unfinished or ongoing) charges assigned to the Committee.
(Note: “new” Committee charges are to be included within subsequent issues.)
c. Thank the Committee members.

3) The final Committee report shall contain a single listing of all Issues and attachments submitted.
   a. The title given to any Issue or attachment shall be used consistently within all submitted Committee documents.
   b. Issue attachments:
      i. Attachments subject to editing by Council (i.e., during deliberation) may be attached as an Adobe Acrobat (.pdf) document, but must be made available in advance to the Council Scribe in MS Word (.doc) format for downloading.
      ii. If an attachment is referenced in multiple Issues, it must be attached only once to the Committee report Issue, then referenced in subsequent Issue(s) (for example: “See ABC Committee Report, Attachment #1, titled: XYZ”).

4) Council Chairs will work with Committee Chairs to determine the best method of attaching documents.

**Issue Attachment Limitations**

Attachments to an Issue are subject to the following limitations:

1) All attached documents must be in MS Word (.doc) or Adobe Acrobat (.pdf) format; other formats such as Text (.txt) and Rich Text Format (.rtf) will NOT be accepted.

2) The name of the attachment must be specific and accurately referenced within the Issue; the attachment name may be modified by the Conference because of space limitations, clarification, or duplication.

3) A description of the specific section(s) and/or page number(s) referenced must be noted.

4) If documents to be attached are posted online on a publicly accessible website, it is requested that a single-page MS Word (.doc) or Adobe Acrobat (.pdf) document be the only attached document providing the actual citations and website address links (URL) for all referenced documents.

5) All Macros are to be removed from attached documents.

6) Attachments over 2 megabytes (2 MB) in size will NOT be accepted.

7) Attachments containing a virus will NOT be uploaded; it is highly recommended that a virus scan be performed on all attachments.

**Submitting Issue Amendments or Revisions**

A consistent Issue amendment and/or revision process will help Council Members understand and recognize their responsibilities and duties; help Issue submitters understand their role during a Council meeting; define what actions may be taken with an Issue during a Council meeting; and provide an effective, efficient, and fair process for Council deliberation and action.

Any Issue amendment, revision, or supplemental handouts submitted during the biennial meeting for consideration by a Council will adhere to the following:

1) Amendments, revisions, or supplemental handouts must be:
   a. Provided in advance to the appropriate Council Chair or Vice Chair in an acceptable electronic format (e.g., CD, USB) for downloading by the Council Scribe, along with 25 paper copies for Council Members.
   b. Submitted in an underline and strikeover format to allow Council Members to readily locate changes.
   c. Dated and timed to reduce confusion with previous submissions.

2) Submitter of amendment or revision will notify the Council Chair in advance so that time can be scheduled for Council Members to review the new information.

3) Content and format of final Issue recommendation must meet the specifications described in the Issue Acceptance Criteria.

4) Bringing the amendment or revision to the table:
a. A Council Member who is the original submitter may bring the amendment or revision to the table as recognized by the Council Chair.

b. If the Issue submitter is not a Council Member, then a Council Member must bring the amendment or revision to the table as recognized by the Council Chair. Issue Submitter may address the amendment or revision when recognized by the Council Chair.

5) The Council will determine if they have adequate time to address the amendment or revisions. There is no guarantee that all amendment or revisions will be debated; the submitter should be aware of the limitation of time available at Council sessions.

- Researched allied organization's “branding policies” for review and discussion at the August 2007 Executive Board meeting. The Board agreed that an existing Commercialism Policy established in August 2000 adequately addressed the Conference needs.

The Conference for Food Protection Commercialism Policy reads as follows:

**Purpose:** This policy has been developed by the Executive Board to establish guidelines for the use of commercial names, logos, or other information in Issues submitted to the Conference

**Policy:** The Conference for Food Protection shall not endorse the use of a product, process or service by brand name. Issues submitted for consideration at a Biennial Meeting will be reviewed; and those where brand names are used in the issue, rational or solution will be rejected. The Issue Submission Form will contain a statement that reads, “It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.”

- Review and assignment of Issues as mandated by Constitutional charge.

### Committee Members:

<table>
<thead>
<tr>
<th>Local Regulatory</th>
<th>State Regulatory</th>
<th>Academia</th>
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</table>
| Vicki Everly, Issue Committee Chair  
Santa Clara County Dept. of Environmental Health  
1555 Berger Drive, Suite 300  
San Jose CA 95112-2716  
(408) 918-3490  
vicki.everly@deh.sccgov.org | David Ludwig, Council III Chair  
Maricopa County Environmental Services  
1001 N. Central Avenue, Suite 300  
Phoenix AZ 85004  
(602) 506-6971  
dludwig@mail.maricopa.gov | Glenda Christy  
Allegheny County Health Dept  
3901 Penn Avenue, Building #1  
Pittsburgh PA 15224-1318  
(412) 578-7932  
gchristy@achd.net |
| Darwin Pattengale  
Albuquerque Environmental Health Department  
One Civic Plaza  
Albuquerque NM 87103  
(505) 768-2616  
dpattengale@cabq.gov | Lee Comman, Council I Chair  
Florida Dept. of Agriculture and Consumer Svcs.  
3125 Conner Blvd., C-18  
Tallahassee FL 32399-1650  
(850) 488-8434  
cornmal@doacs.state.fl.us | Aggie Hale, Council II Vice-Chair  
Florida Dept. of Agriculture and Consumer Svcs.  
3125 Conner Blvd., Suite H  
Tallahassee FL 32399-1650  
(850) 245-5520  
halea@doacs.state.fl.us |
| Dean Finkenbinder  
Wyoming Department of Agriculture  
2219 Carey Avenue  
Cheyenne WY 82002  
(307) 777-6587  
dfinke@state.wy.us | Brian A. Nummer, Ph.D.  
Utah State University  
8700 Old Main Hill  
Logan UT 84322-8700  
(435) 797-2116  
briann@ext.usu.edu | Glenda R. Lewis  
USFDA/CFSAN  
5100 Paint Branch Parkway, HFS 626, Room 2C-006  
College Park MD 20740  
(301) 436-2150  
glewis@fda.hhs.gov |
## Industry – Food Service

<table>
<thead>
<tr>
<th>Name</th>
<th>Company</th>
<th>Address</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Gurrisi</td>
<td>Council II Chair</td>
<td>Darden Restaurants, Inc.</td>
<td>5900 Lake Ellenor Drive</td>
<td>(407) 245-6842</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5900 Lake Ellenor Drive</td>
<td>Orlando FL 32809</td>
<td><a href="mailto:jgurrisi@darden.com">jgurrisi@darden.com</a></td>
</tr>
<tr>
<td>Pam Williams</td>
<td>Council I Vice-Chair</td>
<td>Yum! Brands, Inc.</td>
<td>675 Mansell Road, Suite 200</td>
<td>(770) 990-2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Roswell GA 30076</td>
<td></td>
<td><a href="mailto:Pam.Williams@yum.com">Pam.Williams@yum.com</a></td>
</tr>
<tr>
<td>Frank Ferko</td>
<td></td>
<td>RARE Hospitality International, Inc.</td>
<td>8215 Roswell Road, Bldg. 600</td>
<td>(678) 320-9288</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Atlanta GA 30350</td>
<td></td>
<td><a href="mailto:fferko@loho.com">fferko@loho.com</a></td>
</tr>
<tr>
<td>David Armatis</td>
<td></td>
<td>Guckenheimer</td>
<td>#3 Lagoon Drive, Suite 325</td>
<td>(650) 274-8573</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Redwood Shores CA 94065</td>
<td></td>
<td><a href="mailto:darmatis@guckenheimer.com">darmatis@guckenheimer.com</a></td>
</tr>
<tr>
<td>Alan Odom</td>
<td></td>
<td>Compass Group</td>
<td>310 West Church St.</td>
<td>(618) 439-9753</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Benton IL 62812</td>
<td></td>
<td><a href="mailto:alan.odom@exch.compass-usa.com">alan.odom@exch.compass-usa.com</a></td>
</tr>
<tr>
<td>Eric D. Martin</td>
<td></td>
<td>Margaritaville</td>
<td>6800 Lakewood Plaza Drive</td>
<td>(407) 224-3216</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Orlando FL 32819</td>
<td></td>
<td><a href="mailto:emartin@margaritaville.com">emartin@margaritaville.com</a></td>
</tr>
<tr>
<td>Dee Williams</td>
<td></td>
<td>Jack in the Box Inc.</td>
<td>9330 Balboa Avenue, Innovation Center</td>
<td>(858) 571-2550</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5915 West Church St.</td>
<td>San Diego CA 92123</td>
<td><a href="mailto:deewilliams@jackinthebox.com">deewilliams@jackinthebox.com</a></td>
</tr>
<tr>
<td>Mary Sandford</td>
<td></td>
<td>Burger King Brands</td>
<td>5505 Blue Lagoon Drive</td>
<td>(305) 378-7917</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Miami FL 33126</td>
<td></td>
<td><a href="mailto:msandford@whopper.com">msandford@whopper.com</a></td>
</tr>
</tbody>
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## Industry – Retail

<table>
<thead>
<tr>
<th>Name</th>
<th>Company</th>
<th>Address</th>
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<tbody>
<tr>
<td>Ken Rosenwinkel</td>
<td>Council III Vice-Chair</td>
<td>Jewel-Osco / Albertson’s</td>
<td>1955 W. North Avenue</td>
<td>(708) 531-6787</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Melrose Park IL 60160</td>
<td></td>
<td><a href="mailto:ken.rozenwinkel@albertsons.com">ken.rozenwinkel@albertsons.com</a></td>
</tr>
<tr>
<td>Jane Griffith</td>
<td></td>
<td>Wawa, Inc.</td>
<td>260 W. Baltimore Pike</td>
<td>(610) 358-8180</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wawa PA 19063-5699</td>
<td></td>
<td><a href="mailto:jane.m.griffith@wawa.com">jane.m.griffith@wawa.com</a></td>
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## Industry – Vending

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<tbody>
<tr>
<td>Robert Himes</td>
<td></td>
<td>Himes Vending, Inc.</td>
<td>4654 Groves Rd.</td>
<td>(614) 868-6931</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Columbus OH 43232</td>
<td></td>
<td><a href="mailto:himesvend@juno.com">himesvend@juno.com</a></td>
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## Committee Consultants

<table>
<thead>
<tr>
<th>Name</th>
<th>Company</th>
<th>Address</th>
<th>Phone</th>
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</tr>
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<tbody>
<tr>
<td>Kevin Hamstra</td>
<td>Multimedia Technical Specialist</td>
<td>Purdue University</td>
<td>(765) 496-3833</td>
<td><a href="mailto:khamstra@purdue.edu">khamstra@purdue.edu</a></td>
</tr>
<tr>
<td>Lisa Wright</td>
<td>CFP Executive Assistant</td>
<td>11825A Spruce Run Drive</td>
<td>San Diego CA 92131-3714</td>
<td>(858) 547-8595</td>
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<td><a href="mailto:ewright1@san.rr.com">ewright1@san.rr.com</a></td>
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Emergency Action Plan for Retail Food Establishments

Practical guidance for retail grocery and food service establishments to plan and respond to emergencies that create the potential for an imminent health hazard.

Produced by:
Emergency Preparedness Committee of Council II
2004-2006 Conference for Food Protection

with much appreciation to:
CITY OF DETROIT HEALTH DEPARTMENT
MACOMB COUNTY HEALTH DEPARTMENT
MICHIGAN DEPARTMENT OF AGRICULTURE
MICHIGAN RESTAURANT ASSOCIATION
OAKLAND COUNTY HEALTH DEPARTMENT

Revised by:
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with much appreciation to:
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Introduction

Planning Ahead

According to the National Archives and Records Administration:

- 43% of companies struck by disaster never resume operations.
- 29% of those that resume business fail within two years.

The high cost of paying staff that are idle, cost associated with loss of staff, added work and material costs related to the disaster, loss of inventory, other hard cash costs, lost business, lost customer loyalty, and lost customer confidence all take a toll.

It is therefore important to plan ahead and be prepared. You should consider the type of hazard(s) for which your business is most vulnerable and take precautions to minimize the impact of such occurrences. For example, of the imminent health hazards listed in this document, statistics show that interruption of electrical service is likely to be the most common. Ask yourself what would you do if your establishment lost power today? What would you do if the power outage lasts for an extended period of time, is widespread, and many people are competing for ice, batteries, generators, refrigerated trucks, etc.? Would your business survive?

A food establishment manager (or the “Person-in-Charge”) is responsible for conducting both initial and ongoing assessments to ensure consistent compliance with food safety requirements. Manager or the Person-in-charge is also responsible for assuring all food service employees know where written procedures can be located and are trained on what actions to take as a part of the response procedures.

This document is designed to provide guidance in the development of emergency procedures for retail food establishments. Individual establishments can use the samples and resources in this document to develop procedures that meet the needs of their specific organization. In the event disaster strikes, do you know what your organization’s emergency procedures are?

 Interruption of Electrical Service:

- Power outages are the most frequent type of man made disasters. Statistics indicate that the average power outage lasts four hours, but could last for days. The August 2003 power outage disaster affecting large areas in the northeastern part of the country lasted four days.
- Consider your access to an electrical generator to be used in emergencies. Make certain that the generator has the capacity to operate critical equipment such as refrigeration and freezer units, pumps, safety lighting, hot water heaters, etc. Make certain that individuals are trained to operate the equipment safely. Be sure to consult with a licensed electrician. Advise the utility company that you are using a generator as a safety precaution for their employees.
- Consider securing access to a refrigerated truck that can be delivered to the site during an emergency.
Consider securing access to a refrigerated warehouse that has a back-up generator to which you can bring food needing refrigeration in insulated containers.

Prepare an “emergency menu” in advance including recipes for food items that do not require cooking since the ventilation system will no longer remove smoke, steam, grease laden air, etc.

Develop a plan for minimizing loss of food product held under refrigeration. Opening refrigeration equipment doors will cause the food to warm more quickly. What is your strategy for loss prevention?

Develop a plan to monitor and record product temperatures and a plan to relocate product(s) from display cases to walk in coolers, freezers, or reefers (refrigerated trailers) as needed to maintain safe internal temperatures.

If you plan to use ice to keep food cold, where will you obtain ice when ice is in high demand by the general population?

Dry ice should not be used in enclosed spaces (i.e. walk-in cooler) because of the potential build-up of carbon dioxide. If used, pack potentially hazardous food in dry ice using precautions, such as utilizing insulated gloves to handle and venting the area before entering.

Heating, air conditioning, security systems, computers, cash registers, lighting, and other systems may not operate. Develop a plan for coping with these problems.

Maintain contact information for people that can help you such as the utility company, garbage hauling service, ice supplier, refrigerated truck company, food warehouse, septic tank pumping service, local health department, emergency broadcast station frequency numbers, etc.

Develop a list of equipment that uses electricity in your establishment and develop a contingency plan that describes what you would do if electrical service is interrupted. Use the *Emergency Guidance for Retail Food Establishments* as a guide to help describe the steps that you would take in your own establishment.

Develop a plan for communicating with key people in your organization. Keep an updated list of emergency contact numbers with you at all times.

- Consider the purchase of a phone that can use common batteries or can be plugged in to alternative energy sources (such as a car lighter).
- Utilize a cellular or satellite service that can provide continuous service in the event of a power outage.
- Consider use of wireless e-mails, text messaging, instant messaging or other alternative means of communication.
- Plan how important documents and other information will be communicated without the use of computers and fax machines.

**Water Supply Related Issues:**

- Prepare an “emergency menu” in advance including recipes for food items that require no water or minimal amounts of water to prepare.
- Maintain an inventory of single-service and single-use articles to help get through a reasonable time period.
- Maintain an inventory of bottled water.
- Maintain an inventory of containers suitable for hauling water.
- Maintain an inventory of disposable gloves and hand sanitizer.
• Develop a business agreement with a supplier of bottled water or a licensed drinking water hauler that will provide assurance that you will have an alternative source of water available during an emergency.
• Locate public water supplies in your area and points where containers can be filled with drinking water.
• Develop a contingency plan for toilets. If the water service is interrupted, where will you and your employees find toilet facilities available for use?
• Develop a business agreement with a supplier of ice in order to assure you that you will have access to ice during an emergency.
• Maintain current contact information for people that can help you such as your plumber, water well drilling contractor, utility company, ice supplier, water supplier, fire department, local health department, emergency broadcast station frequency numbers, etc.
• Develop a list of equipment that uses water in your establishment and develop a contingency plan that describes what you would do if the water is either interrupted or contaminated. Use the Emergency Guidance for Retail Food Establishments as a guide to help describe the steps that you would take in your own establishment.

Sewage Backup:
• Develop a list of equipment and facilities that have a drain. What specific steps would you take if each piece of equipment or a combination were no longer operable due to a drainage problem? Use the Emergency Guidance for Retail Food Establishments as a guide to help describe the steps that you would take in your own establishment.
• Develop a contingency plan for toilets. If the drain no longer functions, where will your employees and patrons find toilet facilities available for use?
• Maintain current contact information for people that can help you such as the plumber, drain cleaning service, utility company, septic tank pumping service, local health department, etc.

In Case of Fire:
• Post the phone number of the fire department in a conspicuous place by each phone.
• Ask the local fire marshal or other authority to conduct an assessment to determine if there are any fire hazards.
• Develop a plan for what to do in case of a fire. Have a practice fire drill.
• Assure that your fire extinguisher is charged and Ansul hood systems inspections are up-to-date.
• Maintain current contact information for people that can help you such as the fire department, police department, insurance company, water and fire damage restoration company, utility companies, lawyer, local health department, etc.

In Case of Flood:
• Determine if food and other products that can be damaged by water are being stored in areas prone to flooding, are off of the floor, are not under water and/or sewer lines, etc.
• Develop a plan for monitoring and maintaining sump pumps, down spouts, plumbing, exterior surface grading, storm drains, and other facilities that can contribute to flooding.
• Have an alternate egress in and out of the property identified in case of flood debris blockage.
• Consult with a rubbish management company for removal of any flood debris.
• Maintain current contact information for people that can help you such as the plumber, electrician, local rent-all store, fire department, police department, insurance company, water damage restoration company, utility companies, local health department, etc.

In Case of Infectious Disease Contamination: (any situation where there is a potential exposure to a person’s blood or body fluids):
• Only employees trained in the appropriate use of personal protective equipment should respond to the incident. Recommended equipment includes nonabsorbent disposable gloves, facemasks, eye goggles, and red biohazard disposable bags.
• Assume all blood and body fluids are infectious. Always wear personal nonabsorbent, disposable gloves and other protective equipment (face mask, and/or goggles dependent on the risk present) and use a protective “pocket mask” if performing rescue breathing.

In case of Potential Terrorist Threats (Follow FDA ALERT system guidelines):
• ASSURE that the supplies and ingredients you use are from safe and secure sources.
• LOOK after the security of the products and ingredients in your facility.
• EMPLOYEES must have background checks before hire and vendors must show identification.
• REPORTS of products received and sold must be available, per the Public Health Security and Bioterrorism Preparedness Act of 2002.
• THREATS must be addressed through notification of appropriate regulatory authorities.

In case of Pandemic influenza:
• All retail food establishments should prepare plans regarding the disruption or continuation of service during a pandemic influenza.

Sample references:
http://www.ohiopandemicflu.gov/docs/A-ZBusiness.pdf
Responsibilities of the Permit Holder and Regulatory Authority During an Emergency

Permit Holder

Single Event
In the event of an imminent health hazard involving interruption of electrical service, interruption of water service, contaminated water supply, fire, flood, sewage back-up, infectious disease contamination, or potential terrorist threat at an individual establishment, the Permit Holder shall:

1. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure.
2. Notify the regulatory authority of the imminent health hazard and discuss alternate procedures to be used. Determine if the issue is widespread.
3. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

Widespread Emergency
In the event of an imminent health hazard involving interruption of electrical service, interruption of water service, contaminated water supply, fire, flood, sewage back-up, infectious disease contamination, or potential terrorist threat that affects numerous establishments, the Permit Holder shall:

1. Conduct an evaluation of the operation as it relates to the hazard to determine if a safe operation can be maintained in accordance with applicable regulations.
2. Close the establishment if a safe operation cannot be assured.
3. If a safe operation can be assured, the establishment can remain open provided the appropriate action plan is followed.

Regulatory Authority

The Regulatory Authority will:

1. Promptly respond to single events involving imminent health hazards and provide guidance to help the permit holder resume operation as quickly as possible.
2. Allow permit holders to assess food safety within their individual establishment during a widespread emergency and allow the permit holder to follow the action plan.
3. Communicate with the industry during widespread emergencies through business associations (i.e. FMI, NRA, etc.), conference calls, mass media, hot lines, web sites, etc.
4. Conduct surveillance during a widespread emergency to determine if permit holders are following the action plan.
5. Conduct enforcement activity as appropriate to protect public health.
EMERGENCY GUIDANCE

Interruption of Electrical Service

For the purpose of defining an imminent health hazard for this guidance, an extended interruption of electrical service means that the electrical service has been interrupted for **2 hours or more**. For single events affecting an individual establishment, it is recommended that the permit holder note the date and time, notify the regulatory authority at the onset of the interruption, and implement their emergency procedures. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

I. Assessment
In the event of an emergency involving electrical service interruption, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of food operations.
- The duration of the emergency event.
- The impact on other critical infrastructure and services (example: refrigeration).
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

II. Response
The following are temporary alternative procedures that can be taken to address specific affected food operations during an extended interruption of electrical service.

Affected Operations
Refrigeration: Refrigeration equipment inoperable.

Alternative Procedures
- Note the time the power outage begins. And
- Monitor and record food temperatures every 2 hours (see chart in Recovery Section for disposition of potentially hazardous food) – document that you have acted responsibly. In open upright retail cases where doors are not available, monitor/document product temperatures every hour.
- Keep refrigeration equipment doors closed. In open upright retail cases where doors are not available, cover the cases with cardboard, plastic or equivalent to retain cold air.
- Pack potentially hazardous food in commercially made ice or dry ice (use precautions for using dry ice by using insulated gloves and venting the area before entering).
- Relocate product in cases to walk-in boxes, freezers, or reefers if safe temperatures cannot be maintained in the cases.
- Do not put hot food into refrigeration equipment.
Ventilation: No mechanical ventilation provided to remove cooking smoke, steam, grease laden air, etc.

Alternative Procedures
- Discontinue all cooking operations.

Lighting: Lack of artificial illumination for personal safety, food preparation, food handling, cleaning equipment/utensils, cleaning the premises.

Alternative Procedures
- Limit operation to daylight hours. Restrict operations to those that can be safely conducted in available natural light.
- Provide lighting using other power sources (i.e. battery operated lantern, flashlight, etc. if fire codes allow). Limit operation to those procedures that can be safely conducted using alternative lighting.

Cooking Equipment: Cooking equipment is no longer functional

Alternative Procedures
- Evaluate time and temperature to determine if foods should be discarded
- Discard raw animal/potentially hazardous foods that were in the cooking or re-heating process but did not reach a safe final temperature.
  And
- Discontinue cooking operations.

Hot Food Holding: Equipment for holding potentially hazardous food hot is no longer operational

Alternative Procedures
- Note the time the power outage begins.
  And
- Discard all potentially hazardous food after 4 hours from being removed from temperature control (below 135° F)
  Or
- Use an alternate heat source such as “canned heat” and monitor temperatures hourly. Note: If power returns within 4 hours, reheat food to 165° F.

Dishwashing Equipment: Equipment for cleaning and sanitizing utensils and tableware is no longer operational.

Alternative Procedures
- Use the three compartment sink if hot water is still available
  Or
- Use single service tableware
  And
- Discontinue operations that generate soiled utensils/tableware.
Water: The well serving the establishment no longer produces water.

Alternative Procedures
- See “Interruption of Water Service” procedures.

Sewage Disposal: Sewage ejector pump(s), no longer function

Alternative Procedures
- Discontinue all operations. Contact the local health department for possible options.

Electric Hot Water Heater: No hot water

Alternative Procedures
- Heat water on a gas cooking appliance.

III. Recovery
Recovery involves the necessary steps for re-opening and returning to a normal safe operation. (See Extended Interruption of Water Service for re-opening considerations relative to the water supply.)

A food establishment that was ordered or otherwise required to cease operations may not re-open until authorization has been granted by the regulatory authority.

Refrigerated Food Safety Guide
When power is restored, the following table should be used as a guide for handling potentially hazardous food (PHF / TCS) stored in refrigeration units that may have lost power. When in doubt, throw it out! (See the FDA Food Code, Chapter 3 for additional information on maintaining safe food temperatures.)

<table>
<thead>
<tr>
<th>Time</th>
<th>42° - 45° F</th>
<th>46° - 50° F</th>
<th>51° F or above</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-2 hrs</td>
<td>PHF (TCS) can be sold</td>
<td>Immediately cool PHF (TCS) foods to 41°F or below within 2 hours</td>
<td>PHF (TCS) foods cannot be sold. DESTROY the food.*</td>
</tr>
<tr>
<td>2-3 hrs</td>
<td>PHF (TCS) can be sold but must be cooled to 41°F or below within 2 hours</td>
<td>Immediately cool PHF (TCS) to 41°F or below within 1 hour</td>
<td></td>
</tr>
<tr>
<td>4 hrs</td>
<td>Immediately cool PHF (TCS) to 41°F or below within 1 hour</td>
<td>PHF (TCS) foods cannot be sold. DESTROY the food.*</td>
<td></td>
</tr>
<tr>
<td>5+ hrs</td>
<td>PHF (TCS) foods cannot be sold. DESTROY the food.*</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Regulatory authority may determine disposition of food depending on commodity or item and the ability to cool it down to 41°F or below within 2 hours for some foods such as harder cheeses, butters, margarines, etc with low aw and/or foods with lower pH provided refrigeration was restored within 4 hours and documentation is available.
If the location was vacated during the power outage, upon return the storage equipment may be fully functioning and the food may be at proper temperature. If the duration of the power outage and the highest temperature of the food can not be verified then all potentially hazardous food must be discarded.

**Frozen foods** that remain solid or semi-solid can be refrozen if food packages show no evidence of thawing such as weeping, stains, physical depreciation, evaporation, or container damage. If product is somewhat thawed or soft and has not exceeded 41°F on the outside and the inner core is still solid, it can be refrozen or further processed/cooked by food service operators. This product is not recommended for retail sale due to quality deficiencies.

**Key areas to consider for returning to normal operation when power is restored:**

- Electricity, potable water, and/or gas services have been fully restored.
- All circuit breakers have been properly re-set as needed.
- All equipment and facilities are operating properly including: lighting, refrigeration (back to operating temperature of 41°F and below), hot holding, ventilation, water supply, sewage pumps, hot water heaters, toilet facilities, ware washing machines and hand washing facilities.
- Food contact surfaces, equipment and utensils cleaned and sanitized prior to resuming food-handling operations. This includes ice bins in ice machines where ice has melted during the interruption.
- Flush all water lines, change filters, etc.

**Disposal of Food:**
Small volumes of food can be denatured (such as with bleach, a detergent or other cleaning product to render it unusable) or alternatively destroyed and placed in an outside refuse bin for removal. To discard large volumes of food, the firm should contact a disposal company for immediate transportation to a licensed landfill.
Interruption of Water Service

For the purpose of defining an imminent health hazard for this guidance, an extended interruption of water service means that the water service has been interrupted for 2 hours or more. For single events affecting an individual establishment, it is recommended that the permit holder document the date and time the water interruption begins, and notify the regulatory authority at the onset of the interruption and implement the emergency procedures. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

I. Assessment
In the event of an emergency involving water service interruption, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of food operations,
- The onset and duration of the emergency event,
- The impact on other critical infrastructure and services, and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

A food establishment manager (or the “Person-in-Charge”) is responsible for conducting both initial and ongoing assessments to ensure consistent compliance with food safety requirements.

II. Response
The following are temporary alternative procedures that can be taken to address specific affected food operations during an extended interruption of water service.

Affected Operations

Handwashing – No water to wash hands in food preparation area.

Alternative Procedure

- Do not touch ready-to-eat foods with bare hands. Suspend otherwise approved alternative procedures for bare hand contact.
- Chemically treated towelettes (not to be used for bare hand contact) may be used for cleaning hands if the food items offered are pre-packaged AND a hand washing facility is available at the alternate toilet room location.

And/Or

- Potable water from an approved public water supply system which can be placed into a clean, sanitized container with a spigot which can be turned on to allow clean, warm
water to flow over one’s hands into a sink drain. Provide suitable hand cleaner, disposable towels, and a waste receptacle.

**And/Or**
- Use of commercially bottled water with FDA approved germicidal soap followed up by an FDA Food Code compliant hand antiseptic approved for use as an indirect food additive.

**Toilet Facilities** – no water to flush toilets and urinals

**Alternative Procedure**
- Toilet rooms and or portable toilets with adequate hand washing facilities that may not be conveniently located but are easily accessible to employees during all hours of operation may be used until water service is restored.
  - Or
- Discontinue operation if toilet facilities are not available.
  - Or
- Use commercially bottled water or other potable water to flush toilets

**Drinking Water**

**Alternative Procedure**
- Use commercially bottled water
  - And/Or
  - Haul water from an approved public water supply in a covered sanitized container
  - And/Or
  - Arrange to use a licensed drinking water tanker truck.

**Affected Operations**

**Cooking – Food Preparation**

**Alternative Procedure**
- Use commercially bottled water, water hauled from an approved public water supply in a covered sanitized container, or water from a licensed drinking water tanker truck
  - And/Or
- Restrict the menu to items that don’t require water.

**Ice**

**Alternative Procedure**
- Use commercially manufactured ice.

**Post-mix Fountain Drinks**

**Alternative Procedure**
- Discontinue service.

**Cleaning/Sanitizing Equipment, Utensils, Tableware, Physical Facility**

**Alternative Procedure**
- Use single service/use articles
  - And/Or
- Use commercially bottled water or water from an approved public water supply in a covered sanitized container. Water from a licensed drinking water tanker truck can
also be used to clean and sanitize equipment and utensils. If water from an alternate source can be obtained, then follow established procedures to wash, rinse and sanitize. Pre-scrape prior to washing as necessary.

And

- Discontinue operations as inventories of clean equipment utensils, and tableware are exhausted
- Discontinue operations when cleanliness of the physical facility jeopardizes food safety.

III. Recovery

Recovery involves the necessary steps for reopening and returning to a normal safe operation.

A food establishment that was ordered or otherwise required to cease operations may not re-open until authorization has been granted by the regulatory authority.

After water service has been restored and after either the municipality or regulatory authority has lifted any “Boiled Water Advisory”:

- Flush pipes/faucets: follow the directions from your water municipality such as those via television, radio, newspaper, fax, etc. or, as general guidance, run cold water faucets for at least 5 minutes.
- Equipment with waterline connections such as post-mix beverage machines, spray misters, coffee or tea urns, ice machines, glass washers, dishwashers, and other equipment with water connections must be flushed, cleaned, and sanitized in accordance with manufacturer’s instructions.
- Run water softeners through a regeneration cycle.
- Drain reservoirs in tall buildings.
- Change out all filters.
- Flush beverage machines.
- Flush drinking fountains: run continuously for 5 minutes.
- Ice Machine Sanitation:
  - Flush the water line to the machine inlet
  - Close the valve on the water line behind the machine and disconnect the water line from the machine inlet.
  - Open the valve, run 5 gallons of water through the valve and dispose of the water.
  - Close the valve.
  - Reconnect the water line to the machine inlet.
  - Open the valve.
  - Flush the water lines in the machine.
  - Turn on the machine.
  - Make ice for 1 hour and dispose of the first batch of ice.
  - Clean and sanitize all parts and surfaces that come in contact with water and ice, following the manufacturer’s instructions.

Food establishments using a Non-Community Water Supply (privately owned
well) must follow the disinfection and sampling requirements of the Safe Drinking Water Act as found in 40 CFR 141 and 142 (Code of Federal Regulations). Contact your health department for specific instructions.
Contaminated Water Supply (Biological)

For the purpose of this Emergency Guidance, an imminent health hazard exists whenever a municipality has issued a Boil Water Advisory or when an onsite water supply has exceeded the maximum contaminant level for coliform bacteria. For single events affecting an individual establishment, the permit holder must report to the regulatory authority. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

I. Assessment

In the event of an emergency involving a contaminated water supply, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of food operations,
- The onset and duration of the emergency event,
- The impact on other critical infrastructure and services; and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

A food establishment manager (or the “Person-in-Charge”) is responsible for conducting both initial and ongoing assessments to ensure consistent compliance with food safety requirements.

II. Response

The following are temporary alternative procedures that can be taken to address specific affected food operations during a biological contamination of the water supply (boil water advisory). Where “boiled” water is indicated, the water must remain at a rolling boil for at least one minute. Although chemicals (e.g. bleach) are sometimes used for disinfecting small amounts of household drinking water, chemical disinfection is generally not an option for food establishments because of the lack of onsite equipment for testing chemical residuals.

Affected Operations

Drinking Water
Alternative Procedures
- Use commercially bottled water and/or water that has been boiled for at least 1 minute
  And/Or
- Haul water from an approved public water supply in a covered sanitized container
  And/Or
- Arrange to use a licensed drinking water tanker truck.

Beverages made with water – including post mix carbonated beverages, auto-fill
coffee makers, instant hot water dispenser, juice, tea, etc.

Alternative Procedures
- Discontinue use of post-mix carbonated beverage machine, auto-fill coffee makers, instant hot water heaters, etc. using auto-fill.
Additional information for safe drinking water can be found at the following website: www.epa.gov/ogwdw/faq/emerg.html.

**Ice Making**
Alternative Procedures
- Discard existing ice.
  And
- Discontinue making ice.
- Use commercially manufactured ice.

**Preparing food products requiring water**
Alternative Procedures
- Discard any ready-to-eat food prepared with water prior to the discovery of the contamination.
- Prepare ready-to-eat food using commercially bottled or boiled water.

**Washing / Soaking produce**
Alternative Procedures
- Use pre-washed packaged produce.
- Use frozen/canned fruits and vegetables.
  And/or
- Wash fresh produce with boiled, commercially bottled water, or safe potable water hauled from a public water supply system.

**Thawing of frozen foods**
Alternative Procedures
- Thaw only in the refrigerator or as part of the cooking process.

**Cooking**
Alternative Procedures
- Use commercially bottled water
  And/or
- Haul water from an approved public water supply in a covered sanitized container
  And/or
- Arrange to use a licensed drinking water tanker truck.

**Handwashing**
Alternative Procedures
- Use heated bottled water, boiled water, or safe water hauled from an approved public water supply.
  Or
- Do not allow bare hand contact with ready-to-eat food. Suspend otherwise approved alternative procedures for bare hand contact.
  And
- Use tap water followed by an FDA Food Code compliant hand antiseptic.

**Cleaning and Sanitizing utensils and tableware**
Alternative Procedures
• Use single service utensils and tableware.
Or
• Use the existing automatic dish machine or the 3-compartment sink. Make certain that the sanitization step is being properly conducted (sanitizer concentration/temperature).

**Spray Misting Units** — used to spray produce, seafood, meat cases, etc

**Alternative Procedures**
• Discontinue use of misters.

**III. Recovery**

Recovery involves the necessary steps for re-opening and returning to a normal safe operation.

**A food establishment that was ordered or otherwise required to cease operations may not re-open until authorization has been granted by the regulatory authority.**

After either the municipality or regulatory authority has provided notice that the water supply is safe to use, the operator must ensure the following has been completed:
• Flush pipes/faucets: follow the directions of your water utility (in the newspaper, radio, or television) or, as general guidance, run cold water faucets for at least 5 minutes.
• Equipment with waterline connections such as post-mix beverage machines, spray misters, coffee or tea urns, ice machines, glass washers, dishwashers, and other equipment with water connections must be flushed, cleaned, and sanitized in accordance with manufacturer’s instructions.
• Run water softeners through a regeneration cycle.
• Drain reservoirs in tall buildings.
• Flush drinking fountains: run continuously for 5 minutes.
• Ice Machine Sanitation:
  o Flush the water line to the machine inlet
  o Close the valve on the water line behind the machine and disconnect the water line from the machine inlet.
  o Open the valve, run 5 gallons of water through the valve and dispose of the water.
  o Close the valve.
  o Reconnect the water line to the machine inlet.
  o Open the valve.
  o Flush the water lines in the machine.
  o Turn on the machine.
  o Make ice for 1 hour and dispose of the first batch of ice.
  o Clean and sanitize all parts and surfaces that come in contact with water and ice, following the manufacturer’s instructions.

Food Establishments utilizing a Type II or Type III Non-Community Water Supply (privately owned well) must follow the disinfection and sampling requirements of The Safe Drinking Water Act, PL93, 523, before resuming operations. Contact your local health department for specific instructions.
Sewage Backup

For the purpose of this guidance, a sewage backup means the overflow of sewage from equipment or plumbing facilities within a food establishment. The Food Code defines sewage as liquid waste that contains animal or vegetable matter in suspension or solution and may also include liquids containing chemicals in solution. Clear water waste (i.e. ice bin/machine drainage, condensation from refrigeration and air conditioning equipment) is not considered sewage. For single events affecting an individual establishment, the permit holder must report to the regulatory authority. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

I. Assessment
In the event of an emergency involving a sewage backup, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of food operations,
- The duration of the emergency event,
- The impact on other critical infrastructure and services (example: food, equipment, utensils, linens, single service/use items, employee health), and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

A food establishment manager (or the “Person-in-Charge”) is responsible for conducting both initial and ongoing assessments to ensure consistent compliance with food safety requirements.

II. Response
The following are temporary alternative procedures that can be taken to address specific affected food operations during a sewage backup emergency.

Affected Operations

General: Sewage from equipment directly connected to the plumbing system is either slow to drain or does not drain

General Procedures
- Remove the affected equipment/fixture from service.
  And
- Remove the obstruction or call a service company.
- Thoroughly clean any spills with a detergent solution followed by a sanitizer solution.
- Keep foot traffic away from area.
- Use other appliances or fixtures in the establishment that are properly operating.

Handwashing All hand washing sinks in the establishment do not drain
Alternative Procedure
• Chemically treated towelettes (not to be used for bare hand contact) may be used for cleaning hands if the food items offered are prepackaged or otherwise protected from contamination by hands AND a hand washing facility is available at the toilet room location.
  Or
• Hot water can be placed into a 5-gallon insulated container with a spigot which can be turned on to allow clean, warm water to flow over one’s hands into another container. Provide suitable hand cleaner, disposable towels, and a waste receptacle. The container may only be emptied into an operational janitor sink or toilet.
  Or
• Discontinue operation.

Toilet Facilities – all toilet facilities do not drain
Alternative Procedure
• Toilet rooms that may not be conveniently located but are accessible to employees. during all hours of operation, may be used until water service is restored.
  Or
• Discontinue operation if no alternate toilet facilities are available.

Culinary Sinks – all sinks required for thawing food, washing fruits and vegetables, cooling food, etc., do not drain.
Alternative Procedure
• Thaw food in the refrigerator or as part of the cooking process.
• Use pre-washed packaged produce.
• Use frozen/canned fruits and vegetables that do not require washing.
• Use alternate cooling methods.
• Modify the menu to avoid procedures requiring the use of a culinary sink.

Ware washing Equipment – all dish machines, 3-compartment sinks, pot sinks do not drain
Alternative Procedure
• Discontinue dish/utensil washing and use single service/use items.
• Discontinue affected operations after supply of clean equipment, utensils, and single service items is exhausted.

Janitor / Utility Sink – does not drain
Alternative Procedure
• Discontinue the use of the janitor sink.
• Dump mop water into a toilet.
• Discontinue operation if the physical facility cannot be maintained in a sanitary condition.

Continuous Overflow of Sewage into the Establishment – Sewage continues to backup into the building after the individual appliance(s) have been removed from service
Alternative Procedure
• Discontinue operation.
III. Recovery
Recovery involves the necessary steps for re-opening and returning to a safe, normal operation.

A food establishment that was ordered or otherwise required to cease operations may not re-open until authorization has been granted by the regulatory authority.

Determine the cause of the problem and take appropriate corrective action.
- In the case of plugged drain lines, the permit holder will:
  - Contact a service company to find and remove the obstruction.
  - Replace worn or damaged plumbing as needed.
- In case the onsite sewage disposal system is malfunctioning:
  - Contact the local health department for permit requirements.
  - Contact a sewage pumping contractor to pump the septic tank and haul away sewage to an approved disposal site until repairs can be made.
  - If necessary, barricade the affected area to keep the public and employees away from areas having exposed sewage.
  - Contact a sewage disposal system installation contractor to arrange for repairs to be made.

Personal Health and Safety Considerations for Employees Involved in clean-up
- Wear eye protection.
- Wear rubber boots that can be washed and sanitized after the event.
- Wear protective clothing such as coveralls.
- Do not allow employees to walk between the affected area and other areas of the establishment without removing footwear and protective clothing.
- Follow OSHA rules for handling detergents, sanitizers, and other chemicals used in the cleaning process.
- Handwashing – Immediately after working with contaminated materials and before engaging in food preparation activities (working with exposed food, clean equipment and utensils, unwrapped single service / use articles).
  - Double hand washing: Clean hands and exposed portions of the arms using a cleaning compound in a lavatory that is properly equipped by vigorously rubbing together the surfaces of their lathered hands and arms for at least 20 seconds and thoroughly rinsing with clean water. Repeat.
  - Dry hands using disposable towels.
  - Use a disposable towel to turn off the water to prevent re-contaminating the hands.
  - Follow-up with a hand antiseptic.
  - Have janitorial staff clean the lavatory faucets and other portions of the lavatory after use to prevent transferring any contamination to food handlers.

Provide general clean-up.
- All damaged food equipment, utensils, linens, and single service items must be destroyed and properly disposed of.
- Floors, walls, furnishings, carpets, utensils, and equipment damaged beyond salvage must be removed and replaced as necessary.
- Affected walls, floors, and equipment surfaces must be cleaned with soap and water, rinsed, and sanitized. Carpets should be either removed or effectively cleaned and sanitized.
- Remove wet materials. Dispose of any materials that cannot be effectively cleaned and sanitized.
- Remove any standing sewage.
- Clean and sanitize any utensils and equipment in the affected area.
- Use a detergent solution to clean floors, equipment, and other affected areas followed by a clean water rinse.
  - Sanitize the floor and any other affected areas by using an approved chlorine sanitizer/disinfectant to equal 500 parts per million chlorine solution or equivalent. Recommend calculating prior to an emergency. Follow manufacturer’s instructions.
  - Air-dry the affected area.
  - Launder or discard mop heads and other cleaning aids that contacted the sewage.
  - Alternative measure: Hire a janitorial service having expertise in cleaning food establishments exposed to sewage backups.

Contaminated Linens, Single Service / Use Items
- Launder any linens or uniforms in contact with sewage.
  - Launder separately from other linens.
  - Use bleach.
  - Use a mechanical dryer.
- Discard any single service / use items in contact with sewage.

General Food Salvage Assessment:
Discard any food or food packaging materials that have come into contact with sewage. Very few food or beverage items can be saved after being exposed to sewage. Food items in soft packaging or with screw-top lids must be destroyed. In some cases canned goods in metal cans or rigid plastic containers can be saved. Even so, the condition of the can is another limiting factor. The presence of rust, soil, or destroyed labeling precludes salvage.

Sewage can make foods unsafe to eat especially if packaging is contaminated. Discard the following foods if sewage has covered, splashed, dripped on or seeped into the package:
- Alcoholic beverages: Refer to your local regulatory authority for salvage or destruction.
- Exposed foods, bulk foods, fresh produce, meat, poultry, fish and eggs;
- Any foods packaged in paper, plastic, cloth, or fiber;
- Cardboard boxes, even if the contents seem dry, including cereals, pasta products, rice, salt;
- Foods with cardboard seals, such as mayonnaise and salad dressing, or foil or cellophane packages;
- Food in glass jars, including unopened jars with waxed paper, foil, cellophane or cloth covers;
- Foods, liquids or beverages in crown-capped bottles or containers with pull-tab tops, corks or screw caps;
- All opened containers and packages; foods in bags or canisters;
- Cans that are dented, leaking, bulging or rusted; and
- Cans that have been tossed about and are far from their normal storage spot (possibility of pinholes or seam fractures).
- Cans may not be sold without all required labeling information. Therefore, cans with damaged labels should be discarded.

**Salvaged Goods – Reconditioning**

If the quantities of food involved are large (e.g. a large supermarket or a food warehouse), it may be feasible to attempt salvage for either human or animal consumption. The items must either be destroyed or moved to approved firms that have reconditioning capability. Such movement is coordinated with the U.S. Food and Drug Administration and the other states’ officials. The move must be supervised at all times with the products under seizure until under the control of the FDA or officials at state of destination.

**Disposal of Food**

If it is determined that food must be discarded:

- Remove to a designated condemned food storage area away from food preparation and equipment storage and secured in covered refuse containers or other isolated areas to prevent either service to the public or accidental contamination of the facility and other food.
- If the food must be retained until the distributor can credit the facility, it must be clearly labeled as “NOT FOR SALE”.
- Discarded refrigerated food may be stored in a refrigerated location separate from other food and held for credit until recorded by food supplier/distributor.
- The facility should document the type and amount of food, costs and the reason for disposal for insurance and regulatory purposes.
- Small volumes of food to be discarded can be denatured with a cleaning product (such as bleach) and placed in a covered refuse bin outside the facility.
- Large volumes of food should be stored in covered refuse containers in a secure location and disposed of by a refuse disposal company as soon as possible.
- All food waste is to be disposed of in accordance with state and local waste disposal regulations in a licensed landfill.
- Local landfills should be contacted prior to delivery of food from a private individual or carrier to ensure acceptance of the waste.
**Fire**

For the purpose of this Emergency Guidance, a non-reportable fire is any small confined fire in a food establishment that has been extinguished using a simple device such as a wet towel or pan lid. Otherwise, all other fires must be reported to the regulatory authority. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

**I. Assessment**

In the event of an emergency involving a fire, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of food operations,
- The duration of the emergency event,
- The impact on other critical infrastructure and services (example: water supply, electrical service, physical facility, equipment, smoke/water damage, offensive odors, deposition of toxic chemicals), and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

A food establishment manager (or the “Person-in-Charge”) is responsible for conducting both initial and ongoing assessments to ensure consistent compliance with food safety requirements.

**II. Response**

The following are temporary alternative procedures that can be taken to address specific affected food operations as a result of a fire.

**Affected Operations**

**Fire is confined** to a small incidental area or a single piece of equipment and fire is extinguished using a simple fire-fighting device (i.e. hand held extinguisher) that does not require extensive cleanup.

Alternative Procedures
- Unaffected areas of the establishment may remain open while clean-up and minor repairs are made.

**Process of fighting fire**, regardless of size, contaminates any of the following: food, equipment, utensils, linens, single service items. Typically associated with use of high pressure fire suppression device (i.e. ventilation hood fire suppression system or professional fire dept equipment).

Alternative Procedures
- Discontinue operations. Resume operations only after recovery steps have been completed.
Fire causes extensive damage to equipment and the facility’s structure.

Alternative Procedures

- Discontinue operations. Resume operations only after recovery steps have been completed.

**III. Recovery**

Recovery involves the necessary steps for re-opening and returning to a normal safe operation.

A food establishment that was ordered or otherwise required to cease operations may not re-open until authorization has been granted by the regulatory authority.

The Permit Holder will:

- Contact the local building department and other appropriate agencies to determine if the building structure is safe and approved for occupancy.
- Sort the salvageable from the non-salvageable foods as quickly as possible.
- Properly dispose of the non-salvageable food items.
- Provide general clean-up. Clean and sanitize equipment and utensils.

**Charitable Donation**

It may be possible to divert some foods mentioned above such as minimally damaged canned foods to a local food bank for distribution to charitable organizations. Check with your state or local regulatory authority regarding the Good Samaritan requirements. See Act 136 of the Public Acts of 1993 – Immunity of Food Donors From Civil Liability. A donor of food is generally protected from liability unless:

- The illness or disease resulted from the willful, wanton, or reckless acts of the donor.
- The illness of disease resulted from prepared food if any of the following apply:
  - The prepared food was potentially hazardous food at the time it was donated.
  - A law of this state or a rule promulgated by an agency or department of this state concerning the preparation, transportation, storage, or serving of the prepared food was violated at any time before the food was donated.
  - The illness or disease resulted from food in hermetically sealed containers that were not prepared by a commercial processor.
  - The donor had actual or constructive knowledge that the food was tainted, contaminated, or harmful to health or wellbeing of the recipient of donated food.

**Food Salvaging/General Considerations**

If the quantities of food involved are large (e.g. a large supermarket or a food warehouse) it may be feasible to attempt salvage for either human or animal consumption. The items must either be destroyed or moved to approved firms that have reconditioning capability. Such movement is coordinated with the U.S. Food and Drug Administration and the other states’ officials. The move must be supervised at all times with the products under seizure until under the control of the FDA or officials at state of destination.

The following is a guide for handling specific food items. These recommendations are based on severe fire/smoke damage and the regulatory authority may determine the disposition and salvage of some items depending on the severity of fire, smoke and/or water damage:
• **Alcoholic beverages**: Refer to your local regulatory authority for salvage or destruction.

• **Bottled soft drinks**: Unless protected by a plastic outer wrap or in bottles with sealed screw-on lids, soft drinks in glass bottles are very difficult to salvage. In addition, if soft drinks in plastic bottles have been subjected to excessive heat, fire or smoke, they are almost always deemed unsalvageable. Bottle contents must be drained before returning the containers for deposits. This can be permitted if there are proper facilities for disposing of the liquid and a health nuisance is not created. If such facilities are not available, the product and container may have to be destroyed by removing to a licensed landfill.

• **Canned soft drinks**: Cans may be salvaged if the contents have not been subjected to excessive heat or fire. The cans must be cleaned and sanitized, if necessary. If the cans have been subjected to excessive heat or are deemed uncleanable, the contents must be destroyed.

• **Dairy products**: Dairy products must be destroyed with no attempt to salvage if they have been subjected to excessive heat, fire, smoke or water or have been temperature abused due to vulnerable packaging and temperature requirements.

• **Sugars, candies, flour, cereal products, bakery products, dried beans, rice, and other grains**: If subjected to excessive heat, fire, smoke or water damage, no attempt to salvage such products can be permitted due to vulnerable packaging.

• **Products in glass with metal screw-type or metal slip covers**: This includes pickles, olives, catsup, steak sauces, salad dressings, syrups, etc. If subjected to excessive heat, fire, or smoke, this type of container is very difficult to clean or disinfect due to exposure of the threaded closure and may have to be destroyed.

• **Fish and meats – fresh or frozen**: If they have been subjected to excessive heat, fire, smoke and/or water damage or have been temperature abused, these products must be destroyed.

• **Refrigerated and frozen food**: If refrigerated and frozen foods are stored in a completely enclosed walk in refrigerator or freezer or enclosed case, and electrical service has not been interrupted for extended periods, some product may be salvaged, depending upon the severity of heat, fire, smoke and water and the product exposure to these elements. Prompt removal of such foods to a suitable storage unit is necessary to save the product.

• **Produce – fresh or dried**: If exposed to excessive heat, fire, smoke and/or water damage, no attempt to salvage can be permitted and all such products must be destroyed.

• **Canned goods**: Where the heat and water damage has been minimal, canned goods can be salvaged quickly by cleaning the exterior surfaces and removing them to suitable storage areas, preferably away from the fire scene. Cleaning and re-labeling a relatively small quantity of canned goods is usually not attempted because of the cost involved compared to the lower value of the salvaged product.

### General Cleanup Considerations

• All areas affected by the fire must be cleaned and sanitized.

• All damaged food products, equipment, utensils, linens, and single service/use items must be removed from the premises as necessary.

• Re-occupancy should be allowed only after the fire department has determined that the structure is safe.
Disposal of Food
If it is determined that food must be discarded:

- Remove to a designated condemned food storage area away from food preparation and equipment storage and secured in covered refuse containers or other isolated areas to prevent either service to the public or accidental contamination of the facility and other food.
- If the food must be retained until the distributor can credit the facility, it must be clearly labeled as “NOT FOR SALE”.
- Discarded refrigerated food may be stored in a refrigerated location separate from other food and held for credit until recorded by food supplier/distributor.
- The facility should document the type and amount of food, costs and the reason for disposal for insurance and regulatory purposes.
- Small volumes of food to be discarded can be denatured with a cleaning product (such as bleach) and placed in a covered refuse bin outside the facility.
- Large volumes of food should be stored in covered refuse containers in a secure location and disposed of by a refuse disposal company as soon as possible.
- All food waste is to be disposed of in accordance with state and local waste disposal regulations in a licensed landfill.

Local landfills should be contacted prior to delivery of food from a private individual or carrier to insure acceptance of the waste.
**Flood**

For single events affecting an individual establishment, the permit holder must report to the regulatory authority. Assess the situation. Immediately discontinue operation if a safe operation cannot be maintained using an alternative procedure. Follow the appropriate emergency procedures if approved by the regulatory authority or remain closed until granted approval to re-open by the regulatory authority.

**I. Assessment**
In the event of an emergency involving a flood, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:
- The complexity and scope of food operations,
- The duration of the emergency event,
- The impact on other critical infrastructure and services (example: water supply, food, equipment, linens, single service, wastewater disposal, site drainage, building access, indoor air quality), and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

A food establishment manager (or the “Person-in-Charge”) is responsible for conducting both initial and ongoing assessments to ensure consistent compliance with food safety requirements.

**II. Response**
The following are temporary alternative procedures that can be taken to address specific affected food operations after a flood.

**Affected Operations**

**Minor leakage** from a water line or incidental water accumulation on a floor. Food, utensils, equipment, clean linens, single service/use items not affected.

Alternative Procedure
- Unaffected areas of the establishment may remain open while repairs/recovery takes place. Minimize traffic from flooded areas to unaffected food areas.

**Flooding inside the building** due to the overflow of a body of water, poor surface drainage, a major break in a water line, etc. that affects food, utensils, equipment, clean linens, or single service/use items.

Alternative Procedure
- Discontinue operation. Resume operations only after recovery steps have been completed.

**III. Recovery**
Recovery involves the necessary steps for re-opening and returning to a normal operation.

A food establishment that was ordered or otherwise required to cease operations may not re-open until authorization has been granted by the regulatory authority.
The Permit Holder will:

- Sort the salvageable from the non-salvageable foods, equipment, utensils, linens, and single service items as quickly as possible.
- Properly dispose of the non-salvageable items.
- Contact the local building department and other appropriate agencies to determine if the building structure is safe and approved for occupancy.
- Provide general clean-up while ensuring worker health and safety. Clean and sanitize equipment and utensils.

For information on air quality after a flood, see the U.S. EPA publication “Fact Sheet: Flood Cleanup - Avoiding Indoor Air Quality Problems” at: http://www.epa.gov/mold/flood/index.html

Personal Health and Safety Considerations for Employees Involved in Clean-up

- Wear eye protection.
- Wear rubber boots that can be washed and sanitized after the event.
- Wear protective clothing such as coveralls.
- Do not allow employees to walk between the affected area and other areas of the establishment without removing footwear and protective clothing.
- Follow OSHA rules for handling detergents, sanitizers, and other chemicals used in the cleaning process.
- Handwashing – Immediately after working with contaminated materials and before engaging in food preparation activities (working with exposed food, clean equipment and utensils, unwrapped single service / use articles)
  - Double hand washing: Clean hands and exposed portions of the arms using a cleaning compound in a lavatory that is properly equipped by vigorously rubbing together the surfaces of their lathered hands and arms for at least 20 seconds and thoroughly rinsing with clean water. Repeat.
  - Dry hands using disposable towels.
  - Use a disposable towel to turn off the water to prevent re-contaminating the hands.
  - Follow-up with a food code compliant hand antiseptic.
  - Have janitorial staff clean the lavatory faucets and other portions of the lavatory after use to prevent transferring any contamination to food handlers.

Clean-up

- To prevent mold and mildew growth, conduct corrective actions within 24-48 hours after the flood waters recede.
- Remove wet materials. Dispose of any materials that cannot be effectively cleaned and sanitized. Remove any standing water.
- Unsalvageable food, food equipment, and all single service items, packaged or unpackaged that came in contact with flood water, must be destroyed and properly disposed.
- Floors, walls, furnishings, carpets, and equipment damaged beyond salvage must be removed and replaced as necessary. Sheet rock is especially susceptible to mold growth and should be removed and replaced if in contact with flood waters.
Affected walls, floors, and equipment surfaces must be cleaned with soap and water, rinsed, and sanitized. Carpets should be either removed or effectively cleaned and sanitized.

Use a detergent solution to clean floors, equipment, and other affected areas followed by a clean water rinse.

Sanitize the floor and any other affected areas by using an approved chlorine sanitizer/disinfectant to equal 500 parts per million chlorine solution or equivalent. Recommend calculating prior to an emergency. Follow manufacturer's instructions.

Air-dry the affected area.

Clean and sanitize any utensils and salvageable equipment in the affected area.

Launder any linens or uniforms in contact with flood water. Launder separately from other linens by using bleach and/or a mechanical dryer.

Launder or discard mop heads and other cleaning aids that contacted flood water.

Alternative measure: Hire an outside service having expertise in cleaning and sanitizing food establishments exposed to floods.

General Flood Salvage Assessment

Flood waters may carry silt, raw sewage, oil or chemical waste that can make storm-damaged foods unsafe to eat if packaging is contaminated. Discard any food or food packaging materials that have come into contact with flood water. Very few food or beverage items can be saved after being exposed to flood water. Food items in soft packaging or with screw-top lids must be destroyed. In some cases canned goods in metal cans or rigid plastic containers can be saved. Even so, the condition of the can is another limiting factor. The presence of rust, soil, or destroyed labeling precludes salvage.

Flood water can make foods unsafe to eat especially if packaging is contaminated. **Discard** the following foods if water has covered, splashed, dripped on or seeped into the package:

- Alcoholic beverages: Refer to your local regulatory authority for salvage or destruction.
- Exposed foods, bulk foods, fresh produce, meat, poultry, fish and eggs;
- Any foods packaged in paper, plastic, cloth, or fiber;
- Cardboard boxes, even if the contents seem dry, including cereals, pasta products, rice, salt;
- Foods with cardboard seals, such as mayonnaise and salad dressing, or foil or cellophane packages;
- Food in glass jars, including unopened jars with waxed paper, foil, cellophane or cloth covers;
- Foods, liquids or beverages in crown-capped bottles or containers with pull-tab tops, corks or screw caps;
- All opened containers and packages; foods in bags or canisters;
- Cans that are dented, leaking, bulging or rusted; and
- Cans that have been tossed about and are far from their normal storage spot (possibility of pinholes or seam fractures).
- Cans may not be sold without all required labeling information. Therefore, cans with damaged labels should be discarded.
Salvaged Goods – Reconditioning
If the quantities of food involved are large (e.g. a large supermarket or a food warehouse), it may be feasible to attempt salvage for either human or animal consumption. The items must either be destroyed or moved to approved firms that have reconditioning capability. Such movement is coordinated with the U.S. Food and Drug Administration and the other states’ officials. The move must be supervised at all times with the products under seizure until under the control of the FDA or officials at state of destination.

Disposal of food
- Remove to a designated condemned food storage area away from food preparation and equipment storage and secured in covered refuse containers or other isolated areas to prevent either service to the public or accidental contamination of the facility and other food.
- If the food must be retained until the distributor can credit the facility, it must be clearly labeled as “not for sale“ and kept in a refrigerated location separate from other food and held for credit.
- Discarded refrigerated food may be recorded by food supplier/distributor.
- The facility should document the type and amount of food, costs and the reason for disposal for insurance and regulatory purposes.
- Small volumes of food to be discarded can be denatured with a cleaning product (such as bleach) and placed in a covered refuse bin outside the facility.
- Large volumes of food should be stored in covered refuse containers in a secure location and disposed of by a refuse disposal company as soon as possible.
- All food waste is to be disposed of in accordance with state and local waste disposal regulations in a licensed landfill.
- Local landfills should be contacted prior to delivery of food from a private individual or carrier to insure acceptance of the waste.

Wells
- If you have your own well serving your food service business, and the well was covered by the flood, it must be chlorinated and tested prior to use. Please contact your local health department for complete instructions on chlorination. It will be important to know the diameter of the well casing and the depth of the well to complete chlorination.

Sewage Systems
- If your septic tank system was flooded, please call your local health department for an evaluation of the system before using it. Flooded systems may malfunction without proper attention.

Mold
- Organic material, bacteria and other microorganisms are deposited onto hard surfaces and into porous building materials and furnishings by flood waters. Many building materials and furnishings that remain wet for more than 48 hours will develop visible fungal colonies. These colonies are commonly referred to as mold or mildew.
- Molds and mildews resulting from flooding can create significant health risks for occupants. Unintentional ingestion of flood water or sediment can cause
gastrointestinal diseases. Inhalation exposure to molds may cause allergy symptoms. These symptoms can often be severe. Some fungi may cause infectious respiratory disease, while others generate toxins that may cause illness. Disinfect floors or wood surfaces using a solution of 2 ½ tablespoons chlorine bleach (5.25% concentration) in a gallon of water.

**Equipment with waterlines**

- Take the following precautions when salvaging post-mix and beverage machines, coffee or tea urns, ice machines, glass washers, dishwashers, and other equipment with water connections:
  - Flush waterlines, faucet screens and waterline strainers, and purge fixtures of any standing water.
  - Discard any equipment that is damaged and can’t be restored to safe sanitary standards. This may include flood-damaged wood/particle board or plastic laminate components (counters, cabinets, bars, etc.)

**Walk-In Cooler Restoration Guidelines**

In general, the walk-in cooler in a flooded food service facility needs to be reviewed on a case by case basis.

- If the inside of the cooler has a Quarry tile floor with 6-inch sealed coving, and the water did not flood over the coving, the interior surface can be cleaned, scrubbed, and sanitized with a solution of 2 ½ tablespoons chlorine bleach (5.25% concentration) in a gallon of water.
- If the inside of the cooler has walls that sit directly on the floor, and the caulking seal is intact, the cooler walls can be cleaned, scrubbed, and sanitized with 1 cup bleach/4 gallons water. The walls of the cooler should be made of wood frame with closed foam insulation for this process to be successful.
- If the inside of the walk-in cooler was damaged by holes or cuts, and the flood water rose above those holes or cuts, the entire panel will need to be replaced.
- On a free-standing walk-in, the panels can be disassembled, cleaned, and sanitized to remove the silt below the panel. This would apply when the cooler wall did not have a satisfactory seal at the wall and floor juncture.
- Flooded walk-in coolers with a permeable wood floor need to have the floor replaced.
- Walk-in coolers sitting directly on the floor with an aluminum interior floor should have the floor raised and power washed below the floor to remove the river silt.
- Remediation techniques will not guarantee the absence of odors that may develop in the future.

****WARNING****

Always use extreme caution when restarting equipment with electrical components

**Walls and Ceilings**

- If flood water soaked the sheet rock, insulation, or ceiling tiles, remove these items 30 inches above the waterline.
- Paneling may be removed and saved but you will still need to get air circulating in the wall cavities to dry the studs and sills. Wet studs and sills do not need to be replaced if
allowed to dry properly. Flooded portions of studs and sills should be treated with biocides such as bleach and water.

- For paneling, carefully pry the bottom off each panel away from the wall. Use something to hold the bottom away from the sill so the cavities can be drained, cleaned, checked for molds, and dried out. You can nail them back into shape after they and the studs dry out. Remove and discard flooded insulation.
- Undamaged walls, hard surfaced floors, and other surfaces should be cleaned and sanitized with a solution of 2 ½ tablespoons chlorine bleach (5.25% concentration) in a gallon of water.
- Vinyl wall covering should be removed and thrown out if soaked.

Floors and Floor Coverings
- Remove any linoleum or tile that been flooded, so you can clean and dry the wooden sub flooring. When placed on a concrete base, only loose linoleum or tile need be removed. Linoleum or vinyl tile can be saved and reused if it can be cleaned and sanitized.
- Wall-to-wall carpeting, padding and foam rubber should be thrown away if they were soaked with flood water.
- Remove tile or vinyl flooring if it is warped, loose, or has a foam-rubber pad.

Duct Work
- Vents and duct work for air conditioning/heating units that were submerged in flood waters need thorough cleaning and sanitizing. If it is impossible to do this, it will be necessary to replace them. Insulation around ducts, or ducts made of compressed fiberglass will need to be replaced.

Safety Guidelines for Building Entry and Occupancy
Can be found at the Department of Insurance and Building Inspectors Association websites: www.ncdoi.com/ and www.ncbia.org
Infectious Disease Contamination - Blood borne Incidents:

I. Assessment
In the event of an emergency involving contamination from a blood borne incident, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of the food operations
- The duration of the emergency event
- The impact on other critical infrastructure and services (example: water supply, food, equipment, linens, single service, wastewater disposal, site drainage, building access, indoor air quality) and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements.

II. Response
The following are procedures that can be taken to address specific food operations after a blood borne contamination event.

- Only employees trained in the appropriate use of personal protective equipment should respond to the incident.
- Assume all blood and body fluids are infectious. Always wear personal nonabsorbent, disposable gloves and other protective equipment (face mask, and/or goggles dependent on the risk present) and use a protective “pocket mask” if performing rescue breathing. Recommend double gloving for any blood or bodily fluid clean-up
- Thoroughly spray contaminated surface areas with a disinfectant solution made from at least 1 ½ cups of chlorine bleach (5.25% concentration) in a gallon of water.
- Pick up any contaminated solid material making sure not to use your hands to pick up any sharp objects, such as glass. Use a broom, dustpan or similar cleaning tool to pick up sharp objects.
- Wipe down the contaminated area with a paper towel moistened with disinfectant solution of 1 ½ cups of chlorine bleach (5.25% concentration) in a gallon of water.
- Place all contaminated solids or clean up materials in a separate bag marked biohazard. (Preferably a red bag). Sharp objects must be placed in a puncture proof container before being placed in the bag.
- Clean and sanitize any tools or other non-disposable items used in the clean up.
- Remove personal protective equipment and place them in the biohazard bag.
- Wrap and tie the biohazard bag and give it to the person in charge.
- Wash hands and face immediately using germicidal soap.

If you are exposed to blood borne pathogens, immediately wash all portions of your body; notify management of the incident, seek medical assistance and follow-up and document on an incident report.

III. Recovery
Cleaning and sanitizing areas affected by blood spillage are all that’s necessary to resume operations.
Infectious Disease Contamination - Vomit Incidents:

I. Assessment

In the event of an emergency involving contamination from a vomiting incident, appropriate food establishment responses must be taken after an assessment of multiple factors including but not limited to:

- The complexity and scope of the food operations.
- The duration of the emergency event.
- The impact on other critical infrastructure and services (example: water supply, food, equipment, linens, single service, wastewater disposal, site drainage, building access, indoor air quality) and
- The availability of alternative procedures that can be used to meet Food Code and Food Law requirements including notification of the regulatory authority if diagnosed as norovirus, exclusion of sick employees, and any necessary destruction or recall of food products.

II. Response

The following are procedures that can be taken to address specific food operations after a vomiting contamination event.

- Only employees trained in the appropriate use of personal protective equipment should respond to the incident.
- When a food worker or patron vomits in a public area or food preparation area, the vomit should be treated as potentially infectious material and should be immediately covered with a disposable cloth and doused with a sanitizer to reduce the potential airborne contamination.
- All individuals in the immediate area of the vomit incident should be cleared from the area before the vomit is cleaned up.
- Cleaning staff must use disposable facemasks, nonabsorbent disposable gloves and aprons when cleaning up after a vomit incident.
- Wipe the area clean with detergent and water followed by disinfection with exposure to 5000 ppm hypochlorite solution for at least 5 minutes in order to eliminate norovirus. This would be equivalent to 1 ½ cups of chlorine bleach (5.25% concentration) in a gallon of water.
- If the contaminated area is a food contact surface, then the disinfection must be followed by a clear–water rinse and a final wipe down with a sanitizing bleach solution consisting of 200ppm bleach. (Quaternary ammonia and ethanol alcohol are not effective against norovirus as they are lipophilic sanitizers that do not attack non-enveloped RNA viruses, such as norovirus, which lacks a lipid envelope).
- All “heavy hand-contact” surfaces such as food preparation surfaces, self service utensil handles, faucets, faucet handles, tables, chairs, counters, door handles, push plates, railings, elevator buttons, telephones, keyboards, vending machines, soap dispensers, restroom stall doors and latches, toilet seats and handles, and towel dispensers are important areas that require disinfection.
- To reduce the chance of airborne contamination, hard surface floors that are contaminated by vomit should not be buffed or vacuumed. Contaminated carpets
should be sanitized with a chemical disinfectant if possible, and then steam cleaned for a minimum of 5-minute contact time at a minimum temperature of 170° F.

- Place all contaminated solids or clean up materials in a separate bag marked biohazard. (preferably a red bag)
- Clean and sanitize any tools or other non-disposable items used in the clean up.
- Remove personal protective equipment and place them in the biohazard bag.
- Wrap and tie the biohazard bag and give it to the person in charge.
- Wash hands and face immediately using germicidal soap.

### III. Recovery

Recovery involves the necessary steps for re-opening and returning to a normal operation and/or re-admission of employees to a food establishment. A food establishment that was ordered or otherwise required to cease operations may not re-open until the regulatory authority has granted authorization. Section 2-201.13 of the Food Code gives guidelines regarding procedures for removal, adjustment, or retention of exclusions and restrictions for employees sickened by noroviruses as well as Shigella spp., Hepatitis A, Salmonella typhi, or enterohemorrhagic or shiga toxin-producing E.coli.
Bioterrorism Prevention and Terrorist Threat Procedures:

I. Assessment (ALERT)

- ASSURE that the supplies and ingredients you use are from safe and secure sources. Use only known and approved vendors for services, incoming materials, etc. Encourage suppliers to practice food defense measures. Request only locked and/or sealed vehicles/containers/railcars. Supervise off-loading of incoming materials.
- LOOK after the security of the products and ingredients in your facility. Have a system for receiving, storing, and handling distressed, damaged, returned, and rework products that minimize the potential for being compromised. Track incoming materials and finished products. Store product labels in secure locations and destroy outdated or discarded product labels. Secure cleaning chemicals and pesticides. Limit access to restricted areas of the facility. Ensure public and private warehouses and shipping operations practice appropriate security measures.
- EMPLOYEES should have background checks before hire and vendors must show identification. Check names of all employees against FBI BOLO (Be On the Look Out) list. Employees should wear identification badges such as uniforms, photo identification badges, nametags, etc. Limit access so staff enters only those areas necessary for their job function.
- REPORTS of products received and sold must be available, per the Public Health Security and Bioterrorism Preparedness Act of 2002. Make written records of every item returned to stores for refunds including person’s state id number (such as Driver’s License), address, telephone number and reason for returning the item. At least annually, perform random food defense inspections to evaluate the effectiveness of the security management system. Review vulnerabilities and revise plan according, keeping the results confidential.
- THREATS must be addressed through notification of appropriate regulatory authorities. Hold any product that you believe may have been affected. If a food establishment operator suspects that any meat, poultry or egg products have been subject to tampering, counterfeiting, or other malicious, criminal, or terrorist action, they should notify the appropriate regulatory authority and the USDA-FSIS 24 hour emergency number at 1-800-233-3935 or their local FSIS District Office listed at http://www.fsis.usda.gov/Contact_Us/Office_Locations_&Phone_Numbers/index.asp. For all other food products, contact the FDA 24 hour emergency number at 301-443-1240 (1-888-723-3366) or call their local FDA District Office. These are listed at: http://www.cfsan.fda.gov/~dms/district.html

II. Response
Recommended Actions for the Food Sector During Homeland Security Alerts at:

Level Blue (guarded):
- Be alert of suspicious activity and report it to proper authorities.
- Review stored disaster supplies and replace items that are outdated.
- Develop an emergency communication plan that includes all key employees.
Establish an alternate meeting place away from business with the management team.
Create relationships with local police and health officials and have those numbers readily available.

Level Yellow (elevated):

- Complete recommended actions at lower levels
- Be alert of suspicious activity and report it to proper authorities.
- Utilize digital CCTV systems to cover food prep and display areas, dining areas, back rooms and docks, and parking lots. (Save surveillance video for a minimum of 60 days depending on format – tape or digital)
- Review and ensure disaster supply kit is stocked and ready. (Supply kits include, but are not limited to, emergency contact list, flashlights and batteries, supply of bottled water, first aid kit, battery operated radio, cigarette lighter, cell phone recharge cord, map, change of clothes, etc.). Replace items that are outdated.
- Check telephone numbers and e-mail addresses in your company emergency communication plan and update as needed.
- Review command structure to ensure that there’s a knowledgeable person in charge in the event the PIC is unavailable.
- Eliminate common area clutter both inside and outside of establishments to not provide potential hiding areas.
- Relocate vendor racks, pallets, etc. away from buildings to prevent easier access to roof and HVAC systems.
- Secure all lockers, compressor, electric, generator, and storage areas to prevent unauthorized entry. Place company locks on all of these areas.
- Check all rest rooms, janitor closets, and other areas where packages could be concealed after the establishment doors are locked.
- Periodically review evacuation plans.
- Have staff develop alternative routes to/from work and practice them.
- Compare your company disaster plans with Homeland Security Guidelines.

Level Orange (high):

- Complete recommended actions at lower levels
- Be alert of suspicious activity and report it to proper authorities.
- Review company disaster plan and policies on threats with PICs and back ups.
- Have a notification process in place to share information within company, throughout industry and with government partners.
- Ensure management teams are familiar with your emergency response guidelines.
- Ensure store/restaurant personnel or loss prevention staff communicate with local law enforcement and create a closer bond with police.
- Have truckers and suppliers exercise caution when traveling.
- Check identification badges for vendors and require them to sign in and out.
- Be aware of what trucks or abandoned vehicles are parked by buildings and stores or in underground parking lots.
- Keep car gas tank full and have some extra cash available.

Level Red (severe):
- Complete recommended actions at lower levels
- Listen to radio/TV for current information/instructions
- Communicate to industry trade groups and government partners for additional information/instructions via telephone, cell phone, e-mail, instant messaging, etc.
- Implement company disaster recovery plan, if necessary.
- Determine status of work situation and inform associates of closure or pertinent information.
- Listen for any travel restrictions and be prepared to deploy essential personnel.
- Be prepared to shelter in place or evacuate if instructed to do so by local government authorities.
- If a need is announced, promote blood donation at designated blood collection centers.

(Source: Dept of Homeland Security, FMI, NJ Food Council, Pathmark Stores Inc.).

**Biological Attack:**
- Stop what you are doing.
- Do not taste, smell or try to analyze the suspicious substance.
- Leave the room and close the door, or section off the area to prevent others from entering.
- Wash your hands with soap and cool water for 60 seconds and then wash your face.
- Notify security office or local law enforcement.
- Remove clothing without pulling it over your head. If necessary, cut clothes to remove them. Place clothing in a plastic bag and tie shut. The clothing should be given to emergency responders for proper handling.
- When emergency personnel respond, they will provide guidance on decontamination.

**Chemical Attack:**
- Evacuate the affected area.
- If the chemical is inside the building, try to evacuate the building without passing through the contaminated area.
- If you cannot get out of the building without passing through the contaminated area, move away from the area and “shelter in place”.
- If your eyes are watering, your skin is tingling, you have trouble breathing, or you think you may have been exposed to a chemical:
  - Remove clothing without pulling it over your head. If necessary, cut clothes to remove them.
  - Look for a hose, fountain, or any other water source, and wash with soap. DO NOT SCRUB YOUR SKIN!
  - Request emergency medical attention at your location.
  - Place contaminated clothing in a plastic bag and tie shut. The clothing should be given to emergency responders for proper handling.

**Radiological Attack:** (dirty bombs or attacks on nuclear power plants that cause the release of radioactive material).
Until public health officials determine the extent of radiation contamination after a blast, best practices include:
• Shielding—If you have a thick shield between yourself and the radioactive materials more of the radiation will be absorbed, and you will be exposed to less.
• Distance—The farther away you are from the blast and fallout, the lower your exposure.
• Time—Minimizing the time spent exposed would also reduce your risk.

(Source USDA)

Suggested Protocol for Identifying and Handling Suspicious Letters/Packages:
• Some characteristics of suspicious letters/packages and foods include the following: excessive postage; handwritten or poorly written typed addresses; incorrect titles; title but no name; misspellings of common words; no return address, visual distractions such as damaged container, leakage, spillage, or unknown powder on package; marked with restrictive endorsements such as “personal” or “confidential”; and/or shows a city or state in the postmark that does not match the return address.
• Do not shake or empty the contents of the envelope or package.
• Notify the establishment management team, security, and the local FBI office.
• Put it in a plastic bag or other container to prevent leakage of the contents. If a bag is not available, cover the envelope or bag with anything available (clothing, paper, trash can, etc) and do not remove the covering. Clear the area.
• Leave the room and close the door or section off the area.
• Ask co-workers and others to leave and keep others from entering.
• Wash hands with soap and water to prevent spreading of any powder or other dangerous substance.
• Do not bring the envelope or package to an emergency department or doctor’s office.
• Report the incident to local police or other law enforcement officials.
• Make a list of all of the people in the room or area when the letter or package was recognized and provide it to law enforcement and public health officials for follow up investigations and advice.

(Source: US Postal Service/CDC/FMI).

III. Recovery
• For incidents involving a possible contamination such as unknown white powder, do not try to clean up the powder.
• Remove contaminated clothing as soon as possible without pulling it over your head. If necessary, cut clothes to remove them. Place clothing in a plastic bag and tie shut or in some other container that can be sealed. This clothing bag should be given to the emergency responders for proper handling.
• Shower with soap and water as soon as possible. DO NOT USE BLEACH OR OTHER DISINFECTANT ON YOUR SKIN!
• After a crime scene investigation and clearance by regulatory authorities, the environment in direct contact with the letter or package should be decontaminated with a solution of one part household bleach to 10 parts water. Personal affects may be decontaminated similarly.

(Source: CDC, NJ Dept of Health and Senior Services/FMI).
IV. Recovery-Guidelines for Disposal of Intentionally Adulterated Food Products and Decontamination of Food Processing Facilities:

- Although response to any intentional contamination incident must be considered on a case-by-case basis, this document provides some guidance on disposal options for the contaminated product and decontamination actions for the facility.
- Depending on the nature of the incident, a great deal of interaction among regulatory agencies (federal, state, and local) might be required.
- Types of adulterants may include biological, chemical, or radiological materials not typically found in food. Disposition of these unusual agents may require specific actions that provide special protection for personnel and to limit the contamination of other environmental media.
FDA Food Code

Here is language from the 2005 FDA Food Code that addresses actions to be taken by the regulatory authority and the food establishment operators when an imminent health hazard occurs:

**Imminent Health Hazard**

**8-404.11 Ceasing Operations and Reporting.**

(A) Except as specified in ¶ (B) of this section, a PERMIT HOLDER shall immediately discontinue operations and notify the REGULATORY AUTHORITY if an IMMINENT HEALTH HAZARD may exist because of an emergency such as a fire, flood, extended interruption of electrical or water service, SEWAGE backup, misuse of POISONOUS OR TOXIC MATERIALS, onset of an apparent foodborne illness outbreak, gross unsanitary occurrence or condition, or other circumstance that may endanger public health.

(B) A PERMIT HOLDER need not discontinue operations in an area of an establishment that is unaffected by the IMMINENT HEALTH HAZARD.

**8-404.12 Resumption of Operations.**

If operations are discontinued as specified under § 8-404.11 or otherwise according to LAW, the PERMIT HOLDER shall obtain approval from the REGULATORY AUTHORITY before resuming operations.
### Emergency Contact Information

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<thead>
<tr>
<th>Name</th>
<th>Phone #</th>
<th>Emergency # Cell / Page</th>
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<td><strong>Organization:</strong></td>
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<td>Security / Safety</td>
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<td>National Poison Control Center 1 800 441-8080</td>
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<td>State Restaurant Association</td>
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<td>State Department of Agriculture</td>
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<td>Local Health Department</td>
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<td>Centers for Disease Control 1 800 311 3435</td>
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<tr>
<td>USDA FSIS: 1 800.233.3935 (Food Product Emergencies)</td>
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<tr>
<td>USDA FSIS: 1 866.395.9701 (Office of Food Defense and Emergency Response) (for non-routine incidents)</td>
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<tr>
<td>USDA Meat and Poultry Hotline: 1 888.674.6854</td>
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<td>FDA Information Hotline 1 888 723 3366</td>
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<td>FDA 24 hour Emergency Hotline 1 301 443 1240</td>
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<tr>
<td>EPA Safe Drinking Water Hotline 1 800 426 4791</td>
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REFERENCES

ON-LINE RESOURCES

There are many excellent on-line resources available for both regulatory and industry to utilize. Most of the state websites have emergency guidance as well as some of the state restaurant associations. Check your respective state for emergency guidance* that may be applicable to your needs.

*It is important to note that the resources listed on this document are just a small sample of those that are available for both regulatory and industry. You may find other guidance that is more suitable for your organizational needs.

US GOVERNMENT AND OTHER RESOURCES

Consult http://www.fsis.usda.gov/
US Department of Agriculture’s Food Safety and Inspection Service for guidance on disaster response, and food safety during emergencies regarding meat, poultry and egg products

Consult http://www.fda.gov/
US Food and Drug Administration for guidance on disaster response in regards to all other food products and for science-based information on food safety for retail and food service industries.

Consult http://www.epa.gov
US Environmental Protection Agency for guidance on disaster response in regards to potable water supply, wastewater and soil erosion and contamination.

http://www.cfsan.fda.gov/

http://www.foodsafety.gov/~dms/retdisa2.html

http://www.neha.org/

http://www.fema.gov/

http://redcross.org/

http://www.cdc.gov/flu/pandemic/

http://www.usda.gov/birdflu

STATE HEALTH DEPARTMENT RESOURCES

http://www.michigan.gov/mda/0,1607,7-125--105442--,00.html

Emergency Handbook for Food Managers from NACCHO:
For a hardcopy notebook, at Publications:
http://www.naccho.org/topics/environmental/food safety/documents/HandbkPDFEmerHB.pdf

For downloadable PDFs, at EQUIPh: http://www.naccho.org/EQUIPh/index.cfm

Bottled Water <http://www.mass.gov/dph/fpp/bottledwater>

Dairy <http://www.mass.gov/dph/fpp/dairy>

Foodborne Illness<http://www.mass.gov/dph/fpp/foodborneillness>

Food Processing <http://www.mass.gov/dph/fpp/foodprocessing>

Retail Food <http://www.mass.gov/dph/fpp/retail>

Seafood <http://www.mass.gov/dph/fpp/seafood>

http://www.oph.dhh.louisiana.gov/sanitarianservices/retailfood/docs/ORLEANS%20BOIL%20ADVISORY.pdf

Food and Water Safety

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<td>Emergency Food and Water Supplies</td>
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<td>CDC Safe Water Program</td>
<td><a href="http://www.cdc.gov/safewater/publications/microbes.htm">http://www.cdc.gov/safewater/publications/microbes.htm</a></td>
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<td>Microbes in Sickness and in Health</td>
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<td>CDC Division of Bacterial and Mycotic Diseases</td>
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<td>Hand Hygiene for Consumers Association for Professionals in Infection Control and Epidemiology</td>
<td><a href="http://www.apic.org/AM/AMTemplate.cfm?Section=Brochures&amp;Template=/CM/ContentDisplay.cfm&amp;ContentFileID=298">http://www.apic.org/AM/AMTemplate.cfm?Section=Brochures&amp;Template=/CM/ContentDisplay.cfm&amp;ContentFileID=298</a></td>
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<td>Evaluating Your Risks How likely are you to catching an infectious disease? Mayo Clinic</td>
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<td>CDC</td>
<td>An Ounce of Prevention Keeps the Germs Away</td>
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<td>Hand Hygiene Guidelines CDC Media Relations</td>
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<td>EPA Environmental Protection Agency</td>
<td>Sample Public Notices on Drinking Water</td>
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<td>Frequent Questions: How Can I Test the Quality of My Private Drinking Water Supply?</td>
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<td>Protect Your Drinking Water For Life</td>
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<td></td>
<td>Consider the Source: A pocket Guide to Protecting Your Drinking Water (52 pages)</td>
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<td>Drinking Water From Household Wells (24 pages)</td>
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<tr>
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<td>Human Health: What Are Some Naturally Occurring Sources of Pollution in Drinking Water?</td>
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<td></td>
<td>Water Myths and Realities</td>
</tr>
<tr>
<td></td>
<td>Water Treatment Cycle</td>
</tr>
<tr>
<td></td>
<td>Children and Drinking Water Standards (15 pages)</td>
</tr>
<tr>
<td></td>
<td>Welcome to the Water Sourcebooks (Four Grade level books: k-2, 3-5, 6-8, 9-12)</td>
</tr>
</tbody>
</table>
### Background

**Physician Preparedness for Acts of Water Terrorism (Water Health Connection)**
http://www.waterhealthconnection.org/bt/index.asp

**Talking About Disaster: A Guide For Standard Messages**
http://www.disastereducation.org/guide.html

### WHO World Health Organization

**Food Safety and Foodborne Illness Fact Sheet**
http://www.who.int/mediacentre/factsheets/fs237/en/

**Foodborne Diseases, Emerging**
http://www.who.int/mediacentre/factsheets/fs124/en/

### U.S. Department of Agriculture

**Keeping Food Safe During an Emergency**
http://www.fsis.usda.gov/Fact_Sheets/keeping_food_Safe_during_an_emergency/index.asp

**Foodborne Illness: What Consumers Need to Know**

**Food Safety and Security What Consumers Need to Know**

**Floodwaters and Food and Drinking Water Q&A**
http://www.fsis.usda.gov/FAqs_Power_Out/index.asp#1

**Fire in Our Home and Food Safety**

**Fire in Home and Food Safety**

**Food Started to Thaw During Power Outage**

**Should I Refreeze Food?**

**Food Safety FAQ**

**Food Safety Facts**

**Foodborne Illness: Peaks in Summer Why?**
http://www.fsis.usda.gov/Fact_Sheets/Foodborne_Illness_Peaks_in_Summer/index.asp

**Food Defense and Emergency Response**

**Security Guidelines for Food Processors, Transporters and Distributors; Disposal and Decontamination Guidelines**

### Botulism

**CDC Facts About Botulism**
http://www.bt.cdc.gov/agent/botulism/factsheet.asp

**CDC Botulism Frequently Asked Questions Division of Bacterial and Mycotic Diseases**
http://www.cdc.gov/ncidod/dbmd/diseaseinfo/botulism_g.htm

**CDC Botulism Frequently Asked Questions Division of Bacterial and Mycotic Diseases Spanish**
http://www.cdc.gov/ncidod/dbmd/diseaseinfo/botulism_g_sp.htm

**Botulism NIAID Overview**

**Botulism Mayo Clinic Q & A**
http://www.mayoclinic.com/invoke.cfm?id=AN00788

### Bovine Spongiform Encephalopathy and Creutzfeldt – Jacob Disease

**CDC Fact Sheet New Variant Creutzfeldt – Jacob Disease**
http://www.cdc.gov/ncidod/diseases/cjd/cjd_fact_sheet.htm

**CDC Questions and Answers Bovine Spongiform Encephalopathy and Creutzfeldt – Jacob Disease**
http://www.cdc.gov/ncidod/diseases/cjd/bse_cjd_qa.htm

**Questions and Answers Regarding Creutzfeldt – Jacob Disease Infection-Control Practices**
http://www.cdc.gov/ncidod/diseases/cjd/cjd_inf_ctrl_qa.htm
<table>
<thead>
<tr>
<th>Disease</th>
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<tr>
<td>Glanders</td>
<td>Glanders Frequently Asked Questions CDC Division of Bacterial and Mycotic Diseases Glanders Fact Sheet St. Louis University</td>
<td><a href="http://www.cdc.gov/ncidod/dbmd/diseaseinfo/glanders_g.htm">http://www.cdc.gov/ncidod/dbmd/diseaseinfo/glanders_g.htm</a> <a href="http://www.bioterrorism.slu.edu/bt/quick/brucellae01.PDF">http://www.bioterrorism.slu.edu/bt/quick/brucellae01.PDF</a></td>
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<tr>
<td>Brucellosis</td>
<td>Brucellosis Fact Sheet St. Louis University Brucellosis Frequently Asked Questions CDC Division of Bacterial and Mycotic Diseases</td>
<td><a href="http://www.bioterrorism.slu.edu/bt/quick/brucellae01.PDF">http://www.bioterrorism.slu.edu/bt/quick/brucellae01.PDF</a> <a href="http://www.cdc.gov/ncidod/dbmd/diseaseinfo/brucellosis_g.htm">http://www.cdc.gov/ncidod/dbmd/diseaseinfo/brucellosis_g.htm</a></td>
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</table>

For more detailed information, please refer to the respective websites.
| Protect our Baby and Yourself From Listeriosis | http://www.fsis.usda.gov/Fact_Sheets/Protect_Your_Baby/index.asp |
| Listeriosis CDC Division of Bacterial and Mycotic Diseases | http://www.cdc.gov/ncidod/dbmd/diseaseinfo/listeriosis_g.htm |

### Salmonella

| CDC Salmonella Questions and Answers **English** | http://www.cdc.gov/ncidod/dbmd/diseaseinfo/salmonellosis_g.htm |
| CDC Salmonella Questions and Answers **Spanish** | http://www.cdc.gov/ncidod/dbmd/diseaseinfo/salmonellosis_g.htm |
| CDC Salmonella Infection and Animals | http://www.cdc.gov/healthypets/diseases/salmonellosis.htm |
| Salmonella NIAID Fact Sheet | http://www.niaid.nih.gov/factsheets/foodbornedis.htm#f |

### Shigellosis

| Shigellosis Frequently Asked Questions CDC Division of Bacterial and Mycotic Diseases | http://www.cdc.gov/ncidod/dbmd/diseaseinfo/shigellosis_g.htm |
| Shigellosis Frequently Asked Questions CDC Division of Bacterial and Mycotic Diseases **Spanish** | http://www.cdc.gov/ncidod/dbmd/diseaseinfo/shigellosis_g_sp.htm |
| Shigellosis NIAID Overview | http://www.niaid.nih.gov/factsheets/foodbornedis.htm#g |
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Date of Committee Report: Original - March 13, 2007 (Revised – 01/15/2008)

Submitted By: Chirag H. Bhatt

Committee Charge(s):
Issue: 2006 II - 041
Title: Recommendation post Emergency Guidance Document on CFP and CFSAN Websites.

Recommended Solution:
The Conference recommends that the Emergency Preparedness and Response Committee Emergency Guidance document be posted on the CFP website and that a letter be sent to the FDA, USDA and leaders of other interested organizations requesting links be created on their website(s) to the CFP website for the purpose of accessing this document.

The Committee should be re-created and charged with evaluating comments received from the use of these documents and update the guidance documents as appropriate.

The Committee should evaluate other areas where guidance documents are needed and explore strategies to make it available to interested parties.

Committee Members:

<table>
<thead>
<tr>
<th>Last</th>
<th>First</th>
<th>Geo</th>
<th>Aff.</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bhatt</td>
<td>Chirag</td>
<td>S</td>
<td>Tech*</td>
<td>Garrison Enterprises, Inc., Co-Chair</td>
</tr>
<tr>
<td>Hernandez</td>
<td>Jorge A</td>
<td>N</td>
<td>FMI</td>
<td>US Foodservice, Co-Chair</td>
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<tr>
<td>Bowman</td>
<td>Patricia</td>
<td>NE</td>
<td>Acad</td>
<td>Johnson and Wales University</td>
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<td>Nummer</td>
<td>Brian A</td>
<td>C</td>
<td>Acad</td>
<td>Utah State University</td>
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<td>SE</td>
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<td>Eric D</td>
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<td>Ryan</td>
<td>Paul</td>
<td>N</td>
<td>NRA</td>
<td>Paragon Bermuda (Canada) Ltd.</td>
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<td>Tammi M</td>
<td>E</td>
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<td>Bacon</td>
<td>Brenda</td>
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<td>Larry</td>
<td>E</td>
<td>FMI</td>
<td>Food Marketing Institute</td>
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<td>Frias</td>
<td>Liza</td>
<td>W</td>
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<td>Michelle</td>
<td>C</td>
<td>FMI</td>
<td>Sam’s Club / Walmart</td>
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<tr>
<td>Diskin</td>
<td>Michael</td>
<td>E</td>
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<td>Allegheny County Health Department</td>
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<tr>
<td>Knapp</td>
<td>Jennifer</td>
<td>N</td>
<td>Local</td>
<td>Summit County Health District</td>
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<td>Watts</td>
<td>Debbie</td>
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<td>Baker</td>
<td>Shana</td>
<td>W</td>
<td>State</td>
<td>Colorado Dept. of Public Health and Environment</td>
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<tr>
<td>Barscewski</td>
<td>Stephen</td>
<td>S</td>
<td>Local</td>
<td>San Antonio Metro Health Department</td>
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<tr>
<td>Besey</td>
<td>Kevin</td>
<td>N</td>
<td>State</td>
<td>Michigan Dept. of Agriculture, Food and Dairy Div</td>
</tr>
</tbody>
</table>
Progress Report/Committee Activities:

After selecting a co-chair, Jorge Hernandez (US Foodservice) a committee was formed to include all segments and geographical areas of the industry. An email was sent out to prospective members to determine whether they were still interested in serving on the committee. Membership list was distributed to selected members.

A Google Group was created and each member was invited to join the group’s website page. The website group page allowed members to obtain files and documents, post messages and review other details regarding conference calls, etc.

Conference Call dates: 09/12/2006, 11/14/2006, 01/09/2007 and 03/13/2007. First conference call was hosted by CFP. Other conference calls were hosted and sponsored by US Foodservice to allow for better participation.

After each conference call, participants were asked to review discussed document and submit changes/corrections/modifications to Committee chair for discussions and comments by others. Updated document(s) and comments were posted at the group’s website. Based on feedback and comments a revised document (Emergency Action Plan) was prepared and a draft copy is submitted with this report. Committee co-chairs (Chirag H. Bhatt and Jorge Hernandez) requested Council II chair and vice chair to allow members to make additional changes and typing corrections before submitting it as an issue during 2008 Conference.

The final draft document (Emergency Action Plan) was posted at the CFP’s website soliciting comments and feedback from general membership. Based on comments received from members, some minor corrections were made to the document. A summary of changes made to the document is also attached along with the revised document.

Requested Actions:

The committee has completed its assigned charges.

The committee has submitted an issue (Emergency Preparedness and Response Committee) at 2008 CFP in San Antonio for the guidance document (Emergency Action Plan) to be accepted.

Attachments:
1 – EPRC – Emergency Action Plans for Retail Food Establishments 2006_08 revisions -Draft
2 – EPRC – Summary of changes to Emergency Action Plan Document
### Summary of changes to Emergency Guidance Document

**Original Document – 2004-2006 Committee**

**Changes and revisions – Recommended by 2006-2008 Committee**

<table>
<thead>
<tr>
<th>CURRENT SECTION / LANGUAGE</th>
<th>REVISED TO</th>
<th>REASON WHY CHANGE NEEDED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table of Contents.</td>
<td>Added Infectious Disease-Norovirus/HIV section.</td>
<td>Needed direction as to how to clean up after exposure to vomit/blood/etc. to avoid exposure to associates and public.</td>
</tr>
<tr>
<td>Table of Contents.</td>
<td>Added bioterrorism prevention and reaction procedures including potential exposure to anthrax, bomb threats, etc.</td>
<td>Needed direction as to how to conduct risk assessment and best practices to prevent and handle potential bioterrorism including FDA’s new ALERT initiative.</td>
</tr>
<tr>
<td>Water related issues.</td>
<td>Changed order between Interruption of electrical service and then discuss water related issues next.</td>
<td>“Planning ahead” section intro refers to interruption of electrical service as likely to be the most common and frequent hazard. Therefore it should be referred to first.</td>
</tr>
<tr>
<td>Planning Ahead-Interruption of electrical service.</td>
<td>Added information about developing plan to monitor and record product temperatures and a plan to relocate product from display cases to walk in coolers, freezers, or reefers as needed to maintain safe temperatures.</td>
<td>No reference to temperature documentation to make educated decisions about product safety was referred to in introduction.</td>
</tr>
<tr>
<td>Planning Ahead</td>
<td>Added: In case of an infectious disease event such as projectile vomiting from Norovirus or blood spill from persons in infected with HIV:…</td>
<td>Needed direction as to how to clean up after exposure to vomit/blood/etc. to avoid exposure to associates and public.</td>
</tr>
<tr>
<td>Planning Ahead</td>
<td>Added: In case of a potential terrorist threat….review procedures and guidelines for handling levels of yellow, orange and red.</td>
<td>Needed direction as to how to conduct risk assessment and best practices to prevent and handle potential bioterrorism. Best practices. FDA ALERT system, etc.</td>
</tr>
<tr>
<td>Communicate with the industry during widespread emergencies through mass media, hot lines, web sites, etc.</td>
<td>Added communication protocols to include business associations (i.e. FMI, NRA, etc), conference calls, hotlines, web sites, mass media, etc.</td>
<td>Prioritized the communication chain using existing support organizations in order to get accurate, undiluted information to industry is more efficient than using mass media to communicate and should be the last resort.</td>
</tr>
<tr>
<td>CURRENT SECTION / LANGUAGE</td>
<td>REVISED TO</td>
<td>REASON WHY CHANGE NEEDED</td>
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<tr>
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</tr>
<tr>
<td>Alternative Procedures</td>
<td>Monitor and record food temperatures every 2 hours…</td>
<td>Added clarification about open upright retail cases where doors are not available to monitor/document product temperatures every hour.</td>
</tr>
<tr>
<td>Alternative Procedures</td>
<td>Keep refrigeration equipment doors closed.</td>
<td>Added clarification about open upright retail cases where doors are not available, cover the cases with cardboard, plastic, etc to help maintain refrigeration.</td>
</tr>
<tr>
<td>Recovery</td>
<td>Refrigerated Food Safety Guide (chart)</td>
<td>Changed to allow regulatory authority to determine disposition of food depending on item and the operator’s ability to cool it down within 2 hours.</td>
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<tr>
<td>Interruption or water service</td>
<td>Response</td>
<td>Clarification added.</td>
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<td></td>
<td>Hand washing</td>
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<tr>
<td>Interruption of water service</td>
<td>Toilet Facilities-no water to flush toilets and urinals</td>
<td>Added use of commercially bottled water to flush toilets.</td>
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<tr>
<td>Recovery</td>
<td>Equipment with waterline connections</td>
<td>Added clarification</td>
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<tr>
<td>Recovery</td>
<td>Sewage overflow</td>
<td>Added clarification</td>
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<tr>
<td></td>
<td>Recovery</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Provide general clean up</td>
<td></td>
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<tr>
<td>Fire</td>
<td>Recovery</td>
<td>Added a qualifier for all of the commodities mentioned stating the same as the one used for canned goods.</td>
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<tr>
<td></td>
<td>Food Salvaging/General Considerations</td>
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<td></td>
<td>Emergency Contact Information – Phone number for USDA FSIS</td>
<td>Replaced phone numbers with national numbers.</td>
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<td></td>
<td>References</td>
<td>Rearranged to show proper affiliation.</td>
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<tr>
<td>CURRENT SECTION / LANGUAGE</td>
<td>REVISED TO</td>
<td>REASON WHY CHANGE NEEDED</td>
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<tr>
<td>References</td>
<td>Current references added.</td>
<td>None</td>
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<tr>
<td>Sample checklists</td>
<td>Added clarification to allow for time and temperature parameters.</td>
<td>Some foods such as harder cheeses, butters, margarines, etc with low aw or foods with lower pH, as well as items requiring refrigeration for quality such as pickles, fruit juices, etc., may be salvaged if refrigeration is restored within 4 hours and may be salvaged, providing time/temperature documentation is available.</td>
</tr>
<tr>
<td>Recommendations by product type</td>
<td>Added clarification.</td>
<td>Clarifies the parameters for defining &quot;somewhat thawed or soft&quot; and allows for further processing of slacked foods that have not been in the danger zone for &gt; 4 hours. It is not recommended that partially slacked foods be refrozen at the retail level for consumer purchase due to quality issues from potential crystallization or freezer burn.</td>
</tr>
<tr>
<td>Refrigerated product on the sales floor.</td>
<td>Added clarification to reflect current codes.</td>
<td>Current language implies that product temps reaching 45 F for more than 4 hours would have to be discarded.</td>
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<tr>
<td>Frozen product on the sales floor.</td>
<td>Added clarification.</td>
<td></td>
</tr>
<tr>
<td>Refrigerated product in a department cooler.</td>
<td>Added clarification to reflect current codes.</td>
<td></td>
</tr>
<tr>
<td>Frozen product in a department freezer.</td>
<td>Added clarification.</td>
<td></td>
</tr>
<tr>
<td>Making a Disaster Supply Kit</td>
<td>Deleted</td>
<td>This is clearly for a home use and not to be a part of this Emergency Guidance for Retail Food Establishments.</td>
</tr>
<tr>
<td>Guidelines for Cleaning Your Food Service Business After a Flood Food and Beverages</td>
<td>Added clarification to reflect other section in the revised document.</td>
<td>None</td>
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<tr>
<td>N/A</td>
<td>Added Guidance Procedures as to how to effectively clean vomitus and kill norovirus, clean infected blood spills, etc.</td>
<td>None</td>
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<tr>
<td>N/A</td>
<td>Added Food Security Guidance/FDA ALERT system guidelines.</td>
<td>None</td>
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</table>
Council II – Food Contact and Utensil Barrier Usage Committee Report

Date of Committee Report: January 11, 2008

Submitted By: LeAnn Chuboff

Committee Charge(s): The Conference recommends the Conference for Food Protection create a Food Contact Utensil and Barrier Usage Committee to produce a brand neutral guidance document illustrating the effective use of barriers and utensils when handling foods, including the use of disposable gloves, and the process of barrier use related to hand hygiene.

The resulting document would be a user friendly reference document outlining information about food contact utensil and barrier usage. It might contain a series of charts with some visuals and text, preferable multi-lingual. Including but not limited to:

1) A listing of standard and unique utensils that can be used as barriers to bare hand contact with RTE foods
2) Example barrier tasks for various segments of industry

Committee Members:

Chair:
LeAnn Chuboff
National Restaurant Association
175 W. Jackson Blvd. Suite 1500
Chicago, IL  60604
P: 312-715-5374
F: 312-566-9729
lchuboff@restaurant.org

State Regulatory
Michelle Motsinger
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246
P: 303-692-3647
F: 303-753-6809
Michelle.motsinger@state.co

Janet Anderberg
Washington State Department of Health
14230 Salal Drive
Edmonds, WA 98026
P: 425-745-1726
F: 360-236-2261
Janet.anderberg@doh.wa.gov

Local Regulatory
Joseph Comello
Larimer County Department of Health and Environment
1525 Blue Spruce Drive
Fort Collins, CO 80524
P: 970-498-6793
F: 970-498-6772
jcomello@gmail.com

Federal
Dianne Benjamin
FDA/ CFSAN
Dianne.Benjamin@fda.hhs.gov

Academia
Jeannie Riess
Colorado State University/ Environment Health Service
637 Justice Drive
Fort Collins, CO 80526
P: 970-491-6745
F: 970-491-4804
jriess@lamar.colostate.edu

Industry
Robert Joyce
Radisson Airport Hotel
2081 Post Road
Warwick, RI  02886
401-739-3000
401-732-9019

Lacie Thrall       Alternate: Doris Rittenmeyer
FoodHandler, Inc.  FoodHandler, Inc.
1917 S. Brighton Circle  15 Pentire Circle
Mesa, AZ 85209       Iowa City, IA 52524
P: 480-218-9144       P: 319-356-0107
F: 480-218-9145       F: 319-356-0108
L.thrall@foodhandler.com  d.rittenmeyer@foodhandler.com

Jane Griffith
WaWa, Inc.
260 W. Baltimore Pike
WaWa, PA 19063
P: 610-358-8180
F: 610-361-3704
Jane.m.griffith@wawa.com

Frank Ferko
RARE Hospitality
International, Inc.
8215 Roswell Road. Bldg. 600
Atlanta, GA  30350
P: 678-320-9288
F: 770-901-6643
fferko@loho.com

Linda McClurg
Dunkin Brands
1202 S. Victory Blvd.
Burbank, CA  91502
P: 818-295-2969
Linda.mcclurg@dunkinbrands.com
**Progress Report/Committee Activities:**
Below is a recap of the committee’s actions regarding the development of the guidance document:

**Completed Tasks:**
The committee identified:
- Five categories of bare hand contact barrier utensils that will be addressed within the document:
  1. Spoons, Scoops, Ladles and Spatulas
  2. Tongs
  3. Deli and Bakery Tissue
  4. Single-use gloves
  5. Forks, Chopsticks and Toothpicks
- The scope of the document as to provide a training and teaching tool for industry and regulatory with the primary purpose of demonstrating alternatives to bare-hand contact.
- A PowerPoint delivery format based on its flexibility and its ability to be customized by the user to incorporate such information as organizational specific text, pictures or graphics.
- Criteria for each category to include: a generic description of the utensil; general guidelines on use and care; alternative uses for the utensil; and advantages and disadvantages to the utensil. Pictures or illustrations demonstrating the traditional, alternative and creative uses of the utensil will also be included for each category.

To date, the committee created content for four out of the five categories of utensils

**Tasks yet to be completed:**
- Develop content for the fifth category, Forks, Chopsticks and Toothpicks.
- Identify potential languages for translation.
- Evaluate the costs associated with translating document.
- Provide additional pictures and/or illustrations representing utensil use.
- A complete review and sign off by all committee members to gain full support of the document.

**Requested Actions:**
Two issues will be submitted to the Conference.
- The first issue will acknowledge the work of the committee.
- The second issue will be to continue the work of the committee in order to complete all charges issued to this committee and secure consensus among all committee members.
2006 – 2008 Electronic Data Capture and Reporting Committee Survey 1
Jurisdiction Information Results

Responses: 210

Jurisdiction Information

1. What is the level of jurisdiction represented in your answers? (select one)
   - Local: 167 (79.5%)
   - State: 34 (16.2%)
   - Territorial: 1 (0.5%)
   - Tribal: 2 (1.0%)
   - Federal: 2 (1.0%)
   - Other: 4 (1.9%)
     o Specify Type: All county

1a. What state does your jurisdiction represent?

<table>
<thead>
<tr>
<th>State</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
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<td>Maryland</td>
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<td>Montana</td>
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<td>Nevada</td>
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<td>New Hampshire</td>
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<td>Wisconsin</td>
<td></td>
</tr>
<tr>
<td>Wyoming</td>
<td>3</td>
</tr>
</tbody>
</table>

2. What is the name of your jurisdiction?

Counties, cities, states listed
3. What categories of food establishments is your jurisdiction responsible for inspecting? (Check all that apply)

- Food Service (Including Temporary and Mobile): 204 (97.1%)
- Food Store: 153 (72.9%)
- Food Vending: 124 (59.0%)
- Institution: 162 (77.1%)
- Other: Specify 43 (20.5%)

   Included: B&B, Catering, Day Care, Processing, Hotels, etc.

4. How many food establishments are included in your total food inspection program?

   Range: 7 to 50,000
   Mean: 3135
   Median: 600

Inspection Report Information

5. Does your jurisdiction use an electronic method for collecting and/or storing inspection data?

   - Yes: 147 (70%)
   - No: 63 (30%)

5a. How is your electronic inspection data collected?

   - By inspector in the field: 71 (48.3%)
   - Transferred in office from paper inspection report: 71 (48.3%)
   - Other: 5 (4.8)

5b. Where is your electronic inspection data stored?

   - Onsite in an agency maintained database: 97 (66.0%)
   - Transferred to a state agency (or similar entity) maintained database: 27 (18.4%)
   - Offsite on inspection software vendor’s database: 17 (11.6%)
   - Other: 6 (4.1%)

   Specify: Most indicate a combination

5c. Do you have plans in place to begin such a program in the future?

   - Yes, within 6 months: 7 (11.1%)
   - Yes, within 1 year: 11 (17.5%)
   - Yes, but it is more than one year out: 23 (36.5%)
   - No, we do not currently have any plans: 22 (34.5)
6. Do you use a Conference for Protection, Food Code based inspection form?

- Yes: 101 (48.1%)
- No: 109 (51.9%)

7. What version of the Food Code is your form based on?

- 2005: 37
- 2003: 12
- 2001: 20
- 1999: 18
- 1997: 4
- 1995: 1
- 1993: 2
- 1982 Model Foodservice Code: 2
- 1976 Model Foodservice Code: 4
- Other: 1

8. Does your inspection form divide items into 'Foodborne Illness Risk Factors and Public Health Interventions' and 'Good Retail Practices'

- Yes: 78 (37.1%)
- No: 132 (62.9%)

9. Does your inspection form have the following capabilities (check all that apply)

Items are designated as **Critical / Non-critical**: 180 (85.7%)

Items can be marked **Not Applicable**: 96 (45.7%)

Items can be marked **Not Observed**: 90 (42.9%)

Facilities are assigned a **Risk Category**: 133 (63.3%)

**Reason for inspection** is noted (Routine/Regular, Re-inspection, Complaint): 205 (97.6%)

**Repeat** issues are tracked: 144 (68.6%)

Issues that are **Corrected** while the inspector was on site are tracked: 153 (72.9%)

10. What capabilities would your ideal inspection form contain? (check all that apply)

Items are designated as **Critical / Non-critical**: 196 (93.3%)

Items can be marked **Not Applicable**: 148 (70.5)

Items can be marked **Not Observed**: 147 (70.0%)

Facilities are assigned a **Risk Category**: 172 (81.9%)
**Reason for inspection** is noted (Routine/Regular, Re-inspection, Complaint): **192 (91.4%)**

**Repeat** issues are tracked: **198 (94.3%)**

Issues that are **Corrected** while the inspector was on site are tracked: **179 (85.2%)**

Other (specify): **36 (17.1%)**

Score, rating, HACCP, Food handler certification, enforcement action, inspection time, positive comments, correct by dates, code citation,

11. Would your jurisdiction be interested in participating in a program, which involves sending your anonymous electronic data to a central database for research purposes such as improving food safety practices and codes?

- Yes, definitely: **32 (15.2%)**
- Only if the time/resource commitment is minimal: **123 (58.6%)**
- No, we would not be interested: **55 (26.2%)**

12. Other Comments on Electronic Food Inspection Reports and Data Sharing: Variety of answers
1. Best practices and lessons learned
   a. Training
      - Be patient with staff and make sure they learn and use all of the features.
      - Training is critical to ensuring complete and consistent establishment and inspection data.
      - Be flexible with staff when switching from paper to electronic inspection forms. Paper will always be faster to complete in the field and it is hard for inspectors to adjust to the increased time when they are trying to get caught up (or stayed caught up) on their facility inventories or are trying to get out of a facility before the lunch rush starts. It helps to have clearly expressed goals/reasons for changing from paper to electronic forms- what exactly is it suppose to accomplish and are we meeting those goals? It can be frustrating to inspectors if they feel they are glorified clerical staff. E.g. why can’t I do it on paper and just have clerical enter it later? Obviously it is better if paperwork doesn’t have to be handled twice but inspectors feel their time is better spent inspecting and educating than doing data entry.
      - Training is essential for limiting data entry errors.
      - For any electronic data base using field laptop computers, a visual data entry step by step flow chart cuts down on most process errors.
      - Having a strong network of users via a User Group that meets at least quarterly is invaluable. This ensures that the system continually meets the program’s needs and facilitates resolution to errors by sharing experiences and solutions.
   b. Development
      - Do not let your developer design the system around what he thinks best. You must spend serious time understanding and documenting thoroughly your business practices or else you will end up with a product that does not suit your needs.
      - Pilot any digital program for at least one year. Fully understand data collection and analysis prior to inception.
      - Choose or have application managers on staff that can accomplish every goal as identified in a needs assessment.
      - Having system development in-house has been both a blessing and a curse. In-house developers have been able to respond to feedback and requests by the counties, and make changes to the system as appropriate. While this has been a real benefit in terms of creating a system that meets the needs of the counties, it has probably contributed to the system being too complex for Access. Making a system that is all things to all people is a little tough. It would probably have been
better to have a workgroup to sift through change requests with an eye toward maintaining a more basic system that focused on essential functions.

- Planning and knowing what you want are very important. Keep on asking yourself if the data is pertinent and relevant to your needs.
- Using a canned system will speed the process, but cut down on the individually of that system. Be prepared to spend a lot of time retraining inspectors to think like the system.
- Field inspectors were not involved enough in the design, creating change requests for production support; suggestion for improvement – require inspectors to review/sign off on requirements and design documentation through a formalized session
- Funnel communications through a focal point within agency’s tech team, and have a tech team representative at all regular status meetings.
- Not enough foresight was given to future system needs, such as: easily updating Food Law, Food Code and other regulatory violations, as adopted.
- Make sure the field component of any software does not contribute in adding complexity and time during the inspection process
- When purchasing software get it with enough time for staff to practice with it to get problems resolved. We recently bought a software program that was poorly done (obviously never field tested) and we spent 2 weeks with our in house staff fixing it so we could use it in the field. Always ask for references from jurisdictions that are using the system you are looking at purchasing so you can contact them and discuss it first.

c. Field Usage

- Large upfront time commitment needed to adjust to new system and increased time at inspection site has not been recouped.
- Data entering (previously only hard file maintained) is beneficial to analyze data and adjust processes to achieve desired results.
- Always have back up paper forms in case of mechanical difficulties.
- With some facilities it’s not practical to use the electronic system (Temporary events, food courts in malls or in sports stadiums where there is not place to set up printer and it is too far to go back to car).
- Have extra ink cartridges on hand and print office copies after returning to the office (otherwise inspectors will use a lot of cartridges).
- Some operators get upset when an inspector takes up a table or their office to write and print the report. Field staff needs to be reminded to be the least obtrusive as possible. If it is busy and the facility needs the table space then inspector needs to write report in the car if they don’t write as they go. If space is small and cramped do not take in case and printer- leave it in car, etc.
- Due to portable printer ink limitations it is better to hand write the grade card versus print them.
• Decide on policies and required capabilities for Electronic Signature capture
d. Data management
  • Decentralized data (county specific databases) is not a good idea. Centralized and web-based is preferred.

2. Is there anything you would have done differently or features you would have asked for?
   a. It is essentially a flat-file design that needs to be replaced with a proper relational database design.
   b. Hold the supervisor(s) more accountable for making certain all of the inspectors learned and used the system at the same level.
   c. We would not use MS Access at all and go with strictly a browser based system.
   d. Commercially available system not in house development.
   e. Use the same system for the entire State.
   f. We did not initially take into consideration using the data for trend analysis or monitoring employee/program efficiency and effectiveness. Those queries and reports were added later.
   g. It would be nice if you could print permits off of this program.
   h. A single unit with an integral printer would help tremendously. A unit with a small integral or attached keyboard would be nice. (Some staff choose not to use the keyboard because it is just one extra thing to carry). The more convenient the unit is the better.
   i. Be careful when selecting equipment. We just bought some replacement printers and the new ones use different size ink cartridges for the colored ink. We have also experienced a lot of breakage of equipment, especially keyboards. They take a lot of wear and tear and jostling about as they are put in and out of case and in and out of car, etc.
   j. The more touch screen format the inspection form is the more user friendly it is (which saves time and keeps inspectors happy). It gets very frustrating to have to keep closing out screens to go to another one to enter data. For example, the inspection form we are currently using the date and type of inspection (routine, etc) is under one tab, violation data is another tab, comments are on another tab, collecting the signature is on another tab (and to print that person’s name you have to go to still a different tab!). Food certification information and re-inspection date are on another tab. And then to finally view the inspection report it’s under another tab. We are constantly going back and forth. We would like form where we can just touch the screen and check the box to mark it as a violation or click on the box and enter the information directly (as with re-inspection date, certification info, etc.). We currently aren’t marking Not applicable, Not Observed, etc- we only mark violations- just because it takes too much time to change screens, find the appropriate pull downs, etc. In the field it took an extra 30 minutes to write the report for a facility with one violation. For a harder facility it took an extra hour to write the report with
marking all the additional fields. This is a significant amount of time increase when you are doing as many inspections as we do.

k. Having an annual maintenance agreement lessens the burden on staff to resolve system issues, allowing them more time to devote to department functions

l. Email capability - ability to integrate with other databases

m. BIGGER FONTS! Ability to see the words on the screen is the biggest problem for "senior" inspectors.

n. Include the ability to show historical operations of food establishments, including previous violations.

o. Avoid the "train the trainer" concept and have the vendor perform all the initial trainings until fully implemented across the organization.

3. How long did the process take (inception to completion)?
   a. Average length: 27 months
   b. Median length: 12 months
   c. Mode: 6 months
   d. Range: 3 months to 20 years

4. Did you use a contractor or do the work in house? If a contractor, which one?
   a. In-house: 44%
   b. Contractors include: Accela, Custom Data Processing (CDP), Decade, Digital Health, Electronic Data Systems Corporation (EDS), Garrison, Paragon, Pen-Fact, Steton

5. What was the approximate cost and scope of the system?
   a. Average: $282,000
   b. Median: $50,000
   c. Range: $900 - $1,116,658

6. What type of database the information is stored in?
   a. Access: 37%
   b. SQL: 19%
   c. Oracle: 7%
   d. Foxpro: 7%
   e. Other: 30%

7. Reasons why agencies would not participate in data sharing:
   a. Decision must be made at a higher level
   b. No budget
   c. Privacy issues
   d. HIPAA concerns
   e. Don’t perceive a need
Conference for Food Protection
Electronic Data Capture and Reporting Committee Final Report

Date of Report: Dec. 7, 2007

Committee Charge (CFP Issue 2006-II-32)
The Conference recommends that a new Electronic Data Capture and Reporting System Committee be formed and work with the Inspection Form Committee to identify best practices and lessons learned in the development and sharing of an electronic data capture and reporting system for presentation at the 2008 CFP Biennial Meeting.

Attachments:
2006 – 2008 Electronic Data Capture and Reporting Committee Survey 1
Jurisdiction Information Results
2006 – 2008 Electronic Data Capture and Reporting Committee Survey 2 Best Practices Results

Progress Report
Two surveys were conducted of public health officials across the country to determine the following:
- Current usage of electronic data capture
- Current usage of Conference for Food Protection based forms
- Willingness to share data in an electronic database
- Current inspection form capabilities
- Ideal inspection form capabilities
- Barriers to sharing data in an electronic database
- Costs of implemented systems
- Database types for implemented systems
- Contractors for implemented systems
- Length of time to implement
- Best practices and lessons learned from electronic data capture system implementation

An overview of the results of the surveys is presented as follows.

2006 – 2008 Electronic Data Capture and Reporting Committee Survey 1
Jurisdiction Information Results
Survey One had 210 respondents from 43 states.

Current usage of electronic data capture
70% of survey respondents currently operate an electronic data system. Of those that did not currently have an electronic data system, 65.5% intend to have one in the next year.
Current usage of Conference for Food Protection based forms
48.1% of survey respondents utilize a Conference for Food Protection based inspection form. The breakdown of the forms was as follows:

- 2005: 37%
- 2003: 12%
- 2001: 20%
- 1999: 18%
- 1997: 4%
- 1995: 1%
- 1993: 2%
- 1982 Model Foodservice Code: 2%
- 1976 Model Foodservice Code: 4%
- Other: 1%

Willingness to share data in an electronic database
15.2% of respondents were definitely interested in participating in a program, which involves sending anonymous electronic data to a central database for research purposes such as improving food safety practices and codes. 58.6% would only be interested if the time/resource commitment is minimal. 26.2% would not be interested.

Current inspection form capabilities
The table below shows the current capabilities of respondents’ inspection forms.

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<thead>
<tr>
<th>Capability</th>
<th>% of respondents with capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Divides items into 'Foodborne Illness Risk Factors and Public Health Interventions' and 'Good Retail Practices'</td>
<td>37.1%</td>
</tr>
<tr>
<td>Items are designated as Critical / Non-critical</td>
<td>85.7%</td>
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<tr>
<td>Items can be marked Not Applicable</td>
<td>45.7%</td>
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<tr>
<td>Items can be marked Not Observed</td>
<td>42.9%</td>
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<tr>
<td>Facilities are assigned a Risk Category</td>
<td>63.3%</td>
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<tr>
<td>Reason for inspection is noted (Routine/Regular, Re-inspection, Complaint)</td>
<td>97.6%</td>
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<tr>
<td>Repeat issues are tracked</td>
<td>68.6%</td>
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<tr>
<td>Issues that are Corrected while the inspector was on site are tracked</td>
<td>72.9%</td>
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</table>

Ideal inspection form capabilities
The table below shows the desired capabilities of respondents’ ideal inspection form.

<table>
<thead>
<tr>
<th>Capability</th>
<th>% of respondents desiring capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Items are designated as Critical / Non-critical</td>
<td>93.3%</td>
</tr>
<tr>
<td>Items can be marked Not Applicable</td>
<td>70.5%</td>
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<tr>
<td>Items can be marked Not Observed</td>
<td>70.0%</td>
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<tr>
<td>Facilities are assigned a Risk Category</td>
<td>81.9%</td>
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<tr>
<td>Reason for inspection is noted (Routine/Regular, Re-inspection, Complaint)</td>
<td>91.4%</td>
</tr>
<tr>
<td>Repeat issues are tracked</td>
<td>94.3%</td>
</tr>
<tr>
<td>Issues that are Corrected while the inspector was on site are tracked</td>
<td>85.2%</td>
</tr>
</tbody>
</table>
2006 – 2008 Electronic Data Capture and Reporting Committee Survey 2
Best Practices Results
Survey Two was sent to the respondents to Survey One, and 31 responses were received from 20 states.

Barriers to sharing data in an electronic database
Of those respondents who would not participate in a program involving sending anonymous electronic data to a central database for research purposes, the reasons for the unwillingness to participate were:
- Decision must be made at a higher level;
- No budget;
- Privacy issues;
- HIPAA (Health Insurance Portability and Accountability Act) concerns;
- Don’t perceive a need

Costs of implemented systems
Costs varied greatly, as shown below.
- Average: $282,000
- Median: $50,000
- Range: $900 - $1,116,658

Database types for implemented systems
Database types varied greatly, as shown below.
- Access: 37%
- SQL: 19%
- Oracle: 7%
- Foxpro: 7%
- Other: 30%

Contractors for implemented systems:
- In-house: 44%
- Contractors include: Accela, Custom Data Processing (CDP), Decade, Digital Health, Electronic Data Systems Corporation (EDS), Garrison, Paragon, Pen-Fact, Steton

Length of time to implement
Length of time to implement varied greatly, as shown below.
- Average length: 27 months
- Median length: 12 months
- Mode: 6 months
- Range: 3 months to 20 years

Best practices and lessons learned from electronic data capture system implementation
Best practices and lessons learned varied greatly, and centered around training, difficulties with field usage and additional features that were added later. The specific comments from the survey can be found in the survey.
Conclusions
Many jurisdictions around the country have or are moving towards using an electronic data capture system for reporting on inspection data. In addition, many would be willing to anonymously share that data in a central database for research purposes such as improving food safety practices and codes, providing that the time and resource commitment is minimal.

Possible barriers to this type of sharing include:
- Resource limitations
- Usage of different inspection forms
- Storage of data in a variety of databases
- Lack of willingness/interest in participation.

Survey two contains detailed information regarding specific best practices and lessons learned in the development and sharing of an electronic data capture and reporting system which may be useful for any organization that is implementing such a system.

Issue Submitted and Recommendations
We have submitted an issue to the conference, requesting that the report of this committee be acknowledged.

We further recommended within the issue that the Inspection Form Committee be charged with the following:
1. consider options to make the results of the "Best Practices and Lessons Learned" as identified in the 2006-2008 Electronic Data Capture and Reporting Committee Survey 2 available to jurisdictions considering an electronic data capture system; and
2. conduct research into the feasibility of providing an anonymous, central electronic database for the collection of electronic data from jurisdictions across the country.
## 2006-2008 Electronic Data Capture and Reporting Committee

### Industry

<table>
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<tr>
<th>Name</th>
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<th>Address</th>
<th>Phone</th>
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<td>Cannon</td>
<td>Steritech</td>
<td>10066 Owens Drive Westminster</td>
<td>(720) 252-4196</td>
<td>SW</td>
<td><a href="mailto:beth.cannon@steritech.com">beth.cannon@steritech.com</a></td>
</tr>
<tr>
<td>Hebert</td>
<td>Wal-Mart Stores, Inc.</td>
<td>508 SW 8th Street Bentonville</td>
<td>(479) 277-2578</td>
<td>SW</td>
<td><a href="mailto:steven.hebert@wal-mart.com">steven.hebert@wal-mart.com</a></td>
</tr>
<tr>
<td>Kolenski</td>
<td>The Kroger Co.</td>
<td>1014 Vine St. Cincinnati</td>
<td>(513) 762-4041</td>
<td>CEN</td>
<td><a href="mailto:john.kolenski@kroger.com">john.kolenski@kroger.com</a></td>
</tr>
<tr>
<td>Lawlis</td>
<td>Bob Evans Farms, Inc.</td>
<td>3776 S. High Street, Suite 81</td>
<td>(614) 497-4368</td>
<td>CEN</td>
<td><a href="mailto:tim_lawlis@boevans.com">tim_lawlis@boevans.com</a></td>
</tr>
<tr>
<td>Pimentel</td>
<td>NSF International</td>
<td>789 N Dixboro Rd Ann Arbor</td>
<td>(734) 827-6893</td>
<td>CEN</td>
<td><a href="mailto:pimentel@nsf.org">pimentel@nsf.org</a></td>
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<tr>
<td>Roberson</td>
<td>Publix Super Markets, Inc.</td>
<td>P.O. Box 32024 Lakeland</td>
<td>(863) 688-1188 x 32422</td>
<td>SE</td>
<td><a href="mailto:michael.roberson@publix.com">michael.roberson@publix.com</a></td>
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</table>


2006-2008 Electronic Data Capture and Reporting Committee

Ryan Paul
Paragon Bermuda (Canada) Ltd.
100 York Boulevard, Suite 610,
Ontario Canada L4B1J8
(905) 886-4816 11
(905) 886-0755 pryan@paragoncd.ca

Samuels Derek
Comark Instruments
9710 SW Sunshine Court
Beaverton OR 97005
(610) 518-1862 PAC Region
(610) 269-6525 derek@comarkusa.com

Yamnik Dale
Yum! Brands Inc.
542 Eaglestone Drive
Castle Rock CO 80104
(303) 708-1536 SW Region
(303) 660-2429 dale.yamnik@yum.com

State

Andrews Ann
Connecticut Dept. of Public Health/Food Protection Program
410 Capitol Avenue, MS#11 FDP
Hartford CT 06134-0308
(860) 509-7652 NE Region
(860) 509-8071 ann.andrews@po.state.ct.us

Dove Sheri L.
Pennsylvania Dept. of Agriculture/Div. of Food Safety
2301 North Cameron Street
Harrisburg PA 17110-9408
(717) 787-4315 x 205 CEN Region
(717) 787-1873 shdove@state.pa.us
### 2006-2008 Electronic Data Capture and Reporting Committee

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<thead>
<tr>
<th>Name</th>
<th>State</th>
<th>Department</th>
<th>Address Details</th>
<th>Phone Numbers</th>
<th>Region</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Juarez</td>
<td>Padraic</td>
<td>Florida Department of Health</td>
<td>4052 Bald Cypress Way, Bin A08 Tallahassee, FL 32399-1710</td>
<td>(850) 245-4273, (850) 487-0864</td>
<td>SE Region</td>
<td><a href="mailto:padraic_juarez@doh.state.fl.us">padraic_juarez@doh.state.fl.us</a></td>
</tr>
<tr>
<td>Lancaster</td>
<td>Sandra</td>
<td>Arkansas Department of Health</td>
<td>PO Box 1437, Slot #H-46 Little Rock, AR 72203-1437</td>
<td>(501) 661-2575, (501) 661-2572</td>
<td>SW Region</td>
<td><a href="mailto:slancaster@healthyarkansas.com">slancaster@healthyarkansas.com</a></td>
</tr>
<tr>
<td>Luke</td>
<td>John</td>
<td>Mississippi Department of Health</td>
<td>PO Box 1700 Jackson, MS 39215</td>
<td>(601) 576-7691, (601) 576-7632</td>
<td>SE Region</td>
<td><a href="mailto:john.luke@msdh.state.ms.us">john.luke@msdh.state.ms.us</a></td>
</tr>
<tr>
<td>Paulus</td>
<td>Colleen</td>
<td>Minnesota Department of Health</td>
<td>625 North Robert Street St. Paul, MN 55155</td>
<td>(651) 201-4507, (651) 201-4507</td>
<td>CEN Region</td>
<td><a href="mailto:colleen.paulus@state.mn.us">colleen.paulus@state.mn.us</a></td>
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<tr>
<td>Hainline</td>
<td>Joe</td>
<td>Jefferson County Health Department</td>
<td>P.O. Box 437 Hillsboro, MO 63050</td>
<td>(636) 789-3372, (636) 797-2160</td>
<td>SW Region</td>
<td><a href="mailto:hainlj@lpha.dhss.mo.gov">hainlj@lpha.dhss.mo.gov</a></td>
</tr>
<tr>
<td>Knapp</td>
<td>Jennifer</td>
<td>Summit County Health District</td>
<td>1100 Graham Road Circle Stow, OH 44224</td>
<td>(330) 926-5643, (330) 923-6436</td>
<td>CEN Region</td>
<td><a href="mailto:jknapp@schod.org">jknapp@schod.org</a></td>
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<tr>
<td>Pattengale</td>
<td>Darwin</td>
<td>Albuquerque Health Department</td>
<td>One Civic Plaza, Albuquerque, NM 87103</td>
<td>(505) 768-2616</td>
<td>SW</td>
<td><a href="mailto:dpattengale@cabq.gov">dpattengale@cabq.gov</a></td>
</tr>
<tr>
<td>Leong</td>
<td>Mary</td>
<td>USFDA</td>
<td>158-15 Liberty Ave., Rm 5016, Jamaica, NY 11433</td>
<td>(718) 662-5536</td>
<td>NE</td>
<td><a href="mailto:mary.leong@fda.hhs.gov">mary.leong@fda.hhs.gov</a></td>
</tr>
<tr>
<td>Otto, III</td>
<td>Charles S.</td>
<td>CDC/Environmental Health Service</td>
<td>4770 Buford Highway NE, MS F28, Atlanta, GA 30341-3724</td>
<td>(770) 488-7303</td>
<td>SE</td>
<td><a href="mailto:cotto@cdc.gov">cotto@cdc.gov</a></td>
</tr>
<tr>
<td>Tufto</td>
<td>Brad</td>
<td>USFDA</td>
<td>1000 North Argonne, Suite 105, Spokane Valley, WA 99005</td>
<td>(509) 353-2554</td>
<td>PAC</td>
<td><a href="mailto:brad.tufto@fda.hhs.gov">brad.tufto@fda.hhs.gov</a></td>
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Manager Training, Testing, and Certification Committee
Report to Executive Board and Conference

Date: December 7, 2007

Prepared by: Roger Hancock, Chair

Committee charge:

1. Investigate what is needed to ensure comparability between the current Standards for Accreditation of Food Protection Manager Certification Programs (Standards) and international standards that exist for personnel engaged in the food business;
2. Make recommendations to the Conference Board at regular Board meetings;
3. Submit issues to the next biennial meeting of the Conference containing any recommendations necessary to modify or enhance the Standards to attain such comparability;
4. Develop a process to review public information (including the removed Annex B) related to food manager training for relevance, a process to make that information available through the Conference for Food Protection (i.e. web site or other appropriate means), and submit this information to the Executive Board for consideration and adoption.

Committee Members:

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<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
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<tr>
<td>Roger Hancock</td>
<td>Albertsons</td>
<td>208-395-6740</td>
</tr>
<tr>
<td>Aggie Hale</td>
<td>Fl. Department of Agriculture</td>
<td>850-488-3951</td>
</tr>
<tr>
<td>Cynthia D. Woodley</td>
<td>Professional Testing</td>
<td>407-894-6405</td>
</tr>
<tr>
<td>David McSwane</td>
<td>Indiana University, Public Aff.</td>
<td>317-274-2918</td>
</tr>
<tr>
<td>Dianna Pasley</td>
<td>Schnuck Markets</td>
<td>314-994-4346</td>
</tr>
<tr>
<td>George Roughan</td>
<td>TAP Series</td>
<td>818-889-8799 (103)</td>
</tr>
<tr>
<td>Jane Griffith</td>
<td>Wawa Inc.</td>
<td>610-358-8180</td>
</tr>
<tr>
<td>Jeff Hawley</td>
<td>Harris Teeter, Inc.</td>
<td>704-844-3098</td>
</tr>
<tr>
<td>Jon Costa</td>
<td>Applebee’s</td>
<td>913-967-2866</td>
</tr>
<tr>
<td>Joyce Jensen</td>
<td>Lincoln-Lancaster Health Dept.</td>
<td>402-441-8033</td>
</tr>
<tr>
<td>Julie Albrecht, Ph.D.</td>
<td>University of Nebraska (Health S.)</td>
<td>402-472-8884</td>
</tr>
<tr>
<td>Larry Lynch</td>
<td>National Registry</td>
<td>407-352-3830</td>
</tr>
<tr>
<td>LeAnn Chuboff</td>
<td>Educ. Foundation of the NRA</td>
<td>800-765-2122 (374)</td>
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<tr>
<td>Lee Cormman</td>
<td>Fl. Department of Agriculture</td>
<td>850-245-5547</td>
</tr>
<tr>
<td>Lynn Hodges</td>
<td>USDA</td>
<td>214-767-9116 (609)</td>
</tr>
<tr>
<td>Nancy Nesel</td>
<td>Yum Brands</td>
<td>502-847-8493</td>
</tr>
<tr>
<td>Patty Esparza</td>
<td>NEHA</td>
<td>303-756-9090 (304)</td>
</tr>
<tr>
<td>Patrick Guzzle</td>
<td>Idaho Dept. of Health &amp; Welfare</td>
<td>208-334-5938</td>
</tr>
<tr>
<td>Patrick Pimental</td>
<td>NSF International</td>
<td>734-827-6893</td>
</tr>
</tbody>
</table>
Ruth Hendy  TX Dept of Health  512-834-6753 (2050)
Sandy Cecere  Prometric  800-786-3926 (3257)
Shirley Bohm  U.S. FDA  301-436-2096
Stephen Posey  Brinker International  972-770-1716
Steve Wycoff  Wal-Mart  479-277-9202
Sue Vergne  Jack in the Box Inc.  858-571-2171
Susan Quam  Wisconsin Restaurant Assoc.  608-270-9950
Tomeji Miller  Plano Environmental Health Dept.  972-941-7143
Vicki Everly  County of Santa Clara  408-918-3490

Consultants (non-voting):

John Marcello  ANSI-CFP Accreditation Committee
Roy Swift  ANSI

Progress Report:

Following the 2006 Conference for Food Protection biennial meeting, the Standing Committee met two times and had a number of conference calls to address the charges given to the Committee. The charges above have been addressed successfully. The committee continued with its current structure of subcommittees.

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<tr>
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<tr>
<td>Communication</td>
<td>Prepare communication re: standards, etc. to audiences</td>
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<tr>
<td>Education &amp; Training</td>
<td>Develop guidelines for training necessary for certification</td>
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<tr>
<td>Standards</td>
<td>Maintain the Standards and the need for amendment as required</td>
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**Logistics Subcommittee:** Fine work was done by the Logistics subcommittee to arrange for all meeting needs including location, facilities, equipment, reservations, scribes, etc. In addition, the Logistics subcommittee facilitated the maintenance of the Committee roster and the nomination of new/replacement members to the Committee.

**Communication Subcommittee:** A Frequently Asked Questions (FAQ) document was completed and posted on the CFP web site.

In addition, two communications were prepared for distribution to a wide audience in the environmental health/food safety community (NEHA, AFDO, NACCHO, etc.) that encourage adoption and use of the Standards.

**Education & Training Subcommittee:** Addressing the charge to review public information (including the removed Annex B) related to food manager training for relevance, and develop a process to make that information available through the Conference for Food Protection was the focus of this subcommittee.
The role of education and training in the certification process has been a matter of committee deliberation for years. Perhaps the biggest point of misunderstanding and debate among the many stakeholders in food manager certification is the role that training plays. Time was spent reviewing the history of food manager certification within the Conference for Food Protection, and the rationale for a test-driven measure for certification.

The Committee deliberated at length the role of training in the certification process from the perspectives of the many different stakeholders involved. State and local regulators play a key role in directly training people who handle food, reviewing training programs for adequacy, and are being asked by candidates for referrals to training programs. Candidates want training curricula that will prepare them for certification. Businesses involved in either training or testing want to maintain the integrity of their businesses and fit into the process outlined by the CFP Standards.

Training delivery methods range considerably, from classroom style to computer-assisted to on-the-job to formal education. Regardless of style, the committee strongly endorsed the FDA Food Code as the authoritative guide for training content. The Committee also understands that the complexities of training do not lend themselves to a certification standard that can be accredited. Neither does a CFP endorsement of training programs resolve the training question for many reasons.

The Committee by consensus reaffirmed the following statement as foundational to the Conference position on training in the certification process:

“The conference for Food Protection (CFP) recognizes the importance and need for the provision of food safety training for all food employees and managers. The CFP recommends the content of food protection manager training be consistent with paragraph 2-102.11 (C) of the most recent FDA Food Code. The CFP promotes the information contained in the FDA Food Code as well as content outlines based on job task analyses, which may be of value in developing or evaluating training.”

This consensus position recognizes that it leaves the training question open to evaluation by all of the stakeholders involved in the certification process. To assist with this evaluation, the committee has taken an additional step of providing access to content outlines for ANSI accredited certification programs through links on the Conference web site. These content outlines are based on Job Task Analyses that are practical applications of the FDA Food Code in the real world of managing a food business (receiving, storing, processing/preparing, serving/selling, etc.). These content outlines cover the knowledge base required to become certified, and point to the information needed in any training program used to prepare candidates for certification.

An issue has been submitted to the Conference for Food Protection 2008 Biennial Meeting that recommends this position as a final resolution for charge #4 listed above.
Standards Subcommittee:

The Standards subcommittee worked with the American National Standards Institute (ANSI) and the ANSI-CFP Accrediting Committee (ACAC) to identify sections of the Standards that need clarification.

Based on input from both ANSI and accredited certification providers, revision to the Standards to tighten sections of the Standards that address test security was discussed. Items of concern include over exposure of individual test items (e.g. test items being used too frequently or otherwise exposed outside the test environment), teaching to the test, exam administration procedures, individuals who compromise one provider’s test then being able to administer or gain access to another provider’s test, and maintaining test security when an individual acts as both a trainer and a test administrator.

Several changes to the Standards are recommended to enhance exam security.

An Issue has been submitted to the Conference for Food Protection 2008 Biennial Meeting that recommends changes to the Standards.

Other Business:

The entire committee deliberated the first charge listed above. The scope of exhaustively evaluating comparability between the CFP Standards and international standards for personnel engaged in the food business was deemed beyond the committee’s ability. There are hundreds of standards that deal with food and persons engaged in the food business. Clarification from the Executive Board narrowed the scope of the charge to consider comparability (of only standards that are relevant for food managers).

When looked at from an International Organization of Standardization (ISO) standpoint, no Standard for food managers exists, though there are many food standards and two personnel standards. As stated on the ANSI web site (http://www.ansi.org/conformity_assessment/personnel_certification/overview.aspx?menuid=4):

“The American National Standards Institute (ANSI) administers two accreditation programs for personnel certification agencies. One accreditation is based on the new International Standard ANSI/ISO/IEC 17024 and the other is based on The Conference for Food Protection Accreditation Standards for certification agencies that certify food protection managers. Both programs are based on an internationally recognized process for accrediting organizations and it has been used by ANSI for many years. This process involves both a review of a paper application and the performance of an audit (on-site visit) to validate information provided by each applicant. The use of an onsite audit for accreditation of personnel certification agencies is unique to ANSI.”
Based on this information, the Committee determined there was no merit to pursuing this topic any further, and deems this charge, as assigned, to be complete.

**Requested Board/other actions:**

Please accept/approve this report as submitted.

**Recommendation(s) for future charge:**

The Manager Training, Testing, and Certification Committee needs to be charged as follows from the 2008 Biennial Meeting:

1. Continue to work with the Executive Board and the ANSI-CFP Accreditation Committee (ACAC) to maintain the standards in an up-to-date format.
Conference for Food Protection

Standards for Accreditation
Of
Food Protection Manager Certification Programs

As Amended by the 2006 Biennial Conference

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.

All certifying organizations attesting to the competency of Food Protection Managers, including regulatory authorities that administer and/or deliver certification programs, have a responsibility to the individuals desiring certification, to the employers of those individuals, and to the public. Certifying organizations have as a primary purpose the evaluation of those individuals who wish to secure or maintain Food Protection Manager Certification in accordance with the criteria and standards established through the CFP. Certifying organizations issue certificates to individuals who meet the required level of competency.
The CFP standards are based on nationally recognized principles used by a variety of organizations providing certification programs for diverse professions and occupations. Accreditation, through the process recognized by CFP, indicates that the certification organization has been evaluated by a third party accrediting organization and found to meet or exceed all of the CFP’s established standards.

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

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

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

The CFP strongly encourages regulatory authorities and other entities evaluating credentials for Food Protection Managers to recognize and endorse these standards and the accreditation process. The CFP Standards for Accreditation of Food Protection Manager Certification Programs provides the framework for universal acceptance of individuals who have obtained their credentials from an accredited certification program. In the U.S Food and Drug Administration’s Model Food Code, hereinafter referred to as the FDA Food Code, Section 2-102.11 20 recognizes Food Protection Manager certificates issued by an accredited certification program as one means of meeting the FDA Food Code’s “Demonstration of Knowledge” requirement, as prescribed in Paragraph 2-102.11(B).

Modifications and Improvements

The MTTC Committee followed the Conference directive to use the 1996 conference working document, Standards for Training, Testing and Certification of Food Protection Managers, in the development of accreditation standards. Extensive revision of this document was presented to CFP’s 2000 and 2002 Biennial Conferences under the title, Standards for Accreditation of Food Protection Manager Certification Programs.
The revision and reformatting of the document were made after a comprehensive MTTC Committee review of each section. The Standards for Accreditation of Food Protection Manager Certification Programs:

1. adds and improves definitions that are more precise and more consistent with terminology and definitions used in the psychometric community and by accreditation organizations;

2. italicizes defined terms throughout the document;

3. eliminates ambiguities in the 1996 conference working document pertaining to test development and administration; and

4. identifies certification organization responsibilities to candidates, the public and the accrediting organization; and

5. adds computer-based test standards; and

6. clarifies demonstration of continued proficiency.

Annexes

The annexes located at the back of the document are NOT part of the standards, but provide information to guide those responsible for implementing or reviewing Food Protection Manager Certification programs. Each of the annexes provides guidelines for specific responsibilities that impact the effective implementation of the Conference Standards for Accreditation of Food Protection Manager Certification Programs.

Annex A provides a “Code of Ethics” for certification organizations and test providers responsible for the design of the assessment tool used to measure a candidate’s competency. Certification organizations have a responsibility to ensure that the certification process is fair to the candidates and protects their inherent rights.
Annex B provides some guidance to regulatory authorities that incorporate Food Protection Manager Certification as part of their requirements to obtain or retain a permit to operate. The CFP Standards for Accreditation of Food Protection Manager Certification Programs is designed to be a set of voluntary unifying national standards providing a mechanism for the universal acceptance of Food Protection Managers who obtain their certificates from an accredited certification program.

Over the past 25 years, many regulatory authorities have developed their own Food Protection Manager Certification Programs. This has resulted in a variety of standards for certification programs. The CFP national standards for universal acceptance of Certified Food Protection Managers provide regulatory authorities reliable and legally defensible criteria for evaluating certification programs. In addition, they eliminate duplication of testing and additional cost for the industry.

_Regulatory authorities_ that may not be in a position to eliminate their existing programs are encouraged to recognize Food Protection Managers certified in accordance with these standards as fulfilling their program requirements. Annex B provides additional guidance, developed through the CFP, for the implementation of these regulatory _certification_ programs.
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Section 1.0 Definitions

1.1 **Accreditation** means that an *accrediting organization* has reviewed a Food Protection Manager *Certification* program and has verified that it meets standards set by the CFP (a review of a *certifying organization* by an independent organization using specific criteria, to verify compliance with Food Protection Management *Certification* Program standards).

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

1.3 **Accredited certification program** means a Food Protection Manager *Certification* Program that has been evaluated and listed by an *accrediting organization* accepted by the CFP and has met the CFP standards for such programs.

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

   (b) does not refer to training functions or educational programs.

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

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

1.6 **Certification** means the process wherein a *certificate* is issued.
SECTION 1.0 - DEFINITIONS

Section 1.0 Definitions

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

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

1.3 Accredited certification program means a Food Protection Manager Certification Program that has been evaluated and listed by an accrediting organization accepted by the CFP and has met the CFP standards for such programs.

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

(b) does not refer to training functions or educational programs.

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

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

1.6 Certification means the process wherein a certificate is issued.

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

1.8 Certified Food Protection Manager means a person who has demonstrated by means of a food safety certification examination to a certifying organization that he/she has the knowledge, skills and abilities required to protect the public from food borne illness. Duties of such persons include but are not necessarily limited to:

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

b. development or implementation of specific policies, procedures or
standards aimed at preventing food borne illness;

c. coordination of training, supervision or direction of food preparation activities, and responsibility for taking corrective action as needed to protect the health of the consumer;

d. responsibility for completion of in-house self-inspection of daily operations on a periodic basis to see that policies and procedures concerning food safety is being followed.

1.9 Competency means a defined combination of knowledge, skills, and abilities required in the satisfactory performance of a job.

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

1.11 Computer-Adaptive Testing means a method of computer-based testing that uses algorithms based on the statistics of the test questions to determine the examinee’s proficiency by selecting items at various difficulty levels.

1.12 Computer-Based Testing means an examination administered on a computer.

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

1.14 Demographic data means the statistical data of a population, especially the data concerning age, gender, ethnic distribution, geographic distribution, education, or other information that will describe the characteristics of the referenced group.

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

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

1.17 Equivalency (in “equivalent examinations”) means that there is specific psychometric evidence that various forms of an examination cover the same content and their respective passing scores represent the same degree of competence.
1.18 Examination forms means alternate sets of test questions (with at least 25% alternate questions) to assess the same competencies, conforming to the same examination specifications.

1.19 Examination specifications means the description of the specific content areas of an examination, stipulating the number or proportion of items for each area of competency and the level of complexity of those items. The specifications are based on the job analysis and its verification.

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

1.21 Food establishment

(a) Food establishment means an operation that stores, prepares, packages, serves, vends, or otherwise provides food for human consumption:

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

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

(b) Food establishment includes:

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

(ii) an operation that is conducted in a mobile, stationary, temporary, or permanent facility or location; where consumption is on or off the premises; and regardless of whether there is a charge for the food.
**Food establishment** does not include:

(i) an establishment that offers only prepackaged foods that are not potentially hazardous;

(ii) a produce stand that only offers whole, uncut fresh fruits and vegetables;

(iii) a food processing plant;

(iv) a kitchen in a private home if only food that is not potentially hazardous is prepared for sale or service at a function such as a religious or charitable organization’s bake sale if allowed by law and if the consumer is informed by a clearly visible placard at sales or service locations that the food is prepared in a kitchen that is not subject to regulation and inspection by the regulatory authority;

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

(vi) a kitchen in a private home, such as a small family day-care provider; or a bed-and-breakfast operation that prepares and offers food to guests if the home is occupied, the number of available guest bedrooms does not exceed 6, breakfast is the only meal offered, the number of guests served does not exceed 18, and the consumer is informed by statements contained in published advertisements, mailed brochures, and placards posted at the registration areas that the food is prepared in a kitchen that is not regulated and inspected by the regulatory authority; or

(vii) a private home that receives catered or home-delivered food.

1.22 **Food Safety Certification Examination** means an examination in food safety approved in accordance with the provisions of this program.

1.23 **Instructor** means an individual who teaches a course that includes competencies in prevention of food borne illness.

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

1.25 **Item sequence** means the presentation order of test items in an examination.

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

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

b. knowledge, skills, and abilities (KSA’s) include the information and other attributes that the worker must possess in order to perform effectively and safely. They include information and understanding as well as learned behaviors and natural attributes.

1.27 Legal entity means an organization structured in a manner that allows it to function legally and be recognized as a responsible party within the legal system.

1.28 Legally defensible means the ability to withstand a legal challenge to the appropriateness of the examination for the purpose for which it is used. The challenge may be made by actual or potential examinees or on behalf of the public. Candidates’ challenges may pertain to perceived bias of the examination or inappropriately chosen content. Challenges on behalf of the public may claim that the examination does not provide adequate measures of a candidate’s knowledge, skills and abilities required to protect the consumer from food borne illness.

1.29 Monitor means the same as Proctor (See Proctor.)

1.30 Overexposure means the relative frequency in which a test item which is presented across all computerized tests has undermined the integrity of the tests. Whether a test item is overexposed or not is based upon the type of exam test item (pictorial vs. written) and its frequency of use.

1.31 Proctor means a person under the supervision of a test administrator, assisting by assuring that all aspects of an examination administration are being carried out with precision, with full attention to security and to the fair treatment of examinees. Proctors have the responsibility and must have the ability to observe examinee behaviors, accurately distribute and collect test materials, and assist the test administrator as assigned. They must have training or documented successful experience in monitoring procedures and must affirm in writing an agreement to maintain test security and to assure that they have no conflict of interest.

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

1.33 Psychometrician means a professional with specific education and training in development and analysis of tests and other assessment techniques and in statistical methods. Qualifications may vary but usually include at least a bachelor’s degree and a minimum of two formal courses in test development and a minimum of two in statistical methods.

1.34 Regulatory Authority means a government agency that has been duly formed under the laws of that jurisdiction to administer and enforce the law.
1.35 **Reliability** means the degree of consistency with which a test measures the attributes, characteristics or behaviors that it was designed to measure.

1.36 **Retail food industry** means those sectors of commerce that operate *food establishments*.

1.37 **Test Administrator** means the individual at the test site who has the ultimate responsibility for conducting a *food safety certification examination*. *Test Administrators* must have training, documented successful experience, or a combination of experience and training in test administration and security procedures. They must provide written assurance of maintaining confidentiality of test contents and of adherence to standards and ethics of secure examination administration. Their responsibilities include but are not limited to:

a. verifying that the contents of the examination materials shipment matches the packing list;

b. assuring that the site conforms to requirements;

c. training and supervising *monitors/proctors*;

d. assuring accurate identification of examinees;

e. adherence to all procedures and instructions in the examination administration manual;

f. maintaining security of test materials;

g. assuring compliance with procedures for handling any breaches of security that may occur;

h. proper handling of completed examinations;

i. confidentiality of candidate scores;

j. such unspecified duties as may be required for safe and secure administration of the examination.

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

1.39 **Trainer**, in this instance, means a professional with appropriate expertise who conducts a course in food safety for applicants for *certification* as Food Protection Managers.
1.40 **Validity** means the extent to which a test score or other type of assessment measures the attributes it was designed to measure. In this instance, does the test produce scores that can help determine if examinees are competent to protect the public from food borne illness in a *food establishment*. 
SECTION 2.0 – PURPOSE OF CERTIFICATION ORGANIZATIONS

Section 2.0  Purpose of Certification Organizations

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

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

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

Section 3.0  Structure and Resources of Certification Organizations

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

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

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

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

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

b.  that staff possesses the knowledge and skills necessary to conduct the certification program or has available and makes use of non-staff consultants and professionals to sufficiently supplement staff knowledge and skills.
SECTION 4.0 – FOOD SAFETY CERTIFICATION EXAMINATION DEVELOPMENT

Section 4.0 Food Safety Certification Examination Development

4.1 Food safety certification examinations administered by accredited certifying programs must comply fully with all criteria set by the CFP and must meet explicit and implicit standards to protect the public from food borne illness.

4.2 Each certification organization must provide evidence that it meets the following professional requirements:

a. ability to conduct or otherwise use a legally defensible and psychometrically valid job analysis;

b. demonstrated experience in the development of psychometrically valid competency examinations;

c. demonstrated capability to develop and implement thorough procedures for security of the item bank, printed, taped or computerized examinations, exam answer sheets and candidate scores;

d. data handling capabilities commensurate with the requirements for effective processing, reporting, and archiving of candidate food safety certification examination scores;

d. demonstrated evidence of an understanding of and willingness to abide by the principles of fairness and due process;

4.3 The certification organization must provide complete information about the food safety certification examination, including that related to procedures and personnel involved in all aspects of the examination development and analysis. The information required for accreditation will include but is not necessarily limited to:

a. complete description of the scope and usage of the examination;

b. job analysis task list, with knowledge, skills, and abilities (KSA’s);

c. examination specifications;

d. the number of unduplicated items in the item bank;

e. statistical performance of each item in the bank;
f. number of examination forms and evidence of their equivalence to each other;

g. description of method used to set passing score;

h. copies of all logs, diaries, and personnel lists and descriptions kept as required in the development process;

i. summary statistics (Section 4.16 Periodic Review) for each examination form;

j. names, credentials, and demographic information for all persons involved in the job analysis, item writing and review, and setting the passing score.

4.4 Job Analysis. The content validity of a food safety certification examination shall be based on a psychometrically valid job analysis developed by Psychometricians and a demographically and technically representative group of individuals with significant experience in food safety. The representative group must include but not necessarily be limited to persons with experience in the various commercial aspects of the retail food industry, persons with local, state or national regulatory experience in retail food safety, and persons with knowledge of the microbiology and epidemiology of food borne illness, and must be sufficiently diverse as to avoid cultural bias and ensure fairness in content according to all federal requirements.

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

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

4.7 The certification organization or its contracted test provider must maintain a log and diary of the procedures and a list of the qualifications, identities, and demographic data of the persons who participated in development of the job analysis and of the food safety certification examination specifications. Those materials must be provided to the accrediting organization on demand.

4.8 Certifying organizations are required to systematically evaluate practices in the retail food industry to assure that the job analysis on which an examination is based remains appropriate for the development of food safety certification
examinations on which the universal credential is awarded. The maximum length of use for any job analysis is five years from the date of validation.

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

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

4.11 The food safety certification examination must be based on psychometrically valid procedures to assure the relative equivalence of scores from various examination forms. The certifying organization must provide evidence of such equivalence as public information.

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

4.13 When any form and/or item bank of the food safety certification examination is translated into a language other than that in which it is originally developed and validated, the developer of the examination must provide evidence of content equivalency of the translated version with the original examination form and/or item bank. The developer must provide a detailed description of the translation method(s), including the rationale for selecting the translation method(s), and must demonstrate congruence of items and instructions with those of the examination form and/or item bank that was translated. To avoid potential problems in translation of terms specific or idiomatic to the retail food industry, translation should be accomplished with the consultation of food safety personnel competent in the languages of both the original and the translated version of the food safety certification examination.

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

4.14a All examinations must be delivered and administered in a format that ensures the security of the examination (i.e. in a secured environment with a proctor.) Unproctored examinations are not acceptable regardless of the mode of administration.

4.15 Internal Security. The certifying organization will demonstrate that procedures are developed and implemented to assure that individual items, item banks, food safety certification examinations 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. In addition to procedures to assure security, the system must include the protocol for handling any real or suspected breaches of security, the contingency plans for disposition of examination forms or items that are shown to be disclosed, and notification to clients of the problem and its consequences.

4.16 Periodic Review. At least semiannually each certifying organization must report to the Accrediting Organization, providing a review of its food safety certification examination(s). The report will include the following summary statistics for all examinations (for each exam used) administered during the preceding six months, as well as other information that may be reasonably requested by the accrediting organization:

a. number of food safety certification examinations administered;

b. mean;

c. mode;

d. standard deviation;

e. range;

f. reliability coefficient;

g. number and percentage of candidates passing the examination;

h. the statistics describing the performance of each item used on food safety certification examinations administered during the six-month period.

4.17 Specific Procedures for Examination Administration. Certification organizations must specify procedures for administering all food safety certification examinations in a standard manner in order to assure that all candidates are provided with the opportunity to perform according to their level of competency and to assure comparability of scores. Procedures must include, but not be limited to:

a. requirements for qualifications of test administrators and
monitors/proctors and a suitable training program for each;

b. a complete administration manual, describing each step of the test administration process and the rationale for each;

c. clear instructions for candidates, both printed for distribution to candidates and read by the test administrator;

d. high quality printing of examination booklets to assure ease of reading;

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;

f. clear criteria (with rationale) for physical facilities for examination administration;

g. clear criteria (with rationale) and procedures for adaptations necessary to accommodate qualified candidates with disabilities.

h. clear criteria (with rationale) and procedures for adaptations necessary to accommodate qualified candidates with literacy limitations that may require a reader.

4.18 A certification organization must have a published, written policy regarding test-site interpretation of food safety certification exams. If a certification organization chooses to allow test-site interpretation of food safety exams when an exam is not available in the candidates' native language, the certification organization must have a published, formal application process available to all candidates. Procedures must include but not be limited to:

a. an application process for candidates that includes an evaluation and documentation component to determine the eligibility of the candidate for test-site interpretation

b. an application process for interpreters that includes clear and precise qualifications that must include but not be limited to the following:

i. fluent in both languages

ii. have a recognized skill in interpretation

iii. trained in the principles of objective test administration
iv. have no personal relationship with the candidate (may not be another candidate, may not be a relative or friend of the candidate and may not be a co-worker, employer, or an employee of the candidate)

v. may not be a Certified Food Protection Manager nor have any vested interest in Food Protection Manager certification or conflict of interest,

vi. provide references or other proof attesting to the interpreter's competencies and professional acumen

vii. agree in writing to maintain the security of the examination.

c. must be in a proctored environment where the interpreter and candidate are not a distraction to other candidates.

d. must be in a proctored environment where the interpreter is not active as the test administrator or proctor.
SECTION 5 – FOOD SAFETY CERTIFICATION EXAMINATION ADMINISTRATION

Section 5.0 Food Safety Certification Examination Administration

5.1 All aspects of food safety certification examination administration are to be conducted in a manner that maximizes the security of the examinations, in keeping with the public protection mandate of the CFP. This must be accomplished in a manner that ensures fairness to all candidates.

5.2 Security of Food Safety Certification Examination Contents. Food safety certification examinations must be presented in a manner that allows absolutely no one other than the examinees to see the contents of the booklet or alternative medium, both before and after the examination is administered.

5.3 Instructor/Educator/Trainer as Test Administrator/Proctor. When an instructor/educator/trainer of a food safety training program administers, proctors or monitors a food safety certification examination from an accredited certification program, the accredited certification program shall provide a food safety certification examination that:

a. conforms to all CFP standards;

b. has been developed from an item bank of at least 600 questions; and

c. minimally on a quarterly basis, is based on a new examination form.

The certifying organization must have a plan that demonstrates it has controlled for item and examination exposure. The exposure plan must take into account the number of times a test item and form/version is administered.

5.4 Where special accommodations must be made for otherwise qualified candidates under provisions of the Americans with Disabilities Act, arrangements must be such that the food safety certification examination contents are not revealed to any test administration personnel with any conflict of interest. A written affirmation to that effect and a written nondisclosure statement from the individual who was chosen to assist the otherwise qualified candidate must be provided to the certifying organization.

5.5 The certifying organization must provide procedures to be followed in any instance where the security of a food safety certification examination is, or is suspected to be, breached. Included must be specific procedures for handling and for reporting to the accrediting organization, 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.

5.6 Examination Administration Manual. The certifying organization must provide each test administrator with a manual detailing the requirements for all aspects of the food safety certification examination administration process.

5.7 Packing, Shipping and Storage of Examination Materials. Security of the food safety certification examination materials must be maintained in shipments to and from the examination administration site, and must include but not necessarily be limited to the following requirements:

   a. secure, tamper resistant packing is required for all materials in all phases of shipment; packing system must be designed to reveal any tampering or violation of the package’s security;

   b. shipping must be done by certifiable, traceable means so that its location can be determined at any given time;

   c. the packing list must show the number of packages in the shipment and the exact contents of each.

The package(s) of examination booklets must be placed in secure storage immediately upon delivery. They must be kept in secure storage both before and after they are used.

5.8 Test Administrator and Monitor/Proctor Qualifications, Training and Duties. Certifying organizations must specify the responsibilities of test administrators and of monitors/proctors, set minimum criteria for approval of test administrators and for monitors/proctors, and provide suitable programs of training to enable persons to meet those criteria. Responsibilities, duties, qualifications and training of test administrators and monitors/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 administrator/monitor/proctor fails to meet job responsibilities must be implemented and documented. Where Instructors/Educators/Trainers are used as Test Administrators/Proctors, the certifying organization shall enter into a formal contractual relationship with the test administrators/proctors to ensure they follow all administrative procedures.

5.9 Test administrators are responsible for the organization and administration of all examination site activities and procedures, and for the
accurate identification of each examinee. They are also responsible for supervision of the activities of monitors/proctors. When the instructor/educator/trainer also serves in the role of test administrator, it is important that the individual clearly recognizes the difference in those two roles.

5.10 Monitors/Proctors shall work under the direction of the test administrator. They have the responsibility and must have the ability to observe examinee behaviors, accurately distribute and collect test materials, and assist the test administrator as assigned.

5.11 The number of approved monitors/proctors assigned to a test administrator must be sufficient to allow each examinee to be observed and supervised to assure conformance to security requirements. There shall be no less than one test administrator for the first thirty-five examinees, plus one additional test administrator or proctor or monitor for each additional 35 examinees or fraction thereof.

5.12 Site Requirements. Sites chosen for administering food safety certification examinations 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 competency.

5.13 Requirements at each site include but are not limited to:

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;

f. ventilation and temperature must be appropriate for health and comfort of examinees;

5.14 Examination Scheduling. Food safety certification examinations must be scheduled far enough in advance to allow for timely shipment of supplies.
5.15 Scoring and Reporting Requirements. Completed answer sheets and test booklets (used and unused) must be shipped by the test administrator according to the certification organization’s written security procedures.

5.16 Scoring will be done only by means authorized by the certifying organization and approved by the accrediting organization.

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

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

5.19 Score reports will be available to examinees in a time frame specified in the application, which will not be later than fifteen business days following the administration of the food safety certification examination. If there is a delay due to problems in verification or authentication of scores, examinees will be so informed and an approximate date for release of the scores will be announced. The certifying organization will have ongoing communication with examinees and with the test administrator until the scores are verified and released.
SECTION 6.0 – COMPUTER-BASED TESTING (CBT)

6.0 Computer-Based Test Development and Administration

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

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

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

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

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

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

6.7 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.

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

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

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

Section 7.0 Certification Organizations Responsibilities to Candidates and the Public.

7.1 Responsibilities to Applicants for Certification. A certifying organization shall:

a. not discriminate among applicants as to age, sex, race, religion, ethnic origin, disabilities or marital status and shall include a statement of non-discrimination in announcement of the certification program;

b. make available to all applicants information regarding formalized procedures for attainment of certification and provide evidence to the accrediting organization of the implementation of the policy;

c. have a formal policy for the periodic review of application and examination procedures to ensure that they are fair and equitable and shall give evidence to the accreditation organization of the implementation of the policy (Section 4.17);

d. provide evidence that competently proctored testing sites are readily accessible (Section 5.10);

e. provide evidence of uniformly prompt reporting of food safety certification examination results to applicants (Section 5.19);

f. provide evidence that applicants failing the food safety certification examination are given information on general areas of deficiency;

g. provide evidence that each applicant’s food safety certification examination results are held confidential (Sections 5.17 and 5.18);

h. have a formal policy on appeals procedures for applicants questioning eligibility or any part of the accredited certification program.

7.2 Qualifications for Initial Certification. To become a Certified Food Protection Manager an individual must pass a food safety certification examination from an accredited certification program recognized by the CFP. The certificate shall be valid for no more than 5 years.

7.3 Effective Date of Certificate. Certificates issued and electronic listing of certificate holders maintained by accredited certification programs shall identify the food safety certification examination form recognized by the accrediting organization and specify the date the examination was taken.
7.4 Replacement or Duplicate Certificate. Replacement or duplicate certificates issued through an accredited certification program shall carry the same effective date as the original, with an expiration worded in such a manner that indicates the certification will be valid for no more than five years.

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

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

7.7 Responsibilities to the Public and to Employers of Certified Personnel. A certification organization shall maintain a registry of individuals certified. Any title or credential awarded by the certification organization shall appropriately reflect the Food Protection Manager’s daily food safety responsibilities and shall not be confusing to employers, consumers, related professions, and/or other interested parties.

7.8 Each accredited certification program must have a published protocol for systematically investigating problems presented by users of the Program, including specific concerns about examination items, administration procedures, treatment of candidates, or other matters involving potential legal defensibility of the examination or program. The protocol will include a published time frame for reporting findings to the User.

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

Section 8.0 Certification Organization Responsibilities to the Accrediting Organization.

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

a. the name and complete ownership of the legal entity;

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

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

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

8.2 Summary Information. A certifying organization shall:

a. provide evidence that the mechanism used to evaluate individual competence is objective, fair, and based on the knowledge and skills needed to function as a Certified Food Protection Manager (Sections 4.3 and 4.4);

b. provide evidence that the evaluation mechanism is based on standards which establish reliability and validity for each form of the Food Safety Certification Examination (Sections 4.3, 4.4 and 4.6);

c. provide evidence that the pass/fail levels are established in a manner that is generally accepted in the psychometric community as being fair and reasonable (Section 4.9);

d. have a formal policy of periodic review of evaluation mechanisms and shall provide evidence that the policy is implemented to ensure relevance of the mechanism to knowledge and skills needed by a Certified Food Protection Manager (Sections 4.8 and 4.16);

e. provide evidence that appropriate measures are taken to protect the security of all food safety certification examinations (Sections 5.2 through and including 5.15)
f. publish a comprehensive summary or outline of the information, knowledge, or functions covered by the food safety certification examination (Section 4.6);

g. make available general descriptive materials on the procedures used in examination construction and validation and the procedures of administration and reporting of results (Section 4.7);

h. compile at least semi-annually a summary of certification activities, including number of applicants, number tested, number passing, number failing, and number certified (Sections 4.16).

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

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

b. advise the accrediting organization of any proposed changes in structure or activities of the certifying organization;

c. advise the accrediting organization of substantive change in food safety certification examination administration;

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

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

f. submit to the accrediting organization the report requirements information specified for the Food Protection Manager Certification Program;

g. be re-accredited by the accrediting organization at least every 5 years
ANNEX A

RESPONSIBILITIES OF PROFESSIONALS INVOLVED IN THE CREDENTIALING PROCESS FOR CERTIFIED FOOD PROTECTION MANAGERS

Accepted June 1997

Recognizing that the justification for regulating entrance to the occupation of Certified Food Protection Manager is to protect the safety and welfare of the public;

and

recognizing that the responsibility and liability for overseeing the protection of safety and welfare of the public lies with those governmental jurisdictions at Federal, state and local levels having the power to set forth laws regulating entrance to and performance in occupations;

and

recognizing that the rights of the public at large and of those members of that public who wish to enter an occupation must be balanced in terms of fairness and due process in the form of a credentialing process for admitting qualified persons to perform in that occupation;

and

recognizing that the validity of any credentialing process for Certified Food Protection Managers is dependent on unbiased application of all aspects of that process, requiring careful determination of the competencies necessary to prevent food borne illness, unbiased education and training for acquisition of those competencies, and fair assessment practices to assure that individuals have achieved mastery of the competencies;

therefore, professionals involved in the credentialing process for Certified Food Protection Managers accept responsibilities based on those considerations.

Assessment tools will be developed to be free from bias due to characteristics that have no bearing on the competencies being measured. Such characteristics as gender, ethnicity, race, socioeconomic status, age, and any other concerns unrelated to ability to apply the required competencies will not be allowed to create differences in candidate scores.

Actual or potential conflicts of interest that might influence judgment or performance of examination developers, Test Administrators or Proctors/Monitors, instructors/trainers/educators, or other participants in the credentialing process will be disclosed.

Items for competency assessments will be selected to be a representative sample of the full spectrum of the competencies determined by the CFP and by federal guidelines to be
necessary to protect the public from food borne illness, regardless of the training/education program undertaken by the applicants being tested. Training/education will be based upon the full spectrum of the competencies agreed upon as being necessary to protect the public from food borne illness, unbiased by any knowledge of the contents of the competency assessment for the credential.

Administration of the assessment instrument will be done with professional attention to security of the food safety certification examination to assure current and continued validity of the examination and of the credential that is earned through its use.

Professionals and organizations will develop and implement full quality assurance procedures to ensure the accuracy of assessment decisions and the integrity of the entire credentialing process.

The rights of those who are assessed will be recognized and protected.
ANNEX B
Guidelines for Regulatory Authorities Implementing Food Protection Manager Certification Programs

B1. Each permitted food establishment should have a minimum of one designated Certified Food Protection Manager who is accountable for food safety.

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

B2. A Certified Food Protection Manager is responsible for:

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

b. developing or implementing specific policies, procedures or standards aimed at preventing food borne illness;

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

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

B3. Qualifications for Certification. In order to become a Certified Food Protection Manager an individual must pass a food safety certification examination from an accredited certifying program recognized by the CFP. To prepare for certification, it is recommended that the individual obtain training. Based on the content of the areas of knowledge prescribed in Paragraph 2-102.11 (C) of the FDA Food Code.

B4. Regulatory authorities should work with the certification organization on a mutually agreeable format, medium and time frame for the submission of score reports pertaining to the administration of food safety certification examinations
Committee Charges:

1. The Conference recommends that the Inspection Form Committee be re-created to work in conjunction with the FDA Standardization Work Group and the CFP Program Standards Committee to evaluate the need for future changes to the inspection form and marking instructions based upon Food Code Changes and any other improvements deemed necessary. The Committee will provide a report back at the 2008 CFP Biennial Meeting.

2. that a charge be given to the Inspection Form Committee to determine if current scoring methodologies have a public health impact on food safety and reducing Risk Factors or other violations; and

3. that the Inspection Form Committee work with the FDA to evaluate and assess scoring methodologies to be used in conjunction with the Food Establishment Inspection Report Form and supporting documents and report back at the 2008 Biennial Meeting.

Background:

The Inspection Form Committee was first established at the 2000 Conference for Food Protection (CFP) Biennial Meeting. The Committee was charged to determine the elements that should be on an inspection form and to bring the form to the 2002 Biennial Meeting. In 2002 the Committee received additional charges to pilot test the inspection form and design an instructional document to assist inspectors in completing the inspection form. In 2004 the Committee was charged to update the form and marking instructions based on changes made in the 2005 FDA Food Code. And in 2006, the Committee was charged, again, with updating the marking instructions and issued two additional charges regarding scoring systems and assessing the public health impact associated with scoring.

Executive Summary:

Based on the separate charges, the Inspection Form Committee broke into two subgroups in order to tackle two assignments: Marking Instructions and Scoring.
Marking Instructions Subcommittee:
This subcommittee (workgroup) identified areas for improvement that will enhance uniformity and consistency in using the FDA model Inspection Report Form, in combination with its supplemental resource documents. These areas included:

1. Consolidating the instructions and code references into one document;
2. Providing a consistent format for instructions, explanations and examples; and
3. Developing Marking Instructions for Good Retail Practice items that are on the Inspection Report Form.

The first task of the workgroup was combining the code provisions and marking instructions into one document. This document then assisted the workgroup in evaluating the current marking instructions covering Risk Factors/Public Health Interventions, with an emphasis on those provisions where there was “little to no” guidelines. Once this was completed, the workgroup drafted guidelines for the Good Retail Practices (GRPs). In developing instructions for the GRPs, the approach taken was to discuss concepts that will guide the inspector without stating the “obvious” by repeating the information provided in the accompanying code references. Additionally, since some of these items contain numerous code citations, it would not have been practical to include enough information that would adequately cover all provisions. Once this was completed, the Scoring workgroup reviewed and commented on the draft marking instructions, followed by the FDA Standardization Committee. A final draft was then provided to the CFP Program Standards Committee.

Scoring Subcommittee:
Chuck Catlin headed up the Scoring workgroup. The workgroup first performed a literature review looking broadly at the scoring issue and any effects on the reduction of the risk factors linked to illness. This review assisted the workgroup in identifying articles or studies associated with scoring systems and the reduction of risk factors. The workgroup then created a two part questionnaire to be given to health departments. The results of the literature search and the survey questionnaire show that scoring can have a positive impact on public health by reducing the risk factors associated with foodborne disease if:

- The health jurisdiction programs include inspector and industry training.
- The scoring system is easy for the health inspector, public and regulated industry to understand.
- The inspector’s performance is standardized on an ongoing basis.
- The jurisdiction is using a risk based food code that requires effective control of CDC risk factors.
- The health department regularly evaluates their inspection program results using a consistent and effective methodology.
- The public receives sanitation scores in a way that allows them to make informed decisions as to where they would like to eat.

Based on the work completed on the two workgroups, the Inspection Form Committee is submitting the following issues:

1. CFP Inspection Form Committee Report
   (Attachment 1, CFP Inspection Form Committee Report);
2. Scoring Food Establishment Inspections and the Reduction of Risk Factors
   (Attachment 2, Scoring Food Establishment Inspections and the Reduction of Risk Factors); and
3. Instructions for Marking the Food Establishment Inspection Report
   (Attachment 3, Instructions for Marking the Food Establishment Inspection Report).
# Council II – Inspection Form Committee Members

<table>
<thead>
<tr>
<th>Member Name</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lorna Girard, Co-Chair</td>
<td>MN Dept of Agriculture 625 Robert Street No.</td>
</tr>
<tr>
<td></td>
<td>St. Paul, MN 55155-2538</td>
</tr>
<tr>
<td></td>
<td>651-201-6591 (Phone)</td>
</tr>
<tr>
<td></td>
<td>651-201-6119 (Fax)</td>
</tr>
<tr>
<td>Dale Yamnik, Co-Chair</td>
<td>Yums! Brand 8841 Fairway Oaksway</td>
</tr>
<tr>
<td></td>
<td>Lonetree, Co 80124</td>
</tr>
<tr>
<td></td>
<td>303-708-1536 (P)</td>
</tr>
<tr>
<td></td>
<td>303-858-0360 (F)</td>
</tr>
<tr>
<td>Pamela Miles</td>
<td>Virginia Dept. of Agriculture/Office of Dairy</td>
</tr>
<tr>
<td></td>
<td>and Foods 102 Governor Street, Room 349</td>
</tr>
<tr>
<td></td>
<td>Richmond, VA 23219</td>
</tr>
<tr>
<td></td>
<td>(804) 786-0412 (P)</td>
</tr>
<tr>
<td></td>
<td>(804) 371-7792 (F)</td>
</tr>
<tr>
<td>John K Seiferth</td>
<td>New Hampshire Dept of Health and Human</td>
</tr>
<tr>
<td></td>
<td>Services/Food 29 Hazen Drive</td>
</tr>
<tr>
<td></td>
<td>Concord, NH XXXXX</td>
</tr>
<tr>
<td></td>
<td>(603) 271-4589 (P)</td>
</tr>
<tr>
<td></td>
<td>(603) 271-4859 (F)</td>
</tr>
<tr>
<td>Mark Sestak</td>
<td>Alabama Department of Public Health RSA</td>
</tr>
<tr>
<td></td>
<td>Tower, 201 Monroe Street, Suite 1250</td>
</tr>
<tr>
<td></td>
<td>Montgomery, AL 36104</td>
</tr>
<tr>
<td></td>
<td>(334) 206-5375 (P)</td>
</tr>
<tr>
<td></td>
<td>(334) 206-5788 (F)</td>
</tr>
<tr>
<td>Frances Guichard</td>
<td>Chicago Dept. of Public Health - Food Protection Division 2133 West Lexington, 2nd Floor Chicago, IL 60612 (312) 746-8035 (P) (312) 746-8040 (F)</td>
</tr>
<tr>
<td>Joseph Comello</td>
<td>Columbus Public Health 240 Parsons Avenue</td>
</tr>
<tr>
<td></td>
<td>Columbus, OH 43215-5331</td>
</tr>
<tr>
<td></td>
<td>614-645-0021 (P)</td>
</tr>
<tr>
<td></td>
<td>614-645-7155 (F)</td>
</tr>
<tr>
<td>M. David Lawrence</td>
<td>Fairfax County Health Dept. Food Safety Branch 10777 Main St., Suite 111 Fairfax, VA 22030 703-246-2461 (P) 703-385-9568 (F)</td>
</tr>
<tr>
<td>Janice D. Buchanon</td>
<td>DeKalb Cty Div of Env Health 445 Winn Way, Suite 320 Decatur, GA 30031 404-508-7900 (P) 404-508-7979 (F)</td>
</tr>
</tbody>
</table>
### Brian Hirsch
Summit County General Health District  
1100 Graham Rd Circle  
Stow, OH 44224  
(330) 926-5653 (P)  
(330) 923-6436 (F)

### FEDERAL

| Bradley E. Tufto, FDA CFSAN’s Liaison  
FDA Retail Food Specialist  
Spokane Resident Post  
1000 North Argonne, Ste 105  
Spokane Valley, WA 99212  
509-353-2554 (P)  
509-353-2746 (F)  
| Greg Abel  
FDA Retail Food Specialist  
212 3rd. Avenue South  
Minneapolis, MN 55401  
(612) 758-7199 (P)  
(612) 334-4100 (F) |

| Kim Livsey  
FDA SE Regional Food Specialist  
RM HFR-SE14, 60 8th Street NE  
Atlanta, GA 30309  
404-253-1273 (P)  
404-253-2257 (F)  
|  |

### INDUSTRY

| Charles Catlin  
P.F. Chang’s China Bistro  
7676 E. Pinnacle Peak Rd.  
Scottsdale, AZ 85255  
480-888-3166 (P)  
480.888.3004 (F)  
| Brady Daniels  
Consultant for EcoSure  
Northbrook, IL 60062  
3524 University Avenue  
Highland Park, IL 60035  
847 732 9407 (P) |

| LeAnn Chuboff  
National Restaurant Association/Educational Foundation  
175 W Jackson, Suite 1500  
Chicago, IL 60604  
312-715-1010, ext 374 (P)  
312-566-9728 (F)  
| Paul Ryan  
Paragon Bermuda (Canada) Ltd.  
100 York Boulevard, Suite 610  
Richmond Hill, Ontario, Canada  
905-886-4816, ext 11 (P)  
905-886-0755 (F) |

| Susan Quam  
Wisconsin Restaurant Association Education Foundation  
2801 Fish Hatchery Road  
Madison, WI 53713  
(608) 270-9950 (P)  
(608) 270-9960 (F)  
| Neil Checketts  
Wal-Mart Stores, Inc.  
508 SW 8th Street  
Bentonville, AR 72716  
(479) 277-7911 (P)  
(479) 273-1911 (F) |
<table>
<thead>
<tr>
<th>Name</th>
<th>Company</th>
<th>Address</th>
<th>Phone (P)</th>
<th>Phone (F)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jonathan Brania</td>
<td>Underwriters Laboratories Inc.</td>
<td>12 Laboratory Drive, Research Triangle Park, NC 27709-3995</td>
<td>(919) 549-1768</td>
<td>(919) 547-6262</td>
</tr>
<tr>
<td>Steven Oswald</td>
<td>Wakefern Food Corporation</td>
<td>505 Division Street, Elizabeth, NJ</td>
<td>(908) 527-3624</td>
<td>(908) 527-3849</td>
</tr>
<tr>
<td>Al Squire</td>
<td>Ryan's Restaurant Group Inc.</td>
<td>405 Lancaster Avenue, Greer, SC 29650</td>
<td>(864) 879-1011</td>
<td>(864) 801-9284</td>
</tr>
</tbody>
</table>
Scoring Food Establishment Inspections and the Reduction of Risk Factors
2008 Conference for Food Protection Council II

Abstract:

The Conference for Food Protection created an Ad hoc Committee to explore the effects of health inspection scoring on the reduction of the risk factors identified by the CDC as the leading causes of foodborne disease. The Committee performed research and found a direct correlation between effective scoring, and the reduction of the behaviours associated with foodborne disease. However, the associated health jurisdictions must perform consistent inspector training, inspector performance standardization, and industry training. In addition, the effective scoring must be easily understood by the regulated industry, inspector and general public. The selected scoring system must be effectively communicated in advance to the general public allowing them to factor sanitation into their decision on where to dine.

Introduction:

The CFP Inspection Form Scoring Sub-committee (Committee) was asked to evaluate if current scoring methodologies have impact on food safety by reducing the Risk Factors or other violations. The Committee was charged with working with the FDA to assess how relevant scoring systems can be used with the current recommended Food Establishment Inspection Report Form and Food and Drug Administrations (FDA) Food Code.

Methods:

The Committee combined a literature review with a questionnaire of local health departments. The literature review was intended to help the team identify studies or articles that highlighted successful scoring systems with strong correlations to reducing the risk factors associated with foodborne disease. While the questionnaire was intended to identify scoring systems that have been effective at reducing the risk factors associated with foodborne disease.

During the literature review the Committee found only a limited number of relevant studies and articles.

Since the Committee was charged with using the current recommended inspection form. Therefore, the Committee constructed a survey designed to determine what type of effective scoring systems are being used by jurisdictions that used the Food Establishment Inspection Report Form (Inspection form) and using a risk based approach.
Survey

The Committee created a two-part questionnaire. Part one of the survey determines what type of scoring systems are being used in conjunction with the Inspection Form. It also asked which jurisdictions were evaluating their scoring systems and its effect on public health. Part two of the survey was a phone interview with the health department personnel that had food inspection programs that met the following criteria:

- Using the current Inspection Form or their own form that is substantively similar,
- Using a risk based food code that features the CDC risk factors and interventions,
- Using a scoring system,
- Regularly evaluating of the effects of their program on the reduction of risk factors and other violations,
- Willing to talk about their programs and methodology.

Part one of the survey was administered to using the National Restaurant Association’s Zoomerang survey tool. The survey was sent to 1031 health departments throughout the country. The health department contact information was provided by the FDA.

The findings were analyzed by the Committee. Eight health departments met all of the Committee’s criteria and were chosen to be phone interviewed.

Part two of the survey was created to evaluate what scoring systems are currently in use by health departments that are employing a consistent methodology to evaluate the effectiveness of their scoring system. The second part of the survey was administered by a recent graduate of a masters program in public health. The Committee chose only one person to administer the survey to reduce the chance of introducing any bias into the answers.

The Committee used the NRA sponsored Wiki Site for information storing and reviewing. They also used numerous phone conferences throughout the year.

Results:

Scoring can have a positive impact on public health by reducing the risk factors associated with foodborne disease if:

- The health departments program includes inspector and industry training.
- The scoring system is easy for the health inspector, the public and regulated industry to understand.
• The inspector’s performance is standardized on an ongoing basis.
• The jurisdiction is using a risk based food code that requires effective control of CDC risk factors.
• The health department regularly evaluates their inspection program results using a consistent and effective methodology.
• The public receives the sanitation scores in a way that allows them to make informed decisions about where they would like to eat.

Conclusions / Recommendations:

The Committee recommends that CFP create a Scoring Ad Hoc to continue to facilitate the identification of a recommended scoring system that can be highlighted in the FDA food code. Scoring has been shown to positively impact public health by helping facilitate the reduction of the risk factors and other violations. Therefore, the Committee also recommends that CFP providing funding for academic research to determine the most effective scoring system. The research must also determine the most effective way to communicate restaurant sanitation scores to the general public, in advance of them choosing where to dine. By communicating sanitation scores to the public “… powerful economic incentives are created for restaurants to improve hygiene, leading to significant improvements in public health outcomes." (Jin and Leslie 2005)

Finally, the Scoring Committee, Standardization Committee and Criticality Committee must work closely together to assure continuity in their recommendations.

Conference for Food Protection Scoring Sub-committee Questionnaire Part One

1. Do you use the “Food Establishment Inspection Report Form” from the FDA?
   a. Yes (go to question 3)
   b. No (go to question 2)

2. If no, then does your form capture the essential elements of the CFP form (i.e. risk factors, public health interventions and GRPs)?
   a. Yes (continue)
   b. No (end survey)

3. Does your agency conduct inspections of retail food establishments?
   a. Yes (continue)
   b. No (end survey)
4. Please indicate the number of establishment(s) you regulate and/or audit by type

- Restaurants
- Institutions (Foodservice in Jails, Schools, Hospitals, Nursing Homes, etc.)
- Grocery Stores
- Supermarkets
- Convenience Stores
- Bakeries (not part of any other type establishment)
- Meat Markets (not part of any other type establishment)
- Fish / Seafood Markets (not part of any other type establishment)
- Confectionary Store
- Mobile Food Establishments

5. Please indicate the total number of inspections completed annually for each establishment type:

- Restaurants
- Institutions (Foodservice in Jails, Schools, Hospitals, Nursing Homes, etc.)
- Grocery Stores
- Supermarkets
- Convenience Stores
- Bakeries (not part of any other type establishment)
- Meat Markets (not part of any other type establishment)
- Fish / Seafood Markets (not part of any other type establishment)
- Confectionary Store
- Mobile Food Establishments

6. Please indicate the average length of a typical inspection for establishment type:

- Restaurants
- Institutions (Foodservice in Jails, Schools, Hospitals, Nursing Homes, etc.)
- Grocery Stores
- Supermarkets
- Convenience Stores
- Bakeries (not part of any other type establishment)
- Meat Markets (not part of any other type establishment)
- Fish / Seafood Markets (not part of any other type establishment)
- Confectionary Store
- Mobile Food Establishments
7. Which FDA region does your agency conduct inspections?
   a. **NE**: RI, ME, MD, NH, VT, CT, NY  
   b. **Central**: IL, MI, WI, MN, ND, SD, IN, KY, OH, DC, VA, MD, WV, PA, NJ, DE  
   c. **SE**: MS, TN, PR, VI, FL, GA, LA, NC, SC, AL  
   d. **SW**: OK, AK, NM, TX, NE, UT, CO, WY, KS, IA, MO  
   e. **PACIFIC**: CA, HI, AK, OR, AZ, NV, WA, ID, MT

8. How many food borne illnesses and outbreaks have been linked to the retail & foodservice establishments in your jurisdiction within the last 5 years? (group needs to qualify)
   
   Illnesses
   Outbreaks

9. What type of scoring measurements does your agency use to evaluate a facility? (group needs to qualify)
   a. Risk Factors  
   b. Critical Violations  
   c. GMPs or GRPs  
   d. Combination (Describe) ___________________________  
   e. Other (Describe) _________________________________

10. What type of final inspection score and/or rating method does your agency provide to establishment? (group needs to qualify)
    a. Pass/Fail  
    b. Satisfactory vs. Not  
    c. Letter Grade  
    d. Numerical Score  
    e. Combination (please list) open end response

11. Does your agency provide an inspection score and/or rating to the establishment that is available to the public?
    a. Yes  
    b. No

12. Does your agency collect data which captures inspection report and/or rating information?
    a. Yes (continue)  
    b. No (end survey)
13. Does your agency conduct trend analysis studies for the establishments regulated
and/or audited?
   a. Yes (continue)
   b. No (end survey)

14. Have any of the studies verified that your *inspection rating or scoring method*
has contributed over time to a reduction in risk factors or critical violations?
   a. Yes (continue)
   b. No (end survey)

15. If yes, please explain? (open ended response)

16. Would you be interested in being contacted to discuss your scoring
methodologies further?
   a. Yes (continue)
   b. No (end survey)

17. If yes, please provide information on the appropriate person to contact to obtain
this information and data.

**Conference for Food Protection Scoring Sub-committee**

**Questionnaire Part Two**

Please ask each participant the same questions without variation. Please keep careful
notes and try not to lead the participant in any way.

1. **What is your current scoring system?**
   a. Follow-up questions: How long have you been using this system?
   b. What systems have you used to for scoring in the past? If the respondent
      has trouble answering the question you can prompt them with:
      i. Pass/Fail
      ii. Satisfactory/Unsatisfactory
      iii. Letter grade
      iv. Numerical Scoring
   c. Do you require public posting of the score for public viewing?
   d. If they have recently changed their scoring system please ask them why
      they decided to change.

2. **Do you feel that your current scoring system has impacted public health by
   encouraging the reductions of the risk factors that cause disease?**
   a. Follow-up Questions If yes to question 2: What has guided you to this
      conclusion?
3. Do you feel that other variables in your program could be responsible for the reductions in the risk factors? Note; If the respondent has trouble answering the question you can prompt them with the following:
   a. Have you modified/improved your inspector training or standardization?
   b. Have you instituted any restaurant operator training/ Food handler cards?
   c. Could it be caused by a random event?

4. Can you briefly describe the methodology your agency used to evaluate the rating system?
   a. How did you assess pre and post conditions?
   b. Were there any specific risk factors that you were focused on when you were evaluating your system?
   c. How did you measure the improvements that you feel resulted from your scoring system?

5. Do you feel that your scoring system has resulted in a reduction in Foodborne illness?
   a. What has guided you to this conclusion?
   b. Have you explored any supporting data for your position?

6. What else would you like to share with our Committee regarding scoring and the reduction of the risk factors that cause foodborne illness?
BIBLIOGRAPHY


Kay Everett, “Standards Of Food Safety In Hamilton County Restaurants” Capstone Research February 23, 2000


Ginger Zhu Jin “The Case in Support of Restaurant Hygiene Grade Cards” Choices 2nd Quarter 2005

Paul A Simon “Impact of Restaurant Hygiene Grade Cards on Foodborne Disease Hospitalizations in Los Angeles County” Journal of Environmental Health vol 67 Number 7

Dr, Phillip Leslie, Personal Interview October 3, 2007

Conference For Food Protection Forms Committee Scoring Sub-group, Two part questionnaire 2007
A. GENERAL MARKING INSTRUCTIONS

**HEADER Information**

- **Establishment**: Complete this section using the “usual/common name” or “Doing Business As” name of the business. This information should be the same as the license/permit application completed at the initiation of the business.
- **Address**: Street address of the actual business location
- **Zip Code**: Actual business location
- **Telephone**: Contact phone number for the establishment
- **License/Permit #**: License number or tracking identification
- **Permit Holder**: Name of Owner or Operator as shown on application
- **Purpose**: The reason for the inspection – routine, re-inspection, complaint, or follow-up, etc.
- **Est. Type**: Description or code for describing the type of facility (e.g. restaurant, market, vehicle, temporary food facility)
- **Risk Category**: Designation of risk/priority level for determining frequency of inspection
- **Number of Risk Factor/Intervention Violations**: The number of boxes marked OUT in items 1-27 should be counted and the total number placed here
- **Number of Repeat Risk Factor/Intervention Violations**: The number of boxes marked R (repeat) in items 1-27 should be counted and the total number placed here
- **Score (optional)**: A score is optional for this form. If a jurisdiction has a scoring system, it should be incorporated into the inspection form and the score of an inspection placed here.
- **Date**: The date of the inspection including month, day, and year
- **Time In**: The actual time the inspection begins
- **Time Out**: The actual time the inspection ends
B. RISK FACTORS AND INTERVENTIONS

Risk factors are food preparation practices and employee behaviors most commonly reported to the Centers for Disease Control and Prevention (CDC) as contributing factors in foodborne illness outbreaks. Risk factors include: Food from Unsafe Sources, Improper Holding Temperatures, Inadequate Cooking, Contaminated Equipment, and Poor Personal Hygiene. These items are prominent on the Food Establishment Inspection Report because maintaining these items in compliance is vital to preventing foodborne illness. Additionally, five key public health interventions were introduced in the 1993 Food Code that supplemented the other interventions long-established by the Food and Drug Administration (FDA) model codes and guidances to protect consumer health. The five key interventions are: Demonstration of Knowledge, Employee Health Controls, Controlling Hands as a Vehicle of Contamination, Time and Temperature Parameters for Controlling Pathogens, and the Consumer Advisory.

For each item on the inspection report form in the Foodborne Illness Risk Factors and Public Health Interventions section, the inspector should indicate one of the following for Compliance Status: “IN” which means that the item is in compliance; “OUT” which means that the item is not in compliance; “N.O.” which means that the item was not observed during the inspection; or “N.A.” which means that the item is not applicable for the facility. If N.A. or N.O. is not listed as an option for a particular item, this means that this item must be evaluated during the inspection and a compliance status must be determined. If the item is marked “OUT”, document details of each violation for the item number in the “Observations and Corrective Actions” section on the second page of the inspection report. Compliance status should be determined as a result of observations that establish a pattern of non-compliance. Consideration should be given to the seriousness of the observation with regard to prevention of foodborne illness.

For items marked “OUT,” further indicate the status of the violation by marking an “X” in the corresponding box for Corrected On-Site (COS) during the inspection and/or Repeat violation (R). Marking COS indicates that all violations cited under that particular item number have been corrected and verified before completing the inspection. The actual corrective action taken for each violation should be documented in the “Observations and Corrective Actions” section of the inspection report. For example, Item #7 Handwashing sink is marked out of compliance because the establishment does not have soap and paper towels at the handwashing sink. The person in charge partially corrects the problem by putting soap at the sink, but does not replace the paper towels or provide any other effective means for drying hands. The corrective action taken for the soap is documented in the narrative on the form, but COS is not marked for Item #7 because all violations under that item were not corrected. Marking R indicates that the same violation under a particular item number was cited on the last inspection report. Using the same scenario, on the subsequent inspection if the provision of soap and paper towels is not in violation, but employees are not washing hands in the correct sink (which is also cited under Item #7 Handwashing sink), R would not be marked because this is a new violation which was not cited on the previous inspection report.
## Marking Instructions

### Supervision

<table>
<thead>
<tr>
<th>IN / OUT</th>
<th>PIC present, demonstrates knowledge, and performs duties</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This item must be marked IN or OUT of compliance based on an interaction with the Person in Charge (PIC). The PIC has three assigned responsibilities – Presence; Demonstration of Knowledge; and Duties. This item is marked OUT of compliance if any one of the following responsibilities is not met:</td>
</tr>
<tr>
<td></td>
<td>A. <strong>Person in charge is present.</strong> This item should be marked OUT of compliance when there is no designated PIC. Do not assume that a food employee possessing food management certification is the PIC.</td>
</tr>
<tr>
<td></td>
<td>B. <strong>Demonstration of knowledge.</strong> The PIC has three options for demonstrating knowledge. This item is marked OUT of compliance if the PIC fails to meet at least one of these options:</td>
</tr>
<tr>
<td></td>
<td>1. Certification by an ACCREDITED PROGRAM as specified in § 2-102.20;</td>
</tr>
<tr>
<td></td>
<td>2. Complying with this Code by having no violations of critical items during the current inspection; or</td>
</tr>
<tr>
<td></td>
<td>3. Correct responses to the inspector’s questions regarding public health practices and principles applicable to the operation. The inspector should assess this item by asking open-ended questions that would evaluate the PIC's knowledge in each of the areas enumerated in ¶2-102.11(C)(1),(4-16). Questions can be asked during the initial interview, menu review, or throughout the inspection as appropriate. The Inspector should ask a sufficient number of questions to enable the inspector to make an informed decision concerning the PIC’s knowledge of the Code requirements and public health principles as they apply to the operation. The dialogue should be extensive enough to reveal whether or not that person is enabled by a clear understanding of the Code and its public health principles to follow sound food safety practices and to produce foods that are safe, wholesome, unadulterated, and accurately represented.</td>
</tr>
<tr>
<td></td>
<td>C. <strong>Duties of the PIC.</strong> This item should be marked IN or OUT of compliance based on the interaction and observation with the PIC and food employee. The inspector needs to determine the systems or controls the PIC has put into practice regarding oversight and/or routine monitoring of the Duties listed in § 2-103.11. This is accomplished by 1) discussion with the PIC, and 2) verified through observation that the systems or controls are actually being implemented. This concept is commonly referred to as Active Managerial Control. This item should be marked OUT of compliance when there is a pattern of non-compliance and obvious failure by the PIC to ensure employees are complying with the duties listed in § 2-103.11. Since marking this item OUT of compliance requires judgment, it is important that this item not be marked for an isolated incident, but rather for an overall evaluation of the PIC’s ability to ensure compliance with the duties described in § 2-103.11.</td>
</tr>
</tbody>
</table>

**N.A.** Do Not Mark this item N.A.

**N.O.** Do Not Mark this item N.O.

**Applicable Code Section:**
- 2-101.11 Assignment *
- 2-102.11 Demonstration *
- 2-103.11 (A-L) Person-In-Charge (PIC) Duties
<table>
<thead>
<tr>
<th></th>
<th>Employee Health</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2.</strong></td>
<td><strong>Management &amp; food employee; and conditional employee; Knowledge, responsibilities and reporting</strong></td>
</tr>
<tr>
<td></td>
<td>This item must be marked IN or OUT of compliance. This item is marked IN compliance when all of the following criteria are met:</td>
</tr>
<tr>
<td></td>
<td>A. The PIC is aware of his or her responsibility to inform food employees and conditional employees of their responsibility to report certain symptoms or diagnosed diseases to the person in charge and for the PIC to report to the regulatory authority as specified under Food Code ¶2-103.11(M) and ¶2-201.11(A),(B),(C),and (E); and</td>
</tr>
<tr>
<td></td>
<td>B. The PIC provides documentation or otherwise satisfactorily demonstrates during the inspection, that all food employees and conditional employees are informed of their responsibility to report to management information about their health and activities as it relates to diseases that are transmissible through food, as specified under ¶2-201.11(A). Satisfactory compliance may be documented by completion of Form 1-B, Conditional Employees or Food Employees Reporting Agreement, in Annex 7 of the Food Code for each employee or other similar State or local form containing the same information; or</td>
</tr>
<tr>
<td></td>
<td>C. In lieu of Form 1-B, compliance may be demonstrated by:</td>
</tr>
<tr>
<td></td>
<td>1. Presenting evidence such as a curriculum and attendance rosters documenting that each employee has completed a training program which includes all the information required on Form 1-B regarding their reporting responsibilities; or</td>
</tr>
<tr>
<td></td>
<td>2. Implementation of an employee health policy which includes a system of employee notification using a combination of training, signs, pocket cards, or other means to convey all of the required information on Form 1-B to all food employees and conditional employees. A signed acknowledgement by the employee should be part of any employee health policy.</td>
</tr>
<tr>
<td></td>
<td>The Regulatory Authority is encouraged to establish a policy of selecting one employee at random during each inspection and requesting the PIC verify, by one of the previously listed methods, that the selected employee has been informed of his or her responsibility to report symptoms, exposures, and diagnosed illnesses to management. The PIC is not expected to quote symptoms and diseases from memory, but should be able to locate that information on Form 1-B or similar documents used to demonstrate compliance.</td>
</tr>
<tr>
<td></td>
<td>The regulatory authority is encouraged to establish a policy of selecting one employee at random during each inspection and requesting the PIC verify, by one of the previously listed methods, that the selected employee has been informed of his or her responsibility to report symptoms, exposures and diagnosed illnesses to management. The PIC is not expected to quote symptoms and diseases from memory, but should be able to locate that information on Form 1-B or similar documents used to demonstrate compliance.</td>
</tr>
<tr>
<td></td>
<td><strong>Applicable Code Sections:</strong></td>
</tr>
<tr>
<td></td>
<td>2-201.11(A), (B), (C), &amp; (E) Responsibility of PIC, Conditional &amp; Food Employees *</td>
</tr>
<tr>
<td></td>
<td>2-103.11(M) Food employees &amp; Conditional Employees Informed of Reporting responsibilities</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td><strong>Do Not Mark</strong> this item N.A.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td><strong>Do Not Mark</strong> this item N.O.</td>
</tr>
<tr>
<td><strong>3.</strong></td>
<td><strong>Proper use of restriction &amp; exclusion</strong></td>
</tr>
<tr>
<td></td>
<td>This item should be marked IN or OUT of compliance. To be marked IN there must be no ill employees or food employees experiencing symptoms requiring reporting, or reason for the PIC to exclude or restrict an employee observed at the time of the inspection. Compliance must be based on first hand observations or information and cannot be based solely on responses from the PIC to questions regarding hypothetical situations or knowledge of the Food Code. This item should be marked OUT of compliance when:</td>
</tr>
<tr>
<td></td>
<td>• The inspector observes a working employee with specific reportable symptoms (subparagraph 2-201.11(A)(1);</td>
</tr>
<tr>
<td></td>
<td>• The inspector becomes aware that an employee has reported information about his or her health and activities as it relates to diseases that are transmissible through food and the PIC has not acted to restrict or exclude an employee as required by the Food Code (¶2-201.12) &amp; (¶2-201.13); or</td>
</tr>
<tr>
<td></td>
<td>• The inspector becomes aware that the PIC has not notified the regulatory authority that an employee is jaundiced or diagnosed with an illness due to a pathogen as specified as specified under subparagraphs 2-201.11 (A)(2)(a)-(e) of the Food Code.</td>
</tr>
</tbody>
</table>
There are food employees working in the food establishment that have been diagnosed with Norovirus, hepatitis A virus, shigellosis, *E. coli* 0157:H7, or other EHEC, or typhoid fever; or with active symptoms of vomiting and/or diarrhea; or working articles with an open, uncovered infected wound or pustule, or with a sore throat with a fever. Additionally, in food establishments exclusively serving a highly susceptible population, there are to be no food employees with an active sore throat with a fever working in the food establishment.

**Applicable Code Sections:**
- 2-201.12 Exclusions & Restrictions *
- 2-201.13 Removal of Exclusions & Restrictions
- 2-201.11 (D) Responsibility of PIC to Exclude or Restrict
- 2-201.11 (F) Responsibility of Food Employee to Comply

## Good Hygienic Practices

### 4. Proper eating, tasting, drinking, or tobacco use

**IN / OUT**

This item should be marked IN or OUT of compliance based on direct observations or discussions of the appropriate hygienic practices of food employees. This item should be marked IN compliance when a food employee is observed drinking from a closed beverage container subsequently stored on a non-food-contact surface and separate from exposed food, clean equipment, and unwrapped single-service and single-use articles. This item should be marked OUT of compliance when food employees are observed improperly tasting food, eating, drinking, or smoking, or there is supporting evidence of these activities taking place in non-designated areas of the establishment. An open container of liquid in the kitchen preparation area does not necessarily constitute marking this item OUT. Further discussion with a food employee or the PIC may be needed to determine if the liquid, if labelled, is used as an ingredient in food, or may be an employee beverage that is consumed in another designated area. If the liquid is an open beverage that is consumed in a designated area, it must still be stored in a manner to prevent the contamination of food, equipment, utensils, linens and single-service/single-use articles.

**IN / OUT**

This item may be marked N.O. for retail operations only in the **RARE** case when there are no food workers present at the time of inspection.

**Applicable Code Sections:**
- 2-401.12 Eating, Drinking, or Using Tobacco *
- 3-301.12 Preventing Contamination when Tasting *

### 5. No discharge from eyes, nose, and mouth

**IN / OUT**

This item should be marked IN or OUT of compliance based on direct observations of food employees. This item should be marked IN compliance when no food employees are observed having persistent coughing, sneezing, runny nose, or watery eyes. This item should be marked OUT of compliance when a food employee has persistent coughing, sneezing, runny nose, or watery eyes subjecting food and food-contact surfaces to potential contamination. An affected employee should be immediately restricted in their duties when this item is marked OUT of compliance.

**IN / OUT**

This item may be marked N.O. for retail operations only in the **RARE** case when there are no food workers present at the time of inspection.

**Applicable Code Sections:**
- 2-401.12 Discharges from the Eyes, Nose, and Mouth *
### Preventing Contamination by Hands Control of Hands as a Vehicle of Contamination

<table>
<thead>
<tr>
<th>6.</th>
<th>Hands clean and properly washed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IN / OUT</strong></td>
<td>This item should be marked IN or OUT of compliance. This item should be marked IN compliance only when employees are observed using proper handwashing techniques at appropriate times and places.</td>
</tr>
<tr>
<td><strong>N.A</strong> Do Not Mark this item N.A.</td>
<td></td>
</tr>
<tr>
<td><strong>N.O</strong></td>
<td>This item may be marked N.O. for retail operations only in the RARE case when there are no food workers present at the time of inspection. (If there are no food workers present, but the PIC accompanies the inspector on the inspection and touches food, clean equipment, or utensils without washing his/her hands, this item should be marked OUT of compliance.)</td>
</tr>
<tr>
<td><strong>Applicable Code Sections:</strong></td>
<td></td>
</tr>
<tr>
<td>2-301.11 Clean condition *</td>
<td></td>
</tr>
<tr>
<td>2-301.12 Cleaning Procedure *</td>
<td></td>
</tr>
<tr>
<td>2-301.14 When to Wash *</td>
<td></td>
</tr>
<tr>
<td>2-301.15 Where to Wash</td>
<td></td>
</tr>
<tr>
<td>2-301.16 Hand Antiseptics</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.</th>
<th>No bare hand contact with RTE ready-to-eat foods or a pre-approved alternative procedure properly followed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IN / OUT</strong></td>
<td>This item should be marked IN or OUT of compliance based on actual observation. This item should be marked IN compliance only when employees are observed using suitable utensils or gloves to prevent bare hand (or arm) contact with ready-to-eat foods or are observed following a pre-approved alternative procedure to no bare hand contact. This item should be marked OUT of compliance if one person is observed touching ready-to-eat food with their bare hands in the absence of a prior approval and written procedures for bare hand contact. Refer to 3-301.11(D) 1-7 for a listing of conditions that must be met in order to receive prior approval by the Regulatory Authority. A pre-approved alternative procedure to no bare hand contact is to include:</td>
</tr>
<tr>
<td><strong>N.A</strong></td>
<td>This item may be marked N.A. for establishments that do not prepare ready-to-eat foods.</td>
</tr>
<tr>
<td><strong>N.O</strong></td>
<td>This item may be marked N.O. for establishments that prepare ready-to-eat foods only when no food preparation is performed at the time of inspection.</td>
</tr>
<tr>
<td><strong>Applicable Code Sections:</strong></td>
<td></td>
</tr>
<tr>
<td>3-301.11 Preventing Contamination from Hands *</td>
<td></td>
</tr>
</tbody>
</table>
### Handwashing sinks properly supplied and accessible

<table>
<thead>
<tr>
<th>IN/OUT</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>This item must be marked IN or OUT of compliance based on observations in determining that handwashing sinks are properly equipped and conveniently located for food employee use. This item should be marked OUT of compliance when the facility is not stocked with soap, hand drying provisions or equipped with the required signage. In addition, if the handwashing sink is not located to be available to food employees who are working in food preparation, food dispensing and warewashing areas, is blocked by portable equipment or stacked full of soiled utensils or other items, or the facility is unavailable for regular employee use, this item should be marked OUT of compliance.</strong></td>
<td></td>
</tr>
</tbody>
</table>

**N.A. Do Not Mark** this item N.A.

**N.O. Do Not Mark** this item N.O.

**Applicable Code Sections:**
- 5-202.12 Handwashing Sinks (installation)
- 5-203.11 Handwashing Sinks (nos./capacities) *
- 5-204.11 Handwashing Sinks (loc./placement) *
- 5-205.11 Using a Handwashing Sink
- 6-301.11 Handwashing Cleanser, Availability
- 6-301.12 Hand Drying Provision
- 6-301.13 Handwashing Aids & Devices, Use Restrictions
- 6-301.14 Handwashing Signage
- 6-501.18 Maintaining & Using Handwashing Sinks

---

### Food obtained from approved source

<table>
<thead>
<tr>
<th>IN/OUT</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>This item should be marked IN or OUT of compliance based on direct observations of food products, food labels and packaging, water analyses, and discussion with the PIC or other food employees. This item should be marked IN compliance when the regulatory authority is able to determine approved food sources. A review of supplier names, shipment invoices, buyer specification plans, molluscan shellfish tags, proof of regulatory permit/licensure of a food source, etc. can be used to document approved food sources. This item should be marked OUT of compliance when an approved food source cannot be determined.</strong></td>
<td></td>
</tr>
</tbody>
</table>

**N.A. Do Not Mark** this item N.A.

**N.O. Do Not Mark** this item N.O.

**Applicable Code Sections:**
- 3-201.11 Compliance with Food Law *
- 3-201.12 Food in Hermetically Sealed Container *
- 3-201.13 Fluid Milk & Milk Products *
- 3-201.14 Fish *
- 3-201.15 Molluscan Shellfish *
- 3-201.16 Wild Mushrooms *
- 3-201.17 Game Animals *
- 3-202.13 Eggs *
- 3-202.14 Eggs & Milk Products, Pasteurized *
- 3-202.110 Pre-packaged Juice-Treated
- 5-101.13 Bottled Drinking Water *
### 10. Food received at proper temperature

<table>
<thead>
<tr>
<th>IN / OUT</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IN</strong></td>
<td>This item should be marked IN or OUT of compliance based on actual food temperature measurements of PHF(TCS) foods being received. This item should be marked IN compliance when food is received and found at proper temperatures during the inspection (i.e. catered meal for child care center arrives during the inspection and the regulatory authority verifies receiving temperature). This item should be marked OUT of compliance if food is received and accepted, but an actual food temperature measurement of a PHF (TCS) food by the regulatory authority at the time of delivery exceeds the temperature specifications for receiving as prescribed by the Code.</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td>This item may be marked N.A. for retail operations when the establishment receives only foods that are not PHF (TCS) food and that are not frozen.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td>This item may be marked N.O. if food is not received during the inspection.</td>
</tr>
</tbody>
</table>

**Applicable Code Sections:**
- 3-202.11 Temperature *

### 11. Food in good condition, safe and unadulterated

<table>
<thead>
<tr>
<th>IN / OUT</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IN</strong></td>
<td>This item must be marked IN or OUT of compliance based on direct observations of the integrity of product packaging, wholesomeness, and signs of adulteration. This item should be marked IN compliance when a dent in a canned food has not compromised the hermetic seal; cuts made in outer cardboard packaging during opening of the case do not enter the inner product packaging; the true appearance, color, or quality of a food is not misrepresented; and food is honestly presented. This item should be marked OUT of compliance when the integrity of food packaging has been compromised or the true appearance, color, or quality of a food has been intentionally altered.</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td>Do Not Mark this item N.A.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td>Do Not Mark this item N.O.</td>
</tr>
</tbody>
</table>

**Applicable Code Sections:**
- 3-101.11 Safe, Unadulterated & Honestly Presented *
- 3-202.15 Package Integrity *

### 12. Required records available: shellstock tags, parasite destruction

**NOTE:** Fish that are sold with the intent that the consumer will cook it are not required to be frozen for parasite destruction.

<table>
<thead>
<tr>
<th>IN / OUT</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IN</strong></td>
<td>This item should be marked IN or OUT of compliance based on direct observations of fish in storage, shellstock tags, and/or records of freezing of fish for parasite destruction. This item should be marked IN compliance if the permit holder provides a statement from supplier(s) identifying that fish sold as raw, raw-marinated or undercooked is frozen by supplier for parasite destruction; or there are freeze records maintained by the permit holder when fish are frozen for parasite destruction on the premises. This item should be marked OUT of compliance if there are no shellstock tags available, when the shellstock tags are incomplete, when there is evidence of commingling of shellstock, or when no records of freezing of fish for parasite destruction are available.</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td>This item may be marked N.A. when shellstock are not used in the establishment and the only fish sold as raw, raw-marinated or undercooked is the tuna species or aquacultured fish listed as exempted from freezing in the Food Code.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td>This item may be marked N.O. if shellstock or raw, raw-marinated and undercooked fish are sold periodically in the establishment, but are not being sold at the time of inspection and prior compliance through tags, invoices, or purchase records cannot be verified.</td>
</tr>
</tbody>
</table>

**Applicable Code Sections:**
- 3-202.18 Shellstock Identification *
- 3-203.12 Shellstock, Maintaining Identification *
- 3-402.11 Parasite Destruction *
- 3-402.12 Records, Creation, & Retention
<table>
<thead>
<tr>
<th></th>
<th>Protection From Contamination</th>
</tr>
</thead>
<tbody>
<tr>
<td>13.</td>
<td><strong>Food separated and protected</strong></td>
</tr>
<tr>
<td><strong>IN / OUT</strong></td>
<td>This item should be marked IN or OUT of compliance based on direct observations of food storage and food handling practices. This item should be marked OUT of compliance when ready-to-eat foods are subject to potential contamination by raw animal foods; raw animal foods are observed not separated by type based on minimum cook temperatures by spacing or placing in separate containers; food is not packaged or covered during storage (unless in the process of cooling); or food is in contact with soiled equipment and utensils.</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td>This item may be marked N.A. when there are no raw animal foods used in the facility and only prepackaged foods are sold.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td><strong>Do Not Mark</strong> this item N.O.</td>
</tr>
<tr>
<td><strong>Applicable Code Sections:</strong></td>
<td></td>
</tr>
<tr>
<td>3-302.11</td>
<td>Separation, Packaging, &amp; Segregation *</td>
</tr>
<tr>
<td>3-304.11</td>
<td>Food Contact with Equipment &amp; Utensils *</td>
</tr>
<tr>
<td>3-306.13(A)</td>
<td>Consumer Self Service Operations *</td>
</tr>
<tr>
<td>14.</td>
<td><strong>Food-contact surfaces: cleaned and sanitized</strong></td>
</tr>
<tr>
<td><strong>IN / OUT</strong></td>
<td>This item should be marked IN or OUT of compliance based on direct observations of food-contact surfaces of equipment and utensils; actual measurements/readings of chemical sanitizer concentration, hot water sanitizing temperature, pH, hardness, water pressure, etc. using test strips, heat-sensitive tapes, and equipment gauges; observations of cleaning and sanitizing procedures; and discussion of cleaning and sanitizing procedures and frequency with the PIC or other food employees. This item should be marked IN compliance when manual and/or mechanical methods of cleaning and sanitizing are effective, and performed at the prescribed frequency. There should be an overall assessment of the food-contact surfaces of equipment and utensils in clean storage and in use to determine compliance. For example, this item is not marked OUT of compliance based on one visibly soiled utensil, such as a plate or knife. This item should be marked OUT of compliance when manual and/or mechanical methods of cleaning and sanitizing food-contact surfaces of equipment and utensils are ineffective, or if one multiuse piece of equipment such as a slicer or can opener is visibly soiled and being used at the time of the inspection.</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td>This item may be marked N.A. only when there is no requirement to clean equipment and utensils such as when only prepackaged foods are sold.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td><strong>Do Not Mark</strong> this item N.O.</td>
</tr>
<tr>
<td><strong>Applicable Code Sections:</strong></td>
<td></td>
</tr>
<tr>
<td>4-501.111</td>
<td>Manual Warewashing, Hot Water Sanitization *</td>
</tr>
<tr>
<td>4-501.112</td>
<td>MechanicalWarewashing, Hot Water Sanitization</td>
</tr>
<tr>
<td>4-501.113</td>
<td>Mechanical Warewashing, Sanitization Pressure</td>
</tr>
<tr>
<td>4-501.114</td>
<td>Chemical Sanitization-Temp, pH, Concentration, Hardness *</td>
</tr>
<tr>
<td>4-501.115</td>
<td>Manual Warewashing Equip. Detergent Sanitizers</td>
</tr>
<tr>
<td>4-601.111(A)</td>
<td>Food Contact Surface Clean to sight &amp; Touch *</td>
</tr>
<tr>
<td>4-602.11</td>
<td>Food Contact Surface-Cleaning Frequency *</td>
</tr>
<tr>
<td>4-602.12</td>
<td>Cooking &amp; Baking Equipment</td>
</tr>
<tr>
<td>4-702.11</td>
<td>Before Use After Cleaning *</td>
</tr>
<tr>
<td>4-703.11</td>
<td>Hot Water and Chemical *</td>
</tr>
</tbody>
</table>
15. **Proper disposition of returned, previously served, reconditioned, and unsafe food**

<table>
<thead>
<tr>
<th>IN / OUT</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IN</strong></td>
<td>This item must be marked IN or OUT of compliance. This item should be marked OUT of compliance if food is found unsafe, adulterated, from an unapproved source, or ready-to-eat food is contaminated by employees and is not discarded or reconditioned according to an approved procedure; or if previously served unwrapped, unprotected food is observed being re-served.</td>
</tr>
<tr>
<td><strong>N.A.</strong></td>
<td>Do Not Mark this item N.A.</td>
</tr>
<tr>
<td><strong>N.O.</strong></td>
<td>Do Not Mark this item N.O.</td>
</tr>
</tbody>
</table>

Applicable Code Sections:
- 3-306.14 Returned Food & Re-service of Food *
- 3-701.11 Discarding/Reconditioning Adulterated Food *

**Potentially Hazardous Food (PHF) (Time Temperature Control for Safety Food) (TCS Food)**

16. **Proper cooking time and temperatures**

**NOTE:** The cooking temperatures of foods must be measured to determine compliance or non-compliance. Do not rely upon discussions of proper raw animal food cook temperatures with managers or cooks to make a determination of compliance or non-compliance. The temperature of raw animal foods of different types cooked during the inspection should be taken. For instance, if the facility fries chicken, scrambles eggs, bakes fish, grills hamburgers, and slow-roasts prime rib during the inspection – the cook temperatures of all of the products should be measured and recorded. Temperatures, both IN compliance and OUT of compliance, should be recorded in the “Temperature Observations” section of the inspection report. If there is insufficient space for the number of temperatures taken, additional temperatures should be documented in the “Observations and Corrective Actions” section on the second page of the inspection report.

- If a food is cooked below the required temperature but the facility has an approved Consumer Advisory or an approved variance with HACCP plan for that food item, mark the item IN compliance, record the temperature and document the reason it is IN compliance. The time of inspections should be varied so that cooking can be observed.

- This item should be marked IN or OUT of compliance based on actual cooking temperature measurements using a calibrated food temperature measuring device. This item should be marked OUT of compliance if a food item checked does not meet the temperature requirements for cooking and the determination is made that the employee doing the cooking intends to serve the product before completing the cooking process.

- If a food is cooked below the required temperature but the facility has an approved Consumer Advisory or an approved variance with HACCP plan for that food item, mark the item IN compliance, record the temperature and document the reason it is IN compliance. The time of inspections should be varied so that cooking can be observed.

- This item may be marked N.A. when no raw animal foods are cooked in the establishment.

- This item may be marked N.O. when no raw animal foods are cooked during the time of inspection.

**IN / OUT**

- This item may be marked N.O. when no raw animal foods are cooked during the time of inspection.

The cooking temperature / time requirements for each raw animal species are as follows:

- **IN**
  - Raw eggs broken on request and prepared for immediate service cooked to 63°C (145°F) for 15 seconds; Raw eggs broken, but not prepared for immediate service, cooked to 68°C (155°F) for 15 seconds
  - Comminuted fish, meat, game animals cooked to 68°C (155°F) for 15 seconds
  - Roasts, including formed roasts, are cooked to 54.4°C (130°F) for 112 minutes or as chart specified and according to oven parameters per chart
  - Ratites and injected meats cooked to 68°C (155°F) for 15 seconds
  - Poultry, stuffed fish/meat/pasta/poultry/ratites, or stuffing containing fish, meat, poultry or ratites cooked to 74°C (165°F) for 15 seconds
  - Wild game animals cooked to 74°C (165°F) for 15 seconds
  - Whole muscle, intact beef steaks cooked to surface temperature of 63°C (145°F) on top and bottom; meat surfaces have a cooked color change
  - Raw animal foods rotated, stirred, covered, and heated to 74°C (165°F) in microwave; food stands covered for 2 minutes after cooking

- **N.A.**
  - This item may be marked N.A. when no raw animal foods are cooked in the establishment.

- **N.O.**
  - This item may be marked N.O. when no raw animal foods are cooked during the time of inspection.
### Proper reheating procedures for hot holding

**NOTE:** The reheating temperatures of foods must be taken to determine IN or OUT of compliance. Do not rely solely upon discussions with managers or cooks to determine IN or OUT of compliance. Temperatures IN and OUT should be recorded in the “Temperature Observations” section of the inspection report. If there is insufficient space for the number of temperatures taken, additional temperatures should be documented in the “Observations and Corrective Actions” section of the inspection report. This item should be marked OUT of compliance if the items checked are not reheated to the required temperatures. Foods reheated on steam tables and in bainmaries should not automatically be marked OUT if the piece of equipment is capable of reheating the food to the required temperature within 2 hours.

**IN / OUT**
This item should be marked IN or OUT of compliance based on actual temperature measurements of foods upon completion of the reheating process and prior to being placed in hot holding using a calibrated food temperature measuring device. This item should be marked OUT of compliance if the items checked are not reheated to the required temperatures or within 2 hours prior to hot holding.

**N.A.**
This item may be marked N.A. when foods are not held over for a second service and/or reheating for hot holding is not performed in the establishment.

### Proper cooling time and temperatures

**NOTE:** The requirement for cooling cooked PHF (TCS) food, is that the food must be cooled from 135°F to 41°F or less (or to 45°F or less based on the jurisdiction’s cold holding temperature requirement), in 6 hrs provided that the food is cooled from 135°F to 70°F within the first 2 hours. For example, if a facility cools chili from 135°F to 70°F in 1.5 hours; they then have 4.5 hours to get it from 70°F to 41°F or less (or 45°F or less). There are two critical limits that must be met with cooling. If the food is not cooled from 135°F to 70°F within 2 hours, this item is marked OUT. If the food is not cooled from 70°F to 41°F or less within 6 hours minus the time it took the food to cool from 135°F to 70°F, the item is marked OUT. Discussions with the person in charge along with observations should be used to determine compliance. For instance, during discussion the person in charge says that a food product was cooled overnight in the walk-in cooler. The product is checked and the temperature is 50°F. Eight hours have elapsed from closing to opening. This item should be marked OUT of compliance because the product did not cool from 135°F to 70°F within 2 hours and from 70°F to 41°F or less (or 45°F or less) within a total of 6 hours. Temperatures IN compliance and OUT of compliance should be recorded in the “Temperature Observations” section of the inspection report. If there is insufficient space for the number of temperatures taken, additional temperatures should be documented in the “Observations and Corrective Actions” section of the inspection report. Because the entire cooling process is difficult to observe during an inspection, at the onset of the inspection a determination of whether foods are currently being cooled should be made. If cooling is taking place temperatures should be taken to make a determination of whether proper cooling is possible with procedures being used.
<table>
<thead>
<tr>
<th>IN / OUT</th>
<th>This item should be marked IN or OUT of compliance based on actual temperatures of PHF (TCS) foods in the cooling process. The basis for determining IN or OUT of compliance can also be supported through discussion and/or record review which would provide the inspector reliable data of the &quot;start time&quot; for cooling from 135 degrees F. See above NOTE for an example of using actual temperature and discussion with the PIC in determining OUT without actually being at the establishment during the entire cooling of PHF (TCS) process, from start to finish.</th>
</tr>
</thead>
<tbody>
<tr>
<td>N.A.</td>
<td>This item may be marked N.A. when the establishment does not receive raw eggs, shellstock, or milk, prepares no PHF (TCS) food from ambient temperature ingredients that require cooling, and does not cool cooked PHF (TCS) food.</td>
</tr>
</tbody>
</table>
| N.O.  | This item may be marked N.O. when the establishment does cool PHF (TCS) food, but proper cooling per the prescribed temperature and time parameters cannot be determined during the length of the inspection. The cooling categories and their temperature / time requirements are as follows:  
- Cooked PHF (TCS) food cooled from 57°C (135°F) to 5°C (41°F) or less, or to 7°C (45°F) or less in 6 hrs, provided that the food is cooled from 57°C (135°F) to 21°C (70°F) within the first 2 hours  
- PHF (TCS) food from ambient temperature ingredients cooled to 7°C/5°C (45°F/41°F) or below within 4 hours  
- Foods (shellstock, milk) received at a temperature according to law cooled to 7°C/5°C (45°F/41°F) within 4 hours  
- Raw eggs received at an ambient temperature of 7°C (45°F) immediately placed in refrigerated equipment that maintains an ambient air temperature of 7°C (45°F) |
|       | Applicable Code Sections:  
3-501.14 Cooling * |
| 19.   | **Proper hot holding temperatures**  
NOTE: Temperatures IN compliance and OUT of compliance should be recorded in the “Temperature Observations” section of the inspection report. If there is insufficient space for the number of temperatures taken, additional temperatures should be documented in the “Observations and Corrective Action” section of the inspection report. |
| IN / OUT | This item should be marked IN or OUT of compliance based on actual food temperature measurements using a calibrated food temperature measuring device. This item should be marked IN compliance when the regulatory authority determines that, of the PHF(TCS) temperature measurements taken during the inspection, no hot holding temperatures are less than prescribed by the Code. This item is marked OUT of compliance if one PHF(TCS) is found out of temperature, unless TPHC is used for that PHF(TCS). |
| N.A.  | This item may be marked N.A. when the establishment does not hot hold food. |
| N.O.  | This item may be marked N.O. when the establishment does hot hold foods, but no foods are being held hot during the time of inspection. |
|       | Applicable Code Sections:  
3-501.16 Hot Holding * |
| 20.   | **Proper cold holding temperatures**  
NOTE: Temperatures IN compliance and OUT of compliance should be recorded in the “Temperature Observations” section of the inspection report. If there is insufficient space for the number of temperatures taken, additional temperatures should be documented in the “Observations and Corrective Action” section of the inspection report. |
### IN / OUT

**This item should be marked IN or OUT of compliance based on actual food temperature measurements using a calibrated food temperature measuring device.** Discussions should be made with the PIC to determine if a food is in the process of cooling, TPHC is used, or there is an approved method to render a food so that it is not PHF(TCS). **This item should be marked IN compliance when the regulatory authority determines that, of the PHF(TCS) temperature measurements taken during the inspection, no cold holding temperatures are greater than prescribed by the Code.** This item should be marked OUT of compliance if one PHF(TCS) is found out of temperature, with supportive evidence, unless TPHC is used for that PHF(TCS).

| N.A. | This item may be marked N.A. when the establishment does not cold hold food. |
| N.O. | **Do not mark** this item N.O. |

**Applicable Code Sections:**

3-501.16 Cold Holding *

### 21. Proper date marking and disposition

**IN / OUT**

This item should be marked IN or OUT of compliance. This item would be IN compliance when there is a system in place for date marking all foods that are required to be date marked and is verified through observation. If date marking applies to the establishment, the PIC should be asked to describe the methods used to identify product shelf-life or “consume-by” dating. The regulatory authority must be aware of food products that are listed as exempt from date marking. For disposition, mark IN when foods are all within date marked time/temperature limits or OUT of compliance, such as when date marked food exceeds the time limit or date-marking is not done.

| N.A. | This item may be marked N.A. when there is no ready-to-eat, PHF (TCS) food prepared and held, or commercial containers of ready-to-eat, PHF (TCS) food opened and held, over 24 hours in the establishment. |
| N.O. | This item may be marked N.O. when the establishment does handle foods requiring date marking, but there are no foods requiring date marking in the facility at the time of inspection. For disposition, mark N.O. when RTE, PHF (TCS) food is prepared on premises, or opened commercial container is held beyond the 7-day or 4-day time limits and you are unable to determine compliance. |

**Applicable Code Sections:**

3-501.17 RTE PHF (TCS Food), Date Marking *

3-501.18 RTE PHF (TCS Food), Disposition *

### 22. Time as a Public Health Control: procedures and records

**IN / OUT**

This item should be marked IN or OUT of compliance based on direct observations, record review, a discussion with the PIC, and the review of any standard operating procedures to determine if the intent of the Code for use of TPHC is met. This provision only applies if it is the actual intention or conscious decision by the food manager to store PHF(TCS) out of temperature control using TPHC; otherwise, it may be a cold or hot holding issue. This item should be marked IN compliance if there is a written procedure at the food establishment that identifies the types of food products that will be held using time only, describes the procedure for how TPHC will be implemented, and if applicable delineates how food items previously cooked and cooled before time is used, are properly cooled; and food items (marked or identified) do not exceed the 4-hour limit at any temperature or 6-hour limit at 70°F or less. This item should be marked OUT of compliance when the food manager implies use of TPHC but does not have an effective mechanism for indicating the point in time when the food is removed from temperature control to the 4 or 6-hour discard time, or a written procedure or an effective mechanism for using TPHC is not present at the facility.

| N.A. | This item may be marked N.A. when the establishment does not use time only as the public health control. |
| N.O. | This item may be marked N.O. when the establishment uses time only as the public health control, but is not using this practice at the time of inspection. |

**Applicable Code Sections:**

3-501.19 Time as a Public Health Control *
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>23.</strong></td>
<td>Consumer advisory provided for raw or undercooked food</td>
</tr>
<tr>
<td><strong>IN / OUT</strong></td>
<td>This item should be marked IN or OUT of compliance. This item is marked IN compliance if the establishment provides an advisory that meets disclosure and reminder. This item should be marked IN or OUT of compliance based on a thorough review of the posted, written and special/daily menus with the PIC to determine if untreated shell eggs, meats, fish, or poultry may be used as an ingredient in or ordered as a raw, raw-marinated, partially cooked, or undercooked food. The advisory also applies to shellstock offered for sale from a retail service case. This item should be marked IN compliance if the establishment provides an advisory that meets the intent of the Food Code for both the disclosure and reminder components. This item should be marked OUT of compliance when there is no consumer advisory, the food item is not disclosed, or there is no reminder statement. The consumer advisory does not exempt the requirement for freezing for parasite control.</td>
</tr>
<tr>
<td>N.A.</td>
<td>This item may be marked N.A. when the establishment does not serve raw or undercooked animal foods.</td>
</tr>
<tr>
<td>N.O.</td>
<td><strong>Do Not Mark</strong> this item N.O.</td>
</tr>
<tr>
<td><strong>Applicable Code Sections:</strong></td>
<td>3-603.11 Consumer Advisory for Raw/ Undercooked Food*</td>
</tr>
</tbody>
</table>

| **24.** | Pasteurized foods used; prohibited foods not offered |
| **NOTE:** Discussions with the person in charge and employees regarding whether or not certain foods are served or certain practices occur in the establishment, along with observation should be used to determine compliance. |
| **IN / OUT** | This item should be marked IN or OUT of compliance based on direct observations and discussions with the PIC and food employees regarding whether or not certain foods are served or certain practices occur in an establishment serving a highly susceptible population. This item should be marked IN compliance if only treated/pasteurized juices/juice beverages are served; only pasteurized eggs are used in recipes if eggs are undercooked and if eggs are combined, unless there is a cook step or HACCP plan to control Salmonella enteritidis; no raw or partially cooked animal foods or raw seed sprouts are served; and no unopened packaged food is re-served following service to patients in medical isolation or quarantine. |
| N.A. | This item may be marked N.A. if a highly susceptible population is not served. |
| N.O. | **Do Not Mark** this item N.O. |
| **Applicable Code Sections:** | 3-801.11 Pasteurized Foods & Prohibited Food * |

| **25.** | Food additives: approved and properly used |
| **IN / OUT** | This item should be marked IN or OUT of compliance based on direct observations of food ingredients in storage and listed as product ingredients supplemented by discussion with the PIC. This item is marked IN compliance if approved food and color additives are on site and used properly. Approved food additives are listed and have threshold limits in accordance with the CFRs, and does not apply to food additives that are considered Generally Recognized as Safe (GRAS), such as salt, pepper, etc. This item should be marked OUT of compliance if unapproved food additives are found on the premises or approved additives are improperly used, such as sulfites being applied to fresh fruits or vegetables. |
| N.A. | This item may be marked N.A. if the food establishment does not use any additives on the premises. |
| N.O. | **Do Not Mark** this item N.O. |
| **Applicable Code Sections:** | 3-202.12 Approved Additives * 3-302.14 Protection from Unapproved Additives * |
## 26. Toxic substances properly identified, stored, and used

This item must be marked IN or OUT of compliance based on direct observations of food labelling, storage, reconstitution, and application of bulk and working containers of cleaning agents and sanitizers, personal care items, first aid supplies, medicines, pesticides, and potential toxic and poisonous substances. This item should be marked IN compliance when bulk and working containers of cleaning agents and sanitizers are labelled; sanitizing solutions are not exceeding the maximum concentrations; personal care items, first aid supplies, medicines, and chemicals are stored separate from and not above food, equipment, utensils, linens, and single-service and single-use articles; and restricted use pesticides are applied only by or under the supervision of a certified applicator. This item should be marked OUT of compliance if a cleaning agent or sanitizer is not properly identified and stored; if a sanitizing solution has a higher concentration than prescribed for medicines and first aid kits are improperly labelled and stored.

**N.A.** Do Not Mark this item N.A.

**N.O.** Do Not Mark this item N.O.

### Applicable Code Sections:

- 7-101.11 Identifying Information*
- 7-102.11 Common Name, Working Containers *
- 7-201.11 Separation, Storage *
- 7-202.11 Restriction *
- 7-202.12 Conditions of use *
- 7-203.11 Poisonous or Toxic Material Containers *
- 7-204.11 Sanitizers, Criteria *
- 7-204.12 Chemicals for Washing Fruits & Vegetables *
- 7-204.13 Boiler Water Additives *
- 7-204.14 Drying Agents *
- 7-205.11 Incidental Food Contact, Criteria*
- 7-206.11 Restricted Use Pesticides *
- 7-206.12 Rodent Bait Stations *
- 7-206.13 Tracking Powders, Pest Control & Monitoring*
- 7-207.11 Restriction & Storage; Medicines *
- 7-207.12 Refrigerated Medicines, Storage *
- 7-208.11 Storage-First Aid Supplies *
- 7-209.11 Storage-Personal Care Items
- 7-301.11 Separation-for Retail Sale*
| IN / OUT | This item should be marked IN or OUT of compliance based on direct observations of food preparation and storage, a discussion with the PIC to determine if there are specialized food processes [i.e. smoking food, curing food, reduced oxygen packaging, using food additives to render a food so that it is not PHF(TCS), etc.] and the record review of standard operating procedures and HACCP documentation. This item should be marked IN compliance when observations of food operations and review of available records indicate compliance is being met with regards to specialized food processes, when ROP technology is used in conjunction with a secondary barrier, when hard or semi-soft cheese is manufactured using standards of identity, or fish and seafood are frozen before, during and after ROP. This item should be marked OUT of compliance if the inspection reveals specialized food processes that are not approved by the regulatory authority are performed or not conducted in accordance with the approved variance. |
| N.A. | This item may be marked N.A. if the establishment is not required by the regulatory authority to have a variance or HACCP plan, juice is not packaged or reduced oxygen packaging is not done on the premises. |
| N.O. | **Do Not Mark** this item N.O. |

**Applicable Code Sections:**
- 3-502.11  Variance Requirement *
- 3-502.12  Reduced Oxygen Packaging, Criteria *
- 3-404.11  Treating Juice
- 8-103.12  Compliance with Variance and HACCP Plan *
- 8-201.13  When a HACCP Plan is Required
- 8-201.14  Contents of a HACCP Plan
## Common Uses of Additives
U. S. Food and Drug Administration
FDA/IFIC Brochure: January 1992

### Additive Functions/Examples*

<table>
<thead>
<tr>
<th>Additive Functions/Examples*</th>
<th>Foods Where Likely Used</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impart/Maintain Desired Consistency</strong></td>
<td></td>
</tr>
<tr>
<td>Alginates, Lecithin, Mono-&amp; Diglycerides, Methyl Cellulose, Carrageenan, Glyceride, Pectin, Guar Gum, Sodium Aluminosilicate</td>
<td>Baked Goods, Cake Mixes, Salad dressings, Ice cream, Process Cheese, Coconut, Table Salt</td>
</tr>
<tr>
<td><strong>Improve/Maintain Nutritive Value</strong></td>
<td></td>
</tr>
<tr>
<td>Vitamins A and D, Thiamine, Niacin, Riboflavin, Pyridoxine, Folic Acid, Ascorbic Acid, Calcium Carbonate, Zinc Oxide, Iron</td>
<td>Flour, Bread, Biscuits, Breakfast Cereals, Pasta, Margarine, Milk, Iodized Salt, Gelatin Desserts</td>
</tr>
<tr>
<td><strong>Maintain Palatability and Wholesomeness</strong></td>
<td></td>
</tr>
<tr>
<td>Propionic Acid &amp; its Salts, Ascorbic Acid, Butylated Hydroxy anisole (BHA), Butylated Hydroxytoluene (BHT), Benzoates, Sodium Nitrite, Citric Acid</td>
<td>Bread, Cheese, Crackers, Frozen &amp; Dried Fruit, Margarine, Lard, Potato Chips, Cake Mixes, Meat</td>
</tr>
<tr>
<td><strong>Produce Light Texture; Control Acidity/Alkalinity</strong></td>
<td></td>
</tr>
<tr>
<td>Yeast, Sodium Bicarbonate, Citric Acid, Fumaric Acid, Phosphoric Acid, Lactic Acid, Tartrates</td>
<td>Cakes, Cookies, Quick Breads, Crackers, Butter, Chocolates, Soft Drinks</td>
</tr>
<tr>
<td><strong>Enhance Flavor or Impart Desired Color</strong></td>
<td></td>
</tr>
<tr>
<td>Cloves, Ginger, Fructose, Aspartame, Saccharin, FD&amp;C Red No.40, Monosodium Glutamate, Caramel, Annatto, Limonene, Turmeric</td>
<td>Spice Cake, Gingerbread, Soft Drinks, Yogurt, Soup, Confections, Baked Goods, Cheeses, Jams, Gum</td>
</tr>
</tbody>
</table>

*Includes GRAS and prior sanctioned substances as well as food additives. Additives recognized as GRAS are not included under #25 on the inspection form. Additives must have a limit to be assessed under #25.
Good Retail Practices (GRPs)

- everything we’re told that’s not a Risk Factor or Intervention
- prerequisite programs (if in the HACCP mode)
- SOPs (standard operating procedures)
- can be both critical and non-critical debits
- supporting systems and operations
- both structural and operational
- minimum standards/expectations

Good Retail Practices (GRPs) are systems to control basic operational and sanitation conditions within a facility, and if not controlled, they could be contributing factors to foodborne illness by introducing hazards (biological, chemical and physical), into the end product, either directly or indirectly. For example, equipment in disrepair, such as a cutting board with deep grooves/cuts, makes effective cleaning difficult or impossible, and thereby could introduce a bacterial hazard onto food that comes into contact with the board. In addition, in assessing GRPs, it is important to make an overall assessment of the issue by looking for practices or trends versus an isolated incident; and the potential public health impact. For example, a few missing floor tiles in a dry area may not rise to the level of a “violation”; however, missing floor tiles in an area where there is CIP using pressure hoses could create conditions whereby a bacterial hazard could be introduced on to food equipment. These items usually require judgement, and if uncorrected, the regulatory authority must decide whether or not these conditions would lead to potential contamination (the WHAT IF concept).

GRPs, again, are the methods used in, or the facilities or controls used for the receiving, preparation, storage, serving, packaging or holding of food which are designed to assure unsanitary conditions do not lead to the introduction of hazards or unintentional substances into the end product.

The intention of this inspection form is to focus the inspector’s attention on those factors that have been shown to be most often linked with causing foodborne illness. Since the major emphasis of an inspection should be on the Risk Factors that cause foodborne illness and the Public Health interventions that have the greatest impact on preventing foodborne illness, the GRPs have been given less importance on the inspection form and a differentiation between IN, OUT, N.A. and N.O. is not made in this area. For marking the GRPs section, place an “X” in the box to the left of the numbered item if a code provision under that item is OUT of compliance. Document each violation of the code provision for the item number in the “Observations and Corrective Actions” section on the second page of the inspection report. For items marked out of compliance, further indicate the VIOLATION STATUS by marking an “X” in the corresponding box: COS = Corrected on site during inspection and R = Repeat violation per the same instructions as given in the Risk Factor section. References to the appropriate Food Code provisions that can be debited under each numbered GRP item are listed in Guide 3-B.
## Good Retail Practices (GRPs)

### C. MARKING INSTRUCTIONS FOR EACH GOOD RETAIL PRACTICE (GRP) ON THE INSPECTION REPORT

<table>
<thead>
<tr>
<th></th>
<th>Safe Food and Water</th>
</tr>
</thead>
<tbody>
<tr>
<td>28.</td>
<td><strong>Pasteurized eggs used where required</strong></td>
</tr>
<tr>
<td></td>
<td>Certain menu items use eggs as an ingredient in the preparation of RTE foods, such as Caesar salad, Hollandaise sauce, etc. This is verified by discussion with the PIC and food employees regarding the substitution of pasteurized egg products for raw eggs in uncooked foods, unless allowed under 3-401 (D) (2).</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>3-302.13 Pasteurized eggs substituted for raw eggs in uncooked, egg-based recipes</td>
</tr>
<tr>
<td>29.</td>
<td><strong>Water and ice from approved source</strong></td>
</tr>
<tr>
<td></td>
<td>There are two types of systems: Public Water System or Non-Public Water System. Regardless of its source, it must meet drinking water standards established by EPA and applicable state standards. If a non-public system is used as Drinking water, the water is sampled / tested at least yearly and records retained on file at the food establishment or per state regulations. Consideration must be given to the supply containers, piping, hoses, etc., connected to the APPROVED source when water is made available for mobile and or TEMPORARY FOOD ESTABLISHMENT without a permanent supply.</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>3-202.16 Ice used as a food/cooling medium made from potable water*</td>
</tr>
<tr>
<td></td>
<td>5-101.11 Drinking water from an approved source*</td>
</tr>
<tr>
<td></td>
<td>5-102.11 Standards of quality for public drinking water met*</td>
</tr>
<tr>
<td></td>
<td>5-102.12 Non-drinking water used only for non-food purposes*</td>
</tr>
<tr>
<td></td>
<td>5-102.13 Sampling report for non-public water tested as required</td>
</tr>
<tr>
<td></td>
<td>5-102.14 Recent report available</td>
</tr>
<tr>
<td></td>
<td>5-104.12 Alternative water supply delivered through approved means</td>
</tr>
<tr>
<td>30.</td>
<td><strong>Variance obtained for specialized processing methods</strong></td>
</tr>
<tr>
<td></td>
<td>When a Food Establishment wants to deviate from a requirement in the code, utilizes Specialized Processing Methods such as Smoking Food for Preservation, using Reduced Oxygen Packaging (ROP) or other methods listed in 3-501.11, etc. a variance must first be obtained from the regulatory authority. A HACCP plan may also be required as listed in 8-201.13(A) as part of the variance request, such as ROP where there is only one barrier (e.g., refrigeration) for <em>C. botulinum</em>.</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>8-103.11 Documentation &amp; justification for variance on file with regulatory authority</td>
</tr>
<tr>
<td></td>
<td>Food Temperature Control</td>
</tr>
<tr>
<td>---</td>
<td>--------------------------</td>
</tr>
</tbody>
</table>
| 31. | **Proper cooling methods used; adequate equipment for temperature control**  
A determination must be first be made that cooling food is part of the processing step. To assess whether or not the methods used facilitate the cooling criteria specified under 3-501.14, a discussion with the PIC should support actual observations used in cooling foods. There should be enough equipment with sufficient capacity used for the cooling, heating, and hot/cold holding of foods requiring temperature control as specified in Chapter 3 to meet the demands of the operation. Observations must support the determination of compliance status. Frozen food is solid to the touch.  
Applicable Code Sections:  
3-501.11 Frozen food stored frozen  
3-501.15 Proper cooling methods used for PHF (TCS Foods)  
4-301.11 Cooling, heating, & holding equipment sufficient in number, capacity & in good repair |
| 32. | **Plant food properly cooked for hot holding**  
In determining compliance, observation along with an actual cooking temperature must be obtained.  
Applicable Code Sections:  
3-401.13 Plant food (vegetables/fruit) cooked to 135°F or above for hot holding |
| 33. | **Approved thawing methods used**  
Observing and then gaining an understanding of the establishment’s thawing method(s) will help in determining whether a violation exists from the approved thawing methods found under 3-501.13 as well as the level of risk imposed. Keep in mind, various food products especially those destined for hot oil frying are often slacked (not thawed) prior to cooking.  
Applicable Code Sections:  
3-501.12 Frozen PHF (TCS Foods) slacked properly;  
3-501.13 Proper thawing methods used for PHF (TCS Foods) |
| 34. | **Thermometers provided and accurate**  
Thermometers provide a means for assessing active managerial control of PHF (TCS Foods) temperatures. Determine compliance by observing the location and verifying the scaling of the temperature measuring devices in the range of use to measure food, water, or ambient air temperatures. Food thermometers must be calibrated at a frequency to ensure accuracy. Food thermometers should be accessible for use by employees and have a probe size appropriate to the food item.  
Applicable Code Sections:  
4-203.11 Food thermometers accurate in the intended range of use  
4-203.12 Ambient air & water thermometers accurate in the intended range of use  
4-204-112 Thermometers located in refrigerators/hot holding units to measure ambient air in warmest/coolest areas of units  
4-302.12 thermometers provided & accessible; Appropriate thermometer for measuring thin foods provided  
4-502.11(B) Good Repair and Calibration |
### Food Identification

<table>
<thead>
<tr>
<th>35.</th>
<th>Food properly labelled; original container</th>
</tr>
</thead>
<tbody>
<tr>
<td>Packaged foods are required to conform to specific labelling laws. Foods packaged within the food establishment must also conform to the appropriate labelling laws, with considerations given to accuracy as well as not being misleading. In addition, all MAJOR FOOD ALLERGENS, if present, must be accurately declared. Working containers and bulk foods removed from their original packaging require some level of assessment as to how recognizable the food is without labelling by its common name. Molluscan shellfish and vended PHF must specifically be assessed based on their specific packaging and labelling requirements.</td>
<td></td>
</tr>
<tr>
<td>Applicable Code Sections:</td>
<td></td>
</tr>
<tr>
<td>3-202.17 Proper identification &amp; sell-by date on packages of shucked shellfish</td>
<td></td>
</tr>
<tr>
<td>3-203.11 Molluscan shellfish stored in original container until sold/prepped</td>
<td></td>
</tr>
<tr>
<td>3-302.12 Food storage containers identified with common name of food</td>
<td></td>
</tr>
<tr>
<td>3-305.13 Vended PHF (TCS Foods) dispensed in original container</td>
<td></td>
</tr>
<tr>
<td>3-601.11 Standards of identity met for packaged foods</td>
<td></td>
</tr>
<tr>
<td>3-601.12 Foods honestly presented, do not misinform consumers</td>
<td></td>
</tr>
<tr>
<td>3-602.11 Food packaged in the food establishment labelled as specified in law</td>
<td></td>
</tr>
<tr>
<td>3-602.12 Consumer warnings as required by law on labels</td>
<td></td>
</tr>
</tbody>
</table>

### Prevention of Food Contamination

<table>
<thead>
<tr>
<th>36.</th>
<th>Insects, rodents and animals not present</th>
</tr>
</thead>
<tbody>
<tr>
<td>An assessment is made through observation and discussion with the PIC for measures taken to control the presence of pests in the food establishment, including elimination of entry points and harborage areas, and removal of pests and its evidence. Insect trapping devices must not be located over food preparation areas.</td>
<td></td>
</tr>
<tr>
<td>Applicable Code Sections:</td>
<td></td>
</tr>
<tr>
<td>2-403.11 Food employees not handling animals*</td>
<td></td>
</tr>
<tr>
<td>6-202.13 Insect control devices properly designed &amp; installed</td>
<td></td>
</tr>
<tr>
<td>6-202.15 Openings to outside protected against entry of pests</td>
<td></td>
</tr>
<tr>
<td>6-202.16 Protective barriers provided for exterior walls/roofs</td>
<td></td>
</tr>
<tr>
<td>6-501.111 Effective pest control measures in place*</td>
<td></td>
</tr>
<tr>
<td>6-501.112 Dead or trapped pest removed traps at adequate frequency</td>
<td></td>
</tr>
<tr>
<td>6-501.115 Prohibited live animals not on premises*</td>
<td></td>
</tr>
</tbody>
</table>
### 37. Contamination prevented during food preparation, storage & display

The observation and understanding of the flow of food items from the point of receipt to the point of sale, service or distribution is necessary to determine whether a violation exists. Food is subject to direct and indirect sources of contamination in the establishment. Sources may be related to the working environment, packaging, adequacy of storage facilities, and exposure of food on display to contamination (i.e. salad bars).

**Applicable Code Sections:**
- 3-202.19 Shellstock free of mud, dead shellfish & shellfish with broken shells
- 3-303.11 Ice as a coolant not used as food
- 3-303.12 Packaged food not stored in direct contact with water/ice during display
- 3-304.13 Linens & napkins not used in contact with food unless as a liner & replaced each time
- 3-305.11 Food stored 6" off the floor in clean, dry location
- 3-305.12 Food not stored in prohibited areas
- 3-305.14 Unpackaged food protected from environmental contamination during preparation
- 3-306.11 Food on display protected by food guards/packaging
- 3-306.12 Condiments protected in dispensers/individual packets
- 3-306.13(B) Consumer self-service operations provided with suitable utensils
- 3-306.13(C) Consumer self-service operations monitored
- 3-307.11 Food not contaminated by any other source
- 6-404.11 Distressed food segregated & properly located away from food, utensils, or equipment

### 38. Personal cleanliness

Observation of facility personnel for clean outer clothing, effective hair restraints, prohibited jewelry and the condition or protection of fingernails must be made.

**Applicable Code Sections:**
- 2-302.11 Fingernails neat & trimmed; Gloves worn over polished nails & artificial nails
- 2-303.11 No jewelry worn during food handling except plain wedding band
- 2-304.11 Outer clothing clean
- 2-402.11 Hair restraints & clothes that cover body hair worn by food employees

### 39. Wiping cloths; properly used and stored

Wiping cloths are to be used for a designated purpose and properly used. When stored in solution, the solutions should be reasonably clean and maintained at the proper sanitizer concentration (4-501.114). Solutions exceeding the recommended sanitizer concentrations would be marked under item no.26. *Toxic substances properly identified, stored, and used.* Sponges, if present are not to be used in contact with clean/sanitized food contact surfaces.

**Applicable Code Sections:**
- 3-304.14 Cloths for spills used for only one purpose; wet wiping cloths stored in sanitizer; wet & dry cloths stored clean
- 4-101.16 Sponges not used on sanitized food contact surfaces
- 4-901.12 Wiping cloths laundered in establishment, air dried if no clothes dryer present

### 40. Washing fruits and vegetables

Chemicals are allowed for washing fruits and vegetables; along with simply washing them in water. Raw fruits and vegetables are to be washed prior to their preparation or offered as RTE. Discussion with the PIC and food employees will help determine the establishment’s practice.

**Applicable Code Sections:**
- 3-302.15 Raw fruit & vegetables thoroughly washed before use.
<table>
<thead>
<tr>
<th></th>
<th>Proper Use of Utensils</th>
</tr>
</thead>
<tbody>
<tr>
<td>41.</td>
<td><strong>In-use utensils; properly stored</strong></td>
</tr>
<tr>
<td></td>
<td>Based on the type of operation, there are a number of methods available for storage of in-use utensils during pauses in food preparation or dispensing, such as in the food, clean and protected, under running water, or changing often enough to prevent bacterial growth etc. If stored in a container of water, the water temperature must be at least 135F. In-use utensils may not be stored in chemical sanitizer or ice between uses.</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>3-304.12 In-use utensils properly stored between uses</td>
</tr>
<tr>
<td>42.</td>
<td><strong>Utensils, equipment and linens; properly stored, dried, handled</strong></td>
</tr>
<tr>
<td></td>
<td>An assessment is made of the overall storage practices and handling of clean equipment and utensils, including tableware located in the various areas within an establishment, including the basement, wait station and dining room. Equipment must be air dried prior to storage and linens properly cleaned and stored.</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>4-801.11 Clean linens free of food residues &amp; soil</td>
</tr>
<tr>
<td></td>
<td>4-802.11 Based on use, linens laundered at adequate frequency</td>
</tr>
<tr>
<td></td>
<td>4-803.11 Soiled linens properly stored</td>
</tr>
<tr>
<td></td>
<td>4-803.12 Linens mechanically washed unless only wiping cloths are laundered on site</td>
</tr>
<tr>
<td></td>
<td>4-901.11 Equipment/utensils air dried after washing, rinsing, &amp; sanitizing</td>
</tr>
<tr>
<td></td>
<td>4-903.11 Equipment/utensils/linens stored 6&quot; off floor in clean, dry location</td>
</tr>
<tr>
<td></td>
<td>4-903.12 Equipment/utensils/linens not stored in prohibited areas</td>
</tr>
<tr>
<td></td>
<td>4-904.11 Kitchenware/tableware handled to protect food-/lip-contact surfaces</td>
</tr>
<tr>
<td></td>
<td>4-904.12 Soiled tableware removed from eating areas</td>
</tr>
<tr>
<td></td>
<td>4-904.13 Preset tableware wrapped/covered; unused settings removed from table</td>
</tr>
<tr>
<td>43.</td>
<td><strong>Single-use/single-service articles; properly stored, used</strong></td>
</tr>
<tr>
<td></td>
<td>These items are not designed to be cleaned and re-used; therefore, they must be properly stored and protected to prevent from possible contamination. Food establishments without facilities for cleaning and sanitizing kitchenware and tableware shall provide only single-use and single-service articles.</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>4-502.12 Single-service items available if no warewashing facilities present *</td>
</tr>
<tr>
<td></td>
<td>4-502.13 Single-service/-use items not reused</td>
</tr>
<tr>
<td></td>
<td>4-502.14 Molluscan/crustacean shells used only once as serving container</td>
</tr>
<tr>
<td></td>
<td>4-903.11 Single-service/use items stored 6&quot; off the floor in a clean, dry location</td>
</tr>
<tr>
<td></td>
<td>4-903.12 Single-service/-use items not stored in prohibited areas/specified places</td>
</tr>
<tr>
<td></td>
<td>4-904.11 Single-service/-use items properly handled to protect food-/lip-contact surfaces</td>
</tr>
<tr>
<td>44.</td>
<td><strong>Gloves used properly</strong></td>
</tr>
<tr>
<td></td>
<td>The observation of food preparation activities and glove-use by food employees are necessary. There should be a discussion with the PIC on how gloves are used, if applicable, in food preparation activities. Gloves may serve as a source of cross-contamination if misused.</td>
</tr>
<tr>
<td></td>
<td>Applicable Code Sections:</td>
</tr>
<tr>
<td></td>
<td>3-304.15 Single-use gloves only used for one task; Appropriate gloves used for task being performed</td>
</tr>
</tbody>
</table>
**Utensils, Equipment and Vending**

**45. Food and non-food-contact surfaces cleanable, properly designed, constructed and used**

Equipment and utensils must be properly designed and constructed, and in good repair. Proper installation and location of equipment in the food establishment are important factors to consider for ease of cleaning in preventing accumulation of debris and attractants for insects and rodents. The components in a vending machine must be properly designed to facilitate cleaning and protect food products (equipped with automatic shutoff, etc.) from potential contamination. Equipment must be properly used and in proper adjustment, such as calibrated food thermometers.

<table>
<thead>
<tr>
<th>Applicable Code Sections:</th>
</tr>
</thead>
<tbody>
<tr>
<td>3-304.16 Clean tableware for seconds provided to self-service consumers</td>
</tr>
<tr>
<td>3-304.17 Returnable’s not refilled at food establishment</td>
</tr>
<tr>
<td>4-101.11 Utensils/food-contact surfaces made of safe, durable, smooth materials*</td>
</tr>
<tr>
<td>4-101.12 Cast iron not used for food-contact surfaces, unless it meets exemptions</td>
</tr>
<tr>
<td>4-101.13 Lead, pewter, &amp; solder exceeding limits for lead, not used for food-contact surfaces</td>
</tr>
<tr>
<td>4-101.14 Copper not used for food-contact surfaces*</td>
</tr>
<tr>
<td>4-101.15 Galvanized metal not used for food-contact surfaces*</td>
</tr>
<tr>
<td>4-101.17 Wood used for food-contact surfaces constructed of hard wood</td>
</tr>
<tr>
<td>4-101.18 Non-scratching utensil used with nonstick coatings</td>
</tr>
<tr>
<td>4-101.19 Nonfood-contact surfaces made of durable, smooth materials</td>
</tr>
<tr>
<td>4-102.11 Single-service/-use items made of safe &amp; clean materials*</td>
</tr>
<tr>
<td>4-201.11 Equipment and Utensil Durability and Strength</td>
</tr>
<tr>
<td>4-201.12 Food Temperature Measuring Devices*</td>
</tr>
<tr>
<td>4-202.11-.12 Food-contact surfaces smooth &amp; easily accessible for cleaning;* CIP equipment easily cleanable</td>
</tr>
<tr>
<td>4-202.13 “V” threads only used for hot oil equipment</td>
</tr>
<tr>
<td>4-202.14 Hot Oil filtering Equipment</td>
</tr>
<tr>
<td>4-202.15 Cutting parts of can opener readily removable for cleaning / replacement</td>
</tr>
<tr>
<td>4-202.16 Non-food-contact surfaces</td>
</tr>
<tr>
<td>4-202.17 Kick plates removable for cleaning</td>
</tr>
<tr>
<td>4-204.12 Covers/lids for equipment openings overlap the opening &amp; sloped to drain</td>
</tr>
<tr>
<td>4-204.15 Equipment requiring lubricants designed so that lubricants do not drip into food</td>
</tr>
<tr>
<td>4-204.16 Beverage tubing not in contact with stored ice</td>
</tr>
<tr>
<td>4-204.17 Liquid waste drains do not pass through ice storage bins</td>
</tr>
<tr>
<td>4-204.18 Condenser unit separated from food storage space</td>
</tr>
<tr>
<td>4-204.19 Can openers on vending machines protected from contamination</td>
</tr>
<tr>
<td>4-204.110 Molluscan shellfish tanks marked for display only or operated under a HACCP plan</td>
</tr>
<tr>
<td>4-204.13 Dispensing equipment designed to protect unpackaged product</td>
</tr>
<tr>
<td>4-204.14 Vending machine equipped with self-closing door or cover</td>
</tr>
<tr>
<td>4-204.111 Vending machines for PHF (TCS Foods) equipped with auto shutoff *</td>
</tr>
<tr>
<td>4-204.121 Vending machines for liquids equipped with drains, internal waste receptacle, &amp; automatic shutoff</td>
</tr>
<tr>
<td>4-204.122 Case lot handling equipment movable by hand, hand trucks, or forklifts</td>
</tr>
<tr>
<td>4-204.123 Vending machine doors/openings tight-fitting</td>
</tr>
<tr>
<td>4-302.11 Dispensing utensils provided for each container of food at a consumer self-service unit</td>
</tr>
<tr>
<td>4-401.11 Equipment, washers/dryers, linen, &amp; storage cabinets properly located</td>
</tr>
<tr>
<td>4-402.11 Fixed or counter-mounted equipment properly spaced or sealed</td>
</tr>
<tr>
<td>4-402.12 Fixed or counter-mounted equipment properly elevated or sealed</td>
</tr>
<tr>
<td>4-501.11 Equipment in good repair &amp; adjusted per manufacturer's specs</td>
</tr>
<tr>
<td>Code Section</td>
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</tr>
<tr>
<td>4-501.12</td>
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<tr>
<td>4-501.13</td>
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<tr>
<td>4-502.11(A &amp; C)</td>
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<td>4-603.11</td>
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<td>4-603.17</td>
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<tr>
<td>4-902.11</td>
</tr>
<tr>
<td>4-902.12</td>
</tr>
</tbody>
</table>

### 46. Warewashing facilities, installed, maintained, used, test strips

Adequate warewashing facilities must be available and used for the cleaning and sanitization of food-contact surfaces, including the availability of means to monitor its' use and the effectiveness of sanitization. Observation of manual and mechanical warewashing methods are made to assess the procedure for cleaning and sanitizing equipment and utensils.

**Applicable Code Sections:**
- 4-203.13 Hot water pressure devices accurate to ± 2 pounds per square inch
- 4-204.113 - .116 Data plate/baffles/thermometers on warewashing machines; heater/basket present for manual heat sanitization
- 4-204.117 Warewashing machine equipped with means to verify dispensing of detergents & sanitizers
- 4-204.118 - .120 Pressure device on machines with hot water sanitizing rinse; sinks, drainboards, compartments self-draining
- 4-301.12 3 compartment sink large enough to immerse largest utensil
- 4-301.13 Adequate drainboards provided
- 4-302.13 -.14 Thermometer for testing sanitizing water temperature &/or test kit for measuring sanitizer concentration provided
- 4-501.14 Warewashing equipment cleaned before use & every 24 hours
- 4-501.15 Warewashing machine operated per data plate
- 4-501.16 Warewashing sinks cleaned & sanitized before & after use for washing food or wiping cloths
- 4-501.17 Cleaning agents used for washing utensils in accordance with manufacturer's instructions
- 4-501.18 Wash, rinse & sanitize solutions maintained clean
- 4-501.19 Manual wash temperature maintained ≥110°F
- 4-501.110 Wash temperature requirement met for warewashing machine based on machine type
- 4-501.116 Concentration of sanitizer solution determined by use of test kit
- 4-603.12 Equipment/utensils precleaned before washing
- 4-603.13 Soiled items properly loaded into warewashing machines
- 4-603.14 Equipment food-contact surfaces & utensils effectively washed
- 4-603.15 Fixed equipment & equipment too large for warewashing sink/machine washed by approved alternative method
- 4-603.16 Utensils & equipment rinsed after washing

### 47. Non-food-contact surfaces clean

Observations should be made to determine if the frequency of cleaning is adequate to prevent soil accumulations on non-food-contact surfaces.

**Applicable Code Sections:**
- 4-601.11(B) - Equipment maintained free of encrusted (C) grease/soil deposits
- 4-602.13 Non-food-contact surfaces cleaned at frequency to prevent build-up of residue

### 48. Physical Facilities

Regardless of the supply system, the distribution of water to the facility must be protected and operated according to LAW. Adequate pressure is to be maintained at all fixtures during peak demand including the capacity to provide hot water at peak hot water demand.

**Applicable Code Sections:**
49. **Plumbing installed; proper backflow devices**

The observation of an approved plumbing system, installed and maintained, including the equipment and devices connected to the potable water supply, is necessary to determine whether a violation exists. An assessment of the layout of the establishment and the water distribution system is made to determine if there are any points at which the potable water supply is subject to contamination or is in disrepair.

**Applicable Code Sections:**
- 5-101.12 Drinking water system flushed & disinfected after repair or emergency*
- 5-201.11 Plumbing system constructed of approved materials*
- 5-202.11 Plumbing system designed, constructed & installed according to law*
- 5-202.13 Air gap provided between water supply inlet & flood level rim of plumbing fixture*
- 5-202.14 Backflow prevention device designed per approved standards
- 5-202.15 Water filter/screen/water conditioning device installed to allow ease of cleaning
- 5-203.13 Service sink available for cleaning of mops & disposal of liquid waste
- 5-203.14 Backflow prevention device or air gap provided on plumbing fixtures as required*
- 5-203.15 Backflow prevention device on carbonator with no air gap*
- 5-204.12 -.13 Backflow prevention devices/conditioning devices located to allow service/maintenance
- 5-205.12 No cross connection between drinking & non-drinking water*
- 5-205.13 Water treatment device inspected & serviced
- 5-205.14 Water reservoir of fogging devices maintained & cleaned*
- 5-205.15 Plumbing system maintained in good repair*
- 5-301.11 Mobile water tank constructed of safe, durable, finished materials
- 5-302.11 -.16 Mobile water tank sloped to drain & designed to allow inspection & cleaning
- 5-303.11 -.13 Mobile water tank designed with cover for water inlet/outlet & dedicated hose connection

50. **Sewage and waste water properly disposed**

There are two types of systems: public SEWAGE treatment plant and an individual SEWAGE disposal system. Observations of the facilities overall sewage and wastewater system is necessary to determine if a violation exists. Indications that a system is not functioning properly may include the presence of sewage back-up into the establishment or outdoors on the ground. Condensate drippage and other nonSEWAGE wastes must be drained to a system in accordance to LAW, and backflow prevention, if required, installed between the SEWAGE system and drain of equipment holding food or utensils. Mobile wastewater holding tanks must also be assessed for capacity and maintenance.

**Applicable Code Sections:**
- 5-304.11 -.14 Water tank/pump/hoses properly disinfected & handled * Backflow prevention in place; waste water properly disposed
- 5-401.11 Mobile holding tank adequately sized for capacity & sloped to drain
- 5-402.11 Backflow prevention – no direct connection between sewage system & food equipment*
- 5-402.12 -.13 Grease trap located to allow ease of cleaning; Sewage conveyed through approved sanitary sewage system*
- 5-402.14 -.15 Mobile establishment waste removed through approved removal procedure; waste retention tank flushed in a sanitary manner
- 5-403.11 -.12 Approved sewage disposal system used for waste disposal* Other liquid wastes drained to disposal per law

51. **Toilet facilities: properly constructed, supplied, clean**

A toilet facility should be assessed to determine if the number of fixtures are adequate, and that toilet tissue and a covered trash receptacle (ladies room only) are provided, fixtures are not being kept clean and the door self closes to prevent recontamination of hands and attractant of insects.
Garbage/refuse properly disposed; facilities maintained

The assessment of the refuse collection and disposal areas for proper receptacles and maintenance is necessary to determine whether a violation exists. Since refuse areas may attract and harbor insects and pests, as well as create a public health nuisance, particular attention must be paid to the maintenance of the refuse facilities and area.

Physical facilities installed, maintained, and clean

Observations are made of the overall conditions or practices related to the physical facility (materials used, good repair and maintained). It is important that a general assessment is made in determining the level of compliance, such as in an isolated incident versus trend, and of the potential public health impact involved. Storage of maintenance tools, use of laundry facilities, if applicable, disposal of mop water and separate living/sleeping quarters are included in this section.
### 6-201.13
Floor to wall junctures coved; Water-flushed floors provided with drains & graded to drain

### 6-201.14 .15
Carpeting not in areas subject to moisture; Mats/duckboards removable & easily cleanable

### 6-201.16 .18
Wall & ceiling coatings/attachments easily cleanable; Studs unexposed in areas subject to moisture

### 6-202.17 .19
Overhead protection at outdoor vending & servicing areas; Outdoor walking/driving surfaces graded to drain

### 6-202.111 .112
Living/sleeping quarters not used for food establishment operations; living/sleeping quarters on the premises separated from food operation

### 6-501.11 .12
Physical facilities maintained in good repair & cleaned as often as necessary to keep them clean

### 6-501.13
Floors cleaned by dustless methods

### 6-501.15
Mop water/maintenance tools not put in prep, handwashing, or warewashing sinks *

### 6-501.16
Mops allowed to air dry after use

### 6-501.17
Sawdust/wood shavings/granular salt/clay not used on floors

### 6-501.113 .114
Maintenance tools properly stored; premises free of unnecessary items/litter

## 54. Adequate ventilation and lighting; designated areas used

Observations should be made to ensure that the ventilation is adequately preventing an accumulation of condensation, grease or other soil from potentially contaminating food and the surrounding environment and that lights are at an adequate light intensity, and personal belongings are properly stored to maintain clean and sanitary facility and protect food and equipment.

### Applicable Code Sections:

<table>
<thead>
<tr>
<th>Code Section</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-202.18</td>
<td>Ventilation filters designed for ease of cleaning &amp; maintenance</td>
</tr>
<tr>
<td>4-204.11</td>
<td>Ventilation hood designed to prevent condensate from dripping onto food/equipment</td>
</tr>
<tr>
<td>4-301.14</td>
<td>Ventilation hood adequate to prevent grease &amp; condensation build-up</td>
</tr>
<tr>
<td>6-202.12</td>
<td>Heating/ventilation/air conditioning units properly designed to prevent contamination</td>
</tr>
<tr>
<td>6-304.11</td>
<td>Mechanical ventilation of adequate capacity to remove steam, heat, vapors, odors, smoke, fumes</td>
</tr>
<tr>
<td>6-501.14</td>
<td>Ventilation system cleaned in way not to cause contamination or create a public health hazard</td>
</tr>
<tr>
<td>6-202.11</td>
<td>Protective shielding on light bulbs over exposed food/utensils/equipment</td>
</tr>
<tr>
<td>6-303.11</td>
<td>Lighting intensity adequate in food prep, storage, &amp; service areas</td>
</tr>
<tr>
<td>6-305.11</td>
<td>Dressing rooms designated if employees change on-site; Lockers provided for employees</td>
</tr>
<tr>
<td>6-403.11</td>
<td>Designated areas for employees for eating / drinking/smoking</td>
</tr>
<tr>
<td>6-501.110</td>
<td>Designated dressing rooms/lockers used by employees</td>
</tr>
</tbody>
</table>
Committee Charge(s):

1. Address issues identified in the CFP Program Standard Committee Report to the 2006 Biennial Meeting (Refer to Issue 2006 II-018).
2. Work with the FDA Clearinghouse Committee to clarify and address language issues.
3. Deal with issues brought forth by other CFP committees regarding the Program Standards.

Committee Membership (Name, Constituency, Employer and Email):

<table>
<thead>
<tr>
<th>Name</th>
<th>Constituency (Fed, State, Local, Industry, Consumer, Academia, Other)</th>
<th>Employer</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Byron Beerbower</td>
<td>State</td>
<td>Michigan Dept of Ag, Food and Dairy Division</td>
<td><a href="mailto:beerbowerb@michigan.gov">beerbowerb@michigan.gov</a></td>
</tr>
<tr>
<td>Ron Klein</td>
<td>State</td>
<td>Alaska Department of Environmental Conservation</td>
<td><a href="mailto:Ron.klein@alaska.gov">Ron.klein@alaska.gov</a></td>
</tr>
<tr>
<td>John Luke</td>
<td>State</td>
<td>Mississippi Department of Health</td>
<td><a href="mailto:John.luke@msdh.state.ms.us">John.luke@msdh.state.ms.us</a></td>
</tr>
<tr>
<td>David Read</td>
<td>State</td>
<td>Minnesota Dept of Ag, Dairy and Food Inspection Division</td>
<td><a href="mailto:David.read@state.mn.us">David.read@state.mn.us</a></td>
</tr>
<tr>
<td>Mark Sestak</td>
<td>State</td>
<td>Alabama Dept of Public Health</td>
<td><a href="mailto:msestak@adph.state.al.us">msestak@adph.state.al.us</a></td>
</tr>
<tr>
<td>Dianne Worzolla</td>
<td>State</td>
<td>Florida DBPR – Div of Hotels and Restaurants</td>
<td><a href="mailto:Dianne.worzalla@dbpr.state.fl.us">Dianne.worzalla@dbpr.state.fl.us</a></td>
</tr>
<tr>
<td>Tomeji Miller</td>
<td>Local</td>
<td>City of Plano Health Dept</td>
<td><a href="mailto:tomejim@plano.gov">tomejim@plano.gov</a></td>
</tr>
<tr>
<td>Keith Winkler</td>
<td>Local</td>
<td>Kings County Health Dept</td>
<td><a href="mailto:Keith.winkler@co.kings.ca.us">Keith.winkler@co.kings.ca.us</a></td>
</tr>
<tr>
<td>Tony Carotenuto</td>
<td>Federal</td>
<td>Navy Environmental Health Center</td>
<td><a href="mailto:anthony.carotenuto@med.navy.mil">anthony.carotenuto@med.navy.mil</a></td>
</tr>
<tr>
<td>April Shaw</td>
<td>Federal</td>
<td>FDA/ORA/SWR</td>
<td><a href="mailto:April.shaw@fda.hhs.gov">April.shaw@fda.hhs.gov</a></td>
</tr>
<tr>
<td>Heidi J. Shaw</td>
<td>Professional Association</td>
<td>Credentialing Coordinator, NEHA</td>
<td><a href="mailto:hshaw@neha.org">hshaw@neha.org</a></td>
</tr>
<tr>
<td>Liza Frias</td>
<td>Industry</td>
<td>Supervalu, Albertsons</td>
<td><a href="mailto:Liza.frias@supervalu.com">Liza.frias@supervalu.com</a></td>
</tr>
</tbody>
</table>

Progress Report/Committee Activities:

The 2006-2008 Program Standards Committee has met on a regular basis to discuss issues brought forth by the FDA Clearinghouse Committee. There were three issues that were brought to this committee for discussion and recommendation to the Conference.

Issue #1 - Program Standard No. 5 – Overview and recommendation

The Clearinghouse Workgroup in reviewing Standard No. 5 wanted our recommendation on whether or not data for Trend Analysis listed under item number seven (7) of the Standard intended to include “all” foodborne illness or injury complaints (even if the complaints were
unsubstantiated or they were not resulting from outbreaks). To assist in our review, the Clearinghouse proposed the following terms:

**Foodborne Disease Outbreak** – Means the occurrence of two or more cases of a similar illness resulting from the ingestion of a common food.

**Confirmed Foodborne Disease Outbreak** – Means a foodborne disease outbreak in which laboratory analysis of appropriate specimens identifies a causative agent and epidemiologic analysis implicates the food as the source of the illness or epidemiological analysis alone implicates the food as the source of the illness.

**Suspect Foodborne Outbreak** – Means an incident in which two or more persons experience a similar illness after ingestion of a common food or eating at a common food establishment/gathering.

**Food-related Injury** – Means an injury from ingesting food containing a physical hazard such as bone, glass or wood.

Clearinghouse justification for inclusion of all these categories in the annual review:

There are a number of reasons for including all these categories in any annual review of incidents contained in a complaint log or database. If only confirmed foodborne disease outbreaks are included in the review, then a large number of incidents are automatically excluded from the review. There are many instances where investigators know from associated facts that some form of food-related event has taken place, but agents are not identified and/or the incident is made known too far after the occurrence to gather all the relevant data needed to categorize the event as confirmed.

The purpose of the annual review is to provide an opportunity to look back and determine whether general food program inspection and intervention programs should be modified to help eliminate the observed problems. The value of reviewing foodborne disease outbreaks, suspect foodborne outbreaks and food-related injuries is two fold. First, the examination of foodborne disease outbreaks, including confirmed and suspect foodborne outbreaks and food-related injuries can and should trigger a review of the epidemiological investigations. It is from this review that areas for improvement in either investigation techniques or role and coordination functions are revealed. Second, a general data review may link a series of cases, which initially appeared unrelated, and may reveal clues valuable in future investigations.

To include only confirmed foodborne disease outbreaks in the annual review would eliminate many Standards' participants from performing any review of data. Under-reporting of foodborne illnesses and passive surveillance systems result in few or no confirmed disease outbreaks in many jurisdictions. It is advantageous for public health to advocate as broad an annual review as is practical and constructive.

After the committee reviewed and discussed this over several meetings, the committee recommends the following changes be made to Standard No. 5- Foodborne Illness and Food Security Preparedness and Response (Attachment No. I)

**Issue #2 was related to language contained in Standard No. 1 – Regulatory Foundation.**

The question that was posed to the Program Standards Committee was related to which version of the Food Code would be acceptable for a jurisdiction to be compliant with Program Standard No. 1 and what timeline would be acceptable as the jurisdiction updates their regulations. The committee discussed and reviewed the recommendations by the Clearinghouse Committee.
The committee recommends that the following changes be made to Standard No. 1 – Regulatory Foundation (Attachment No. II).

**Issue #3 was related to the proposed definition changes to the Definitions contained within the Standards.**

The Clearinghouse requested that the committee review proposed changes to the Definitions section within the Standards. The terms that were included as part of the proposed change for Standard No. 5 have been included in these proposed changes. The committee recommends that the following changes be made to “Definitions” (Attachment No. III).

**Other Business:**

The FDA has asked this Committee to provide input on the utility of a Program Standards Resource Disk. The Disk was recently developed by FDA, and FDA intends to make the initial version available for use by enrolled jurisdictions. FDA anticipates that enrolled jurisdictions will derive real benefit from the Disk as a tool to facilitate the self-assessment and verification audit processes. FDA also anticipates that improvements to the disk may be necessary after jurisdictions begin using it and believes that input from the CFP Program Standards Committee would be helpful in ensuring the maximum usefulness of the Disk.

FDA’s own internal workgroup plans to work closely with the CFP Program Standards Committee to develop a framework for obtaining feedback on the scope and utility of the Disk and to consider what, if any, changes to the Disk or to identify changes necessary in the Program Standards themselves to further enhance the self-assessment and verification audit processes used by enrolled jurisdictions.

**Requested Board/Other Actions:**

The Program Standards committee will submit four (4) issues at the 2008 biennial meeting based on the recommendations of the committee. The issues are:

• Request that language changes be accepted and made to Standard No. 5- Foodborne Illness and Food Security Preparedness and Response (Attachment No. I).
• Request that language changes be accepted and made to Standard No. 1 – Regulatory Foundation (Attachment No. II).
• Request that language changes be accepted and made to the “Definitions” portion of the Program Standards (Attachment No. III), and
• Request that the Program Standards Committee’s report be acknowledged, committee members acknowledged for their contributions and re-create the committee to continue working with the Clearinghouse.

**Recommendation(s) for future charge:**

The Committee recommends the re-creation of a 2008-2010 Program Standards Committee following to:

1. Serve as a stakeholder group to provide input to an FDA internal working group which will be considering administrative functions such as
   • The frequency of revision of the Program Standards document
   • Effective dates/timeframes for meeting new requirements of the Standards
   • Dissemination of changes to the Program Standards document and supporting tools and training materials
   • Mechanisms for encouraging timely self-assessments and audits by enrolled jurisdictions
- Mechanisms for making changes to the PS documents
2. Formulate resolutions to issues brought before the Committee for language changes to the Program Standards prior to the 2010 CFP biennial meeting.
STANDARD 5 - FOODBORNE ILLNESS AND FOOD SECURITY PREPAREDNESS AND RESPONSE

This standard applies to the surveillance, investigation, response, and subsequent review of alleged food-related incidents and emergencies, either unintentional or deliberate, which result in illness, injury and outbreaks.

Requirement Summary

The program has an established system to detect, collect, investigate and respond to complaints and emergencies that involve foodborne illness, injury, and intentional and unintentional food contamination.

Description of Requirement

1. Investigative Procedures

a. The program has written operating procedures for responding to and/or conducting investigations of foodborne illness and food-related injury. The procedures clearly identify the roles, duties and responsibilities of program staff and how the program interacts with other relevant departments and agencies. The procedures may be contained in a single source document or in multiple documents.

b. The program maintains contact lists for individuals, departments, and agencies that may be involved in the investigation of foodborne illness, food-related injury or contamination of food.

c. The program maintains a written operating procedure or a Memorandum of Understanding (MOU) with the appropriate epidemiological investigation program/department to conduct foodborne illness investigations and to report findings. The operating procedure or MOU clearly identifies the roles, duties and responsibilities of each party.

d. The program maintains logs or databases for all complaints or referral reports from other sources alleging food-related illness, food-related injury or intentional food contamination. The final disposition for each complaint is recorded in the log or database and is filed in or linked to the establishment record for retrieval purposes.

e. Program procedures describe the disposition, action or follow-up and reporting required for each type of complaint or referral report.

f. Program procedures require disposition, action or follow-up on each complaint or referral report alleging food-related illness or injury within 24 hours.

g. The program has established procedures and guidance for collecting information on the suspect food's preparation, storage or handling during on-site investigations of food-related illness, food-related injury, or outbreak investigations

h. Program procedures provide guidance for immediate notification of appropriate law enforcement agencies if at any time intentional food contamination is suspected.

i. Program procedures provide guidance for the notification of appropriate state and/or federal agencies when a complaint involves a product that originated outside the agency's jurisdiction or has been shipped interstate.

2. Reporting Procedures
a. Possible contributing factors to the food-related illness, food-related injury or intentional food contamination are identified in each on-site investigation report.

b. The program shares final reports of investigations with the state epidemiologist and reports of confirmed foodborne disease outbreaks with CDC.

3. Laboratory Support Documentation

a. The program has a letter of understanding, written procedures, contract or MOU acknowledging, that a laboratory(s) is willing and able to provide analytical support to the jurisdiction’s food program. The documentation describes the type of biological, chemical, radiological contaminants or other food adulterants that can be identified by the laboratory. The laboratory support available includes the ability to conduct environmental sample analysis, food sample analysis and clinical sample analysis.

b. The program maintains a list of alternative laboratory contacts from which assistance could be sought in the event that a food-related emergency exceeds the capability of the primary support lab(s) listed in paragraph 3.a. This list should also identify potential sources of laboratory support such as FDA, USDA, CDC, or environmental laboratories for specific analysis that cannot be performed by the jurisdiction’s primary laboratory(s).

4. Trace-back Procedures

a. Program management has an established procedure to address the trace-back of foods implicated in an illness, outbreak or intentional food contamination. The trace-back procedure provides for the coordinated involvement of all appropriate agencies and identifies a coordinator to guide the investigation. Trace-back reports are shared with all agencies involved and with CDC.

5. Recalls

a. Program management has an established procedure to address the recall of foods implicated in an illness, outbreak or intentional food contamination.

b. When the jurisdiction has the responsibility to request or monitor a product recall, written procedures equivalent to 21 CFR, Part 7 are followed.

c. Written policies and procedures exist for verifying the effectiveness of recall actions by firms (effectiveness checks) when requested by another agency.

6. Media Management

a. The program has a written policy or procedure that defines a protocol for providing information to the public regarding a foodborne illness outbreak or food safety emergency. The policy/procedure should address coordination and cooperation with other agencies involved in the investigation. A media person is designated in the protocol.

7. Trend Analysis - Data Review and Analysis

a. At least once per year, the program conducts a review of the data in the complaint log or database and the foodborne illness and food-related injury investigations to identify trends and possible contributing factors that are most likely to cause foodborne illness or food-related injury. These periodic reviews of multiple complaints and contributing factors foodborne illnesses may suggest a need for further investigations and may suggest steps for illness prevention.
b. The review is conducted with prevention in mind and focuses on, but is not limited to, the following:

1) **Multiple complaints on the same Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks in a single establishment**;

2) **Multiple complaints Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks in on the same establishment type**;

3) **Multiple complaints Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks implicating the same food**;

4) **Multiple complaints Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks associated with similar food preparation processes**;

5) **Number of laboratory confirmed, food-related outbreaks confirmed foodborne disease outbreaks**;

6) **Number of non-laboratory confirmed but epidemiologically linked, food-related outbreaks foodborne disease outbreaks and suspect foodborne disease outbreaks**;

7) **Contributing factors most often identified**;

8) **Number of complaints involving real and alleged threats of intentional food contamination**; and

9) **Multiple Number of complaints involving the same agent and any complaints involving unusual agents when agents are identified**.

c. In the event that there have been no food-related illness or food-related injury outbreak investigations conducted during the twelve months prior to the trend analysis data review and analysis, program management will plan and conduct a mock foodborne illness investigation to test program readiness. The mock investigation should simulate response to an actual illness confirmed foodborne disease outbreak and include on-site inspection, sample collection and analysis. A mock investigation must be completed at least once per year when no illness foodborne disease outbreak investigations occur.

**Outcome**

A food regulatory program has a systematic approach for the detection, investigation, response, documentation and analysis of alleged food-related incidents that involve illness, injury, unintentional or deliberate food contamination.

**Documentation**

The quality records required to meet this standard include:

1. Logs or databases of alleged food-related illness and food-related injury complaints maintained and current.
2. Collection forms specified in the operating procedures
3. Investigation reports of alleged food-related illness, food-related injury, or incidents. Reports are retrievable by implicated establishment name.
4. The written procedures, contracts or MOU's with the supporting laboratories.
5. The procedure addressing the trace-back of food products implicated in an illness, outbreak, or contamination event
6. 21 CFR, Part 7, or written procedures equivalent to 21 CFR, Part 7 for recalls.
7. Completed copies of the annual trend review and data analysis (after 12 months of data).
8. Current written media policy/procedure and contact person.
9. The contact list for communicating with all relevant agencies.
10. Portions of any emergency response relevant to food safety and security.
STANDARD NO. 1 REGULATORY FOUNDATION

This standard applies to the regulatory foundation used by a retail food program. Regulatory foundation includes any statute, regulation, rule, ordinance, or other prevailing set of regulatory requirements that governs the operation of a retail food establishment.

Requirement Summary

The regulatory foundation includes provisions for:

1. The public health interventions contained in the current published edition of the Food Code or one of the two most recent previous editions of the Food Code;
2. Control measures for the risk factors known to contribute to foodborne illness;
3. Good Retail Practices (GRP’s) at least as stringent as the Food Code edition as specified in 1;
4. Compliance and enforcement at least as stringent as the selected provisions from Food Code and Annex 1 of the Food Code edition as specified in 1.

Description of Requirement

A. Food Code Interventions and Risk Factor Control Measures

The regulatory foundation contains provisions that are at least as stringent as the public health interventions and the provisions that control risk factors known to contribute to foodborne illness contained in the current published edition of the Food Code or one of the two most recent previous editions of the Food Code. Jurisdictions that meet Standard No. 1 but who may become noncompliant due to the release of a new edition of the Code are considered to continue meeting the Standard for a period of two years from the release date of the new Code edition in order to complete the process of updating its regulations. To meet this element of the Standard, regulations must have a corresponding requirement for the Food Code sections as listed in Appendix A, Table A-1 and summarized in Table A-2, from #1 "Demonstration of Knowledge" through #11 "Highly Susceptible Populations." For initial listing, the regulatory foundation must contain at least 9 of the 11 interventions and risk factor controls. In order to meet fully the requirements of the Standard, the regulatory foundation must meet all 11 of the interventions and risk factor controls by the second audit.

B. Good Retail Practices

The regulations contain provisions that address Good Retail Practices that are at least as stringent as those described in the edition of the Food Code as specified in A. To meet this element of the Standard, regulations must have a corresponding requirement for 95 percent of the Food Code sections as listed in Appendix A, Table A-3 and summarized in Table A-4, from #12 "Personnel" through #37 "Variance for Smoking."

C. Compliance and Enforcement

The regulations contain provisions that address Compliance and Enforcement requirements that are at least as stringent as those contained in the edition of the Food Code as specified in A. To meet this element of the Standard, regulations must have a corresponding requirement for each of the Food Code sections as listed in Appendix A, Table A-5, items 1 through 135; except item 12, Legal Remedies, where only one of the sections pertaining to criminal, injunctive, or civil penalties is required.

Outcome
The desired outcome of this standard is the adoption of a sound, science-based regulatory foundation for the public health program and the uniform regulation of industry.

Documentation

The quality records needed for this standard are:

1. The statute, regulation, rule, ordinance or other prevailing set of regulatory requirements that govern the operation of a retail food establishment; and
2. The completed Appendix A and its accompanying tables.
Voluntary Retail Food Regulatory Program Standards

The following definitions apply in the interpretation and application of these Standards.

1. **Active Managerial Control** - Implementation and supervision of food safety practices to control risk factors by the person in charge. The purposeful incorporation of specific actions or procedures by industry management into the operation of a business to attain control over foodborne illness risk factors.

2. **Auditor** - An FDA Certified Evaluation Officer (CEO), or any authorized city, county, district, state, federal, tribal or other third party person who has no responsibilities for the day-to-day operations of that jurisdiction and is charged with conducting a verification audit, which confirms the accuracy of the self assessment.

3. **Baseline Survey** - Establishment of a database that measures the occurrence of the CDC-identified foodborne illness risk factors within the retail segment of the food industry in accordance with the "FDA Retail Food Program Database of Foodborne Illness Risk Factors Report" and FDA Baseline Data Collection Form. See Risk Factor Study.

4. **Baseline Survey Update** - data collected to update the initial baseline survey.

5. **Candidate** - a regulatory officer whose duties include the inspection of retail food establishments.

6. **Compliance and Enforcement** - Compliance includes all voluntary or involuntary conformity with provisions set forth by the regulatory authority to safeguard public health and ensure that food is safe. Enforcement includes any legal and/or administrative procedures taken by the regulatory authority to gain compliance.

7. **Confirmed Foodborne Disease Outbreak** – means a foodborne disease outbreak in which laboratory analysis of appropriate specimens identifies a causative agent and epidemiologic analysis implicates the food as the source of the illness or epidemiological analysis alone implicates the food as the source of the illness.

8. **Direct Regulatory Authority (DRA)** - the organizational level of government that is immediately responsible for the management of the retail program. This may be at the city, county, district, state, federal or tribal level.

9. **Enforcement Actions** - actions taken by the regulatory authority such as, but not limited to, warning letters, revocation or suspension of permit, court actions, monetary fines, hold orders, destruction of food, etc., to correct a violation found during an inspection.

10. **FDA Certified Evaluation Officer (CEO)** - A person, usually a state employee, who has successfully completed the FDA requirements for certification as an evaluator of retail food safety programs.

11. **Follow-up Inspection** - an inspection conducted after the initial routine inspection to confirm the correction of a violation(s).

12. **Food Code Interventions** - the preventive measures included in the *FDA Food Code* to protect consumer health stated below:
   1. management's demonstration of knowledge;
   2. employee health controls;
   3. controlling hands as a vehicle of contamination;
   4. time / temperature parameters for controlling pathogens; and
5. consumer advisory.

11. **Food-Related Injury** - Means an injury from ingesting food containing a physical hazard such as bone, glass or wood.

12. **Foodborne Disease Outbreak** – means the occurrence of two or more cases of a similar illness resulting from the ingestion of a common food.

13. **Good Retail Practices (GRP’s)** - preventive measures that include practices and procedures to effectively control the introduction of pathogens, chemicals, and physical objects into food, that are prerequisites to instituting a HACCP or Risk Control Plan and are not addressed by the *Food Code* interventions or risk factors.

14. **Hazard** - a biological, chemical or physical property that may cause an unacceptable consumer health risk, food to be unsafe for human consumption.

15. **National Registry of Retail Food Protection Programs (National Registry)** - A listing of retail food safety programs that have voluntarily enrolled as participants in the *Voluntary National Retail Food Regulatory Program Standards*.

16. **Person in charge (PIC)** - the individual present at a food establishment who is responsible for the operation at the time of inspection.

17. **Program Element** - One of the program areas for which a National Standard has been established such as regulations, training, inspection system, quality assurance, foodborne illness investigation, compliance and enforcement, industry and consumer relations, and program resources.

18. **Program Manager** - the individual responsible for the oversight and management of a regulatory retail food program.

19. **Quality Records** - Documentation of specific elements of program compliance with the National Standards as specified in each Standard.

20. **Risk Control Plan (RCP)** - a short plan based on HACCP principles designed to control a specific risk factor, a concisely written management plan developed by the retail or food service operator with input from the health inspector that describes a management system for controlling specific out-of-control risk factors.

21. **Risk Factors** – the improper employee behaviors or improper practices or procedures in retail food and food service establishments stated below which are most frequently identified by epidemiological investigation as a cause of contributing to foodborne illness or injury:
   1. improper holding temperature;
   2. inadequate cooking;
   3. contaminated equipment;
   4. food from unsafe source; and
   5. poor personal hygiene.

22. **Risk Factor Study** (formerly Baseline Survey) - A study on the occurrence of foodborne illness risk factors within institutional, foodservice, restaurants, and retail food facility types under a jurisdiction’s regulatory authority. A study serves two purposes:
   1. To identify risk factors most in need of priority attention in order to develop strategies to reduce their occurrence.
   2. To evaluate trends over time to determine whether progress is being made toward reducing the occurrence of foodborne illness risk factors. Studies designed to measure trends require analysis of data over a period of time, and no single point in time can be used to derive trend conclusions.

Risk Factor Studies must include at a minimum:
- Data collection, analysis and a written report,
- A collection instrument with data items pertaining to the five foodborne illness risk factors,
- A collection instrument that uses the convention of IN, OUT, NA, and NO to document observations,
- All facility types identified by FDA’s national study that are under the jurisdictions
23. **Routine Inspection** - a full review and evaluation of a food establishment's operations and facilities to assess its compliance with Food Safety Law, at a planned frequency determined by the regulatory authority. This does not include re-inspections and other follow-up or special investigations.

24. **Self-Assessment** - An internal review by program management to determine whether the existing retail food safety program meets the National Standards.

25. **Standardization Inspection** - an inspection used to demonstrate a candidate's knowledge, communication skills, and ability to identify violations of all regulatory requirements and to develop a risk control plan for identified, uncontrolled risk factors.

26. **Suspect Foodborne Outbreak** – Means an incident in which two or more persons experience a similar illness after ingestion of a common food or eating at a common food establishment/gathering.

26. **Trainer** - an individual who has successfully completed the following training elements as explained outlined in Standard No 2 and is recognized by the program manager as having the field experience and communication skills necessary to train new employees. The training elements necessary are:
   1. Satisfactory completion of the pre-requisite courses,
   2. Completion of a minimum of 25 joint field training inspections, and
   3. Completion of 25 independent inspections and satisfactory completion of the remaining course curriculum.

27. **Training Standard** - a person who has successfully completed the following training elements as outlined explained in Standard No 2, has received further training by an FDA Standardized Inspection or Training Officer, and represents the regulatory agency position on all issues, and is recognized by the program manager as having field experience, communication skills, and knowledge of the program's policies and procedures necessary to conduct field standardization of other employees. The training elements necessary are:
   1. Satisfactory completion of the pre-requisite courses,
   2. Completion of a minimum of 25 joint field training inspections,
   3. Completion of 25 independent inspections and satisfactory completion of the remaining course curriculum, and
   4. Completion of a standardization process similar to the FDA standardization procedures.

28. **Verification Audit** - A systematic, independent examination by an external party to confirm the accuracy of the Self-Assessment.
PROPOSED CHANGES TO STANDARD NO. 5

STANDARD 5 - FOODBORNE ILLNESS AND FOOD SECURITY DEFENSE PREPAREDNESS AND RESPONSE

This standard applies to the surveillance, investigation, response, and subsequent review of alleged food-related incidents and emergencies, either unintentional or deliberate, which result in illness, injury and outbreaks.

Requirement Summary

The program has an established system to detect, collect, investigate and respond to complaints and emergencies that involve foodborne illness, injury, and intentional and unintentional food contamination.

Description of Requirement

1. Investigative Procedures

   a. The program has written operating procedures for responding to and/or conducting investigations of foodborne illness and food-related injury. The procedures clearly identify the roles, duties and responsibilities of program staff and how the program interacts with other relevant departments and agencies. The procedures may be contained in a single source document or in multiple documents.

   b. The program maintains contact lists for individuals, departments, and agencies that may be involved in the investigation of foodborne illness, food-related injury or contamination of food.

   c. The program maintains a written operating procedure or a Memorandum of Understanding (MOU) with the appropriate epidemiological investigation program/department to conduct foodborne illness investigations and to report findings. The operating procedure or MOU clearly identifies the roles, duties and responsibilities of each party.

   d. The program maintains logs or databases for all complaints or referral reports from other sources alleging food-related illness, food-related injury or intentional food contamination. The final disposition for each complaint is recorded in the log or database and is filed in or linked to the establishment record for retrieval purposes.

   e. Program procedures describe the disposition, action or follow-up and reporting required for each type of complaint or referral report.

   f. Program procedures require disposition, action or follow-up on each complaint or referral report alleging food-related illness or injury within 24 hours.
g. The program has established procedures and guidance for collecting information on the suspect food's preparation, storage or handling during on-site investigations of food-related illness, food-related injury, or outbreak investigations.

h. Program procedures provide guidance for immediate notification of appropriate law enforcement agencies if at any time intentional food contamination is suspected.

i. Program procedures provide guidance for the notification of appropriate state and/or federal agencies when a complaint involves a product that originated outside the agency's jurisdiction or has been shipped interstate.

2. **Reporting Procedures**

   a. Possible contributing factors to the food-related illness, food-related injury or intentional food contamination are identified in each on-site investigation report.

   b. The program shares final reports of investigations with the state epidemiologist and reports of confirmed foodborne disease outbreaks with CDC.

3. **Laboratory Support Documentation**

   a. The program has a letter of understanding, written procedures, contract or MOU acknowledging, that a laboratory(s) is willing and able to provide analytical support to the jurisdiction's food program. The documentation describes the type of biological, chemical, radiological contaminants or other food adulterants that can be identified by the laboratory. The laboratory support available includes the ability to conduct environmental sample analysis, food sample analysis and clinical sample analysis.

   b. The program maintains a list of alternative laboratory contacts from which assistance could be sought in the event that a food-related emergency exceeds the capability of the primary support lab(s) listed in paragraph 3.a. This list should also identify potential sources of laboratory support such as FDA, USDA, CDC, or environmental laboratories for specific analysis that cannot be performed by the jurisdiction's primary laboratory(s).

4. **Trace-back Procedures**

   a. Program management has an established procedure to address the trace-back of foods implicated in an illness, outbreak or intentional food contamination. The trace-back procedure provides for the coordinated involvement of all appropriate agencies and identifies a coordinator to guide the investigation. Trace-back reports are shared with all agencies involved and with CDC.

5. **Recalls**

   a. Program management has an established procedure to address the recall of foods implicated in an illness, outbreak or intentional food contamination.
b. When the jurisdiction has the responsibility to request or monitor a product recall, written procedures equivalent to 21 CFR, Part 7 are followed.

c. Written policies and procedures exist for verifying the effectiveness of recall actions by firms (effectiveness checks) when requested by another agency.

6. Media Management

a. The program has a written policy or procedure that defines a protocol for providing information to the public regarding a foodborne illness outbreak or food safety emergency. The policy/procedure should address coordination and cooperation with other agencies involved in the investigation. A media person is designated in the protocol.

7. Trend Analysis - Data Review and Analysis

a. At least once per year, the program conducts a review of the data in the complaint log or database and the foodborne illness and food-related injury investigations to identify trends and possible contributing factors that are most likely to cause foodborne illness or food-related injury. These periodic reviews of multiple complaints and contributing factors foodborne illnesses may suggest a need for further investigations and may suggest steps for illness prevention.

b. The review is conducted with prevention in mind and focuses on, but is not limited to, the following:

1) Multiple complaints on the same Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks in a single establishment;

2) Multiple complaints Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks in on the same establishment type;

3) Multiple complaints Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks implicating the same food;

4) Multiple complaints Foodborne Disease Outbreaks, Suspect Foodborne Outbreaks and Confirmed Foodborne Disease Outbreaks associated with similar food preparation processes;

5) Number of laboratory-confirmed, food-related outbreaks confirmed foodborne disease outbreaks;

6) Number of non-laboratory-confirmed but epidemiologically linked, food-related outbreaks foodborne disease outbreaks and suspect foodborne disease outbreaks;

7) Contributing factors most often identified;
8) Number of complaints involving real and alleged threats of intentional food contamination; and

9) Multiple Number of complaints involving the same agent and any complaints involving unusual agents when agents are identified.

c. In the event that there have been no food-related illness or food-related injury outbreak investigations conducted during the twelve months prior to the trend analysis data review and analysis, program management will plan and conduct a mock foodborne illness investigation to test program readiness. The mock investigation should simulate response to an actual illness confirmed foodborne disease outbreak and include on-site inspection, sample collection and analysis. A mock investigation must be completed at least once per year when no illness foodborne disease outbreak investigations occur.

Outcome

A food regulatory program has a systematic approach for the detection, investigation, response, documentation and analysis of alleged food-related incidents that involve illness, injury, unintentional or deliberate food contamination.

Documentation

The quality records required to meet this standard include:

1. Logs or databases of alleged food-related illness and food-related injury complaints maintained and current.
2. Collection forms specified in the operating procedures.
3. Investigation reports of alleged food-related illness, food-related injury, or incidents. Reports are retrievable by implicated establishment name.
4. The written procedures, contracts or MOU's with the supporting laboratories.
5. The procedure addressing the trace-back of food products implicated in an illness, outbreak, or contamination event.
6. 21 CFR, Part 7, or written procedures equivalent to 21 CFR, Part 7 for recalls.
7. Completed copies of the annual trend review and data analysis (after 12 months of data).
8. Current written media policy/procedure and contact person.
9. The contact list for communicating with all relevant agencies.
10. Portions of any emergency response relevant to food safety and security.
STANDARD NO. 1 REGULATORY FOUNDATION

This standard applies to the regulatory foundation used by a retail food program. Regulatory foundation includes any statute, regulation, rule, ordinance, or other prevailing set of regulatory requirements that governs the operation of a retail food establishment.

Requirement Summary

The regulatory foundation includes provisions for:
1. The public health interventions contained in the current published edition of the Food Code or one of the two most recent previous editions of the Food Code;
2. Control measures for the risk factors known to contribute to foodborne illness;
3. Good Retail Practices (GRP's) at least as stringent as the Food Code edition as specified in 1; and
4. Compliance and enforcement at least as stringent as the selected provisions from Food Code and Annex 1 of the Food Code edition as specified in 1.

Description of Requirement

A. **Food Code Interventions and Risk Factor Control Measures**

The regulatory foundation contains provisions that are at least as stringent as the public health interventions and the provisions that control risk factors known to contribute to foodborne illness contained in the current published edition of the Food Code or one of the two most recent previous editions of the Food Code. Jurisdictions that meet Standard No. 1 but who may become noncompliant due to the release of a new edition of the Code are considered to continue meeting the Standard for a period of two years from the release date of the new Code edition in order to complete the process of updating its regulations. To meet this element of the Standard, regulations must have a corresponding requirement for the Food Code sections as listed in Appendix A, Table A-1 and summarized in Table A-2, from #1 "Demonstration of Knowledge" through #11 "Highly Susceptible Populations." For initial listing, the regulatory foundation must contain at least 9 of the 11 interventions and risk factor controls. In order to meet fully the requirements of the Standard, the regulatory foundation must meet all 11 of the interventions and risk factor controls by the second audit.

B. **Good Retail Practices**

The regulations contain provisions that address Good Retail Practices that are at least as stringent as those described in the edition of the Food Code as specified in A. To meet this element of the Standard, regulations must have a corresponding requirement for 95 percent of the Food Code sections as listed in Appendix A, Table A-3 and summarized in Table A-4, from #12 "Personnel" through #37 "Variance for Smoking."
C. Compliance and Enforcement

The regulations contain provisions that address Compliance and Enforcement requirements that are at least as stringent as those contained in the edition of the *Food Code* as specified in A. To meet this element of the Standard, regulations must have a corresponding requirement for each of the *Food Code* sections as listed in Appendix A, Table A-5, items 1 through 135; except item 12, Legal Remedies, where only one of the sections pertaining to criminal, injunctive, or civil penalties is required.

**Outcome**

The desired outcome of this standard is the adoption of a sound, science-based regulatory foundation for the public health program and the uniform regulation of industry.

**Documentation**

The quality records needed for this standard are:
1. The statute, regulation, rule, ordinance or other prevailing set of regulatory requirements that govern the operation of a retail food establishment; and
2. The completed Appendix A and its accompanying tables.
Proposed Changes to the Definitions within the Voluntary National Retail Food Program Standards

Voluntary Retail Food Regulatory Program Standards

The following definitions apply in the interpretation and application of these Standards.

1. **Active Managerial Control** - Implementation and supervision of food safety practices to control risk factors by the person in charge. The purposeful incorporation of specific actions or procedures by industry management into the operation of a business to attain control over foodborne illness risk factors.

2. **Auditor** - An FDA Certified Evaluation Officer (CEO), or any authorized city, county, district, state, federal, tribal or other third party person who has no responsibilities for the day-to-day operations of that jurisdiction and is charged with conducting a verification audit, which confirms the accuracy of the self assessment.

3. **Baseline Survey** - Establishment of a database that measures the occurrence of the CDC-identified foodborne illness risk factors within the retail segment of the food industry in accordance with the "FDA Retail Food Program Database of Foodborne Illness Risk Factors Report" and FDA Baseline Data Collection Form. See Risk Factor Study

4. **Baseline Survey Update** - Data collected to update the initial baseline survey.

4. **Candidate** - A regulatory officer whose duties include the inspection of retail food establishments.

5. **Compliance and Enforcement** - Compliance includes all voluntary or involuntary conformity with provisions set forth by the regulatory authority to safeguard public health and ensure that food is safe. Enforcement includes any legal and/or administrative procedures taken by the regulatory authority to gain compliance.

6. **Confirmed Foodborne Disease Outbreak** – means a foodborne disease outbreak in which laboratory analysis of appropriate specimens identifies a causative agent and epidemiologic analysis implicates the food as the source of the illness or epidemiological analysis alone implicates the food as the source of the illness.

7. **Direct Regulatory Authority (DRA)** - The organizational level of government that is immediately responsible for the management of the retail program. This may be at the city, county, district, state, federal or tribal level.

8. **Enforcement Actions** - Actions taken by the regulatory authority such as, but not limited to, warning letters, revocation or suspension of permit, court actions, monetary fines, hold orders, destruction of food, etc., to correct a violation found during an inspection.
9. **FDA Certified Evaluation Officer (CEO)** - A person, usually a state employee, who has successfully completed the FDA requirements for certification as an evaluator of retail food safety programs.

9. **Follow-up Inspection** - an inspection conducted after the initial routine inspection to confirm the correction of a violation(s).

10. **Food Code Interventions** - the preventive measures included in the *FDA Food Code* to protect consumer health stated below:
   1. management's demonstration of knowledge;
   2. employee health controls;
   3. controlling hands as a vehicle of contamination;
   4. time / temperature parameters for controlling pathogens; and
   5. consumer advisory.

11. **Food-Related Injury** - Means an injury from ingesting food containing a physical hazard such as bone, glass or wood.

12. **Foodborne Disease Outbreak** – means the occurrence of two or more cases of a similar illness resulting from the ingestion of a common food.

13. **Good Retail Practices (GRP’s)** - preventive measures that include practices and procedures to effectively control the introduction of pathogens, chemicals, and physical objects into food, that are prerequisites to instituting a HACCP or Risk Control Plan and are not addressed by the *Food Code* interventions or risk factors.

14. **Hazard** - a biological, chemical or physical property that may cause an unacceptable consumer health risk, food to be unsafe for human consumption.

15. **National Registry of Retail Food Protection Programs (National Registry)** - A listing of retail food safety programs that have voluntarily enrolled as participants in the *Voluntary National Retail Food Regulatory Program Standards*.

16. **Person in charge (PIC)** - the individual present at a food establishment who is responsible for the operation at the time of inspection.

17. **Program Element** - One of the program areas for which a National Standard has been established such as regulations, training, inspection system, quality assurance, foodborne illness investigation, compliance and enforcement, industry and consumer relations, and program resources.

18. **Program Manager** - the individual responsible for the oversight and management of a regulatory retail food program.

19. **Quality Records** - Documentation of specific elements of program compliance with the National Standards as specified in each Standard.

20. **Risk Control Plan (RCP)** - a short plan based on HACCP principles designed to control a specific risk factor—a concisely written management plan developed by the retail or food service operator with input from the health inspector that describes a management system for controlling specific out-of-control risk factors.

Proposed Changes to the Definitions within the Voluntary National Retail Food Program Standards
21. **Risk Factors** – the improper employee behaviors or improper practices or procedures in retail food and food service establishments stated below which are most frequently identified by epidemiological investigation as a cause or contributing to foodborne illness or injury:
   1. improper holding temperature;
   2. inadequate cooking;
   3. contaminated equipment;
   4. food from unsafe source; and
   5. poor personal hygiene.

22. **Risk Factor Study** (formerly Baseline Survey)—A study on the occurrence of foodborne illness risk factors within institutional, foodservice, restaurants, and retail food facility types under a jurisdiction’s regulatory authority. A study serves two purposes:
   1. To identify risk factors most in need of priority attention in order to develop strategies to reduce their occurrence.
   2. To evaluate trends over time to determine whether progress is being made toward reducing the occurrence of foodborne illness risk factors. Studies designed to measure trends require analysis of data over a period of time, and no single point in time can be used to derive trend conclusions.

Risk Factor Studies must include at a minimum:
- Data collection, analysis and a written report,
- A collection instrument with data items pertaining to the five foodborne illness risk factors,
- A collection instrument that uses the convention of IN, OUT, NA, and NO to document observations.
- All facility types identified by FDA’s national study that are under the jurisdictions regulatory authority, and
- Studies subsequent to the initial study repeated at 5-year intervals.

23. **Routine Inspection** - a full review and evaluation of a food establishment’s operations and facilities to assess its compliance with Food Safety Law, at a planned frequency determined by the regulatory authority. This does not include reinspections and other follow-up or special investigations.

24. **Self-Assessment** - An internal review by program management to determine whether the existing retail food safety program meets the National Standards.

25. **Standardization Inspection** - an inspection used to demonstrate a candidate’s knowledge, communication skills, and ability to identify violations of all regulatory requirements and to develop a risk control plan for identified, uncontrolled risk factors.

26. **Suspect Foodborne Outbreak** – Means an incident in which two or more persons experience a similar illness after ingestion of a common food or eating at a common food establishment/gathering.

27. **Trainer** - an individual who has successfully completed the following training elements as explained outlined in Standard No 2 and is recognized by the program.
manager as having the field experience and communication skills necessary to train new employees. The training elements necessary are:

1. Satisfactory completion of the pre-requisite courses,
2. Completion of a minimum of 25 joint field training inspections, and
3. Completion of 25 independent inspections and satisfactory completion of the remaining course curriculum.

28. Training Standard - a person who has successfully completed the following training elements as outlined explained in Standard No 2; has received further training by an FDA Standardized Inspection or Training Officer; and represents the regulatory agency position on all issues; and is recognized by the program manager as having field experience, communication skills, and knowledge of the program’s policies and procedures necessary to conduct field standardization of other employees. The training elements necessary are:

1. Satisfactory completion of the pre-requisite courses,
2. Completion of a minimum of 25 joint field training inspections,
3. Completion of 25 independent inspections and satisfactory completion of the remaining course curriculum, and
4. Completion of a standardization process similar to the FDA standardization procedures.

29. Verification Audit - A systematic, independent examination by an external party to confirm the accuracy of the Self-Assessment.
2008 Conference for Food Protection

Certification of Food Safety Regulation Professionals
Work Group Report

Prepared and Submitted By the Work Group’s Co-Chairs

John Marcello  Dr. David McSwane

BACKGROUND

The Conference for Food Protection (CFP) has progressed through multiple stages in the development of a nationally recognized process for training and standardizing regulatory Food Safety Inspection Officers (FSIO) responsible for institutional foodservice, restaurant, and retail food safety inspections. Much of this work is reflected in the criteria found in Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards (2007).

During the 2006 Conference, the Voting Delegates unanimously approved a training process for inclusion in Steps 1 and 2 of the Standard 2 criteria. This training process includes both pre-requisite coursework and field-training inspections. It is based on national research conducted by the CFP Certification of Food Safety Regulation Professionals (CFSRP) Work Group that identified the minimum competencies FSIOs should be able to demonstrate prior to conducting independent inspections of retail food and/or foodservice establishments. The CFSRP Work Group developed a guide and worksheets that provided retail food program managers a national model from which to design regulatory retail food training programs. The Guide to Conducting an Assessment of Training Needs for Regulatory Retail Food Inspection Officers (Guide) is available from the following CFP web link:


Jurisdictions do not have to be enrolled in the FDA Draft Voluntary National Retail Food Regulatory Program Standards to use, and benefit from, this training structure for preparing FSIOs to conduct independent inspections of retail food and/or foodservice facilities. One of the primary purposes for developing the Guide and Field Training Worksheets was to provide jurisdictions that do not have the staff resources or necessary funding to develop a comprehensive training process with a training structure that can readily be integrated into their existing regulatory retail food programs.

The training process outlined in the Guide represents the culmination of years of research and review by subject matter experts comprised of psychometricians and representatives from state and local regulatory retail food programs; industry trade associations; retail food and foodservice operations; academia; and the
F  FDA’s Office of Regulatory Affairs University (ORA U). Prior to the 2006 Conference, however, it had not been field tested by regulatory retail food protection programs.

The 2006 Conference charged the CFSRP Work Group with the responsibility for conducting an Assessment of Training Needs (ATN) pilot project. The project provided an opportunity to field test the FSIO training process. The data and feedback received from the project has been subsequently used by the Work Group to enhance the Guide and Field Training Worksheets to better reflect the regulatory retail food program training environment within which they are used.

This report summarizes the Work Group’s coordination of the ATN pilot project as well as its deliberation of Conference charge’s impacting the criteria in Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards (2007).

SUMMARY OF THE CONFERENCE CHARGES
The following tables provide a list of the Conference charges to the CFP CFSRP Work Group. Following these tables, a short summary of the actions taken by the Work Group to address each of these charges is provided.

- Administer and coordinate the CFP Assessment of Training Needs (ATN) pilot project.
- Analyze the results from the ATN pilot project and provide a report to the 2008 Conference that summarizes the projects results.
- Address issues identified in the CFP CFSRP Work Group report to the 2006 Conference.
  1. Determining whether there is a need to reassess the written examination options listed in Step 1 of Program Standard 2.
  2. Reassessing whether the Application Course options identified in Appendix B-1, Standard 2, should be listed as a required rather than recommended course.
  3. Clarifying the qualifications needed by individuals who are responsible for conducting an Assessment of Training Needs.
  4. Determining what impact lowering the minimum number of standardization inspections from 8 to 4 has on FDA’s process for scoring a candidate’s performance.
The Work Group received the following additional charge from the CFP Executive Board after the 2006 Conference.

- The Executive Board charges the Committee to discuss a solution that will address FDA’s responses to the two Issues regarding the incorporation of hiring practices into Standard 2 and report back to the 2008 Conference.

**CFSRP WORK GROUP RESPONSE TO EACH CHARGE**

- Administer and coordinate the CFP Assessment of Training Needs (ATN) pilot project.

Twenty-nine (29) state/local/tribal jurisdictions participated in the Assessment of Training Needs pilot project. The field test of the ATN forms and protocol was conducted by participating regulatory retail food programs from June, 2006 through July 2007. A standardized ‘Jurisdiction Pilot Project Feedback Form’ was used to collect data from all the participating jurisdictions and served as the basis for preparing the project report for submission to the Conference.

The CFSRP Work Group conducted a face-to-face meeting in Chicago, September 14-16, 2007, to discuss the data results and feedback from pilot project jurisdictions. Based on this meeting, the Work Group reached consensus on how to prepare the project report and what revisions were needed to improve the Guide for Conducting an Assessment of Training Needs and the Field Training Worksheets.

In addition, a focus group conference call of a representative sample of pilot project jurisdictions was conducted in November, 2007. The purpose of the focus group was to obtain additional feedback on whether the pilot project conclusions reached by the Work Group accurately reflected their experiences using the field-training process and worksheets.

- Analyze the results from the CFP ATN Pilot Project and provide a report to the 2008 Conference that summarizes the projects results.

**Pilot Project Report**

**NOTE:** The Work Group’s report summarizing the findings and feedback from the ATN Pilot project has been submitted to the 2008 Conference as a separate Issue titled:

**Assessment of Training Needs (ATN) Pilot Project Report**
A reprint of the table of contents for the pilot project report is presented below.

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*Revisions to the Content and Format for FSIO Training*

The Work Group has used the data and feedback from the pilot project to modify and revise the training content and forms originally provided in the *Guide for Conducting an Assessment of Training Needs*. The work group’s
recommendations have been submitted to the 2008 Conference as a separate Issue titled:

**CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers**

Some of the changes to the field-training process and worksheets include:

- Reformatting the content to create an instructional step-by-step field-training manual.
- Inserting additional information on pre-requisite coursework that an FSIO should complete prior to conducting independent retail food and/or foodservice inspections.
- Including a new *CFP Training Plan* to assist jurisdictions with identifying appropriate methods of training for listed competencies.
- Providing optional *Training Logs* for tracking a FSIO’s weekly progress as well as the types of establishments included in the field-training process.
- Clarifying language so the manual is only used for training purposes and **not** as an evaluation/audit process or for administrative purposes. All references to the training process being an ‘assessment’ of the FSIO have been eliminated.
- Including expectations of trainers regarding their role during field-training inspections and methods for working with FSIOs newly hired or assigned to the retail food protection program.
- Modifying the *Field Training Worksheets* to better reflect a training process rather than an assessment tool (References for ‘A’ – (Acceptable) or ‘NI’ – (Needs Improvement) have been removed). *Worksheets* are now designed to track the continual improvement of the FSIO as progress is made during the field-training inspections.
- Describing options for jurisdictions to use the forms and worksheets provided in the manual. Flexibility has been built into the process to allow jurisdictions to develop their own forms or modify those provided to meet specific training needs.
- Creating forms that will allow entering information on worksheets electronically. The *CFP Training Plan and Log*, as well as the *Field Training Worksheets* have been developed using a Word ‘Form’ format. This format will allow these documents to be completed electronically. The option to complete the forms manually is still available to jurisdictions that prefer to use them this way.
PROCESS FOR ADDRESSING ISSUES

Four issues identified in the CFSRP Work Group 2006 Conference Report or submitted as charges by the Conference, were deliberated by the Work Group. These issues pertain to:

1. Determining whether there is a need to reassess the written examination options listed in Step 1 of Standard 2;
2. Reassessing whether the Application Course options identified in Appendix B-1, Standard 2 should be listed as a required rather than recommended course;
3. Clarifying the qualifications needed by individuals who are responsible for conducting an Assessment of Training Needs; and
4. Determining what impact lowering the minimum number of standardization inspections from 8 to 4 has on FDA’s process for scoring candidate’s performance.

The Work Group Co-Chairs provided a format for reviewing the pertinent information and development of recommended actions for each of these issues. A backgrounder for each “Issue” was developed that contained:

- Statement of the Issue
- References to use in considering the Issue
- Background on the Issue
- Current Environment

The “Backgrounders” were distributed to Work Group members approximately three weeks prior to the conference call on which they were to be discussed. Recommendations for resolving the Issues were submitted by Work Group members for consideration.
SUMMARIES OF WORK GROUP RESPONSES TO ISSUES

A brief summary of the final Work Group actions for each of the four issues described in this section is presented below. The Backgrounders that were reviewed by the Work Group members have been included as appendices with this report.

SUMMARY OF ISSUE #1

- Address issues identified in the CFP CFSRP Work Group Report to the 2006 Conference.
  1. Determining whether there is a need to reassess the written examination options listed in Step 1 of Program Standard 2.

The Work Group was charged with re-evaluating the written examination options presented in Step 1, Option 2, contained in Standard 2 – Trained Regulatory Staff, approved at the 2006 Conference for Food Protection. The Work Group assessed the strengths and challenges with limiting the written examination options to those that are based on a valid job task analysis specific to the knowledge elements related to the regulatory retail food safety profession.

Reference
Appendix B – Work Group Backgrounder for ISSUE #1

Work Group Consensus Decision - ISSUE #1

All members of the Work Group agreed that the language as it is currently written in Step 1, Option 2, of Standard 2, met the intent of demonstrating a basic level of food safety knowledge. The consensus of the work group was to keep the current language without any changes.

SUMMARY OF ISSUE #2

- Address issues identified in the CFP CFSRP Work Group Report to the 2006 Conference.
  2. Reassessing whether the Application Course options identified in Appendix B-1, Standard 2, should be listed as a required rather than recommended course.

Appendix B-1 of Standard 2 recommends that FSIOs complete one of three Application of the Basics of Inspection/Investigation course (Application Course) options within 18 months of hire or assignment to the regulatory retail food program. The Work Group was charged with determining whether or not this recommendation should be a requirement for FSIOs to complete their retail food training curriculum.
The Issue was tabled until feedback was received from jurisdictions participating in the ATN Pilot Project. Sixty-four percent (64%) of the pilot project jurisdictions indicated that the completion of an Application Course would have better prepared their FSIOs for conducting retail food inspections.

Pilot jurisdictions that indicated the Applications Course should be retained as a recommendation commented that there was limited availability of the course and their jurisdictions lack the necessary resources to develop one. The Work Group received confirmation from FDA ORA U that the Application of the Basics of Investigation/Inspection Course can be obtained from the FDA Division of Human Resource Development (DHRD) lending library.

Enough copies of the course materials and exercises are available to supply 20 to 25 jurisdictions at any one time. Jurisdictions are sent the course materials and exercises to make copies for their own use. When the jurisdiction has completed copying the course presentations and exercises, the original is sent back to the FDA DHRD lending library for redistribution.

Reference
Appendix C – Work Group Background for ISSUE #2

Work Group Consensus Decision – ISSUE #2

The Work Group reached unanimous consensus to recommend in an Issue to the Conference, that a jurisdiction’s training program (inclusive of both classroom and field training inspections) for staff newly hired or newly assigned to the retail food protection program must include a minimum of eighty percent (80%) of the learning objectives contained in the FDA ORA U Application of the Basics of Inspection/Investigation Course. The decision was based on feedback from the ATN pilot project jurisdictions and knowledge that an option for obtaining a fully developed Applications Course is currently available to regulatory retail food protection programs through FDA’s DHRD lending library.

The Work Group has submitted this recommendation to the 2008 Conference as a separate Issue titled:

Revision to Appendix B-1, Standard 2, FDA Program Standards (2007)
SUMMARY OF ISSUE #3

- Address issues identified in the CFP CFSRP Work Group Report to the 2006 Conference.
- 3. Clarifying the qualifications needed by individuals who are responsible for conducting an Assessment of Training Needs.

The Work Group was charged with clarifying the language in the *Guide to Conducting an Assessment of Training Needs (Guide)* as it pertains to trainer qualifications. The term ‘trainer’, as referenced in the *Guide*, is specific to an individual who has completed all the training elements within Standard 2 with the exception that the individual need not be standardized.

Based on the findings and feedback from the ATN Pilot Project, the CFSRP Work Group has extensively revised the content and worksheets that are included in the current version of the *Guide*. The Work Group has developed a field training manual for retail food protection programs and submitted it as a separate Issue to the 2008 Conference titled:

**CFP Field Training Manual for Regulatory Retail Food Inspection Officers**

The *Field Training Manual* is intended to replace the current *Guide*.

The *Field Training Manual* includes a discussion of items management of retail food protection programs should consider when selecting staff to serve as trainers.

*Reference*
*Appendix D – Work Group Backgrounder for ISSUE #3*

**Work Group Consensus Decision – ISSUE #3**

The *Field Training Manual* provides a national training model developed through the CFP process, consisting of a training plan and log, field-training worksheets and procedures that may be used by any regulatory retail food protection program. Jurisdictions do not have to be enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards (2007)* to use, and benefit from, this training structure for preparing FSIOs to conduct independent inspections of retail food and/or foodservice facilities. The manual was developed to assist jurisdictions that do not have the available staff resources and funding necessary to develop a comprehensive training process. The training model provided in the manual can be readily integrated into existing regulatory retail food programs.
The *Field Training Manual* provides guidance to managers of regulatory retail food protection programs for selecting trainers. The excerpt from the manual, provided below represents the Work Group’s effort to provide clarification on who can serve as trainers for Food Safety Inspection Officers newly hired or assigned to the regulatory retail food protection program.

**STEP 1 – Select Appropriate Trainers**

The management of the regulatory retail food protection program has the discretion of deciding who will serve as trainers. Management will need to consider available training resources, (personnel, time, funding), and overall program objectives when selecting staff to oversee and conduct the FSIO field-training.

A trainee can garner important knowledge and perspective from observing different inspection approaches from experienced staff. During the course of these joint inspections it is expected that a new FSIO will observe experienced staff demonstrate performance elements competencies that are part of the jurisdiction’s training plan.

**NOTE:** For jurisdictions enrolled in the FDA Draft Voluntary National Retail Food Regulatory Program Standards, the trainer or designated staff member responsible for documenting the FSIO’s demonstration of a competency on the training plan, must have completed all the training elements in Steps 1-3 required in Program Standard 2 – Trained Regulatory Staff. It is highly recommended that this trainer be standardized in a process similar to the ‘FDA Standardization Procedures’.

**SUMMARY OF ISSUE #4**

- Address issues identified in the CFP CFSRP Work Group Report to the 2006 Conference.
- 4. Determining what impact lowering the minimum number of standardization inspections from 8 to 4 has on FDA’s process for scoring a candidate’s performance.

The Work Group was charged with conducting research as to what impact the lowering of the minimum number of standardization inspections from 8 to 4 in Step 4, *Standard 2 – Trained Regulatory Staff*, has on scoring a FSIO’s performance if a jurisdiction uses the ‘FDA Standardization Procedure’. The work group was directed to consult with FDA’s Division of Math to determine if a statistical assessment could be used for this evaluation.

**Assessment – FDA Division of Math**

The statisticians within FDA’s Center of Food Safety and Applied Nutrition’s (CFSAN) Biostatistics Branch were asked to make a quantitative assessment of
the impact of reducing the number of inspections on a FSIO’s ability to meet the FDA Standardization performance requirements (scoring system criteria). The data required to do this type of analysis is not available.

FDA does not maintain a central database to enter data from the standardization inspections the agency’s staff conducts. Resources are not available to gather all the data from FDA Regional Retail Food Specialists files to analyze candidate performance on specific data items. In addition, there is no current data available that can be analyzed to assess how candidates perform as they move through the process (for studying the relationship between a FSIO’s performance and the number of inspections conducted).

FDA’s statisticians assigned to this evaluation indicate that without data there are no reliable statistical models that can be used to project what impact reducing the number of inspections will have on a FSIO’s ability to successfully complete the process. The sample pool for any one exercise is too small (FDA Procedure – minimum of 8 inspections).

A FSIO must meet two performance criteria, one for each individual inspection exercise, and one that is based on a collective performance assessment for the entire process. In addition, each individual standardization exercise has two assessment components, one pertaining to observations made of practices directly related to foodborne illness risk factors and interventions, the other related to good retail food practices. Each of these components has its own specific performance (scoring) criteria.

The FDA standardization performance criteria are very specific to the procedure and any assessment of the impact of reducing the minimum number of inspections on a candidate’s performance requires analysis of actual data from standardizations conducted in the field.

Reference
Appendix E – Work Group Backgrounder for ISSUE #4

Work Group Consensus Decision – ISSUE #4
The Work Group is submitting a separate Issue to the 2008 Conference recommending the establishment of a new CFSRP Work Group. This issue includes a summary of recommended Conference ‘charges’ the Work Group should address and is titled:

Certification of Food Safety Regulation Professionals Work Group Charges

The charges include the Work Group collaborating with FDA’s Division of Human Resource Development on the creation of an audit/evaluation tool that mirrors the FSIO competencies included as part of the Field Training Manual.
The FDA Standardization process currently referenced in Step 4, *Standard 2 – Trained Regulatory Staff*, was not specifically designed as an evaluation protocol for field-training of FSIOs outlined in the *Field Training Manual*. What is currently missing is an evaluation/audit instrument that regulatory retail food program managers can use to assess FSIOs after their initial field-training that is based on the basic minimum competencies needed to conduct effective independent inspections of retail food and/or foodservice facilities.

Once an assessment/audit process has been developed, the Work Group will provide a recommendation to the 2010 Conference as to whether it should be incorporated as part of Standard 2 or be positioned as a stand alone tool that would be made available via an FDA web link to jurisdictions interested in using it.

**CFP EXECUTIVE BOARD CHARGE TO THE WORK GROUP**

- The Executive Board charges the CFP CFSRP Work Group to discuss a solution that will address FDA's responses to the two Issues regarding the incorporation of hiring practices into Standard 2 and report back to the 2008 Conference.

After the 2006 Conference, the CFP Executive Board submitted a charge to the Work Group to evaluate options for addressing FDA’s concerns related to incorporating a Bachelor’s degree requirement as part of the Standard 2 criteria. The Work Group reviewed three options that were submitted by a sub-group assigned the responsibility for developing a recommended course of action for addressing this issue.

a. **OPTION #1** – The *FDA Food Code* is a complex, scientific document. As such, it is necessary that the most qualified people are sought to interpret and enforce the guidelines contained within when serving as fully proficient food safety inspection officers. The qualified person must hold a minimum of a bachelor’s degree with at least 30 semester or 45 quarter hours in basic sciences (i.e. biological, natural, physical, and/or health sciences) OR an appropriate combination of education and experience sufficient to demonstrate that the applicant possesses the knowledge, skills, and abilities required to perform work in the occupation, and is comparable to that normally acquired through the successful completion of a full 4-year course of study with a major in the appropriate field.

b. **OPTION #2** – The *FDA Food Code* is a complex, scientific document. It is highly recommended that the most qualified people are sought to interpret and enforce the guidelines contained within when serving as fully proficient food safety inspection officers. It is further recommended that the qualified person hold a minimum of a bachelor’s degree with at
least 30 semester or 45 quarter hours in basic sciences (i.e. biological, natural, physical, and/or health sciences).

c. **OPTION #3** – The *FDA Food Code* is a complex, scientific document. It is highly recommended that the most qualified people are sought to interpret and enforce the guidelines contained within. It is further highly recommended that the qualified person hold a minimum of a bachelor’s degree with at least 30 semester or 45 quarter hours in basic sciences (i.e. biological, natural, physical, and/or health sciences) OR possess professional work experience in restaurant management, restaurant inspection, food establishment operations, food sanitation or quality control, or food regulatory inspection to substitute on a year-for-year basis for the recommended bachelor’s degree.

The Work Group agreed to prepare a resolution for the CFP Resolutions Committee to submit to the Executive Board for consideration at the 2008 Biennial Conference in San Antonio. The resolution is based on the language from the original issue and changes the language to add the word “minimum” of a bachelor’s degree.

Some members of the work group expressed the belief that the educational requirement needed to be made part of the Standards in order to make a strong statement. These work group members were allowed an opportunity to contact FDA to determine if they would consider references to hiring practices within the context of the Standard 2 document. There was insufficient time prior to the deadline for Issue submission to the Conference for these Work Group members to submit an alternative proposal for consideration.
Summary of CFP CFSRP Work Group Issues
Submitted to the 2008 Conference

(Work Group Issues are listed by titles. Conference assigned “Issue Numbers” were not available prior to submission.)

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<tr>
<th>Issue</th>
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<tbody>
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<td>Certification of Food Safety Regulation Professionals Work Group Report</td>
<td>2008 Certification of Food Safety Regulation Professionals Work Group Report</td>
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| Assessment of Training Needs (ATN) Pilot Project Report               | Conference for Food Protection
|                                                                       | Certification of Food Safety Regulation Professionals Work Group
|                                                                       | Assessment of Training Needs Pilot Project Report                           |
| CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers | Attachment A – (two file documents)                                         |
| Clarifying language for Step 2, Standard 2, FDA Program Standards (2007) | Attachment A                                                                 |
|                                                                       | Track Changes to Step 2, Standard 2 – Trained Regulatory Staff             |
| Revision to Appendix B-1, Standard 2, FDA Program Standards (2007)     | Attachment A                                                                 |
|                                                                       | Appendix B-1, Program Standard #2                                           |
|                                                                       | Curriculum for Retail Food Inspection Officers                              |
|                                                                       | Attachment B                                                                 |
|                                                                       | Track Changes Proposed for Appendix B-1, Program Standard #2               |
|                                                                       | Curriculum for Retail Food Inspection Officers                              |
| Certification of Food Safety Regulation Professionals Work Group Charges |                                                                                |
**2008-2010 Conference Charges for the Work Group**

The Work Group issue titled, *Certification of Food Safety Regulation Professionals Work Group Charges*, recommends that the 2008 Conference form a new CFP CFSRP Work Group to address the following charges:

- Work in collaboration with FDA’s Division of Human Resource Development to create an evaluation/audit tool that mirrors the FSIO competencies identified in the *Field Training Manual*. Provide a recommendation to the 2010 Conference as to whether the evaluation/audit tool should be included as part of the *Standard 2 – Trained Regulatory Staff* criteria or be positioned as a stand alone tool available via an FDA web link to jurisdictions interested in using it.

- Continue to review the findings and feedback from the Assessment of Training Needs Pilot Project to determine if further revisions can be made to the *Field Training Manual* and *Worksheets* that will provide a clearer understanding of the minimum competencies that are to included as part of the field-training process and facilitate the use of the worksheets and forms.

- Continue to review the criteria within *Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards* to ensure it reflects the most up-to-date approach for training and standardizing Food Safety Inspection Officers newly hired or assigned to regulatory retail food protection programs.

The Work Group Co-Chairs express their thanks for all the CFSRP work group members who diligently dedicated their time for work group initiatives over the past two years. A list of CFP Certification of Food Safety Regulation Professionals is presented in Appendix A.
CERTIFICATION OF FOOD SAFETY
REGULATION PROFESSIONALS WORK GROUP

(Part of the Conference for Food Protection (CFP)
Program Standards Committee)

David McSwane, Co-Chair
Professor
School of Public & Environmental Affairs
Indiana University
801 W. Michigan Street
Indianapolis, IN 46202
(317) 274-2918
FAX: (317) 274-7860
dmcswane@iupui.edu

John Marcello, Co-Chair
Pacific Region Retail Food Specialist
U.S. Food & Drug Administration
FDA Phoenix Resident Post
51 W. 3rd Street, Suite 265
Tempe, AZ 85281
(480) 829-7396 ext. 35
FAX: (480) 829-7677
john.marcello@fda.hhs.gov

STATE REGULATORY

1. Lee M. Cornman
Florida Department of Agriculture and Consumer Services
Division of Food Safety
312 Conner Boulevard (C-18)
Tallahassee, FL 32399-1650
(850) 488-8434
FAX: (850) 488-7946
cornmal@doacs.state.fl.us

2. Ruth Hendy
State Standardization Officer, Food Establishments
PSQA Unit
Texas Department State Health Services Group
1100 West 49th Street
Austin, Texas  78756
(512) 834-6753
FAX: (512) 834-6683
Ruth.Hendy@dshs.state.tx.us

3. Ronald S. Klein
Program Manager, Food Safety and Sanitation
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK  99501
(907) 269-7583
FAX: (907) 269-7654
Ron.Klein@alaska.gov
4. Susan Kendrick  
Education Specialist  
Oregon Department of Agriculture, Food Safety Division  
635 Capitol Street NE  
Salem, OR 97301-2532  
(503) 533-0835  
FAX: (503) 986-4729.  
skendric@oda.state.or.us

5. David Read  
Dairy and Food Inspection Division  
Minnesota Department of Agriculture  
625 Robert Street North  
St. Paul, MN 55155-2538  
651-201-6596  
FAX 651-201-6116  
David.read@state.mn.us

LOCAL REGULATORY

6. Vicki Everly, REHS  
Supervising Environmental Health Specialist  
County of Santa Clara, Department of Environmental Health Consumer Protection Division  
1555 Berger Drive, Suite 300  
San Jose, CA 95112-2716  
(408) 918-3490  
FAX: (408) 258-5891  
vicki.everly@deh.sccgov.org

FEDERAL AGENCIES

7. Jim Fear  
Manager State Training  
Office of Regulatory Affairs, DHRD  
U.S. Food and Drug Administration  
11919 Rockville Pike, HFC-60  
Rockville, MD 20852  
(301) 827-8725  
FAX: (301) 827-8708  
James.fear@fda.hhs.gov
PROFESSIONAL ASSOCIATIONS

8. Heidi J. Shaw
   National Environmental Health Association (NEHA)
   720 S. Colorado Blvd., Ste. 1000-N
   Denver, CO  80246
   (303) 756-9090 ext. 339
   (303) 691-9490
   hshaw@neha.org

INDUSTRY – FOODSERVICE (RESTAURANT)

9. Matt Stangley Alternate: LeAnn Chuboff
   National Restaurant Association          800-765-2122 ext. 374
   Educational Foundation lchuboff@nraef.org
   175 W. Jackson Blvd., Suite 1500
   Chicago, IL 60604
   (312) 261-5319
   FAX: 312-5669729
   mstangley@nraef.org

10. Nancy Nesel
    Yum! Brands, Inc
    1900 Colonel Sanders Lane
    Louisville, KY  40228
    (502) 874-8493
    FAX: (502) 874-3523
    Nancy.nesel@yum.com

INDUSTRY – RETAIL FOOD STORE

11. Tom Dominick, R.S.
    Vice President of Food Safety and Sanitation
    Bashas’, Inc.
    2626 S. 7th St.
    Phoenix, AZ  85034
    (602) 594-1356
    FAX: (602) 594-1205
    tdominick@bashas.com
12. Stephanie Mohn  
Food Safety and Sanitation Specialist  
Marsh Supermarkets  
9800 Crosspoint Blvd.  
Indianapolis, IN 46256  
(317) 594-2693  
(317) 594-2703  
samohn@sbcglobal.net

13. Michael Roberson  
Publix Super Markets, Inc.  
P.O. Box 32024  
Lakeland, FL 33802  
(863) 688-1188, Ext. 32422  
FAX (863) 499-5402  
michael.roberson@publix.com

CONSUMER ORGANIZATIONS AND INDEPENDENTS

14. Dorothy Horber, Ph.D.  
Thomson Prometric (formerly Experior Assessments)  
2000 Lenox Drive  
Lawrenceville, NJ 08648  
(609) 895-5126  
dorothy.horber@thomson.com

15. Stan Hazan, Senior Director  
Regulatory Affairs  
NSF International  
789 Dixboro Road  
Ann Arbor, Michigan 48105  
(734) 769-5105  
FAX: (734) 827-7133  
hazan@nsf.org

16. Dr. Cynthia D. Woodley  
Psychometrician  
Vice President, Operations  
Professional Testing Inc.  
7680 Universal Blvd, Suite 300  
Orlando, FL 32809  
(407) 264-2993  
FAX: (407) 330-3776  
cdwoodley@proftesting.com
WORK GROUP CONSULTANT

April Shaw
U.S. Food and Drug Administration
FDA Southwest Region – Retail Food Specialist
FDA Southwest Regional Office
4040 N. Central Expressway, Suite 900
Dallas, Texas 75204
(214) 253-4948 (office)
(214-564-9242 (cell)
FAX: (214) 253-4960
april.shaw@fda.hhs.gov
CFP Certification of Food Safety Regulation Professionals Work Group
Consideration of Program Standard 2 Issues

ISSUE #1: Is there a need to re-evaluate the written examination options presented in Step 1, Option 2, of Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards, approved at the 2006 Conference for Food Protection? More specifically, is there a need to limit the written examination options to those that are based on a valid job task analysis for the profession?

REFERENCE: Step 1, Option 2, of Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards (2007)

BACKGROUND: Prior to the 2006 Conference, the CFSRP Work Group was charged with conducting a joint review with FDA of the ORA University training curriculum as it pertains to Standard 2. This charge was given to the Work Group because jurisdictions enrolled in the Program Standards were requesting a list of specific courses that would address the six broad curriculum areas identified in Standard 2.

1. Prevailing Statutes, Regulations and Ordinances;
2. Public Health Principles;
3. Communication Skills;
4. Microbiology;
5. Epidemiology;
6. HACCP.

Using the FDA ORA U as a model, specific courses and learning objectives were identified for each of these 6 curriculum areas. Appendix B-1 that accompanies Standard 2 outlines the ORA U courses for each of the curriculum areas.

The Work Group was cognizant of the need to recognize other valid and credible methods, in addition to those offered through FDA ORA U, for Food Safety Inspection Officers (FSIO) to obtain the necessary coursework. A process was established for determining equivalency of coursework and training from a variety of sources. Equivalency of courses can be determined through an evaluation of learning objectives. Courses can be considered equivalent if it can be demonstrated that the course covers at least 80% of the learning objectives contained in the comparable FDA ORA U course. The learning objectives for each of the FDA ORA U web courses are available on FDA’s web site at: http://www.fda.gov/ora/training/

In setting up this equivalency process, the Work Group also had to consider administrative and economic constraints. Setting up a national review council to review the acceptability of equivalent courses was determined not to be a feasible option. The Work Group consensus, later affirmed by the Conference, placed the responsibility for determining course equivalency with the jurisdiction’s food program manager/trainer.
This type of de-centralized process empowers many individuals (potentially several hundred) with the responsibility for determining course equivalency in the Standards training process. The Work Group determined that it was important to add a quality assurance component to this equivalency option.

Quality assurance is provided to the course equivalency process by requiring the FSIO to demonstrate basic food safety knowledge by successfully completing one of the four written examination options presented in Step 1, Option 2 of Standard 2. Included in the Standard 2 criteria is an important note on how these written examinations are to be viewed within the context of the Standard.

**NOTE:** The written examinations are part of a training process; NOT a standardization/certification process. The examinations listed are NOT to be considered equivalent to each other. They are to be considered as training tools and have been incorporated as part of the Standard because each instrument will provide a method for assessing whether the FSIO has attained a basic level of food safety knowledge.

For the purposes of Standard 2, the written examination is a quality assurance tool rather than an assessment for certification.

During the time period the Work Group was evaluating what written examination options to include as part of the Standard, there were none that were based on an up-to-date, valid job task analysis of the profession. With the idea of improving the Standard criteria, the Work Group indicated a desire to revisit this issue in the future should written examinations be developed based on a job task analysis specific to the knowledge and skills required of a regulatory Retail Food Safety Inspection Officer.

**CURRENT ENVIRONMENT:** In the time period since the Work Group discussions conducted prior to the 2006 Conference, the National Environmental Health Association (NEHA) has updated the job task analysis for its existing Certified Food Safety Professional (CFSP) examination that is specific to the knowledge and skills Food Safety Inspection Officers must possess to perform their job. NEHA’s CFSP examination was not developed, however, as a basic level assessment. It is intended to serve as a higher level credential.

**WORK GROUP DECISION**

*Work Group Consensus Decision*

All members of the work group agreed that the language as it is currently written in Step 1, Option 2 of Standard 2 met the intent of demonstrating a basic level of food safety knowledge. The consensus of the work group is to keep the current language without any changes.
CFP Certification of Food Safety Regulation Professionals Work Group
Consideration of Program Standard 2 Issues

**ISSUE #2:** Appendix B-1, Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards (2007), recommends that FSIOs complete one of three Application of the Basic of Inspection/Investigation Course options with 18 months of hire or assignment to the regulatory retail food program. Is there a need to change this recommendation to a requirement for FSIOs to complete their training curriculum?

**REFERENCE:** Appendix B-1, Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards (2007)

**BACKGROUND:** Prior to the 2006 Conference, the CFSRP Work Group was charged with conducting a joint review with FDA of the ORA University training curriculum as it pertained to Standard 2. This charge was given to the Work Group because jurisdictions enrolled in the Program Standards were requesting a list of specific courses that would address the six broad curriculum areas identified in the Standard 2.

1. Prevailing Statutes, Regulations and Ordinances
2. Public Health Principles
3. Communication Skills;
4. Microbiology;
5. Epidemiology; and
6. HACCP.

Using the FDA ORA U model, specific courses and learning objectives were identified for each of these 6 curriculum areas. Appendix B-1 that accompanies Standard 2 outlines the ORA U courses for each of the curriculum areas.

In addition to the ORA U web courses, FDA had worked with professional associations, such as AFDO, to develop an *Application of the Basics of Inspection/Investigations Course (Application Course)* that could be delivered as a ‘Hands-On-Training’ workshop for FSIOs to demonstrate the concepts learned from the web-based, and or equivalent courses, included in the Standard 2 curriculum. The Work Group included the *Application Course* options in Appendix B-1 as a recommendation rather than a requirement.

The *Application Course* options are, in essence, intended to serve as a practicum for FSIOs. The basis for the Work Group’s decision to position them as a recommendation was primarily driven by the limited availability of the workshop and training materials.

During the Work Group’s discussion, prior to the 2006 Conference, members of AFDO were delivering the *Application Course* on a limited basis throughout the country. FDA was in the process of packaging the *Application Course* training materials in what it
terms a “course-in-a-box” which could be sent upon request to a jurisdiction’s food program manager/training. This would enable a jurisdiction to conduct the course for its own staff, using its training officers or experienced staff rather than have to wait until a sponsored course came to their state or locale.

At that time, FDA indicated that it did not have the where-with-all to provide all 250 jurisdictions that were enrolled in the Program Standards with the materials for the Application Course. In addition to the jurisdictions enrolled in the Program Standard, the potential existed for many more jurisdictions not enrolled in the Standards to express a need for these workshop materials to train their staff. Given staff turnover and the continuing need to train new hires, jurisdictions would need an Application Course that could be delivered on-site, on-demand. Since resources were not available at the time to ensure on-site/on-demand delivery of the application workshop, the Work Group decided to include the Application Course options as a recommendation within the context of Standard 2.

In addition, some Work Group members indicated that the required Assessment of Training Needs (ATN) process, contained in Standard 2, met the intent and scope of the Application Course. Work group members agreed, however, that the issue should be revisited in the future to determine if the environment for providing the course and/or materials had become more accessible to jurisdictions.

**CURRENT ENVIRONMENT:** In the time period since the Work Group discussions conducted prior to the 2006 Conference, FDA has indicated that it has the Application Course available to send to jurisdictions upon request through its lending library. There are a sufficient number of disks that can be lent to requesting jurisdictions. Once the disk with the course materials is received jurisdictions can make as many copies of the materials as they desire. The jurisdictions are expected to return the original disk to the FDA lending library so it can be redistributed to meet the requests of other jurisdictions.

It should be noted that the Application Course options noted in Appendix B-1 are not limited to the FDA ORA U course or the one delivered through AFDO. Application Courses developed by State or local regulatory jurisdictions or other entities containing learning objectives and exercises equivalent to the FDA-AFDO delivered workshop would meet the intent of the Standard criteria.
WORK GROUP DECISION

Work Group Consensus Decision
The Work Group reached unanimous consensus to recommend in an Issue to the Conference, that a jurisdiction’s training program (inclusive of both classroom and field training inspections) for staff newly hired or newly assigned to the retail food protection program must include a minimum of eighty percent (80%) of the learning objectives contained in the FDA ORA U Application of the Basics of Inspection/Investigation Course. The decision was based on feedback from the ATN pilot project jurisdictions and knowledge that an option for obtaining a fully developed Applications Course is currently available to regulatory retail food protection programs through FDA’s DHRD lending library.

The Work Group has submitted this recommendation to the 2008 Conference, including suggested revisions to Appendix B-1, Standard 2, as a Issue titled:

Revision to Appendix B-1, Standard 2 – FDA Program Standards (2007).
CFP Certification of Food Safety Regulation Professionals Work Group
Consideration of Program Standard 2 Issues

ISSUE #3: Is there a need to re-evaluate the CFP CFSRP Work Group decision, approved by the 2006 Conference for Food Protection, that allows for ‘trainers’ as defined in the FDA Draft Voluntary National Retail Food Regulatory Program Standards to conduct an Assessment of Training Needs? The term ‘trainer’, as defined in the Standards, is specific to an individual who has completed all the training elements within Standard 2 with the exception that the individual need not be standardized.

REFERENCES:
- Recommended Criteria for Retail Food Inspectors/Training Officers; CFP CFSRP Work Group Issue: 2006-II-38
- Who Can Perform Training Needs Assessments under the 2006 Revised Standard 2; Program Standards Clearinghouse Interpretation and
- Excerpt from, Frequently Asked Questions – Revised 8-11-06; Assessment of Training Needs Pilot Project.

BACKGROUND: During the 2006 Conference, the CFSRP Work Group met prior to Council II sessions to discuss each of the Issues it had submitted for deliberation. The primary purpose of this review was to allow the members of the Work Group an opportunity to verify recommendations formulated during conference calls and to propose clarifying language, if needed, to the Issues submitted. The Conference provides the opportunity for the CFP Committees and work groups to amend the language to Issues submitted, with Council approval, once a motion has been made and approved by the Council to bring the Issue to the floor for discussion.

The CFSRP Work Group Issue 2006-II-038 addressed recommended education and training criteria that should be used in selecting ‘Training Standards’. The intent was to provide suggested education/training criteria that FDA could incorporate into their ‘FDA Standardization Procedure’. These suggested criteria could then be used as a model for State/local/tribal jurisdictions to select and prepare individuals to perform the responsibilities of a ‘Training Standard’. The Work Group emphasized in their Issue that the education and training criteria for the ‘Training Standard’:

“…… are offered only as a recommendation; they are NOT part of Standard 2 or a requirement for Standardization and, therefore, NOT subject to outside evaluation or audit.”

In crafting the wording for this Issue, a concern was raised that the distinction between a ‘Trainer’ and a ‘Training Standard’ as defined in the FDA Draft National Voluntary Retail Food Regulatory Program Standards might be lost. Currently the terms ‘Trainer’ and ‘Training Standard’ are both defined and read as follows:
Trainer – an individual who has successfully completed the training elements outlined in Standard 2 and is recognized by the program manager as having the field experience and communication skills necessary to train new employees.

Training Standard – a person who has successfully completed the training by an FDA Standardized Inspection or Training Officer; and represents the regulatory agency position on all issues.

Prior to the 2006 Conference meeting, the Work Group reached consensus to add the following language to CFP Issue 2006-II-038 to recognize the distinction between a ‘trainer’ and a ‘training standard’.

Any Trainer (who is not the Inspection/Training Officer) should meet all Inspection Training/Officer criteria with the exception that the individual need not be standardized.

The above italicized language was approved unanimously by the 2006 Conference Voting Delegates.

Soon after the Conference it became apparent that Issue II-038 had not specifically addressed the issue of whether a ‘Trainer’ could conduct an Assessment of Training Needs. A member of the CFSRP Work Group submitted this question to the Program Standards Clearinghouse for an interpretation. The interpretation confirmed the Work Group intention to allow a ‘trainer’, who had completed all the Standard 2 training elements, with the exception of standardization, the opportunity to conduct an Assessment of Training Needs.

CURRENT ENVIRONMENT: Though the Assessment of Training Needs (ATN) is included as a required Standard 2 criterion, it was not the Work Group’s intention to restrict the use of the ATN process and forms to only those jurisdictions that are enrolled in the Program Standards. One of the primary objectives is to garner broader use of the ATN process among all regulatory retail food protection programs. In support of this objective, regulatory retail food programs not currently enrolled in the Program Standards were recruited, along with jurisdictions enrolled in the Program Standards, to participate in the ATN pilot project.

During the orientation calls for the pilot project, the Work Group Co-Chairs noted that the participating jurisdictions were at various stages in the development of an organized structure for training new hires and staff newly assigned to the retail food protection program. One of the significant variables that each of the jurisdictions needed to address related to the experience level of existing staff who were to serve as trainers and oversee the Assessment of Training Needs process.

Some confusion occurred during the pilot project orientation process because of language inadvertently inserted in Appendix B-2, A Guide to Conducting an Assessment of Training Needs, in Standard 2.
“The jurisdiction’s assessor, or designated staff member, must have completed all the training and standardization elements (Steps 1 – 4) required in Program Standard #2 – Trained Regulatory Staff.”

The language inaccurately implies that standardization is a requirement for those conducting an Assessment of Training Needs. This was not the intent of the Work Group going into the 2006 Conference.

Many of the jurisdictions participating in the pilot project expressed concern that they did not have a standardized training officer (‘training standard’) on staff. Other jurisdictions reported that they did not have enough ‘training standards’ to meet the demands of their current staff. The Work Group Co-Chairs, responsible for coordinating the ATN pilot project, provided guidance to the participating jurisdiction on who can perform an Assessment of Training Needs.

Guidance to Participating Jurisdictions Enrolled in the Program Standards
Trainers conducting Assessment of Training Needs should:

“… have at a minimum met all the criteria in the Standard (Standard 2) with the exception of standardization.”

This response is based on, and consistent with, the Work Group recommendation contained in Issue II-038 and the interpretation provided by the Program Standards Clearinghouse work group.

Guidance to Participating Jurisdictions NOT Enrolled in the Program Standards
For the purposed of the pilot project, jurisdictions not enrolled in the Program Standards,

“… should have the trainer or designated staff person who would normally conduct field training for the agency’s retail food protection program conduct the Assessment of Training Needs.”
WORK GROUP DECISION

Work Group Consensus Decision
The Work Group has submitted to the 2008 Conference an Issue titled:

CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers

The Field Training Manual provides a national training model developed through the CFP process, consisting of a training plan and log, field training worksheets and procedures that may be used by any regulatory retail food protection program. Jurisdictions do not have to be enrolled in the FDA Draft Voluntary National Retail Food Regulatory Program Standards to use, and benefit from, this training structure for preparing FSIOs to conduct independent inspections of retail food and/or foodservice facilities. The manual was developed to assist jurisdictions that do not have the available staff resources and funding necessary to develop a comprehensive training process. The training model provided in the manual can be readily integrated into existing regulatory retail food programs.

The Field Training Manual provides guidance to managers of regulatory retail food protection programs for selecting trainers. The following excerpt from the manual represents the work group’s effort to provide clarification on who can serve as trainers for Food Safety Inspection Officers newly hired or assigned to the regulatory retail food protection program.

STEP 1 – Select Appropriate Trainers

The management of the regulatory retail food protection program has the discretion of deciding who will serve as trainers. Management will need to consider available training resources, (personnel, time, funding), and overall program objectives when selecting staff to oversee and conduct the FSIO field training.

A trainee can garner important knowledge and perspective from observing different inspection approaches from experienced staff. During the course of these joint inspections it is expected that a new FSIO will observe experienced staff demonstrate performance elements competencies that are part of the jurisdiction’s training plan.

NOTE: For jurisdictions enrolled in the FDA Draft Voluntary National Retail Food Regulatory Program Standards, the trainer or designated staff member responsible for documenting the FSIO’s demonstration of a competency on the training plan, must have completed all the training elements in Steps 1-3 required in Program Standard 2 – Trained Regulatory Staff. It is highly recommended that this trainer be standardized in a process similar to the ‘FDA Standardization Procedures’.
ISSUE #4 – Reduction of the Number of Standardization Inspections from 8 to 4

ISSUE #4: Is there a need to re-evaluate the CFSRP Work Group decision approved by the 2006 Conference for Food Protection, that allows for a jurisdiction to establish a standardization process, similar to the ‘FDA Standardization Procedures’, which is based on a minimum of 4 inspections? As a follow-up to the 2006 Conference, the Work Group was charged with working with FDA to assess what impact reducing the minimum number of inspections from 8 to 4 would have on the scoring system FDA has established for its standardization process.

REFERENCES:

- ‘FDA Standardization Procedures’:
  - Section 3-302 Performance Criteria;
  - Section 3-303 Assessment;
  - Annex 2-1 FDA Standardization Inspection Report; and
  - Annex 5 Scoring Form and Instruction for Scoring and Determining Performance

BACKGROUND: During the 2006 Conference, the CFSRP Work Group met prior to Council II sessions to discuss each of the Issues it had submitted for deliberation. The primary purpose of this review was to allow the members of the Work Group an opportunity to verify recommendations formulated during conference calls and to propose clarifying language, if needed, to the Issues submitted. The Conference provides the opportunity for the CFP Committees and work groups to amend the language to Issues submitted, with Council approval, once a motion has been made and approved by the Council to bring the Issue to the floor for discussion.

The Work Group Issue 2006-II-037 addressed all the language revisions recommended for Standard 2 – Trained Regulatory Staff. Included was a substantive revision in Step 4, Food Safety Inspection Officer – Field Standardization, that reduced the minimum number of standardization inspections from 8 to 4.

Within 18 months of employment or assignment to the retail food program, staff conducting inspections of retail food establishments must satisfactorily complete a minimum of four joint inspections with a “training standard” using a process similar to the ‘FDA Standardization Procedures’.

This recommended language change to Standard 2 was approved by the 2006 Conference. This change to Standard 2 did not change FDA’s protocol for using 8 minimum inspections for its own retail food program purposes. It was not the Work Group intention to impact FDA’s approach to its own standardization process. The Work Group submitted this recommendation to reduce the minimum number of inspections
from 8 to 4 in recognition of the structured training approach that had been added to the Standard 2 criteria.

The field standardization criteria described in Step 4 is intended to provide a jurisdiction the flexibility to use their own regulation or ordinance. In addition, the reference to using standardization procedures similar to the *FDA Procedures for Standardization of Retail Food Inspection Officers*, is intended to allow the jurisdiction the option to develop its own written protocol to ensure that personnel are trained and prepared to competently conduct inspections. Any written standardization protocol must include the five performance areas outlined in Step 4.

The five performance areas include:

1. Risk-based inspections focusing on the factors that contribute to foodborne illness;
2. Good Retail Practices;
3. Application of HACCP;
4. Inspection equipment; and
5. Communication

*Standard 2 Criteria Prior to the 2006 Conference* Prior to the 2006 Conference, the Standard 2 criteria that a Food Safety Inspection Officer (FSIO) had to meet to be eligible for standardization included:

- Completion of coursework in the six curriculum areas
  - Prevailing Statutes, Food Code and Regulations;
  - Public Health Principles;
  - Microbiology;
  - Epidemiology;
  - HACCP Principles; and
  - Communication;
- Conducting a minimum of 25 joint field training inspections
- Conducting a minimum of 25 independent inspections

The training elements listed above were to be completed by the FSIO within 18 months of hire or assignment to the regulatory retail food protection program.

*Revisions to the Standard 2 Criteria Approved at the 2006 Conference* The Standard 2 revisions approved at the 2006 Conference, expanded the criteria for Food Safety Inspection Officers to be eligible for standardization. Steps 1 through 3 of the revised Standard 2, identify specific coursework that must be successfully completed within the 6 curriculum areas. Appendix B-1, Standard 2, provides an estimated total of 55 contact hours for completion of these courses. In addition, a field-training process has been included in Step 2 of the Standard which provides a structured process for observing an FSIO in the field performing specific tasks determined by the CFP to be essential to
effective retail food and foodservice inspections. This type of structured training process to prepare candidates for standardization was not in place prior to the 2006 Conference.

Based on the changes to Step 1 through 3 of the revised Standard 2, the Work Group submitted a recommendation to the 2006 Conference, to reduce the number of standardization inspections from 8 to 4. The Work Group determined that the rigor of the newly specified coursework and the addition of the field-training process exceeded any of the previous criteria that existed for FSIOs to be eligible for standardization. The additional resources jurisdictions would be allocating at the front end of the training process justified providing flexibility for jurisdictions to incorporate a standardization process based on a minimum of 4 standardization inspections.

**FDA Standardization Performance Criteria** During the pre-conference meeting, a concern was raised regarding the fairness of the scoring process if the minimum number of inspections was reduced from 8 to 4. The scoring and assessment tools included with ‘FDA’s Standardization Procedures’ are specifically tied to the FDA protocol including conducting a minimum of 8 inspections. The note that accompanies the language in Step 4 cautions jurisdictions to be cognizant of this fact.

*Jurisdictions that modify the limits of the standardization process by reducing the minimum number of inspections from 8 to 4 are cautioned that a redesign of the scoring assessment of the candidate’s performance on the field inspection is required. This sometimes proves to be a very difficult task. A jurisdiction must consider both the food safety expertise of its staff, as well as the availability of personnel versed in statistical analysis before it decides to modify the minimum number of inspections. The jurisdiction’s standardization procedures need to reflect a credible process and the scoring assessment should facilitate consistent evaluation of candidates.*

The Work Group requested any information FDA might have on the assessment of its scoring system and what the potential impact of reducing the number of inspections might have on FSIO’s ability to successful complete the process. Key excerpts from the FDA Standardization Procedures, related to the standardization scoring system include:

- Annex 2-1, FDA Standardization Inspection Report;
- Section 3-302, Performance Criteria
- Section 303, Assessment
- Annex 5, Scoring Form and Instruction for Scoring and Determining Performance

The ‘FDA Standardization Procedures’ are available from the FDA web link at: [www.cfsan.fda.gov/~ear/rfi-toc.html](http://www.cfsan.fda.gov/~ear/rfi-toc.html). The document that appears on this web site contains the 2003 version of the ‘FDA Standardization Procedures’. FDA is currently in the process of updating this document. The references listed on the previous page pertaining to the FDA standardization performance criteria and scoring are, however, still consistent with the updated version.
Based on the Conference approval of the recommendations contained in CFP Issue 2006 II-037, representatives of FDA have discussed with their agency statisticians the potential impact of reducing the number of inspections on the scoring system outlined in the ‘FDA Standardization Procedures’.

**CURRENT ENVIRONMENT**

*Assessment From FDA Division of Math* The statisticians within FDA’s Center of Food Safety and Applied Nutrition’s (CFSAN) Biostatistics Branch were asked to make a quantitative assessment of the impact of reducing the number of inspections on an FSIOs ability to meet the FDA Standardization performance requirements (scoring system criteria). The data they have reported as being required to do this type of analysis is not available.

FDA does not maintain a central database to enter data from the standardization inspections the agency’s staff conducts. Resources are not available to gather all the data from FDA Regional Retail Food Specialists files to analyze candidate performance on specific data items. In addition, there is no current data available that can be analyzed to assess how candidates perform as they move through the process (for studying the relationship between an FSIO’s performance and the number of inspections conducted).

In addition, FDA’s statisticians assigned to this evaluation indicate that without data there are no reliable statistical models that can be used to project what impact reducing the number of inspections will have on an FSIO’s ability to successfully complete the process. The sample pool for any one exercise is small (FDA Procedure – minimum of 8 inspections).

A FSIO must meet two performance criteria, one for each individual inspection exercise, and one that is based on a collective performance assessment for the entire process. In addition, each individual standardization exercise has two assessment components, one pertaining to observations made of practices directly related to foodborne illness risk factors and interventions, the other related to good retail food practices.

Each of these components has its own specific performance (scoring) criteria. The FDA standardization performance criteria are very specific to the procedure and any assessment of the impact of reducing the minimum number of inspections on candidate’s performance requires analysis of actual data from standardizations conducted in the field.

*FDA’s Procedure Based on a Minimum of 8 Inspections* FDA continues to conduct its standardization procedure based on a minimum of 8 inspections. FDA Retail Food Specialists conduct the majority of Food Code standardizations for the agency. Most of these standardizations are performed with State, local, and tribal officials that will ultimately be responsible for standardizing other retail food program personnel.

Anecdotally, Specialists report that it takes a few exercises, particularly during the initial standardization process, for FSIOs to become familiar with the standardization process and forms. The format and content of the standardization form does not usually mirror
the one FSIOs are accustomed to using to collect data as part of their routine inspection. This sometimes has an impact on a candidate’s performance in the early stages of the standardization process.

There is also a concern that reducing the minimum number of inspections will make it difficult for the ‘Training Standard’ to assess a candidate’s ability to accurately assess many ‘data items’ that comprise the standardization process. For example, the Foodborne Illness Risk Factor and Food Code Intervention section of the standardization inspection form is comprised of 56 data items. Most retail food and/or foodservice establishment operations will not be performing or incorporating tasks related to all the data items. This is why the FDA standardization form provides an opportunity for a data item to be marked:

- N.O. – the item is part of the establishment operation but not observed during the inspection; or
- N.A. – the item is not part of the establishment operation

These are valid markings within the context of the standardization process and performance criteria. Within the standardization process, however, one of the objectives of the ‘Training Standard’ is to try and evaluate a FSIOs ability to determine whether a procedure that is actually performed/observed is IN or OUT of compliance.

- IN – the item is In Compliance with applicable Food Code regulations; or
- OUT – the item is Out of Compliance with applicable Food Code regulations

Reducing the number of inspections minimizes opportunities to make observations of actual practices within a retail food and foodservice operations. The ‘Training Standard’ has fewer opportunities to assess a candidate’s ability to apply and interpret food safety standards to actual observations. The standardization procedure is more subject to the ‘luck of the draw’ in terms of observations made of what is actually taking place in the establishment at the time of the standardization procedure.

Finally, as part of the standardization process, FSIO are also assessed on the application of HACCP principles, correct use of equipment, and communication skills. For the HACCP principles assessment, FSIOs must select a total of 3 food preparation processes to describe on a flow chart to include:

- Process 1 – No Cook Step;
- Process 2 – Same Day Service; and
- Process 3 – Complex Food Preparation

For each of these three processes, the FSIO must identify the hazards, critical control points and critical limits and make a determination as to whether the establishment had the appropriate controls in place for the identified hazards. In addition, FSIOs must prepare at least one risk control plan to address a foodborne illness risk factor determined not be in compliance with Food Code critical limits. Given the breadth of the exercises
included in the standardization process, there is a concern that an FSIO might find it
difficult to complete all elements of the standardization process within a minimum of 4
inspections.

*Rationale for Reducing the Minimum Number of Inspection to 4* State, local and tribal
jurisdiction enrolled in the Program Standards have noted that the Standard 2 criteria
reference the *FDA Standardization Procedure* but does not require a jurisdiction to
implement a process that is exactly like the FDA. The Standard 2 criterion provides
jurisdiction the flexibility to implement their own standardization process, similar to the
*FDA Standardization Procedure*. The standardization procedure must address the
following performance areas:

1. Risk-based inspections focusing on factors that contribute to foodborne illness;
2. Good Retail Practices;
3. Application of HACCP;
4. Inspection equipment; and
5. Communication

Jurisdictions enrolled in the Program Standards, especially ones with mid to large size
staff, indicate that the Assessment of Training Needs now addresses many aspects of the
here-to-fore traditional FDA Standardization process. All five standardization
performance elements are included in one form or another within the Assessment of
Training Needs process. The standardization process provides, however, a more detailed
approach to determining a candidate’s ability to apply food safety knowledge to specific
observations of foodborne illness risk factors and good retail practices.

Jurisdictions have indicated they need to look at efficient and effective ways to
standardize their staffs given limited resources. Having the flexibility to institute a
standardization procedure based on a minimum of 4 inspections, provides an opportunity
to recognize the skills of their ‘high performers’ and re-allocate resources to address staff
members in more need of training.
WORK GROUP DECISION

Work Group Consensus Decision

The Work Group is submitting a separate issue to the 2008 Conference that includes a summary of recommended Conference ‘charges’ the work group should address. The charges include the CFP CFSRP work group collaborating with FDA’s Division of Human Resource Development on the creation of an audit/evaluation tool that mirrors the FSIO competencies included as part of the CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers.

The FDA Standardization process currently referenced in Step 4, Standard 2 – Trained Regulatory Staff, was not specifically designed as an evaluation of the joint field training process outlined in the CFP Field Training Manual. What is currently missing is an evaluation/audit instrument that regulatory retail food program managers can use to assess FSIOs after their initial field training on the basic minimum competencies needed to conduct effective independent inspections of retail food and/or foodservice facilities.

Once an assessment process as been developed, the Work Group is to provide a recommendation to the 2010 Conference as to whether it should be incorporated as part of Program Standard 2 or be positioned as a stand alone tool that would be made available via an FDA web link to jurisdictions interested in using it.
CONFERENCE FOR FOOD PROTECTION

CERTIFICATION OF
FOOD SAFETY REGULATION PROFESSIONALS
WORK GROUP

ASSESSMENT OF TRAINING NEEDS
PILOT PROJECT REPORT

January 7, 2008
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Lee Cornman, Florida Department of Agriculture
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Jim Fear, U.S. Food and Drug Administration
Stan Hazan, NSF International
Ruth Hendy, Texas Department of State Health Services
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# Assessment of Training Needs Pilot Project Report

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Executive Summary

The Conference for Food Protection (CFP) has progressed through several stages in the development of a nationally recognized process for training regulatory Food Safety Inspection Officers (FSIO) responsible for inspections of institutional foodservice, restaurant, and retail food establishments. Research conducted by the CFP Certification of Food Safety Regulation Professionals (CFSRP) Work Group addressing this issue revealed that existing training and standardization programs for FSIOs are as varied as the number of regulatory jurisdictions throughout the country. The research also identified the minimum competencies FSIOs should be able to demonstrate prior to conducting independent inspections of retail food and/or foodservice establishments. What has been lacking is a nationally recognized training process for FSIOs that can be used as a model to enhance the effectiveness of regulatory retail food program inspections and increase uniformity among regulatory professionals in their assessment of industry’s food safety practices.

During the 2006 Conference for Food Protection, the Voting Delegates unanimously approved a field-training process for inclusion in Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards. This field-training process includes both pre-requisite coursework and joint field-training inspections. The CFSRP work group was charged by the Conference to conduct a pilot study to evaluate the effectiveness of the training protocol and worksheets contained in the Guide to Conducting an Assessment of Training Needs (ATN) for Regulatory Retail Food Inspection Officers.

The purpose of the pilot project was to assess the ATN process and evaluate the documents (i.e., Field Training Worksheet and Documentation of Successful Completion form) that were developed and used in conjunction with the ATN. Additionally, the Field Training Worksheet and Documentation of Successful Completion form were evaluated to determine strengths and weaknesses of the documents, identify content changes needed in the performance elements and criteria, and to determine if the length and format of the documents made them easy to use without direct supervision and oversight.

A pilot application of the ATN was conducted by 29 retail food regulatory programs between June, 2006 and July, 2007. The type and number of jurisdictions that participated in the pilot project are: State (9), County (11), District (2), City (6), and Tribal (1). The population living in the pilot jurisdictions ranged from less than 25,000 to more than 500,000. The total number of retail food and foodservice establishments under permit in the pilot jurisdictions ranged from 101 to over 6,000. The pilot jurisdictions were geographically distributed throughout the United States, and the pilot project steering work group believes the demographic characteristics of the selected jurisdictions are representative of the larger population of retail food safety programs in the nation.

A total of 132 FSIOs participated in the pilot and a total of 110 FSIOs completed the ATN during the project period. Ninety percent of the jurisdictions (n=26) reported having no FSIOs who were “unable” to complete the process; three jurisdictions indicated they had one FSIO who was unable to complete the process. The disparity between the number who completed and the number “unable” to complete probably represents FSIOs who were either still in the process of completing their training when the pilot project ended or left the jurisdiction’s employment.
More than ninety-six percent (96.6%) of the pilot participants agreed that the ATN process was a valuable use of their jurisdiction’s resources. Most respondents were complimentary to the process and identified it as a “good start.”

Nineteen of the pilot jurisdictions (66%) agreed that a minimum of 25 joint field-training inspections was adequate to prepare the FSIO to conduct independent inspections. Of the 10 jurisdictions that indicated 25 joint inspections was not enough, the number of joint field-training inspections recommended ranged from 10 to 100, with an average of 75. Many of the respondents believed the number of required joint inspections should be variable based on an individual FSIO’s prior experience, skills, capability and affinity for learning new tasks, or accomplishment of certain skills.

Almost all of the jurisdictions (89.6%, n=26) agreed that the 25 performance elements in the Field Training Worksheet sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections. The majority of the jurisdictions (93.1%) indicated the competencies/criteria listed as examples under each Performance Element were helpful to the training process.

Almost all of the jurisdictions (79.3% of the respondents) agreed that the format of the Field Training Worksheet is user-friendly. When asked how the format of the worksheet could be improved, the feedback received from the respondents was that the form was much too long and should be shortened to facilitate use in the field.

Almost all of the jurisdictions (86.2% of the respondents) agreed that the Documentation of Successful Completion form is a useful tool for maintaining a candidate’s record and progress during the Assessment of Training Needs process. However, the general consensus of the respondents was that the form could have less detail as it was redundant to list all the same categories included on the Field Training Worksheet.

Based on the feedback gained from the pilot project, it is evident that the Assessment of Training Needs process and forms are valuable tools for retail food regulatory programs. While opportunities for improving the content, structure, and criteria for the ATN have been identified, information gathered during the pilot project confirms that the ATN process is a valuable training tool. When used properly this process will enable agencies to standardize their training programs for FSIOs and provide the knowledge and skills FSIOs need to effectively conduct independent inspections of retail food operations.

The data and feedback received from the project has been subsequently used by the CFP CFSRP Work Group to enhance the Guide and Worksheets to better reflect the regulatory retail food program training environment within which they are used. A summary of the Work Group’s proposed changes is provided at the end of this report. These recommendations will be submitted to the 2008 Biennial Conference for consideration.
Introduction

Pilot Project

A pilot program began during the biennial CFP Conference in April 2006 when jurisdictions at all levels were solicited for their participation. During the conference, a fact sheet was distributed to prospective participants with basic information regarding the project. A gap analysis was conducted of the interested jurisdictions to determine if additional solicitation was needed to attain a demographically representative sample to reflect a national composition of regulatory retail food protection programs. In June of 2006, participant jurisdictions were selected and pilot project information packages were distributed.

In July of 2006, conference calls were held with the selected jurisdictions to provide them an overview of project objectives and information regarding the goals, methodology, data collection, and other pertinent issues. The pilot project was then launched in the fall of 2006 with a total enrollment of 32 State/Local/Tribal jurisdictions. Additional conference calls were held as needed throughout the project and participating jurisdictions were able to correspond as needed with the Project Managers (Mr. John Marcello and Dr. David McSwane) for answers to their questions and problem resolution.

The pilot project was completed in July 2007 and this report represents the results.

Assessment of Training Needs Pilot Project – Jurisdiction Feedback Form

To facilitate data collection on the project results and use of the ATN Field Training Worksheet, a survey instrument was designed for completion by the participant jurisdictions. The survey instrument titled, Jurisdictions Feedback of the ATN Process and Form, (included as Appendix A), was designed to provide a structured process for collecting and analyzing feedback on the project. Results were then tabulated using statistical scoring software and narrative comments were tabulated and analyzed by Committee members.

For purposes of this report, the project results are presented in the same format as the actual ATN Feedback Form with each question appearing first followed by the tabulated results depicted in bold and within parenthesis after each response variable. Additionally, a summary of the analysis of the results is provided with tables and graphics where appropriate.

Pilot Project Objectives

The objectives of the pilot project included:

   - Determine if the Guide provides sufficient information to enable regulatory retail food program trainers and food program managers to use the ATN process and forms for training new hires and staff newly assigned to the retail food protection program.
Assessment of Training Needs Pilot Project Report

- Determine if there are specific sections of the Guide that need to be revised to enhance clarity in the understanding of the ATN process and use of the forms.

2. An evaluation of the Assessment of Training Needs forms which include the Field Training Worksheet (included as Appendix C), and the Documentation of Successful Completion (included as Appendix D).
   - Review the performance elements and criteria for training retail Food Safety Inspection Officers (FSIOs) for omissions, additions, and items that are not applicable to the knowledge and skills needed to perform their job responsibilities.
   - Determine the ease of use of the documents, including instructions. Determine if jurisdictions are able to use the ATN Field Training Worksheet and the Documentation of Successful Completion independently without direct supervision or an orientation to the ATN process.
   - Determine the length of time required to use the documents and to complete the Assessment of Training Needs.
   - Determine if the format and headers for the ATN Field Training Worksheet and Documentation for Successful Completion documents are appropriate.

3. A comprehensive review of the ATN training process to:
   - Verify whether the pre-requisite coursework, identified in Appendix B-1, Standard 2 – Trained Regulatory Staff, is sufficient to prepare candidates for successful completion of the Assessment of Training Needs and to effectively prepare FSIOs to conduct independent retail food and/or foodservice inspections.
   - Verify whether the ATN is appropriately placed in the Standard 2 training process.
   - Determine if the 25 joint field-training inspections are adequate to prepare the candidate for the Assessment of Training Needs and independent inspections of retail food and foodservice facilities.

4. Gather and analyze data from the pilot project and prepare an Assessment of Training Needs Pilot Project Summary Report for submission at the 2008 Conference for Food Protection Biennial Meeting. The results from the pilot project will be used to develop Conference Issues for deliberation that focus on recommendations to enhance the ATN process and/or forms.

Assessment of Training Needs – Field Training Worksheet

A significant component of the pilot project was the use of the Assessment of Training Needs (ATN) – Field Training Worksheet. This worksheet was developed during 2004 and 2005 after the CFSRP Work Group completed a national research study to identify the minimum performance elements and competencies that are needed to conduct effective regulatory retail food and/or foodservice inspections. The ATN Field Training Worksheet was designed to be used by the jurisdictions as a tool to measure the effectiveness of the training programs used to prepare staff newly hired or newly assigned to the regulatory retail food protection program. The document was designed for the purpose of providing a standardized method for preparing FSIOs to conduct independent field inspections. By using the Field Training Worksheets during field-training inspections, jurisdictions have a method to document the training and resulting skill level of the FSIOs.
The data and feedback received from the pilot project jurisdictions on actual use of the ATN Field Training Worksheet provide important insights on the strengths, weaknesses, and effectiveness of the Worksheet as a training tool. As a result of input received during the project, the Worksheet was revised and will be submitted to the 2008 Conference for consideration.

Terminology

For purposes of this report, the following terms and acronyms are defined:

ATN – Assessment of Training Needs

ATN Field Training Worksheet – Worksheet used by jurisdictions during field-training inspections to assess FSIOs

ATN Jurisdiction Feedback Form – The survey instrument used during the pilot project to collect data and feedback from jurisdictions on the ATN training process and the use of the ATN Field Training Worksheet. Terms in the narrative of the report pertaining to “survey”; “survey instrument”; and/or “survey questions” are direct references to the ATN Jurisdiction Feedback Form.

FSIO – Food Safety Inspection Officer is an individual that has been newly hired or newly assigned to a regulatory retail food program
Section I - Demographics of Participant Jurisdictions

What is the population living within your Jurisdiction?

A. less than 25,000 (2)  B. 25,000 to 49,999 (1)  C. 50,000 to 99,999 (1)
D. 100,000 to 249,999 (4)  E. 250,000 to 499,999 (3)  F. 500,000 or above (18)

A total of 29 jurisdictions participated in the ATN Pilot Project. The population in these jurisdictions ranged from one jurisdiction with a population of 25,000 to 49,999 to 18 jurisdictions with populations of 500,000 or higher. Of the jurisdictions responding, 62% had population sizes of 500,000 or higher. The graphic below depicts the responses.

What is your Jurisdiction’s total number of retail food and foodservice establishments under permit?

A. less than 100 (0)  B. 101 to 500 (5)  C. 501 to 1,000 (1)
D. 1,001 to 3,000 (6)  E. 3,001 to 6,000 (8)  F. 6,001 or above (9)

Of the 29 jurisdictions responding, no jurisdictions had less than 100 foodservice establishments under permit, while nine reported 6,001 or more such establishments. The median number of establishments under permit is reported to range from 3,001 to 6,000. Fifty-nine percent (59%) of the jurisdictions reported having 3,001 or more jurisdictions under permit. The graphic that appears at the top of the next page depicts the responses.
How many Food Safety Inspection Officers are employed by your Jurisdiction with FULL TIME (i.e., 100%) responsibility in the food safety program?

A. less than 4 (13)  
B. 4 to 8 (4)  
C. 9 to 12 (0)  
D. 13 to 20 (6)  
E. 21 to 30 (2)  
F. 31 or more (4)

Of the 29 jurisdictions responding, no jurisdictions reported having 9 to 12 full-time FSIOs employed while thirteen reported having fewer than 4 full-time FSIOs. The median number of responding jurisdictions was 4 to 8 full-time FSIOs employed while 41% responded that their jurisdictions had 13 or more full-time FSIOs employed in their jurisdiction. The chart below depicts the responses.
Assessment of Training Needs Pilot Project Report

How many Food Safety Inspection Officers are employed by your Jurisdiction with responsibilities in other environmental health program areas in addition to their retail food protection duties?

A. less than 4 (7)  
B. 4 to 8 (10)  
C. 9 to 12 (1)  
D. 13 to 20 (2)  
E. 21 to 30 (3)  
F. 31 or more (6)

Of the 29 jurisdictions responding, the number of FSIOs with responsibilities in other environmental health program areas in addition to their retail food protection duties ranged from one jurisdiction with 9 to 12 FSIOs with alternate assignments to ten jurisdictions having 4 to 8 FSIOS with alternate assignments. Thirty eight percent (38%) of those jurisdictions responding reported 13 or more FSIOs from their jurisdiction have responsibilities in areas besides retail food. The graphic below depicts the responses.

If your Food Safety Inspection Officers have responsibilities in other environmental health program areas, on average, how much of their annual work plan is dedicated to the retail food protection program?

A. less than 10% (3)  
B. 10% to 29% (1)  
C. 30% to 49% (4)  
D. 50% to 69% (7)  
E. 70% to 89% (9)  
F. 90% or more (3)

Of the 27 jurisdictions responding, one jurisdiction reported that their FSIOs dedicate, on the average, 10% to 29% of their annual work plan to the retail food program, while nine jurisdictions reported that their FSIOs dedicate 70% to 89% on their retail food program responsibilities. Twenty eight percent (28%) reported that their FSIOs dedicate 49% or less percent of their annual work plan to the retail food protection program. The following graphic appearing at the top of the next page depicts the response.
Is your Jurisdiction AWARE of the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*?

**Yes (29)  No (0)**

All 29 jurisdictions responding reported that their jurisdiction is aware of the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*.

Is your Jurisdiction ENROLLED in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*?

**Yes (25)  No (4)**

Of the 29 jurisdictions responding, 25 reported that their jurisdiction is enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*. The graphic below depicts the response.
If enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*, has your jurisdiction MET all the Standard 2 – Trained Regulatory Staff criteria?

Yes (8)  No (19)  No Response (2)

Coupled with the responses to the previous question, of the 25 jurisdictions reporting that their jurisdiction is enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*, eight jurisdictions, or 32% of the sample, reported that they have met all the Standard 2 – *Trained Regulatory Staff* criteria. Two jurisdictions did not respond to this question and are not included in the graphic below.
Section II - Minimum Educational Requirements for FSIOs

What is the minimum level of education a FSIO MUST have to be considered for employment by your jurisdiction in the retail food protection program?

A. High School Graduate (5)  B. Associate’s degree (2)  C. Bachelor’s degree (21)  D. Other (1)

The majority of jurisdictions (72.4%, n=21) require a Bachelor’s degree as the minimum level of education a FSIO must have to be considered for employment. One jurisdiction wrote in the following “other” response “30 Credit hours of physical/biological sciences, from an accredited university, or a bachelor’s degree. The equivalent experience can replace degree. Experience equivalent to bachelor's degree must include 30 hours of science.” The graphic below depicts the responses:

Are FSIOs in your Jurisdiction REQUIRED to complete at least 30 semester hours of science as part of their academic degree PRIOR TO employment or assignment to the retail food protection program?

Yes (23)  No (6)

The majority of jurisdictions (79.3%, n=23) report their FSIOs are required to complete at least 30 hours of science as part of their academic degree prior to employment or assignment to the retail food protection program. The graphic on the next page depicts the results:
Are FSIOs in your Jurisdiction REQUIRED to have a professional credential such as the Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS) or Certified Food Safety Professional (CFSP) PRIOR TO employment or assignment to the retail food protection program?

Yes (9)  
No (20)

The majority of jurisdictions (69%, n=20) report that FSIOs in their jurisdiction are not required to have a professional credential such as the REHS/RS or CFSP prior to employment or assignment to retail food protection.
If your Jurisdiction REQUIRES a professional credential such as those described in the previous question, but allows for the FSIO to work toward their credential after they have been hired, within what TIME FRAME from the DATE OF EMPLOYMENT must a FSIO attain their credential?

A. less than 6 months (3)  
B. within 1 year (8)  
C. within 2 years (4)  
D. Other (7)

In response to this question, the majority of jurisdictions either selected “other” or left the item blank. Seven jurisdictions selected other and 7 jurisdictions left this item blank. Of those who selected “other” the following list contains the time frame that was written in:

- 4 years
- 9 months within their one year probationary period
- Credential is not required, but promotion to a higher level paid job classification is provided if candidate obtains RS/REHS as an incentive after 2 years experience.
- NA (not applicable)
- State law states up to three years
- Within 3 years

The graphic below depicts the responses:

Identify which Credential(s) the FSIOs in your Jurisdiction are REQUIRED to hold? (Check all that apply)

A. REHS/RS issued by NEHA (2)  
B. REHS/RS issued by State Registration Board (15)  
C. CFSP issued by NEHA (3)  
D. Other (8)

The majority of jurisdictions (n=15) responded that they require a REHS/RS credential issued by a State Registration Board. Of those jurisdictions who reported “other” the list of the credential required is below:

- CEHT issued by NEHA (2)
- Certified food protection manager (2)
- NA (not applicable)
Besides the coursework training needed for employment and/or attainment of any required professional credential, does your jurisdiction REQUIRE FSIOs to complete additional food safety education and training courses PRIOR to conducting independent retail food or foodservice inspections?

Yes (25)  
No (4)

The majority of jurisdictions (86.2%, n=25) reported that in addition to professional credentials, they require FSIOs to complete additional food safety education and training courses prior to conducting independent retail food or foodservice inspections. The graphic below depicts the results:

If your answer to the previous question is YES, please identify the types of additional education and training FSIOs are REQUIRED to successfully complete PRIOR TO conducting independent retail food or foodservice inspections? (Place an X next to ALL education and training options that apply).

A. FDA/State sponsored food safety CLASSROOM courses (3)  
B. WEB-BASED (distant learning courses) such as those offered through FDA ORA U (21)  
C. In-house (provided by your jurisdiction) CLASSROOM courses (14)  
D. Food safety courses provided by trade or professional organizations (2)  
E. An ANSI-CFP accredited Food Protection Manager Certification Course (10)  
F. Other – Please describe in box provided below.

- On the job training
- State Food Service Sanitation Managers Certification Course and Exam (15 hours)
- We require all the course work required by standard 2 of the Voluntary National Retail Program Standards. It can be in-house or FDA sponsored or web based or even trade organizations as long as the course is equivalent to the required courses for standard 2. We also require seafood alliance and seafood regulator.
- We do training on the Retail Food Establishment Sanitation Requirements, but not really in a classroom situation. It is one-on-one discussions about practical application after they have read the "rule book."
- Our requirement to PASS the ANSI-CFP Certification test; as in Indiana law for Food Handlers, the course in NOT required, just the certification as demonstration of knowledge.
- *They are required to do inspections with each of our other FSIOs in a variety of food establishments. We
encourage all other types of training, but currently do not require it. It is a judgment call on the FSIO's supervisor as to when they are allowed to conduct independent inspections.

- In house training topics include: food safety issues, regulations, risk based methods, policies and procedures. Completion of an ANSI-CFP accredited Food Protection Manager Certification Course is required, (the course is offered by TPCHD quarterly), due to the course being offered quarterly, the FSIO may not complete PRIOR TO conducting independent inspections.
- Must successfully pass a state approved Certified Food Manager Examination.
- MDA sponsors several training opportunities each year on food safety topics including allergens, pest control, incident command, Listeria, wells/water, HACCP and HACCP audits, etc. These trainings are mandatory for all MDA food staff and local health agencies with a MDA delegation agreement.
- Six-twelve week training program for newly hired sanitarians in which they are scheduled to accompany senior inspectors, supervisors, and training officers in inspections. (See attached training plan) A Level One Training Plan workbook is to be completed within one year.
- New employees have 1 year to complete Level 1 Training Plan (Appendix K in FDA VNFRP Standards) which includes ORA-U and other in-house classroom courses.
- FSIOs in our jurisdiction has been an EHS (regulator) for more than 10 years, has a Master of Science degree in Food Science/Industry program (ASU), and is a registered Manager Trainer by NEHA; additionally, she is a member of the Institute of Food Technologists. Her thesis was on the isolation and enumeration of E. coli, in frozen thawed baby foods. She also has worked in the food industry such as McClain Foods (food analysis lab), and Goldmark beef, Inc., a meat processing plant, (Quality Assurance/HACCP).
- Videos, one-on-one guidance, independent exercises to review.
- Servsafe within the first year.
- Training plans are developed and individualized to meet the specific needs of each FSIO. FSIO's competency level is assessed during joint inspections, and via development conversations between the FSIOs and their trainers. FSIOs are required to initiate FDA ORA U coursework early in training, and prior to working independently, but may not be required to complete the curriculum or any other coursework prior to conducting independent retail foodservice assessments. FSIOs are trained via a progression of observing, co-conducting and leading assessments with experienced staff and creating targeted training experiences to address areas in need of development. Readiness to work independently is not judged on the basis of completing a specific number of courses (quantitative), but is assessed by the FSIO's ability to conduct a risk-based assessment. Emphasis is placed upon development of field staff capacity to perform risk assessments, understand food safety systems, communicate risk, and develop cooperative, consultative relationships.

Based on the responses above, the majority of jurisdictions (21) identified the Web-based distant learning courses such as those offered through FDA ORA U as well as other custom courses.

What is the minimum number of CLASSROOM food safety training hours your Jurisdiction REQUIRES a FSIO to accrue (after they have been hired) PRIOR TO conducting independent retail food and/or foodservice inspections? Include web-based training, such as those which can be obtained through FDA’s ORA University.

A. None (5)  
B. less than 10 (2)  
C. 10 to 25 (2)  
D. 26 to 40 (12)  
E. 41 to 60 (6)  
F. 61 or more (2)

The two jurisdictions who selected “other” wrote in 85 hours and 120 hours. Twelve jurisdictions (41.4%) indicated that they require between 26 and 40 hours of classroom food safety training for the FSIO after they have been hired but prior to conducting independent retail food and/or foodservice inspections. The responses to this item did not indicate a significant trend towards any minimum number of hours with responses being fairly equally divided. The graphic on the next page depicts the responses:
On average, what percentage of the total number of food safety training hours identified in the previous question, will the FSIO attain through WEB-BASED (distant learning) courses?

A. less than 10% (5)  
B. 10% to 29% (3)  
C. 30% to 49% (3)  
D. 50% to 69% (2)  
E. 70% to 89% (7)  
F. 90% or more (6)

In addition to the responses indicated above, one jurisdiction left this survey item blank. Of those who responded, there does not appear to be any specific trend toward any response. The jurisdictions almost evenly selected each of the options above. The responses ranged from a total of 5 jurisdictions selecting less than 10% to 6 jurisdictions selecting 90% or more. The graphic below depicts the response:
What is the minimum number of joint FIELD training inspections (both trainer-led and trainee-led) your Jurisdiction REQUIRES a FSIO to complete PRIOR TO conducting independent inspections of establishments in which operations extend beyond the sale of pre-packaged foods or limited preparation?

A. None (0)  B. less than 10 (5)  C. 10 to 25 (13)  
D. 26 to 40 (6)  E. 41 to 60 (1)  F. 61 or more If more than 61, how many? (3)

The majority of jurisdictions (44.8%, n=13) responded with a minimum number of joint field-training inspections of between 10 and 25 prior to allowing the FSIO to conduct independent inspections. Of the three jurisdiction who reported more than 61, the write in responses included 21, 61 AND 75. The graphic below depicts the responses.

![Minimum number of joint field inspections required before FISO can conduct independent inspections](chart1)

What is the number of food safety CONTINUING EDUCATION hours your Jurisdiction REQUIRES a FSIO to accrue on an annual basis?

A. None are required (6)  B. less than 5 (4)  C. 6 to 10 (8)  
D. 11 to 15 (9)  E. 16 to 20 (0)  F. 21 or more (2)  If more than 21, how many?

Similarly to the previous question, this survey question did not seem to have any trend towards any specific number of continuing education hours required by the jurisdiction. The graphic below depicts the responses.

![Number of Food Safety Continuing Education Courses FSIO is required to accrue](chart2)
Section III - Guide to Conducting ATN Program - Content Evaluation

Were the instructions given in the Guide sufficient for you to understand and implement the training process in your jurisdiction?

Yes (25)  No (3)

The majority of respondents (86.2%, n=25) indicated that the instructions given in the Guide were sufficient for understanding and implementation of the training process.

Please put an “X” in the boxes below to identify any Section(s) of the Guide you believe needs improvement. Please provide your recommendation(s) for improving the Guide in the space provided for each subject area. The page number from the Guide for each subject area is included in parentheses. If you have no recommended changes for a specific Section of the Guide, leave the corresponding box and comment area blank.

OVERVIEW OF THE ASSESSMENT OF TRAINING NEEDS PROCESS

<table>
<thead>
<tr>
<th>Section</th>
<th>Number of Jurisdictions</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Background (page 1)</td>
<td>5</td>
<td>The “Background” section includes many acronyms, which are used throughout the Guide. It would be helpful to use names (such as inspector instead of FSIO or assessment instead of ATN) rather than acronyms and to include a glossary of definitions. The background section also needs to better define that the ATN is intended as a stand-alone document that can be used by jurisdictions that have enrolled in the training standards as well as jurisdictions that are not enrolled. The Guide also needs to provide a more specific description of the intended outcomes of using the ATN process – in addition to uniformity; it needs to be emphasized that the use of this tool will provide a minimum level of quality for food inspections across the country.</td>
</tr>
<tr>
<td>Introduction and Purpose (page 1)</td>
<td>7</td>
<td>The “Introduction and Purpose” of the guide needs to focus on instructions for use of the ATN forms rather than provide background information on why and how the forms were developed. Since the ATN is not Standardization, the guide should state that the ATN is to provide a structured manner to evaluate the FSIO’s progress in a training program leading to Standardization. It should be clear that the ATN supports a continuous improvement process and that it encompasses more than field-training since it also includes on-line training through ORAU and training on local laws and rules.</td>
</tr>
<tr>
<td>Assessment of Training Needs (page 3)</td>
<td>7</td>
<td>The “Assessment of Training Needs” section does not clarify if the ATN is a training element or if it is a means to identify where additional training is needed, or both. Further clarification is also needed as to who should fill out the Document of Successful Completion (DSC). Some jurisdictions might want to use the ATN for certification, audit or licensure or for administrative purposes, so it was recommended that this use not be restricted. Additionally, the terminology in this section should be consistent with other sections, such as use of the terms certification, audit and licensure.</td>
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</table>
**Who Must Complete the Field Training Process (page 3)**

<table>
<thead>
<tr>
<th>7 jurisdictions selected this section.</th>
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<tbody>
<tr>
<td>The write-in comments are summarized below:</td>
</tr>
<tr>
<td>The “Who Must Complete the Field Training Process” section needs to provide further guidance for experienced, new employees. If the ATN is a training tool, then it should not be used for experienced new employees as it conflicts with the intent of the ATN. Alternatively, it was recommended that the ATN be used for experienced employees, but rather than waiving the 25 joint inspections, have the experienced employee conduct at least 5 joint inspections and complete all of the ORAU prerequisite training. Flexibility to allow completion of the ORAU courses during the assessment rather than before the assessment would be helpful for all new employees. As far as “Who Can Conduct an Assessment of Training Needs”, the word “must” have completed steps 1-4 implies that the ATN can only be used by enrolled jurisdictions and does not afford enough flexibility for jurisdictions that are not enrolled.</td>
</tr>
</tbody>
</table>

**Who Can Conduct an Assessment of Training Needs (page 4)**

| 4 jurisdictions selected this section. |
| No significant written comments provided |

**Field Training Forms and Protocol (page 4)**

| 5 jurisdictions selected this section. |
| The write-in comments are summarized below: |
| The “Field Training Forms and Protocol” section defines the two forms that are used in the ATN process. It would be helpful if the full names of the forms could be used and if the form names could be shorter. |

**FIELD TRAINING WORKSHEET**

**Overview of the Field Training Worksheet (page 5)**

| 3 jurisdictions selected this section. |
| The write-in comments are summarized below: |
| In “Overview of the Field Training Worksheet”, it was suggested that the worksheet be broken down into different segments so that areas that are not evaluated every inspection don’t have to be covered or marked. For example, the sampling section and the pre-inspection could be separate documents. The ATN form could be completed once as a tool to show completion of performance elements rather than being filled out multiple times. The “Description of Header Information of the Field Training Worksheet” does not clarify whether or not a facility that holds three licenses should be counted as one inspection or three. It would also help if completion of a sample collection report and training on chain of custody for samples were included as performance elements. |

**Description of Header Information of the Field Training Worksheet (page 5)**

| 2 jurisdictions selected this section |
| No significant comments provided |
5 jurisdictions selected this section.

**Performance Elements (page 6)**

The write-in comments are summarized below:

The “Performance Elements” section should be renamed “Inspection Training Areas” and the name of the “Summary of Food Safety Inspection Officer (FSIO) Performance Elements” section should be shortened to “Performance Elements”. In the “Summary” section, the term “verifies” is used for correction of out of compliance observations, but how the trainer is to verify is not defined. Additionally, it was suggested that sample collection and evidence development be reserved as separate training. It was recommended that ALERT information or food defense information be added as a performance element in section IV and that more principles addressing HACCP and risk control plans be added. It was also recommended that section II (6), “verifies correction of out of compliance observations identified during previous inspection”, be clarified to indicate if the previous inspection was the previous ATN or the previous inspection by another FSIO. It would read better if it said “reviews history of out of compliance observations/violations from prior reports or previous inspection and takes appropriate enforcement action according to jurisdiction procedures”.

4 jurisdictions selected this section.

**Summary of Food Safety Inspection Officer (FSIO) Performance Elements (page 6)**

The write-in comments are summarized below:

The “Performance Elements” section should be renamed “Inspection Training Areas” and the name of the “Summary of Food Safety Inspection Officer (FSIO) Performance Elements” section should be shortened to “Performance Elements”. In the “Summary” section, the term “verifies” is used for correction of out of compliance observations, but how the trainer is to verify is not defined. Additionally, it was suggested that sample collection and evidence development be reserved as separate training. It was recommended that ALERT information or food defense information be added as a performance element in section IV and that more principles addressing HACCP and risk control plans be added. It was also recommended that section II (6), “verifies correction of out of compliance observations identified during previous inspection”, be clarified to indicate if the previous inspection was the previous ATN or the previous inspection by another FSIO. It would read better if it said “reviews history of out of compliance observations/violations from prior reports or previous inspection and takes appropriate enforcement action according to jurisdiction procedures”.

4 jurisdictions selected this section.

**PREPARING TO CONDUCT AN ASSESSMENT OF TRAINING NEEDS**

The write-in comments are summarized below:

In the “Reviewing the Performance Elements” section, it needs to be noted that the ATN performance elements should be reviewed with the new FSIO prior to beginning joint inspections. The NA and NO could be misinterpreted, so specific instructions on when to use each of these markings should be provided. Additionally, NI should be used for observations noted by the assessor but missed by the trainee. The information on adding additional performance elements that is now included in “Specific Competencies/Criteria for each Performance Element” should be moved to the “Reviewing the Performance Elements” section of the Guide and the word “Optional” in the “Specific Competencies” section should be changed to “Additional”. In the “Determine the Appropriate Number of Assessments” section, guidance on making the determination of the number of assessments would be helpful. It was also suggested that jurisdictions establish in advance when in the training process the ATNs will be conducted. Finally, the last sentence in the first paragraph of this section should be reordered to read “… FSIO’s performance for all competencies/criteria of each performance element.”
<table>
<thead>
<tr>
<th><strong>Specific Competencies/Criteria for each Performance Element (page 8)</strong></th>
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| 5 jurisdictions selected this section.  
No significant comments provided. |

<table>
<thead>
<tr>
<th><strong>Determine the Appropriate Number of Assessments for each FSIO (page 9)</strong></th>
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</table>
| 5 jurisdictions selected this section.  
No significant comments provided. |

<table>
<thead>
<tr>
<th><strong>Choosing Establishments for the Training Process (page 9)</strong></th>
</tr>
</thead>
</table>
| 7 jurisdictions selected this section.  
The write-in comments are summarized below:  
In the “Choosing Establishments for the Training Process” section, the risk categories should be defined in the text of the Guide and the reference to the 2005 food code should be generic so that this document does not have to be updated with each version of the food code – for example, it could read “FDA or jurisdiction’s current version of the Food Code”. Multiple jurisdictions suggested FSIOs need to start in lower risk facilities and work their way up to higher risk facilities. |

**CONDUCTING THE ASSESSMENT OF TRAINING NEEDS**

<table>
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<tr>
<th><strong>Methodology (page 10)</strong></th>
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| 8 jurisdictions selected this section.  
No significant comments provided. |

<table>
<thead>
<tr>
<th><strong>Observing Performance Elements (page 11)</strong></th>
</tr>
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</table>
| 4 jurisdictions selected this section.  
The write-in comments are summarized below:  
In the “Observing Performance Elements” section, the phrase “consistent pattern of performance” is subject to broad interpretation and needs to be restated. Under “Difficult to Observe” elements, “Effective Communication and Conflict Resolution” should be separated. Effective Communication could easily be in the frequently occurring section if you are looking for the ability of the trainer to communicate in a way that promotes the operator’s understanding of FBI risk factors. |

<table>
<thead>
<tr>
<th><strong>Assessing FSIO Training Needs (page 13)</strong></th>
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</table>
| 6 jurisdictions selected this section  
The write-in comments are summarized below:  
In the “Assessing FSIO Training Needs” section, multiple respondents to the survey indicated that further instruction is needed on how to use the markings of Acceptable (A), Needs Improvement (NI), Not Observed (NO) and Not Applicable (NA). For example, does a mark of “NO” mean the performance is not present or does it mean it was present but not observed by the FSIO? The meaning of “Acceptable” also needs to be clarified – does it mean a performance element was met most of the time or all of the time? Guidance similar to what is used for completing standardization forms would be helpful. The term “Performance Element” is contradictory to this being a training element since it implies that an audit or evaluation is being performed. |
### Reviewing the Field Training Worksheet with the FSIO (page 14)

5 jurisdictions selected this section.

The write-in comments are summarized below:

In the “Reviewing the Field Training Worksheet with the FSIO” section, the term “KSAs” is inconsistent with the previously used “competencies/criteria” terminology. Additionally, a recommendation should be added in this section to provide a copy of the assessment to the trainee for future reference.

<table>
<thead>
<tr>
<th>FIELD TRAINING PROCESS – DOCUMENTATION OF SUCCESSFUL COMPLETION</th>
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<tbody>
<tr>
<td>Purpose of the Documentation of Successful Completion (page 15)</td>
</tr>
<tr>
<td>3 jurisdictions selected this section.</td>
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</table>

The write-in comments are summarized below:

A review of the “Purpose of the Documentation of Successful Completion” is needed to insure consistency with terminology. In the “Description of Header Information” section, a space for the number of inspections performed needs to be added as well as a place to designate if the FSIO is a new hire, an experienced FSIO or Other. The assessor should only sign this document when all elements have been completed and there is not a corrective action plan indicated. In the “Assessing FSIO Readiness to Conduct Independent Inspections” section, the terminology “corrective action plan” should be changed to “training plan” and the trainee and assessor should be encouraged to collaborate on development of the plan. If a corrective action plan is developed, an additional ATN or similar document would need to be completed and this is not discussed in this section. Finally, a copy of the DSC should be provided to the trainee for future reference.

<table>
<thead>
<tr>
<th>Description of Header Information (page 15)</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 jurisdictions selected this section.</td>
</tr>
</tbody>
</table>

No significant comments provided.

<table>
<thead>
<tr>
<th>Assessing FSIO Readiness to Conduct Independent Inspections (page 15)</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 jurisdictions selected this section.</td>
</tr>
</tbody>
</table>

No significant comments provided.

### STEP-BY-STEP SUMMARY – FIELD TRAINING PROCESS

#### I. Preparing for the Assessment of Training Needs (page 17)

3 jurisdictions selected this section.

The write-in comments are summarized below:

In “Preparing for the Assessment of Training Needs” #4, the word “Optional” needs to be changed to “Additional” and the sentence needs to be rewritten to read “can be listed in the Additional section”. In #6 of the “Preparing for the Assessment” section and in #3 of the “Conducting the Assessment of Training Needs” section, generic language should be used rather than specifically referring to the 2005 version of the food code.
### II. Conducting the Assessment of Training Needs (page 18)

4 jurisdictions selected this section.

The write-in comments are summarized below:

In #4 of the “Conducting the Assessment” section, the terminology “competencies and criteria” for each performance element should be added and in #5 of this section, “NA” and “NO” need to be better defined as discussed earlier. Overall, the terminology needs to be reviewed for consistency (i.e. the term assessor is used interchangeably with the term trainer).

### III. Completing the Documentation of Successful Completion (page 19)

5 jurisdictions selected this section.

The write-in comments are summarized below:

In “Completing the Documentation of Successful Completion” #3, the term “KSAs” is not consistent with the terminology “competencies/criteria” that was used in previous sections. As mentioned in the “Assessing FSIO Readiness” section on page 15 of the Guide, the term “corrective action plan” should be changed to read “training plan”. In general, this section is lengthy and time consuming, especially for small jurisdictions.
Section IV - ATN Field Training Worksheet – Content Evaluation

The 25 Performance Elements (identified in the gray shaded area of the Field Training Worksheet) sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections of retail food and foodservice establishments. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*  

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>1</th>
<th>2</th>
<th>3 (1)</th>
<th>4 (2)</th>
<th>5 (15)</th>
<th>Strongly Agree</th>
<th>6 (11)</th>
</tr>
</thead>
</table>

Responses to this statement ranged from a low of 3 to a high of 6 with a mode (most frequently selected response) of 5. The mean (average) was 5.24 and the median (midpoint) was 5. Almost all of the jurisdictions (89.6%) selected 5 or higher, agreeing that the 25 performance elements sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections. The graphic below depicts the responses:

Are there additional Performance Elements (knowledge and/or skills) that a FSIO needs to have in order to effectively conduct independent inspections of retail food and foodservice establishments that are MISSING from the current Field Training Worksheet?  

Yes (7)  
No (22)  

The respondents were asked to submit missing performance elements if they felt that some were missing. One jurisdiction wrote in “Knowledge of small water systems and small waste water systems and the Safe Drinking Water Act.” The majority of jurisdictions 75.9% (n=22) felt that there were no missing performance elements. The graphic on the next page depicts the responses:
Were there any Performance Elements that were consistently marked NOT OBSERVED?

Yes (26)  No (3)

The majority of the jurisdictions indicated there were performance elements that were consistently marked NOT OBSERVED. However, jurisdictions were not asked to list the performance elements that were consistently marked NOT OBSERVED so which performance elements they were is not known.

Please identify these by placing an “X” adjacent the item number that identifies any Performance Element(s) that were DIFFICULT TO OBSERVE in each of the Filed Training Worksheet categories listed below.

<table>
<thead>
<tr>
<th>Section I</th>
<th>Section II</th>
<th>Section III</th>
<th>Section IV</th>
<th>Section V</th>
<th>Section VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Item 1 (2)</td>
<td>Item 1</td>
<td>Item 1 (12)</td>
<td>Item 1</td>
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<td>Item 2 (1)</td>
<td>Item 2</td>
<td>Item 2 (20)</td>
<td>Item 2 (1)</td>
<td>Item 2 (3)</td>
<td>Item 2 (2)</td>
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<tr>
<td>Item 3 (7)</td>
<td>Item 3 (10)</td>
<td>Item 3 (19)</td>
<td>Item 3 (8)</td>
<td>Item 3</td>
<td>Item 3 (1)</td>
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<tr>
<td>Item 4 (6)</td>
<td>Item 5 (1)</td>
<td>Item 4 (9)</td>
<td>Item 5 (4)</td>
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<td>Item 6</td>
<td>Item 7 (1)</td>
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</tbody>
</table>

Analyses of the responses above indicate that the following sections were DIFFICULT TO OBSERVE and might need further consideration:

- Section I, Item 3 (7 jurisdictions selected this item)
- Section II, Item 3 (10 jurisdictions selected this item)
- Section III, Item 1 (12 jurisdictions selected this item)
- Section III, Item 2 (20 jurisdictions – 2/3 of the jurisdictions, selected this item)
- Section III, item 3 (19 jurisdictions selected this item)
- Section IV, Item 3 (8 jurisdictions selected this item)
- Section IV, Item 4 (9 jurisdictions selected this item)
If you have identified DIFFICULT TO OBSERVE Performance Elements(s), what factors made them difficult to observe?

Nineteen responses were provided relative to the collection of food/water samples as a routine function of food inspection programs. Sixteen stated that samples were not a routine element, were not something that would be taught to a trainee, or were an element performed by other designated staff. Two respondents stated that samples were taken as part of a foodborne illness investigation only.

Additional comments relative to non-routine inspection performance elements that were difficult to observe included ten responses relative to taking of photographs; six jurisdictions commented that a pre-inspection review of previous establishment history was difficult to accomplish and/or that HACCP/Variance plans are not a requirement of that jurisdiction; three responses indicated that stop sale/embargo actions are not a routine inspection process; seven respondents stated that language barriers or confrontations were not a routine consideration; and, three jurisdictions stated that they did not encounter issues relative to confidentiality.

Several jurisdictions indicated difficulty in identifying areas of concern with cooling procedures during a routine inspection since this was a process largely done after hours, at night, etc. As with several of the above identified items, a number were taught as a classroom or “in-office” type element.

Were there any Performance Elements that were consistently marked NOT APPLICABLE?

Yes (20)  No (8)

Twenty of the jurisdictions (71.4%) reported there were Performance Elements that were consistently marked NOT APPLICABLE. One jurisdiction did not respond (left blank). Jurisdictions were asked to select those that they consistently marked NOT APPLICABLE. The next item contains the responses.

Please identify these by placing an “X” next to the item number of the Performance Element(s) consistently marked NOT APPLICABLE in each of the Field Training Worksheet Section categories listed below.

<table>
<thead>
<tr>
<th>Section I</th>
<th>Section II</th>
<th>Section III</th>
<th>Section IV</th>
<th>Section V</th>
<th>Section VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Item 1</td>
<td>Item 1 (1)</td>
<td>Item 1 (6)</td>
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</table>

Based on the responses above, there are several Performance Elements that should be considered or reviewed as they may not be applicable to this project:

- Section III, Item 2 (12 jurisdictions selected this item)
- Section III, Item 3 (12 jurisdictions selected this item)

If you have identified Performance Elements that were consistently marked NOT APPLICABLE, what factors contributed to this marking?

Thirteen respondents indicated that collection of food/water samples were consistently marked NOT APPLICABLE because this is not a routine inspection item; it is done for foodborne illness investigations only; or, is performed by specialized staff only. A number of these jurisdictions stated that they set up separate lab/office type exercises to train the FSIO.

Also identified as “not a requirement” for the jurisdiction was: five responses on use of lab coats; six responses on HACCP/variance plans; two responses on date marking; three responses on use of infrared thermometer; and, two responses in use of consumer advisory language.
Were there specific Performance Elements that FSIOs consistently experienced DIFFICULTY with?

Yes (11) No (16)

Responses to this item were fairly evenly spread with 11 jurisdictions (40.7%) indicating there were specific Performance Elements they experienced difficulty with and 16 jurisdictions (59.3%) indicating there not any specific Performance Elements they experienced difficulty with. Those that indicated yes were asked to select the items that the FSIOs had difficulty with.

Please identify these by placing an “X” adjacent to the item number of the Performance Elements(s) FSIOs had DIFFICULTY with in each of the Field Training Worksheet Section categories listed below.

<table>
<thead>
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<th>Section I</th>
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</table>

Based on the responses above, there were very few items within the Performance Elements that many jurisdictions indicated FSIOs had difficulty with. Only one area (Section II, Item 3) had enough responses to even review that item, and this item only received 9 responses (less than 30%).

If you have identified Performance Element(s) that FSIOs experienced DIFFICULT with, what factors contributed their challenges.

Overall, the comments provided for this question focused on the inexperience of the trainee FSIO and the difficulty in evaluating their initial inspection work. Five jurisdictions noted challenges in communications relative to the FSIO being too reserved in talking with the PIC, managers and food employees and had to be coaxed to interact, ask questions, and provide compliance information. The ATN was identified as a tool to provide necessary feedback during the training process.

Three jurisdictions stated that gaps were noted in the general knowledge of laws and codes, risk-based inspection procedures and public health significance of the violations noted. There were several comments that the FSIOs were unable to correlate violations to relative foodborne illness concerns; they were challenged by referencing codes and citations correctly and in providing appropriate compliance timelines.

Do you believe there are any Performance Elements that should be DELETED from the Field Training Worksheet?

Yes (13) No (16)

Again, the responses to this item were fairly evenly distributed with 13 jurisdictions (44.8%) indicating they felt there were Performance Elements that should be deleted and 16 jurisdictions (55.2%) indicating they felt there were NOT any Performance Elements that should be deleted. Those that indicated yes were asked which Performance Elements they felt should be deleted. The following item contains the results.
Please identify these by placing an “X” next to the item number of the Performance Element(s) that should be DELETED in each of the Field Training Worksheet categories listed below.

<table>
<thead>
<tr>
<th>Section I</th>
<th>Section II</th>
<th>Section III</th>
<th>Section IV</th>
<th>Section V</th>
<th>Section VI</th>
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<td>Item 3</td>
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</table>

A review of the responses above indicate that very few (if any) of the Performance Elements should be deleted. Of those checked, only two items (Section II, item 2 and item 3) had more than 2 checks and they only had 9 (less than 30%) and should even be considered for deletion. Write in comments provide additional information for consideration.

If you recommended that one or more Performance Elements be deleted in question 7, what rationale can you provide to support your recommendation?

Eight of the eleven respondents identified the food/water sampling elements of Section 3: Items 2 and 3 to be deleted completely or moved to the end of the document as an “addendum”. They largely stated that this was an element used only for investigation of foodborne illnesses or could be accomplished as a classroom/lab taught skill.

The competencies/criteria listed as examples under each Performance Element are helpful to the training process. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
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<td>3 (1)</td>
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<td>4 (1)</td>
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<tr>
<td>5 (9)</td>
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</tbody>
</table>

The majority of the jurisdictions (93.1%) indicated the competencies/criteria listed as examples under each Performance Element were helpful to the training process. The following graphic depicts the overall responses:
Please provide an explanation for your response.

Fifteen comments were provided in response – all largely favorable to the examples offered under each Performance Element. A brief representation of the comments includes the following:

- “It helps provide specific focus areas for better performance evaluations.”
- “The list is long but a complete inspection requires all elements listed.”
- “I believe that it helped the FSIOs get a true understanding of what is important to consider in each category.”

Three of the fifteen comments indicated that the element examples are helpful but that further customization or modification based on jurisdictional criteria is needed.

Are there any Performance Elements for which the competencies/criteria need REVISIONS (additions, deletions, changes)?

Yes (15)  
No (14)

The responses to this item were almost evenly split with 15 jurisdictions (51.7%) indicating there were Performance Elements in need of revisions and 14 jurisdictions (48.3%) indicating there were NOT any Performance Elements in need of revisions. The graphic below depicts these responses:

Please identify these by placing an “X” next to the item number of the Performance Element(s) needing REVISIONS in each of the Field Training Worksheet Section categories listed below.

<table>
<thead>
<tr>
<th>Section I</th>
<th>Section II</th>
<th>Section III</th>
<th>Section IV</th>
<th>Section V</th>
<th>Section VI</th>
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<tbody>
<tr>
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<td>Item 1 (1)</td>
<td>Item 1 (1)</td>
<td>Item 1 (1)</td>
<td>Item 1 (2)</td>
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<td>Item 6 (3)</td>
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<td>Item 6 (2)</td>
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<tr>
<td>Item 7 (2)</td>
<td>Item 7 (2)</td>
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</tr>
</tbody>
</table>

Based on the responses above, there are several sections and items that many need revision, however, no one particular item received a large number of responses or suggestions. The narrative comments that follow provide more in-depth information regarding the suggested revisions.
If you identified one or more Performance Element(s) needing REVISIONS, what changes would you recommend to the competencies/criteria?

Of the comments provided, many were specific to modifications made to accommodate jurisdictional codes or policies. A number of the comments did provide detailed language changes that they had made for their “in-house” use or were recommending as possible changes to the master document.

Four comments recommended reduction/elimination of the food/water sampling language or placing it as an addendum or identifying it as a classroom element only. Two comments recommend clarification of the term “verified” as used in the document. Five comments recommended changes to Section I, Item 3, relative to review of the establishment file and to eliminate the HACCP/Variance language. The addition of pH test kit language was included in three jurisdiction remarks. Additionally, two jurisdictions recommended deletion of the “confidentiality” element in Section IV, Item 4, and four respondents recommended an overall modification or reduction in the Communications section.
### Section V - ATN Field Training Worksheet – Format Evaluation

The format of the Field Training Worksheet is user-friendly. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>6 (8)</td>
</tr>
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<td>2 (1)</td>
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<tr>
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<td>4 (4)</td>
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<tr>
<td>4</td>
<td>2 (1)</td>
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<tr>
<td>5</td>
<td>1 (15)</td>
</tr>
<tr>
<td>6</td>
<td>8 (19)</td>
</tr>
</tbody>
</table>

The responses ranged from a low of 2 to a high of 6 with a mode (most frequently selected response) of 5. The mean (average) was 4.97 and the median (midpoint) was 5. 79.3% of the respondents selected 5 or higher agreeing that the format of the *Field Training Worksheet* is user-friendly. The graphic below depicts the responses:

![Format Evaluation Chart](chart.png)

**What improvements would you recommend?**

The main theme that came from this section is that the form was much too long. There were numerous comments recommending that the form be shortened. The respondents felt that the form was “exhaustive, too lengthy, impractical and had a lot of pages.” Additionally they believed that the form be rearranged so that flipping of pages could be minimized.

**The header labels are appropriate.**

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>6 (19)</td>
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<tr>
<td>2</td>
<td>5 (8)</td>
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<td>4 (1)</td>
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<td>4</td>
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<tr>
<td>5</td>
<td>1 (19)</td>
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<tr>
<td>6</td>
<td>8 (19)</td>
</tr>
</tbody>
</table>

The responses ranged from a low of 3 to a high of 6 with a mode (most frequently selected response) of 6. The mean (average) was 5.55 and the median (midpoint) was 5. 93.1% of the respondents selected 5 or higher agreeing that the header labels were appropriate. The graphic on the next page depicts the responses:
What improvements would you recommend?

The limited comments on this piece mentioned two aspects in particular. One respondent would like to have the piece moved up in the form and stand alone. A second respondent recommended integrating Oral Communication criteria into the Inspection Observations and Performance Criteria because they believe oral communication is a “key success factor in performing a risk-based assessment.”

Enough space is provided for responses and comments.

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>1</th>
<th>2 (2)</th>
<th>3 (3)</th>
<th>4 (3)</th>
<th>5 (10)</th>
<th>Strongly Agree</th>
<th>6 (11)</th>
</tr>
</thead>
</table>

There was a large spread of responses on this item with the responses ranging from a low of 2 to a high of 6. The mode (most frequently selected response) was 6. The mean (average) was 4.86 and the median (midpoint) was 5. 72.4% of the respondents selected 5 or higher indicating there was enough space provided for responses. The narrative comments in the next item provide additional information regarding this. The graphic below depicts the responses:

What improvements would you recommend?
The respondents felt overwhelmingly that the form did not have enough room for their comments. They felt that they needed much more room to provide their comments. Every respondent that replied mentioned this issue except one who liked that the columns were on the right hand side.

4. Is there any general information that is MISSING?

Yes (6)  
No (23)

The majority of the jurisdictions (79.3%, n=23) indicted there was not any general information that was missing. The graphic below depicts the responses:

Is there any general information that is missing?

<table>
<thead>
<tr>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
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<tr>
<td>10</td>
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<td>5</td>
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<td>0</td>
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</tbody>
</table>

Is there any general information that is missing?

- No
- Yes

Please identify information that needs to be ADDED.

The limited comments that were included mentioned having a menu driven focus for inspection, the fact that the form did not have criteria for assessing the ability to affect positive change and that toxic items were not listed.

Is there any general information that should be DELETED?

Yes (5)  
No (24)

The majority of jurisdictions (82.8%, n=24) felt there was NOT any general information that should be deleted. Those that responded “yes” were asked to elaborate and a summary of their responses is provided below.

Please identify information that should be DELETED.

The theme that the form was too long and needed to be condensed made its way into this section as well. They were repeats from question number 1. Other themes mentioned that on the first page in the first paragraph under the instructions that there was a repeat of information that was contained in the instructions so it should be deleted. One respondent mentioned that the pre-inspection section was not needed and that the sections on sampling section and inspector dress could be eliminated.
Did you modify the Field Training Worksheet during the Assessment of Training Needs process?

Yes (8)  
No (21)

The majority of the jurisdictions (72.4%, n=21) did not modify the Field Training Worksheet during the process.
Section VI - ATN Documentation of Successful Completion – Form and Format Evaluation

The Documentation of Successful Completion form is a useful tool for maintaining a candidate’s record and progress during the Assessment of Training Needs process. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>6 (12)</td>
</tr>
<tr>
<td>2 (2)</td>
<td></td>
</tr>
<tr>
<td>3 (2)</td>
<td></td>
</tr>
<tr>
<td>4 (4)</td>
<td></td>
</tr>
<tr>
<td>5 (9)</td>
<td></td>
</tr>
</tbody>
</table>

The responses ranged from a low of 2 to a high of 6 with a Mode (most frequently selected response) of 6. The mean (average) was 4.93 and the median (midpoint) was 5. 72.4% of the respondents selected 5 or higher and 86.2% of the respondents selected 4 or better agreeing that the Documentation of Successful Completion form is a useful tool for maintaining a candidate’s record and process during the Assessment of Training Needs Process. The graphic below depicts the responses:

What improvements would you recommend?

The general consensus of the respondents was that the form did not have to be as detailed as it was because it seemed redundant by having all of the same categories as the Field Training Worksheet. Comments also mentioned that progressive data needs to be included, not just using it as a summary document. They also mentioned adding a timeline so that supervisors could show their staff.

The format of the Documentation of Successful Completion form is user-friendly

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>6 (15)</td>
</tr>
<tr>
<td>2 (1)</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
</tr>
<tr>
<td>4 (2)</td>
<td></td>
</tr>
<tr>
<td>5 (11)</td>
<td></td>
</tr>
</tbody>
</table>

The responses ranged from a low of 2 to a high of 6 with a Mode (most frequently selected response) of 6. The mean (average) was 5.34 and the median (midpoint) was 6. 89.6% of the respondents selected 5 or higher and 96.5% of the respondents selected 4 or better agreeing that the Documentation of Successful Completion form is user-friendly. The graphic on the next page depicts the responses:
What improvements would you recommend?

The limited comments mentioned that the form seemed to create redundancy in checking off boxes that are already assessed with the Field Training Worksheet. The other comment mentioned the form be made shorter and only cover the necessary information.

The header labels on the Documentation of Successful Completion form are appropriate.

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>6 (14)</td>
</tr>
<tr>
<td>2 (1)</td>
<td>5 (13)</td>
</tr>
<tr>
<td>3</td>
<td>4 (1)</td>
</tr>
<tr>
<td>4 (1)</td>
<td>3</td>
</tr>
<tr>
<td>5 (13)</td>
<td>2 (1)</td>
</tr>
</tbody>
</table>

The responses ranged from a low of 2 to a high of 6 with a Mode (most frequently selected response) of 6. The mean (average) was 5.34 and the median (midpoint) was 5. 93.1% of the respondents selected 5 or higher agreeing that the header labels on the Documentation of Successful Completion form are appropriate. The graphic below depicts the responses:
What improvements would you recommend?

The single comment mentioned that the headers should match those on the *Field Training Worksheet*.

**Enough space is provided for responses and comments on the form.**

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (1)</td>
<td>5 (10)</td>
</tr>
<tr>
<td>2</td>
<td>6 (12)</td>
</tr>
<tr>
<td>3 (2)</td>
<td></td>
</tr>
<tr>
<td>4 (4)</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
</tr>
</tbody>
</table>

The responses ranged from a low of 1 to a high of 6 with a Mode (most frequently selected response) of 6. The mean (average) was 5.0 and the median (midpoint) was 5. The responses to this item were all over with a trend towards “Strongly Agree” but with one jurisdiction selecting “Strongly Disagree” and two jurisdictions selecting 3 (below neutral). The graphic below depicts the responses:

---

**What improvements would you recommend?**

Again, the majority of the comments all mentioned that much more space was needed to provide comments and that perhaps and additional comments box could be added at the end of the document so that overall comments could be put there.

**Is there any general information that is missing?**

Yes (0)  
No (29)

100% of the jurisdictions that responded indicated that there was not any general information missing.

**Please identify information that needs to be ADDED.**

Only one comment that said, “I think you put a lot of thought into this and I couldn’t think of anything.”
Is the two document format (*Field Training Worksheet* and *Documentation of Successful Completion*) user-friendly or would it be better to combine them into one document?

- Keep the current two document format (18)
- Merge into one document (10)

The majority of respondents (62.1%) recommended keeping the current two document format and only 34.5% recommended merging the documents into one.

**Provide an explanation for your recommendation.**

| The respondents split pretty evenly down the middle in their responses. One half believed that the form should be merged into one document in order to simply the process and the amount of paperwork needed. Those that felt it should be kept in two separate documents mentioned that the DSC did not provide enough detail so the FTW was still needed, that the DSC allowed for supervisors to show areas that still needed improvement and that the two documents should both be completed and stored in two different locations since they had two different purposes. Overall, there was not a majority for one or the other. |
Section VII - ATN Pilot Project Results

How many FSIOS in your Jurisdiction participated as trainees using the ATN process?

A total of 132 FSIOs participated in the ATN Pilot Project. The number of FSIO’s from each individual jurisdiction ranged from 7 jurisdictions that had one FSIO participating to 1 jurisdiction that had thirteen FSIOs participating. The average number of FSIOs per jurisdiction was five. More jurisdictions had 1 FSIO participating (n=24%) than any other number of FSIOs participating. The graphic below depicts the responses.

How many FSIOs successfully completed the ATN process during the Pilot Project?

A total of 110 FSIOs completed the ATN Pilot Project. This represents a total completion rate of 83.33%. The number of FSIO’s completing the ATN process ranged from zero (in 2 jurisdictions) to all thirteen FSIOs in 1 jurisdiction. The graphic below depicts the responses.
How many FSIOs were unable to successfully complete the ATN process during the Pilot Project?

Very few jurisdictions reported having FSIO’s who were “unable” to complete the process. 90% of the jurisdictions reported having no FSIOs who were unable to complete the process. Three jurisdictions indicated they had one FSIO who was unable to complete the process. The disparity between the number who completed and the number “unable” to complete probably represents FSIOs who were still in the process completing their training when the pilot project ended or who left the jurisdiction’s employment. The graphic below depicts the responses.

How many “assessors” (individuals responsible for the field training and education of newly hired or assigned FSIOs) participated in the Pilot Project?

A total of 87 “assessors” participated in the Pilot Project. The number of assessors participating within each jurisdiction ranged from a low of one (38% reported using one assessor) to a high of 20. Eleven jurisdictions reported having one assessor participate and one jurisdiction reported having 20 assessors participate. The graphic below depicts the responses.
Was there more than one assessor per FSIO?

Eleven jurisdictions reported having more than one assessor per FSIO and 17 jurisdictions responded “no” to this.

If more than one assessor was used per FSIO, on average how many assessors were used per FSIO?

Responses to this question ranged from two assessors per FSIO to seven assessors per FSIO. Six jurisdictions reported using two assessors per FSIO, one jurisdiction reported using three assessors per FSIO, two jurisdictions reported using four assessors per FSIO, two jurisdictions reported using five assessors per FSIO, and one jurisdiction reported using seven assessors per FSIO. Of those who had more than one assessor per FSIO, the most frequently listed number of assessors per FSIO (the mode) was two (n=6). The graphic below depicts the results.

The ATN is designed in such a way as to facilitate the consistent application of the training process by the assessor, even when candidates varied in knowledge and/or skill level.

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>1</th>
<th>2 (4)</th>
<th>3</th>
<th>4 (2)</th>
<th>5 (16)</th>
<th>Strongly Agree</th>
<th>6 (7)</th>
</tr>
</thead>
</table>

The responses ranged from a low of 2 to a high of 6 with a mode (most frequently selected response) of 5. The mean (average) was 4.75 and the median (midpoint) was 5. 80% of the respondents selected 5 of higher agreeing that the ATN is designed in such a way as to facilitate the consistent application of the training process by the assessor, even when candidates varied in knowledge and/or skill level. The graphic that appears at the top of the next page depicts the responses.
What changes would you recommend to facilitate more consistency among assessors?

Five respondents indicated that clarification and improvement was needed in the Guide document to assist in uniform understanding of application by the Assessors. Some jurisdictions stated there was confusion in how to mark the performance elements. Several comments indicated that joint meetings or conferences between the different Assessors would help to facilitate the uniformity of application. Two jurisdictions responded that there should be standardization of the Assessors to the Guide to ensure consistency.

FSIOs that successfully complete the ATN are ready to conduct independent retail food and/or foodservice inspections at the conclusion of the training.

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>1</th>
<th>2</th>
<th>3 (1)</th>
<th>4 (5)</th>
<th>5 (14)</th>
<th>Strongly Agree</th>
<th>6 (9)</th>
</tr>
</thead>
</table>

The responses ranged from a low of 3 to a high of 6 (strongly agree). 80% of the respondents selected 5 or better. The mean (average) was 5.07, the media (midpoint) was 5 and the mode (most frequently selected response) was 5. The graphic below depicts the responses.
What deficiencies did the FSIOs have at the conclusion of the training and what improvements need to be made to the process to address these deficiencies?

Six out of twelve respondents stated that lack of field experience and code knowledge was a significant deficiency in the FSIOs; even after completion of training. Some felt that there were gaps in specific knowledge areas such as low risk vs. high risk firms; exposure to HACCP principles, etc. Several comments suggested more joint inspections.

On average, how long did it take to complete an orientation of the Assessment of Training Needs process and forms for each of the FSIOs?

A. less than 60 minutes (14)  
B. 61 – 120 minutes (7)  
C. 121 – 180 minutes (4)  
D. Other (4)

Fourteen of the jurisdictions (48.3%) indicated I took less than 60 minutes to complete an orientation of the ATN process and forms for each FSIO. Seven jurisdictions (24%) indicated it took between 61 and 120 minutes and four jurisdictions indicated it took between 121 and 180 minutes. Four jurisdictions select other (three said between 121 and 210 minutes and one said 2 [hours?]). The graphic displayed below depicts the responses.

On average, how long did it take to complete the pre-requisite coursework outlined in Appendix B-1 of the revised Program Standard 2?

Jurisdictions reported a range of less than 15 hours to 61-75 hours. A frequency table appears below:

<table>
<thead>
<tr>
<th>Total Number of Hours for a FSIO to complete pre-requisite coursework</th>
<th>Frequency</th>
<th>Percent</th>
<th>Valid Percent</th>
<th>Cumulative Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valid</td>
<td>less than 15 hours</td>
<td>1</td>
<td>3.4</td>
<td>3.6</td>
</tr>
<tr>
<td></td>
<td>16 - 30 hours</td>
<td>12</td>
<td>41.4</td>
<td>42.9</td>
</tr>
<tr>
<td></td>
<td>31 - 45 hours</td>
<td>2</td>
<td>6.9</td>
<td>7.1</td>
</tr>
<tr>
<td></td>
<td>46 - 60 hours</td>
<td>7</td>
<td>24.1</td>
<td>25</td>
</tr>
<tr>
<td></td>
<td>61 - 75 hours</td>
<td>2</td>
<td>6.9</td>
<td>7.1</td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td>4</td>
<td>13.8</td>
<td>14.3</td>
</tr>
<tr>
<td></td>
<td>Total of responses</td>
<td>28</td>
<td>96.6</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>No Response</td>
<td>1</td>
<td>3.4</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>29</td>
<td>100</td>
<td></td>
</tr>
</tbody>
</table>
A total of 53.6% of the jurisdictions indicated it took 45 hours or less for the FSIO to complete the pre-requisite coursework. The majority of the respondents (n=12, 41.4%) indicated it took FSIOs between 16 and 30 hours to complete pre-requisite coursework. Further review is needed to determine why some FSIOs were able to complete the pre-requisite coursework in less than the recommended time. In some cases, it could be because the FSIOs entered the process with alternative education (such as a Bachelor’s degree) thus eliminating the coursework requirement.

**On average, how long did it take the FSIO to conduct a Pre-Inspection Establishment File Review?**

The majority of jurisdictions (n=25, 86.2%) indicated it took less than 30 minutes for the FSIO to conduct a Pre-Inspection Establishment File Review. The table below summarized the responses to this question:

<table>
<thead>
<tr>
<th>Average time it took a FSIO to conduct a Pre-Inspection Establishment File Review</th>
<th>Frequency</th>
<th>Percent</th>
<th>Valid Percent</th>
<th>Cumulative Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valid</td>
<td>less than 30 minutes</td>
<td>25</td>
<td>86.2</td>
<td>86.2</td>
</tr>
<tr>
<td></td>
<td>31 - 60 minutes</td>
<td>3</td>
<td>10.3</td>
<td>10.3</td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td>1</td>
<td>3.4</td>
<td>3.4</td>
</tr>
<tr>
<td>Total</td>
<td>29</td>
<td>100</td>
<td>100</td>
<td></td>
</tr>
</tbody>
</table>

The jurisdictions that selected “other” wrote in “5 to 10 minutes”. Therefore in all cases, 100% of the FSIOs were able to complete the pre-inspection establishment file review in less than 60 minutes and most could do it in less than 30 minutes.

**On average, how long did it take to complete an on-site joint field-training inspection (SINGLE INSPECTION) in which the ATN Field Training Worksheet was used (actual field-training time in hours – including inspection, completion of the inspection report, and discussion of the inspection report with the person in charge)? Do NOT include travel time to & from the establishment.**

As the table below indicates, the majority of the jurisdictions (n=21, 72.4%) indicated it took between 61 and 180 minutes (one to three hours) for an FSIO to complete a single on-site joint field training inspection while using the ATN Field Training Worksheet. Only one jurisdiction reported it took less than an hour and 7 jurisdictions reported “other”.

<table>
<thead>
<tr>
<th>Average time it took to complete an on-site joint field-training inspection</th>
<th>Frequency</th>
<th>Percent</th>
<th>Valid Percent</th>
<th>Cumulative Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valid</td>
<td>less than 60 minutes</td>
<td>1</td>
<td>3.4</td>
<td>3.4</td>
</tr>
<tr>
<td></td>
<td>61 - 120 minutes</td>
<td>11</td>
<td>37.9</td>
<td>37.9</td>
</tr>
<tr>
<td></td>
<td>121 - 180 minutes</td>
<td>10</td>
<td>34.5</td>
<td>34.5</td>
</tr>
<tr>
<td></td>
<td>Other (see below*)</td>
<td>7</td>
<td>24.1</td>
<td>24.1</td>
</tr>
<tr>
<td>*4 hours – (1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*6 hours – (1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*Varied – (1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*Significant – (1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*2 to 4 hours (3)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>29</td>
<td>100</td>
<td>100</td>
<td></td>
</tr>
</tbody>
</table>

The graphic on the next page depicts the results of the previous question.
On average, how long did it take to complete an on-site joint field training inspection?

On average, how long did it take to discuss the results of the ATN Field Training Worksheet from a (SINGLE) joint field training inspection with the FSIO; set training objectives; and complete the training document?

The following frequency table displays the results of this item. The majority of jurisdictions (n=20, 69%) reported it took less than 60 minutes to discuss the results of the ATN Field Training Worksheet with the FSIO. The three respondents who selected “other” indicated both “less than 60 minutes” and “60 to 90 minutes.” Therefore 100% of the respondents indicated it took less than 90 minutes to discuss the results of the ATN Field Training Worksheet with the FSIO.

<table>
<thead>
<tr>
<th>Average time it took to discuss the results of the ATN Field Training Worksheet with the FSIO</th>
<th>Frequency</th>
<th>Percent</th>
<th>Valid Percent</th>
<th>Cumulative Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valid</td>
<td>less than 60 minutes</td>
<td>20</td>
<td>69.0</td>
<td>69.0</td>
</tr>
<tr>
<td></td>
<td>60 - 90 minutes</td>
<td>6</td>
<td>20.7</td>
<td>20.7</td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td>3</td>
<td>10.3</td>
<td>10.3</td>
</tr>
<tr>
<td>Total</td>
<td>29</td>
<td>100.0</td>
<td>100.0</td>
<td></td>
</tr>
</tbody>
</table>

On average, how long did it take a FSIO to successfully complete the Assessment of Training Needs? (Include the orientation process; completion of the pre-requisite courses; establishment file reviews; actual inspection time; review of the training reports with the FSIO; and completion of all training documents/worksheets.)

The table on the next page contains a frequency distribution of the responses regarding the average time for the FSIO to complete the Assessment of Training Needs. The responses varied greatly from less than 20 hours to several months. One respondent indicated it is still not complete.
The graphic below depicts the broad range of responses to this question. More research is required to determine why the responses were so varied.

The ATN process is a valuable use of my Jurisdiction’s resources (e.g., time; staff; finances).

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>1</th>
<th>2 (1)</th>
<th>3</th>
<th>4 (7)</th>
<th>5 (11)</th>
<th>Strongly Agree</th>
<th>6 (10)</th>
</tr>
</thead>
</table>

The responses ranged from a low of 2 to a high of 6. The mode (most frequently selected response) was 5. The mean (average) and median (midpoint) were also 5. A total of 72.4% of the jurisdictions selected either a 5 or 6 and 96.6% selected 4 or better indicating a strong agreement that the ATN process was a valuable use of the Jurisdiction’s resources. The graphic on the next page depicts the results.
The ATN process is a valuable use of my Jurisdiction's resources.

Explain, why?

Overall, most responses were complimentary to the process and identified it as a “good start”. Thirteen of the twenty one responses indicated that the ATN was a valuable training evaluation tool. Nine responses stated that it helps to standardize the overall training process. Four jurisdictions, however, identified the process as time consuming, having too much paperwork, and a potential drain on employee and monetary resources.

What recommendation(s) would you propose to make the ATN process and/or forms more beneficial to your regulatory retail food protection program?

There were a number of lengthy and comprehensive comments relative to customization of the process to an individual jurisdiction’s needs as well as general comments for improvement of the process and forms. One respondent in particular provided detailed remarks relative to the ATN process being too “prescriptive” and stated that, “Clear emphasis needs to be placed on the use of the ATN as a flexible, effective tool that will aid the agency in meeting its training needs, not a set of requirements to me met, as defined by FDA and CFP.”

Six of the jurisdictions responding to this question recommend that the Guide document and forms be “streamlined” and “condensed” for more accuracy and ease of use. Three comments recommended the development of a web-based or computer-friendly form that could be used by jurisdictions that perform inspection work electronically. Two comments expressed concern with Program Standard 2 and in being able to meet the standard criteria. An increase in the minimum joint inspections was recommended by two respondents.
Section VIII - ATN Impact on Program Standard 2 Criteria

The pre-requisite coursework outlined in Program Standard 2, Appendix B-1, is sufficient to prepare the FSIO to successfully complete the ATN. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th></th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (1)</td>
<td>2 (6)</td>
<td>3 (1)</td>
</tr>
<tr>
<td>4 (3)</td>
<td>5 (11)</td>
<td>6</td>
</tr>
</tbody>
</table>

The responses ranged from a low of 1 “Strongly Disagree” to a high of 5 with the mode (most frequently selected response) being 5. The mean (average) was 4.31 and the median (midpoint) was 5. The responses indicate a lack of agreement that the coursework outlined in Program Standard 2, Appendix B-1 is sufficient to prepare the FSIO to successfully complete the ATN.

Please explain.

Many jurisdictions commented that although the pre-requisite coursework was an important component to the overall training of a FSIO, there were other components that were essential to a FSIO successfully completing the ATN. Other components felt to be essential might include: in-house, post-training discussion exercises following ORAU courses, more field work for hands-on training and to promote use of critical thinking skills, and subjects that were jurisdiction-specific. Jurisdictions completing the feedback form that had newly hired staff who were significantly more experienced commented that the pre-requisite coursework was more of a review or refresher for their staff.

If No, what coursework would you ADD?

A second part to the question, asked if the jurisdictions felt that additional (pre-requisite) coursework was needed; what would they add? Some suggestions included:

- Classroom training on material found in Annex 5 of the FDA Model Food Code (Conducting Risk Based Inspections)
- A face-to-face HACCP Application Course.
- More extensive coursework on communication with retail food managers and employees
- Food lab experience
- Training on expert witnesses

Was a minimum of 25 joint field training inspections adequate to prepare the FSIO to conduct independent inspections?

Yes (19) No (10) If No, What is the appropriate number of joint field-training inspections?

19 responded that 25 joint field-training inspections were adequate and 10 responded that they were not. Of the 10 that responded with a “no”, the number of joint field-training inspections recommended ranged from 10 to 100, with an average of 75. The two graphics on the next page depicts the responses.
Was a minimum of 25 joint field training inspections adequate to prepare the FSIO to conduct independent inspections?

If No, What is the appropriate number?

What rationale did you use to determine the appropriate number of joint field training inspections?

The number of joint inspections required may be based on an individual’s skill, capability and affinity for learning new tasks, or accomplishment of certain skills. Many jurisdictions felt that the number of joint inspections required was based on the new hire’s experience. One jurisdiction commented that the number of joint field inspections per FSIO was based on low, medium and high risk facility types and the staff’s ability to demonstrate competencies in each risk category.
If any of your FSIOs proceeded through to standardization did the ATN (Program Standard 2, Steps 1 through 3), adequately prepare them for standardization (Program Standard #4)?

Yes (4)  No (1)  None have as yet been standardized (23)

The majority (82.1%, n=23) of the FSIOs participating in the ATN Pilot Project had not been standardized yet. Of the jurisdictions that had gone through the standardizing process, four stated “yes” they felt adequately prepared and one stated “no”.

What would you recommend to better prepare a FSIO for standardization?

Additionally, the ATN Feedback Form asked for recommendations to better prepare FSIOs for standardization. The following recommendations were made:

- A second module of training during the 18 month training period covering HACCP, Active Managerial Control and Risk Control Plans (long term interventions for out of control risk factors) or completion of the FDA Managing Retail Food Safety Course.
- More communication classes
- More time in the field for “ride-along inspections” with other staff and trainers to become more comfortable in general with the job and questioning operators.
- Training on how to use the inspection report using the CFP format
- Access to the FDA Food Code Training on-line
- Multiple jurisdictions emphasized the importance of additional on-the-job training and additional experience with different facility types

If any of your FSIOs proceeded to standardization, what was the minimum number of inspections needed for a FSIO to successfully complete their standardization?

A. Minimum of 4 (1)  B. Minimum of 8 (12)  C. Other (1)  Please specify number of inspections (8)

Fifteen jurisdictions did not respond to this item, one responded a minimum of 4 inspections, twelve responded a minimum of 8 inspections, and one responded “other” and specified 8 inspections. The graphic below depicts the responses:
Section IX - ATN Additional Comments

Section I – Demographics of Participant Jurisdictions

Item 3: Should include an option of zero FSIOs with Full Time responsibility in the food safety program as all of our staff has additional program abilities.

Item 3: Staff members identified with full time responsibilities in food do both retail and manufactured foods

Item 4: Answer A=0.

Item 4: Staff members identified with part time responsibilities do other work in our Meat Inspection or Dairy Inspection Program.

Item 5: We have 3 FT staff assigned to other program areas, with foods less that 10% of their time. We have 2 FT staff assigned to foods >90% of their time. We have 2 PT assigned 100% of their hours.

Item 8: We have just begun with training of 2 remaining FT staff. As I understand Standard 2 from our FDA Training Specialist, we will not meet Standard 2 because of the staff not assigned FT to foods.

Item 10: A minimum of 6 weeks is devoted to joint field inspections before staff is released to do independent low and medium risk inspection.

Section II – Minimum Education Requirements for FSIOs

Items 3, 4, and 5: Answer D=Other Clarifications made during the conference call and sent via email indicated that "FULL TIME responsibilities in the food safety program are not restricted to just conducting food service or retail food inspections. The FSIO may have also have responsibilities in such areas as retail food plan reviews ...” Our County's staff consists of 13 FSIOs and 2 supervisors. Professional credential is not required as part of employment for entry level FSIOs, (11 of 13). All routine inspection activities of FE's are completed by entry level FSIO'S. While entry level FSIOs are not required, they are highly encouraged, to have professional credentials (RS/REHS) as part of employment. Technical Lead (2 of 13 FSIOs) level and above positions are required to have professional credentials to hold these higher positions. The REHS/RS issued by NEHA or by State Registration Board is acceptable.

Item 4: Indiana law requires 2 years FT experience prior to the REHS exam.

Item 4: Our requirement is to become credentialed within 2 years of hire, however, due to union requirements, once we certify them at 6 months (pass probation), we would not be able to terminate if they did not ever get credentialed. (In order to sit for a credentialing exam, you need to have 1-2 years experience working in the field). But to be promoted from a Food Inspector I to a Food Inspector II (or above), they must have obtained a credential.

Item 6: Our County has an intensive new employee training program that includes practical and classroom training. An example of an eight week training schedule has been attached as well.

Item 8: Answer E. 41-60. The minimum training hours are based on Appendix B-1 of the Program Standards showing the Pre-requisite courses are estimated to be 42 hours, and completion of accredited Food Protection Manager Certification Course.

Item 10: Answer C=25. Minimum number of joint FIELD training inspections, with ATN worksheet completed every 5 inspections.

Item 11: CFSP - NEHA requires 24 CEUs every 2 years & we require CFSP.

Item 11: FSIOs are required to obtain 15 continuing education hours every 2 years. It should be noted that there are sections of the report that refer to the time to complete certain aspects of the ATN process. There does not seem to be any consideration for the potential variation as to the number of Training Inspections accomplished (more or less than the 25) and the number of assessor-led vs. trainee-led and the number of those inspections where an ATN form was completed and discussed with the trainee. As such, care should be taken when entering the data for analysis where such variables are possible.
Item 11: Documentation of Continuing Education is only required if they are credentialed. We have many long-term staff members that are not credentialed. However, we have many opportunities (and is often required) for all staff to attend training sessions.

Item 11: FSIOs in our County are required to complete the standardization process within 18 months of employment. After standardization, each FSIO is required to complete 20 continuing education hours every 3 years.

Section III – Guide to Conducting ATN Program – Content Evaluation

Page 4 of the Guide: The forms need not be redundant, I would suggest that we use the entire form during the first 5 inspections to cover the basics and then change areas of the form to eliminate covering the same materials during each graded inspection. Once the identification of the proper use of required equipment and forms to conduct the inspection has been established, as an example, this needs not be reported during following inspections unless the candidate fails to have that equipment and reports available during the inspections. It is suggested that the next 5 reports focus on the single issue or several issues that will eliminate redundancy from previous training sheets. The next 5 reports would cover additional disciplines as a progressive means and so forth. The last 5 field sheets could go back the original forms and a reinforcement to cover all areas of the evaluation form. Covering the same information over and over becomes time consuming in filling the reports, whereas that additional time could be devoted to other training activities in a progressive manner.

Page 6 of the Guide (Performance Elements): The pre-inspection part of the form should be eliminated after the first 5 inspections once the trainer is confident that the trainee has an understanding of what is required of he or she in that section (see IV #9 page 13.)

Section IV – ATN Field Training Worksheet – Content Evaluation

Section II, Item 3, Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food (ATN Field Training Worksheet): It is suggested that some of the process evaluations in the Inspection Observations and Performance section be separated. For example, in #3 separate TPHC from hot holding and cold holding.

Section III, Item 3, Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction. (ATN Field Training Worksheet): Uses an aseptic water sample collection is seldom accomplished and needs not be included during each inspection report. Use of a standardized form as an add-on would be helpful for any aseptic sampling.

Section IV, Item 1, Asks questions and engages in a dialogue with person in charge/employees to obtain information relevant to inspection. (ATN Field Training Worksheet): Without them some areas may be overlooked.

Section IV, Item 5, Uses effective communication and conflict resolution techniques to overcome inspection barriers. (ATN Field Training Worksheet): Fails to address FSIO’s personal safety while visiting trouble areas.

Section VI, Professionalism (ATN Field Training Worksheet): It's better to assess after 5 inspections to track improvements or deficiencies.

Section V – ATN Field Training Worksheet – Format Evaluation

Item 6: We did not change the form for the purpose of the pilot, but if to become part of our permanent training program, we would make changes.

Item 6: Our County had an existing field evaluation sheet for training new FSIOs. The existing sheet was revised after the ATN pilot project was completed to include some aspects of the ATN such as oral communication. Both sheets are attached.

Item 6: Our State Food Safety Program uses a Basic Training Plan for the new inspectors. The Basic Training Plan includes: procedures, a checklist of items that needs to be addressed to all new inspectors, ORAU training curriculum, basic training record, 25 solo inspection record, and quizzes that need to be completed each week. This plan is reviewed each week by the inspectors' district manager to make sure the plan is completed for each phase. The Basic Training Procedure is to arrange a three-week joint training inspection schedule depending on the new inspector's prior experience. There is a minimum of 25 inspections that need to be conducted and logged into the new inspector’s
basic training log. If the new inspector has had previous experience in conducting food inspections, the number of joint inspections can be reduced. The training inspector will critique the trainee with the Field Training Worksheet on the first inspection each day of the 2nd and 3rd weeks of training. On the 4th week, the district manager decides if the new inspector is ready for verification. Verification is a test to make sure our inspectors are ready to conduct independent inspections. If the new inspector is not ready for verification, then they continue with training. If the district manager has determined that the new inspector is ready to proceed, then the trainee will proceed with the verification process. A standardized staff person will observe eight inspections with the trainee to ensure that the trainee has sufficient knowledge of the regulations and inspection process to operate independently. The standard will use the Documentation of Successful Completion Form for the Verification. We rate them with a 1, 2, or 3 on the ability to complete each item. Inspectors must pass with an overall score of 80% and have an average of 2 on sections II, IV, and V. This form will be filled out and signed if the verification was successful. At this time the new inspector will proceed to independent inspections. If the new inspector does not pass verification, then they will continue with training and make a 2nd attempt at verification. Attached is the revised Documentation of Successful Completion form.

**Section VI – ATN Documentation of Successful Completion – Form and Format Evaluation**

No additional comments were submitted for Section VI

**Section VII – ATN Pilot Project Results**

**Item 1:** We had 2 actual trainees participate, and we waived 3 experienced staff, who then completed the ATN process.

**Item 2:** One trainee completed the entire process, but 4 staff now meet Standard 2 because of the waiver process.

**Item 3:** Not enough time available to complete training and assessment. Five employees scheduled for ATN assessment. Two did not stay with us long enough to use the ATN assessment. Completed ATN assessment on one employee.

**Item 4:** We have 2 Standardized Food Program Inspection Officers standardized by an FDA Standardized Training Officer: Joe did field training, while I did training and assessment at set interval points using the ATNs. There were no inconsistencies brought to my attention. We do joint inspections annually, I review almost all inspection narratives, and we each do 2 standardization inspections with our ISDH Training Officer each year to remain consistent. Maybe we should distinguish between "Trainer" and "Assessor"?

**Item 9:** Average was just above 16 hours with several completing in just under 15 hours.

**Item 9:** This represents ORA-U courses only - our classroom training done on state rules, statutes is not included.

**Item 9:** The computer training is much easier and less time is involved in Trainees that have just graduated from college or are younger. They have had more experience with online computer training than the people that have been in the workforce for several years and not had the experience on computers. The average time required is real diverse depending on needs of the jurisdiction and how much time can be spent on the computer. Some areas would allow the new FSIO to do computer work as needed, and others had the FSIO's doing various duties and did not allow much time for the computer work. Standard # 2 - The timeline allowed on Standard 2 is not real reasonable for most jurisdictions. Generally speaking, more time is needed to complete all of the aspects of training and standardization. Two years would be more reasonable for training and standardizing FSIO's. Also, in most states, the Registration in Training process takes two years before the REHS or RPS is awarded. Worksheets should not be completed until the candidate has performed some joint inspections with the candidate in the lead. This way, the supervisor or training officer has a better idea of where additional training is needed.

**Item 11:** For us, a single inspection would include all departments of a large supermarket (deli and bakery and meat/seafood and produce prep) - hence long time

**Item 13:** It should be noted that the answer does not take into account all the time to plan and implement this ATN process. This would be a one time expenditure of resources to review and tailor the ATN form for a jurisdiction. Note: Less than 25 inspections were done for candidates that were not new hires (2 or 3) and were already conducting independent inspections.
Section VIII – ATN Impact on Other Program Standard 2 Criteria

**Items 1 & 2.** The weekly training format we followed during this pilot is as follows: One or Two days of classroom training on rules, statutes or any of the other sessions we developed. Two to Four days of joint field inspections to reinforce topic(s) covered in classroom and also build upon previous weeks' training. I developed Field Training Guidance Documents for many subjects to help the field trainers know what to re-enforce. ORA-U courses were completed where time allowed (part days, days where field trainer were not available). This schedule allowed for flexibility with schedules of classroom trainers, and field trainers and accommodated necessary travel time considering that ours is a statewide program and not all trainers and trainees live in a centralized area. It also provided a combination of classroom time and field time, so trainees did not get bored sitting in a classroom all day, 5 days a week. It allowed trainees to gain exposure to retail food establishments and the processes that happen there which helped them to understand some of the classroom subjects presented later on.

**Item 2:** Between 10 and 15 inspections were completed. Therefore, if an additional 15 inspections were conducted then that would possibly translate to more than double the time required.

**Item 2:** The new FSIO received in-house training prior to completing FDA ORAU courses. He stated that the one-on-one interaction was essential to the training process. The in-house instructor was able to provide comprehensive feedback and individualized coaching to lead the FSIO in the right direction. The courses served to re-enforce in-house learning objectives. HACCP courses were taken before field-training inspections were conducted. Establishments chosen increased in complexity based on menu and processes as the trainee advanced.

**Item 2:** This process was frequently disrupted to allow time for other departmental priorities

**Item 4:** We do have a program for standardization and follow the FDA model of 8 inspections required (although we would like to see that number reduced to 4).

Section X – Use of Multiple Trainers for the ATN

**Item 1:** Trainers vs. Assessors; we had up to 11 senior staff members act as trainers (those with whom joint field inspections were conducted), but just 7 of those actually conducted an ATN. Some of the trainees had just one assessor; others had 2 or 3 different assessors.

**Item 2:** Trainees did not bring this up, but as a classroom trainer, field trainer, assessor and coordinator for this pilot project, I did note differences in the assessors’ assessment of the trainees’ ability to perform.

Additional Comments not Associated with a Specific Section of the Feedback Form

* Additional performance elements missing (I was not able to type data into the comments area provided after the question). Additional areas that should be added include Pest Control, Food Allergens, Ethnic foods, Labeling, Food Recalls, Evaluating the operation (including menu review to determine most important areas of the operation to observe/inspect); for example - they could have evaluated all the risk factors or public health interventions, but not asked critical questions about products/processes not being conducted during the inspection, or looked at a bakery area in detail, but not placed adequate focus on a RTE food operation like in a deli), Plan Review (to gain a better understanding of agency standards). Another very broad area is the agencies inspection and administrative procedures such as licensing, regulatory/enforcement procedures and obtaining compliance (tools in addition to immediate correction on site, such as HACCP plans, risk control plans, standard operating procedures for long term control).

* It must be noted that we used this process on one of our new FSIO people in our Wholesale Program. He is responsible for conducting inspections on manufacturing and distribution facilities rather than retail type facilities. It was a bit awkward as some of the sections did not correspond to these types of regulations and the FDA GMPs, but it could easily be converted to accommodate this aspect. Overall this is something that has been needed for a long time and we will incorporate this into our training on new retail staff. It will give me as a manager the means to track their progress and know where they stand. Keep up the good work!

* Thank you for including my jurisdiction in the pilot project. The ATN has been a useful and very effective tool for training. I plan to continue using it. The ATN also assists us in meeting standard 2.
* Jurisdictions already experiencing budget cuts, staff shortages, and time constraints would require other resources in order to conduct the ATN in its entirety.

* Our jurisdiction is looking forward to partner with all the jurisdictions who are vested in Food Safety. We will continue using this program as our training tool, as stated before, it has been a good guidance for those of us who are not well versed in food science. Any human community is vulnerable to foodborne disease (including water in all forms) when food stuff is compromised. We are very thankful to the most respectful John Marcello, FDA, for his dedication and support; the Conference of Food Protection, and Dr. David McSwane, H.S.D., R.E.H.S., C.F.S.P. Professor, School of Public and Environmental Affairs, Indiana University.

* This is a useful tool and helpful to anyone without a standardized training program. Although we were unable to complete all aspects of the training, it has been beneficial to our department and has helped to institute a standard training program.

* The ATN process was an improvement to our training program and we plan to continue using the forms, ORAU courses and face to face follow up training.
Section X - Supplemental Survey Items

Did you use multiple trainers to administer the Assessment of Training Needs?

Yes (19)  No (10)

The majority of jurisdictions (65.5%, n=19) indicated they used multiple trainers to administer the Assessment of Training Needs. The graphic below depict the responses:

If you used multiple trainers, did candidates (trainees) report any differences between the trainers assessment of their ability to perform one or more elements contained on the field training worksheet?

Yes (3)  No (16)

The majority of the jurisdictions (84.2%, n=16) reported that their candidates did not report any differences between trainers assessment of their ability to perform one or more elements contained on the field-training worksheet.

Did your jurisdiction implement any steps to minimize the difference in how the ATN process was administered by various trainers?

Yes (10)  No (9)

Ten jurisdictions reported they implemented steps to minimize the difference in how the ATN process was administered by various trainers. The trainers were asked to describe the steps and most jurisdictions that commented described a pre-pilot training session or an informal standardization process.
The second supplemental item in Section X asked the participating jurisdictions before participating in the ATN Pilot Project, were you familiar with the Application of the Basics of Inspection/Investigation Course (FD170) available through ORA University?

Fifteen jurisdictions responded “yes” and 14 responded “no” they were not familiar with the course. If they were familiar with the course, the jurisdictions were asked, do you think this type of ‘Application Course’ would better prepare a Food Safety Inspection Officer for the ATN? Fourteen jurisdictions responded “yes” they thought it would better prepare a FSIO and 3 responded “no”. Twelve jurisdictions did not respond to this question. Most jurisdiction comments in general, endorsed the use of the ‘Application Course’, some suggested using components of the course materials to tailor to their jurisdiction’s needs (due in part to the volume of material and time commitment required to administer the entire course), some found it was helpful to take the course before going out in the field, and commented that it appeared to help the FSIO understand their role and what is required of an inspector.

The final supplemental question in Section X was addressed only to the 25 jurisdictions enrolled in the FDA’s Voluntary National Retail Food Regulatory Program Standards.

This supplemental question asked Should the’ Application Course’ or equivalent be a requirement instead of a recommendation? (The Application of the Basics of Inspection/Investigation Course, FD170, is currently listed in Appendix B-1 of Program Standard 2 as a recommendation.)

There were 18 jurisdictions that responded “yes” it should be required and nine jurisdictions responded “no” it should not be required. Two jurisdictions did not offer an opinion on this issue. Jurisdictions not in favor of making the course a requirement commented that there was limited availability of the course and a lack of jurisdiction resources and therefore did not wish to make it a requirement of Program Standard 2. Some jurisdictions commented that they could not locate the course on the ORAU website, others stated that if required the course should be readily available.
Pilot Project Findings and Conclusions

The findings and conclusions for the pilot project will be presented in three parts:

**Part I – Assessment of Training Needs (ATN) Process and Guide;**

**Part II – ATN Field Training Worksheet; and**

**Part III – Documentation of Successful Completion form.**

**Part I – Assessment of Training Process and Guide**

A vast majority (96.6%) of the pilot participants agreed that the ATN process was a valuable use of their jurisdiction’s resources. Most respondents were complimentary to the process and identified it as a “good start.” Several jurisdictions indicated that the ATN process was a valuable training evaluation tool that helps to standardize the overall training for FSIOs. In a minority opinion, four jurisdictions identified the process as time consuming with too much paperwork and a potential drain on employee and monetary resources.

The majority of respondents (86.2%, n=25) indicated that the instructions given in the *Guide to Conducting an Assessment of Training Needs* were sufficient for understanding and implementing the training process. However, some very good suggestions were made for clarifying and improving several sections of the *Guide*. For example, a significant number of jurisdictions noted that the *Guide* vacillated between being a training manual and an assessment audit procedure. Many jurisdiction recommended revisions to the content to ensure the intended use is clear and terminology remained consistent. In addition, it was recommended that a glossary of terms be included and the use of acronyms be kept to a minimum.

Eleven jurisdictions reported having more than one assessor/trainer for each FSIO. The majority of these respondents (80%) agreed that the ATN is designed to facilitate the consistent application of the training process by the assessor/trainer, even when candidates varied in knowledge and/or skill level.

A majority (66%, n=19) of the pilot jurisdictions used multiple trainers to administer the Assessment of Training Needs. Of the jurisdictions that used multiple trainers, eighty-four percent (84%) reported that their candidates did not report any differences between trainers assessment of their ability to perform one or more elements contained on the *Field Training Worksheet*. Ten jurisdictions reported they implemented steps to minimize the difference in how the ATN process was administered by various trainers; the most commonly used approach was a pre-pilot training session or an informal standardization process for the trainers.

Nineteen of the pilot jurisdictions (66%) agreed that a minimum of 25 joint field-training inspections was adequate to prepare the FSIO to conduct independent inspections. Of the 10 jurisdictions that responded 25 joint inspections was not enough, the number of joint field-training inspections recommended ranged from 10 to 100, with an average of 75. Many of the respondents believed the number of required joint inspections should be variable based on an individual FSIO’s prior experience, skills, capability and affinity for learning new tasks, or accomplishment of certain skills. One jurisdiction commented that the number of joint field inspections for each FSIO was based on low, medium, and high risk facility types and the FSIO’s ability to demonstrate competencies in each risk category.
Eighty percent (80%) of the respondents reported that FSIOs who successfully complete the ATN are ready to conduct independent retail food and/or foodservice inspections at the conclusion of the training.

When the pilot jurisdictions were asked how long it took for the FSIO to complete the Assessment of Training Needs, the responses varied greatly from less than 20 hours to several months. The majority of the respondents (72%) indicated the average time for the FSIO to complete the ATN was less than 100 hours.

Some pilot jurisdictions encouraged customization of the ATN process and forms to an individual jurisdiction’s needs. One respondent remarked the ATN process is too “prescriptive” and stated, “Clear emphasis needs to be placed on the use of the ATN as a flexible, effective tool that will aid the agency in meeting its training needs, not a set of requirements to be met, as defined by FDA and CFP.” Several jurisdictions said the Guide and forms need to be “streamlined” and “condensed” for more accuracy and ease of use. A few jurisdictions recommended the development of a web-based or computer-friendly form that could be used by jurisdictions that perform inspection work electronically.

The pilot project participants were asked if the pre-requisite coursework outlined in Appendix B-1, Standard 2, is sufficient to prepare the FSIO to successfully complete the ATN. The responses received were highly variable. There was, however, an overall lack of agreement on this point. Many jurisdictions commented that, although the pre-requisite coursework was an important component to the overall training of a FSIO, there were other components essential to a FSIO successfully completing the ATN. These other essential components included:

- In-house, post-training discussion exercises following ORA University courses;
- Field work to provide additional hands-on training and to promote use of critical thinking skills;
- Classroom training on material found in Annex 5 of the FDA Food Code (Conducting Risk Based Inspections);
- A face-to-face HACCP Application Course;
- More extensive coursework on communication with retail food managers and employees;
- Food lab experience;
- Training on becoming an expert witness, and
- Other subject areas which are jurisdiction-specific such as local food, plumbing, and building codes and regulations.

The majority of jurisdictions (72%) that were familiar with the Application of the Basics of Inspection/Investigation Course (FD170) available through FDA’s ORA University were in favor of making it a required part of the coursework in Appendix B-1, Standard 2. The jurisdictions that were not in favor of making the course a requirement were concerned about the limited availability of the course and a lack of jurisdiction resources. Most indicated they would not be opposed to making the course a requirement provided it was readily available to all jurisdictions.

Only five of the jurisdictions that participated in the pilot project reported having FSIOs who proceeded through to standardization. While this number is too small to be meaningful, four of the five jurisdictions
that had gone through the standardization process stated they believed the FSIOs were adequately prepared.

**Part II – ATN Field Training Worksheet**

Almost all of the jurisdictions (89.6%, n=26) agreed that the 25 performance elements in the ATN *Field Training Worksheet* sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections. The majority of the jurisdictions (93.1%) indicated the competencies/criteria listed as examples under each performance element were helpful to the training process.

Several jurisdictions mentioned that further instruction is needed on how to use the markings of Acceptable (A), Needs Improvement (NI), Not Observed (NO) and Not Applicable (NA). It was felt the Not Applicable (NA) and Not Observed (NO) markings could be misinterpreted, so specific instructions on when to use each of these should be provided.

The pilot participants were asked to identify any performance elements that were difficult to observe or consistently marked as ‘Not Applicable.’ The most commonly identified item was “collection of food/water samples.” Other items identified by some jurisdictions were use of lab coats, HACCP/variance plans, date marking, use of infrared thermometers, and consumer advisory language.

Almost all of the jurisdictions (79.3%) agreed that the format of the ATN *Field Training Worksheet* is user-friendly. When asked how the format could be improved, the feedback indicated the form was much too long. Some respondents stated the form was “exhaustive, too lengthy, impractical and had a lot of pages.” Additionally, they believed that the form should be rearranged to minimize flipping of pages.

Seventy-two percent (72%) of the respondents agreed there was enough space provided for responses. However, the remaining respondents felt overwhelmingly that they needed much more room to provide their comments.

**Part III – Documentation of Successful Completion Form**

Almost all of the jurisdictions (86.2%) agreed that the *Documentation of Successful Completion* form is a useful tool for maintaining a candidate’s record and progress during the Assessment of Training Needs Process. However, the general consensus of the respondents was that the form did not need to be so long and seemed redundant to have all of the same categories as the *Field Training Worksheet*. Comments also mentioned that progressive data needs to be included, not just using it as a summary document. They also suggested adding a timeline.

The respondents were asked if the two document formats (*Field Training Worksheet* and *Documentation of Successful Completion*) were user-friendly or better if combined into one document. The majority of respondents (62.1%) recommended keeping the current two document format and only 34.5% recommended merging the documents into one. Those respondents that felt it should be kept in two separate documents mentioned that the form did not provide enough detail so the *Field Training Worksheet* was needed to allow tracking of areas that still needed improvement, and that the two documents should both be completed and stored in two different locations since they had two different purposes.
Pilot Jurisdictions Recommendations to the Conference

Based on the findings and conclusions from the pilot project, the following summarizes recommendations received from participating jurisdictions for enhancing the effectiveness of the Assessment of Training Needs process and Guide, the Field Training Worksheet, and the Documentation of Successful Completion form.

1. Revise the Guide to Conducting an Assessment of Training Needs. Some changes that may be made to the content of this document include:
   - Clarifying the intended use of the Guide and Worksheets. Confusion exists as to whether the Guide is intended to be used as an instructional training manual or whether it is to be used as assessment of a FSIOs performance. The content and procedures presented in the Guide need to reflect a consistent objective;
   - Adding a glossary of terms;
   - Using full names in addition to acronyms;
   - Reorganizing and reformatting the Guide so it is an instructional manual rather than a guidance document, and
   - Providing clarification as to who should complete the field-training process.

2. Shorten the Guide and Field Training Worksheet to make them more “streamlined” and “condensed” to enhance accuracy and ease of use.

3. Seek opportunities for developing a web-based or computer-friendly form that could be used by jurisdictions that enter data from inspection work electronically.

4. Explore the possibility of adding courses to the ATN process that would include topics such as post-training discussion exercises following ORA University courses, field work to provide additional hands-on training and to promote use of critical thinking skills, classroom training on material found in Annex 5 of the FDA Food Code (Conducting Risk Based Inspections), a face-to-face HACCP Application Course, more extensive coursework on communication with retail food managers and employees, food lab experience, training on becoming an expert witness, and other subjects that are jurisdiction-specific such as local food, plumbing, and building codes and regulations.

5. Revise Appendix B-1, Standard 2 to include the Application of the Basics of Inspection/Investigation Course (FD170) as a requirement. Work with FDA to assure this course is readily available to all jurisdictions who are participating in the ATN process.

6. Provide additional information and instructions on how to use the markings of Acceptable (A), Needs Improvement (NI), Not Observed (NO), and Not Applicable (NA) in the Field Training Worksheet.

7. Evaluate the Field Training Worksheet to determine whether performance elements, such as “collection of food/water samples” should be revised or eliminated. Other items to consider would include use of lab coats, HACCP/variance plans, date marking, use of infrared thermometers, and consumer advisory language.
8. Explore ways to add more space on the *Field Training Worksheet* for narrative comments by the assessors.

9. Explore ways to make the *Documentation of Successful Completion* less detailed and redundant with the *Field Training Worksheet*.
Next Steps

The CFP CFSRP Work Group conducted a face to face meeting in Chicago, September 14-16, 2007, to discuss the data results and feedback from pilot project jurisdictions. Based on this meeting, the Work Group reached consensus on how to prepare the pilot project report and revisions/modifications needed to the *Guide for Conducting an Assessment of Training Needs* and the *Field Training Worksheets*.

In addition, a focus group conference call of a representative sample of pilot project jurisdictions was conducted in November 2007. The purpose of the focus group was to obtain additional feedback on whether the project conclusions reached by the Work Group accurately reflected their experiences. Representatives from the focus group jurisdictions indicated strong support for the changes and revisions proposed by the Work Group.

The Work Group has used the data and feedback from the ATN pilot project to modify and revise the content and forms originally provided in the *Guide for Conducting an Assessment of Training Needs*. These recommendations have been submitted to the 2008 Conference as a separate issue titled:

*CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers*

Some of the changes to the FSIO training process and forms include:

- Reformating the content to create an instructional step-by-step field-training manual.
- Inserting additional information on pre-requisite coursework that a FSIO should complete prior to conducting independent retail food and/or foodservice inspections.
- Including a new CFP *Training Plan* to assist jurisdictions with identifying appropriate methods of training for listed competencies.
- Providing optional *Training Logs* for tracking a FSIOs weekly progress as well as the types of establishments that have been included in the joint field-training process.
- Clarifying language so the manual is only used for training purposes and *not* as an evaluation/audit process or for administrative purposes. All references to the training process being an ‘assessment’ of the FSIO have been eliminated.
- Including expectations of trainers regarding their role during field-training inspections and methods for working with FSIOs newly assigned to the retail food protection program.
- Modifying the *Field Training Worksheet* to better reflect a training process rather than use as an assessment tool. References for ‘A’ – (Acceptable) or ‘NI’ – (Needs Improvement) have been removed. *Worksheets* are now designed to track the continual improvement of the FSIO as progress is made during field-training inspections.
- Describing options for jurisdictions to use the forms and worksheets provided in the manual. Flexibility has been built into the process to allow jurisdictions to develop their own forms or modify those provided to meet their specific training needs.
- Creating forms that will allow entering information on worksheets electronically. The CFP *Training Plan and Log*, as well as the *Field Training Worksheets* have been developed using a Word ‘Form’ format. This format will allow these documents to be completed electronically. The
option to complete the forms manually is still available to jurisdictions that prefer to use them this way.
Appendices

APPENDIX A – Jurisdiction Feedback Form on the ATN Process and Forms

APPENDIX B – CFP Guide to Conducting an Assessment of Training Needs

APPENDIX C – ATN Field Training Worksheet

APPENDIX D – ATN Documentation of Successful Completion
CONFERENCE FOR FOOD PROTECTION (CFP)

ASSESSMENT OF TRAINING NEEDS (ATN)

REGULATORY RETAIL FOOD SAFETY INSPECTION OFFICERS (FSIO)

JURISDICTION FEEDBACK ON ATN PROCESS AND FORMS

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<tr>
<th>Name of Jurisdiction</th>
<th>Type (place an “X” in the appropriate box)</th>
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Jurisdiction Mailing Address:  
City  
State  
Zip

Contact Person for the Jurisdiction
Contact Phone #  
Contact Fax #  
Contact E-mail Address

Report Prepared By:  
(if different from the Contact Person for the Jurisdiction)
Preparer Phone #  
Preparer Fax #  
Preparer E-mail Address

(Place an “X” in the space adjacent to the most appropriate response for each question)

SECTION I

JURISDICTION DEMOGRAPHICS

1. What is the population living within your Jurisdiction?

- A. less than 25,000
- B. 25,000 to 49,999
- C. 50,000 to 99,999
- D. 100,000 to 249,999
- E. 250,000 to 499,999
- F. 500,000 or above

2. What is your Jurisdiction’s total number of retail food and foodservice establishments under permit?

- A. less than 100
- B. 101 to 500
- C. 501 to 1,000
- D. 1,001 to 3,000
- E. 3,001 to 6,000
- F. 6,001 or above

3. How many Food Safety Inspection Officers are employed by your Jurisdiction with FULL TIME (i.e., 100%) responsibility in the food safety program?

- A. less than 4
- B. 4 to 8
- C. 9 to 12
- D. 13 to 20
- E. 21 to 30
- F. 31 or more

4. How many Food Safety Inspection Officers are employed by your Jurisdiction with responsibilities in other environmental health program areas in addition to their retail food protection duties?

- A. less than 4
- B. 4 to 8
- C. 9 to 12
- D. 13 to 20
- E. 21 to 30
- F. 31 or more

(Section I – continues on the next page)
SECTION I
JURISDICTION DEMOGRAPHICS
(Section I – continued from the previous page)

5. If your Food Safety Inspection Officers have responsibilities in other environmental health program areas, on average, how much of their annual work plan is dedicated to the retail food protection program?

☐ A. less than 10%
☐ B. 10% to 29%
☐ C. 30% to 49%
☐ D. 50% to 69%
☐ E. 70% to 89%
☐ F. 90% or more

6. Is your Jurisdiction AWARE of the *FDA Voluntary National Retail Food Regulatory Program Standards*?

☐ Yes ☐ No

7. Is your Jurisdiction ENROLLED in the *FDA Voluntary National Retail Food Regulatory Program Standards*?

☐ Yes ☐ No

8. If enrolled in the *FDA Voluntary National Retail Food Regulatory Program Standards*, has your jurisdiction MET all the Standard 2 – Trained Regulatory Staff criteria?

☐ Yes ☐ No

(Section II – Starts on the next page)
SECTION II
JURISDICTION’S MINIMUM EDUCATION REQUIREMENTS FOR FOOD SAFETY INSPECTION OFFICERS (FSIOs)

1. What is the minimum level of education a FSIO MUST have to be considered for employment by your jurisdiction in the retail food protection program?

☐ A. High School Graduate ☐ B. Associate’s degree ☐ C. Bachelor’s degree
☐ D. Other Please Specify: __________________________

2. Are FSIOs in your Jurisdiction REQUIRED to complete at least 30 semester hours of science as part of their academic degree PRIOR TO employment or assignment to the retail food protection program?

☐ Yes ☐ No

3. Are FSIOs in your Jurisdiction REQUIRED to have a professional credential such as the Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS) or Certified Food Safety Professional (CFSP) PRIOR TO employment or assignment to the retail food protection program?

☐ Yes ☐ No

4. If your Jurisdiction REQUIRES a professional credential such as those described in the previous question, but allows for the FSIO to work toward their credential after they have been hired, within what TIME FRAME from the DATE OF EMPLOYMENT must a FSIO attain their credential?

☐ A. less than 6 months ☐ B. within 1 year ☐ C. within 2 years
☐ D. Other Please Specify: __________________________

5. Identify which Credential(s) the FSIOs in your Jurisdiction are REQUIRED to hold? (Check all that apply)

☐ A. REHS/RS issued by NEHA ☐ B. REHS/RS issued by State Registration Board
☐ C. CFSP issued by NEHA ☐ D. Other Please Specify: ________

6. Besides the coursework training needed for employment and/or attainment of any required professional credential, does your jurisdiction REQUIRE FSIOs to complete additional food safety education and training courses PRIOR to conducting independent retail food or foodservice inspections?

☐ Yes ☐ No

(Section II – continues on the next page)
SECTION II
JURISDICTION’S MINIMUM EDUCATION REQUIREMENTS FOR
FOOD SAFETY INSPECTION OFFICERS (FSIOs)
(Section II – continued from the previous page)

7. If your answer to the previous question is YES, please identify the types of additional education and training FSIOs are REQUIRED to successfully complete PRIOR TO conducting independent retail food or foodservice inspections? (Place an X next to ALL education and training options that apply).

- A. FDA/State sponsored food safety CLASSROOM courses
- B. WEB-BASED (distant learning courses) such as those offered through FDA ORA U
- C. In-house (provided by your jurisdiction) CLASSROOM courses
- D. Food safety courses provided by trade or professional organizations.
- E. An ANSI-CFP accredited Food Protection Manager Certification Course
- F. Other – Please describe in box provided below.

8. What is the minimum number of CLASSROOM food safety training hours your Jurisdiction REQUIRES a FSIO to accrue (after they have been hired) PRIOR TO conducting independent retail food and/or foodservice inspections? Include web-based training, such as those which can be obtained through FDA’s ORA University.

- A. None
- B. less than 10
- C. 10 to 25
- D. 26 to 40
- E. 41 to 60
- F. 61 or more If more than 61, how many? _____

9. On average, what percentage of the total number of food safety training hours identified in the previous question, will the FSIO attain through WEB-BASED (distant learning) courses?

- A. less than 10%
- B. 10% to 29%
- C. 30% to 49%
- D. 50% to 69%
- E. 70% to 89%
- F. 90% or more

10. What is the minimum number of joint FIELD training inspections (both trainer-led and trainee-led) your Jurisdiction REQUIRES a FSIO to complete PRIOR TO conducting independent inspections of establishments in which operations extend beyond the sale of pre-packaged foods or limited preparation?

- A. None
- B. less than 10
- C. 10 to 25
- D. 26 to 40
- E. 41 to 60
- F. 61 or more If more than 61, how many? _____

11. What is the number of food safety CONTINUING EDUCATION hours your Jurisdiction REQUIRES a FSIO to accrue on an annual basis?

- A. None are required
- B. less than 5
- C. 6 to 10
- D. 11 to 15
- E. 16 to 20
- F. 21 or more If more than 21, how many? _____

(Section III – Starts on the next page)
SECTION III
GUIDE TO CONDUCTING AN ASSESSMENT OF TRAINING NEEDS (ATN)
EVALUATION OF CONTENT
(Please refer to the “Guide to Conducting an Assessment of Training Needs” when responding to the following questions)

1. Were the instructions given in the Guide sufficient for you to understand and implement the training process in your jurisdiction?

☐ Yes  ☐ No

2. Please put an “X” in the boxes below to identify any Section(s) of the Guide you believe needs improvement. Please provide your recommendation(s) for improving the Guide in the space provided for each subject area. The page number from the Guide for each subject area is included in parentheses. If you have no recommended changes for a specific Section of the Guide, leave the corresponding box and comment area blank.

OVERVIEW OF THE ASSESSMENT OF TRAINING NEEDS PROCESS

☐ Background (page 1)

☐ Introduction and Purpose (page 1)

☐ Assessment of Training Needs (page 3)

☐ Who Must Complete the Field Training Process (page 3)

(Section III – continues on the next page)
SECTION III
GUIDE TO CONDUCTING AN ASSESSMENT OF TRAINING NEEDS (ATN)
EVALUATION OF CONTENT

(Section III – continued from the previous page.
Please refer to the “Guide to Conducting an Assessment of Training Needs”
when responding to the following questions)

| ☐ | Who Can Conduct an Assessment of Training Needs (page 4) |
| ☐ | Field Training Forms and Protocol (page 4) |

FIELD TRAINING WORKSHEET

| ☐ | Overview of the Field Training Worksheet (page 5) |
| ☐ | Description of Header Information of the Field Training Worksheet (page 5) |
| ☐ | Performance Elements (page 6) |

(Section III – continues on the next page)
SECTION III
GUIDE TO CONDUCTING AN ASSESSMENT OF TRAINING NEEDS (ATN)
EVALUATION OF CONTENT

Please refer to the “Guide to Conducting an Assessment of Training Needs” when responding to the following questions:

- Summary of Food Safety Inspection Officer (FSIO) Performance Elements (page 6)

PREPARING TO CONDUCT AN ASSESSMENT OF TRAINING NEEDS

- Reviewing the Performance Elements (page 7)
- Specific Competencies/Criteria for each Performance Element (page 8)
- Determine the Appropriate Number of Assessments for each FSIO (page 9)
- Choosing Establishments for the Training Process (page 9)

(Section III – continues on the next page)
**SECTION III**
**GUIDE TO CONDUCTING AN ASSESSMENT OF TRAINING NEEDS (ATN)**
**EVALUATION OF CONTENT**

(Section III – continued from the previous page. 
Please refer to the “Guide to Conducting an Assessment of Training Needs” when responding to the following questions)

**CONDUCTING THE ASSESSMENT OF TRAINING NEEDS**

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<td>Assessing FSIO Training Needs (page 13)</td>
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<td>Reviewing the Field Training Worksheet with the FSIO (page 14)</td>
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**FIELD TRAINING PROCESS – DOCUMENTATION OF SUCCESSFUL COMPLETION**

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(Section III – continues on the next page)
### SECTION III

**GUIDE TO CONDUCTING AN ASSESSMENT OF TRAINING NEEDS (ATN)**

**EVALUATION OF CONTENT**

*(Section III – continued from the previous page. Please refer to the “Guide to Conducting an Assessment of Training Needs” when responding to the following questions)*

<table>
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#### STEP-BY-STEP SUMMARY – FIELD TRAINING PROCESS

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<th>I. Preparing for the Assessment of Training Needs (page 17)</th>
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<td>II. Conducting the Assessment of Training Needs (page 18)</td>
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<td>III. Completing the Documentation of Successful Completion (page 19)</td>
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*(Section IV – Starts on the next page)*
SECTION IV
ASSESSMENT OF TRAINING NEEDS (ATN) - FIELD TRAINING WORKSHEET
EVALUATION OF CONTENT
(Please refer to the ATN Field Training Worksheet when responding to the following questions)

1. The 25 Performance Elements (identified in the gray shaded area of the Field Training Worksheet) sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections of retail food and foodservice establishments. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

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2. Are there additional Performance Elements (knowledge and/or skills) that a FSIO needs to have in order to effectively conduct independent inspections of retail food and foodservice establishments that are MISSING from the current Field Training Worksheet?

☐ Yes ☐ No

Please identify and describe these MISSING performance elements.
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________

3. Were there any Performance Elements that were consistently marked NOT OBSERVED?

☐ Yes ☐ No

Please identify these by placing an “X” adjacent the item number that identifies any Performance Element(s) that were DIFFICULT TO OBSERVE in each of the Filed Training Worksheet categories listed below.

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4. If you have identified DIFFICULT TO OBSERVE Performance Element(s), what factors made them difficult to observe?

   (Section IV – continues on the next page)
SECTION IV
ASSESSMENT OF TRAINING NEEDS (ATN) - FIELD TRAINING WORKSHEET
EVALUATION OF CONTENT

Please refer to the ATN Field Training Worksheet when responding to the following questions.

5. Were there any Performance Elements that were consistently marked NOT APPLICABLE?

☐ Yes  ☐ No

Please identify these by placing an “X” next to the item number of the Performance Element(s) consistently marked NOT APPLICABLE in each of the Field Training Worksheet Section categories listed below.

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6. If you have identified Performance Elements that were consistently marked NOT APPLICABLE, what factors contributed to this marking?

7. Were there specific Performance Elements that FSIOs consistently experienced DIFFICULTY with?

☐ Yes  ☐ No

Please identify these by placing an “X” adjacent to the item number of the Performance Elements(s) FSIOs had DIFFICULTY with in each of the Field Training Worksheet Section categories listed below.

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8. If you have identified Performance Element(s) that FSIOs experienced DIFFICULT with, what factors contributed to their challenges.

(Section IV – continues on the next page)
SECTION IV

ASSESSMENT OF TRAINING NEEDS (ATN) - FIELD TRAINING WORKSHEET

EVALUATION OF CONTENT

(Section IV – continued from the previous page.
Please refer to the ATN Field Training Worksheet when responding to the following questions)

9. Do you believe there are any Performance Elements that should be DELETED from the Field Training Worksheet?

☐ Yes  ☐ No

Please identify these by placing an “X” next to the item number of the Performance Element(s) that should be DELETED in each of the Field Training Worksheet categories listed below.

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10. If you recommended that one or more Performance Elements be deleted in question 7, what rationale can you provide to support your recommendation?


11. The competencies/criteria listed as examples under each Performance Element are helpful to the training process. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

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Please provide an explanation for your response.


(Section IV – continues on the next page)
SECTION IV
ASSESSMENT OF TRAINING NEEDS (ATN) - FIELD TRAINING WORKSHEET
EVALUATION OF CONTENT

(Section IV – continued from the previous page.
Please refer to the ATN Field Training Worksheet when responding to the following questions)

12. Are there any Performance Elements for which the competencies/criteria need REVISIONS (additions, deletions, changes)?

☐ Yes ☐ No

Please identify these by placing an “X” next to the item number of the Performance Element(s) needing REVISIONS in each of the Field Training Worksheet Section categories listed below.

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13. If you identified one or more Performance Element(s) needing REVISIONS, what changes would you recommend to the competencies/criteria?

(Section V – Starts on the next page)
## SECTION V

**ASSESSMENT OF TRAINING NEEDS (ATN) - FIELD TRAINING WORKSHEET
EVALUATION OF THE WORKSHEET FORMAT**

*(Please refer to the ATN Field Training Worksheet to respond to the following questions)*

1. The format of the Field Training Worksheet is user-friendly. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

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What improvements would you recommend?

2. The header labels are appropriate.

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What improvements would you recommend?

3. Enough space is provided for responses and comments.

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What improvements would you recommend?

4. Is there any general information that is MISSING?

☐ Yes  ☐ No

Please identify information that needs to be ADDED.

*(Section V – continues on the next page)*
SECTION V
ASSESSMENT OF TRAINING NEEDS (ATN) - FIELD TRAINING WORKSHEET
EVALUATION OF THE WORKSHEET FORMAT

(Section V – continued from the previous page.
Please refer to the ATN Field Training Worksheet to respond to the following questions)

5. Is there any general information that should be DELETED?
   ■ Yes          ■ No

   Please identify information that should be DELETED.

6. Did you modify the Field Training Worksheet during the Assessment of Training Needs process?
   ■ Yes          ■ No

   If Yes, please attach a copy of your modified Field Training Worksheet.

(Section VI – Starts on the next page)
**SECTION VI**

**ASSESSMENT OF TRAINING NEEDS (ATN)**

**DOCUMENTATION OF SUCCESSFUL COMPLETION – FORM & FORMAT**

*(Please refer to the ATN Documentation of Successful Completion to respond to the following questions)*

1. The Documentation of Successful Completion form is a useful tool for maintaining a candidate’s record and progress during the Assessment of Training Needs process. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

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What improvements would you recommend?

Possible improvements:

2. The format of the Documentation of Successful Completion form is user-friendly

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What improvements would you recommend?

Possible improvements:

3. The header labels on the Documentation of Successful Completion form are appropriate.

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What improvements would you recommend?

Possible improvements:

4. Enough space is provided for responses and comments on the form.

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What improvements would you recommend?

Possible improvements:
SECTION VI

ASSESSMENT OF TRAINING NEEDS (ATN)

DOCUMENTATION OF SUCCESSFUL COMPLETION – FORM & FORMAT

(Section VI – continued from the previous page.
Please refer to the ATN Documentation of Successful Completion to respond to the following questions)

5. Is there any general information that is missing?
☐ Yes ☐ No

Please identify information that needs to be ADDED.

6. Is the two document format (Field Training Worksheet and Documentation of Successful Completion) user-friendly or would it be better to combine them into one document?
☐ Keep the current two document format ☐ Merge into one document

Provide an explanation for your recommendation.

(Section VII – Starts on the next page)
SECTION VII
ASSESSMENT OF TRAINING NEEDS (ATN) PROCESS
TRAINING RESULTS

1. How many FSIOS in your Jurisdiction participated as trainees using the ATN process? _____

2. How many FSIOS successfully completed the ATN process during the Pilot Project? _____

3. How many FSIOs were unable to successfully complete the ATN process during the Pilot Project? _____

4. How many “assessors” (individuals responsible for the field training and education of newly hired or assigned FSIOs) participated in the Pilot Project? _____

5. Was there more than one assessor per FSIO?
   □ Yes   □ No

If more than one assessor was used per FSIO, on average how many assessors were used per FSIO? _____

6. The ATN is designed in such a way as to facilitate the consistent application of the training process by the assessor, even when candidates varied in knowledge and/or skill level. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

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What changes would you recommend to facilitate more consistency among assessors?

7. FSIOs who successfully complete the ATN are ready to conduct independent retail food and/or foodservice inspections at the conclusion of the training.

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What deficiencies did the FSIOs have at the conclusion of the training and what improvements need to be made to the process to address these deficiencies?

(Section VII – continues on the next page)
SECTION VII
ASSESSMENT OF TRAINING NEEDS (ATN) PROCESS
TRAINING RESULTS
(Section VII – Continued from the previous page)

8. On average, how long did it take to complete an orientation of the Assessment of Training Needs process and forms for each of the FSIOs?
   - A. less than 60 minutes
   - B. 61 – 120 minutes
   - C. 121 – 180 minutes
   - D. Other. Please Specify

9. On average, how long did it take an FSIO to complete the pre-requisite coursework outlined in Appendix B-1 of the revised Program Standard 2?
   - A. less than 15 hours
   - B. 16 – 30 hours
   - C. 31 – 45 hours
   - D. 46 – 60 hours
   - E. 61 – 75 hours
   - F. Other. Please Specify:

10. On average, how long did it take the FSIO to conduct a Pre-Inspection Establishment File Review?
    - A. less than 30 minutes
    - B. 31 – 60 minutes
    - C. Other. Please Specify

11. On average, how long did it take to conduct an on-site joint field training inspection (SINGLE INSPECTION) in which the ATN Field Training Worksheet was used (actual field training time in hours – including inspection, completion of the inspection report, and discussion of the inspection report with the person in charge)? Do NOT include travel time to & from the establishment.
    - A. less than 60 minutes
    - B. 61 – 120 minutes
    - C. 121 – 180 minutes
    - D. Other. Please Specify

12. On average, how long did it take to discuss the results of the ATN Field Training Worksheet from a (SINGLE) joint field training inspection with the FSIO; set training objectives; and complete the training document?
    - A. less than 60 minutes
    - B. 60 – 90 minutes
    - C. 91 – 120 minutes
    - D. Other. Please Specify

13. On average, how long did it take a FSIO to successfully complete the Assessment of Training Needs? (Include the orientation process; completion of the pre-requisite courses; establishment file reviews; actual inspection time; review of the training reports with the FSIO; and completion of all training documents/worksheets.)
    - A. less than 20 hours
    - B. 21 – 40 hours
    - C. 41 – 60 hours
    - D. 61 – 80 hours
    - E. 81 – 100 hours
    - F. Other. Please Specify:

(Section VII – continues on the next page)
SECTION VII

ASSESSMENT OF TRAINING NEEDS (ATN) PROCESS

TRAINING RESULTS

(Section VII – Continued from the previous page)

14. The ATN process is a valuable use of my Jurisdiction’s resources (e.g., time; staff; finances).

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Explain, why?

15. What recommendation(s) would you propose to make the ATN process and/or forms more beneficial to your regulatory retail food protection program?

(Section VIII – Starts on the next page)
SECTION VIII

ASSESSMENT OF TRAINING NEEDS
IMPACT ON OTHER PROGRAM STANDARD 2 CRITERIA

(Section VIII – To be completed by Jurisdictions currently enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards)

1. The pre-requisite coursework outlined in Program Standard 2, Appendix B-1, is sufficient to prepare the FSIO to successfully complete the ATN. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

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Please explain.

If No, what coursework would you ADD?

2. Was a minimum of 25 joint field training inspections adequate to prepare the FSIO to conduct independent inspections?

☐ Yes  ☐ No  If No, What is the appropriate number of joint field training inspections? _____

What rationale did you use to determine the appropriate number of joint field training inspections?

3. If any of your FSIOs proceeded through to standardization did the ATN (Program Standard 2, Steps 1 through 3), adequately prepare them for standardization (Program Standard #4)?

☐ Yes  ☐ No  ☐ None have as yet been standardized

What would you recommend to better prepare a FSIO for standardization?

(Section VIII – continues on the next page)
SECTION VIII
ASSESSMENT OF TRAINING NEEDS
IMPACT ON OTHER PROGRAM STANDARD 2 CRITERIA

(Section VIII – continued from the previous page)
To be completed by Jurisdictions currently enrolled in the
FDA Voluntary National Retail Food Regulatory Program Standards)

4. If any of your FSIOs proceeded to standardization, what was the minimum number of inspections needed for a FSIO to successfully complete their standardization?

☐ A. Minimum of 4  ☐ B. Minimum of 8  ☐ C. Other  Please specify number of inspections.____  ____

SECTION IX
ASSESSMENT OF TRAINING NEEDS
ADDITIONAL COMMENTS SECTIONS

(Provide any additional comments on any aspect of the ATN process or form)
SECTION X
SUPPLEMENTAL ITEMS TO ORIGINAL FEEDBACK FORM

USE OF MULTIPLE TRAINERS FOR THE ATN

1. Did you use multiple trainers to administer the Assessment of Training Needs?

☐ Yes  ☐ No

2. If you used multiple trainers, did candidates (trainees) report any differences between the trainers assessment of their ability to perform one or more elements contained on the field training worksheet?

☐ Yes  ☐ No

3. Did your jurisdiction implement any steps to minimize the difference(s) in how the ATN process was administered by various trainers?

☐ Yes  ☐ No

If Yes – Please describe the steps taken to minimize the difference between trainers.
SECTION XI
SUPPLEMENTAL ITEMS TO ORIGINAL FEEDBACK FORM
APPLICATION OF THE BASICS OF INSPECTION/INVESTIGATION COURSE

1. Before participating in the Assessment of Training Needs Pilot Project were you familiar with the ‘Application of the Basics of Inspection/Investigation Course (FD170)’ available through ORA University?

☐ Yes  ☐ No

2. If your answer to question item one is ‘Yes’, do you think this type of ‘Application Course’ would better prepare a Food Safety Inspection Officer for the Assessment of Training Needs?

☐ Yes  ☐ No

If Yes – Please explain why the ‘Application Course’ would better prepare candidate for the ATN.


3. Is your jurisdiction enrolled in FDA’s Voluntary National Retail Food Regulatory Program Standards?

☐ Yes  ☐ No

If your answer to item 3 is ‘Yes’, please answer the following question #4.


4. The ‘Application of the Basics of Inspection/Investigation Course (FD170)’ or equivalent is currently listed in Appendix B-1 of Program Standard 2 as a recommendation. Should the ‘Application Course’ or equivalent be a requirement instead of a recommendation?

☐ Yes  ☐ No

Please provide an explanation for your response to question #4.
A GUIDE TO CONDUCTING AN ASSESSMENT OF TRAINING NEEDS

REGULATORY RETAIL FOOD SAFETY INSPECTION OFFICERS

Standard 2 – Trained Regulatory Staff
Appendix B-2

January 17, 2006
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A Guide to Conducting an Assessment of Training Needs

Retail Food, Restaurant, and Institutional Foodservice
Regulatory Food Safety Inspection Officers

BACKGROUND
The Conference for Food Protection (CFP) has progressed through several stages in the development of a nationally recognized process for training and standardizing regulatory Food Safety Inspection Officers (FSIO) responsible for inspections of institutional foodservice, restaurant, and retail food establishments. Research conducted by the CFP work group charged with addressing this issue revealed that existing training and standardization programs for FSIOs are as varied as the number of regulatory jurisdictions throughout the country. What has been lacking is a nationally recognized training and standardization process for FSIOs that can be used as a model to enhance the effectiveness of regulatory retail food program inspections and increase uniformity among regulatory professionals in their assessment of industry’s food safety practices.

The CFP Program Standards Committee was charged with using the *FDA Draft Voluntary National Retail Food Regulatory Program Standards, Standard 2 – Trained Regulatory Staff*, as a model for developing a multi-tiered approach for training and standardizing FSIOs. The CFP Program Standards Committee assembled a work group to address this specific charge. The criteria contained in the 5-step training and standardization process presented in Program Standard 2 reflects this multi-tiered approach. An innovative and critical component of this multi-tiered process is the inclusion of an Assessment of Training Needs (ATN) as part of the joint field training inspections in Step 2 of the Standard.

INTRODUCTION AND PURPOSE
Training is most effective when it is delivered within the context or environment within which the individual would be expected to apply the knowledge and skills required of the job task. For FSIOs, the appropriate training environment is one that mirrors the actual experience of inspecting retail food, restaurant, and/or institutional foodservice establishments.

The primary purpose of the ATN as described in Program Standard 2 is to establish a structured approach (a national model) for field training of regulatory retail food program inspection staff that is to be part of a continuous improvement process. New hires and/or individuals newly assigned to the regulatory retail food program require consistent training related to the knowledge, skills, and abilities (KSA) that not only involve technical food safety principles, but also include competencies in the areas of oral and written communication.

Consistent and on-going feedback on key inspection related performance elements is the cornerstone of the ATN process. No one inspection/training exercise is used to determine a FSIOs readiness to conduct independent retail food and foodservice inspections. Rather the ATN process and forms are designed to enable the candidate to demonstrate a
consistent pattern of behavior in KSAs identified as important for conducting effective regulatory retail food program inspections.

The ATN has been designed to evaluate specific performance elements within 6 categories:

I. Pre-Inspection;
II. Inspection Observations and Performance;
III. Sample Collection and Evidence Development;
IV. Oral Communication;
V. Written Communication; and
VI. Professionalism

The performance elements for each of the 6 categories were derived from research of current regulatory retail food program training curriculums and competency areas. The CFP work group reviewed training programs/competencies developed by the State of California; Florida Department of Business and Professional Regulations; Massachusetts Department of Public Health; New York Department of Health; North Carolina Department of Environment and Natural Resources; and the Rhode Island Department of Health. Other resources included the Southwest Region Training Plan that has appeared as Appendix K in previous versions of the FDA National Voluntary Retail Food Regulatory Program Standards and FDA’s Level I Investigator Performance Audit criteria.

Each of the performance elements included in the ATN received a comprehensive review by the CFP work group comprised of psychometricians and representatives from state and local regulatory retail food programs; industry trade associations; retail food and foodservice operations; and academia. The performance elements were assessed by the CFP work group to ascertain their:

- Importance to conducting effective regulatory retail food and foodservice inspections;
- Measurement criteria that would be used to assess the FSIO’s KSAs to perform the task; and
- Frequency the item being assessed occurs during retail food and foodservice inspection work.

The ATN forms and protocol contained in this document represent the culmination of the research and review by subject matter experts that comprise the CFP Program Standards work group assigned the charge of developing a training and standardization protocol for state and local regulatory retail food program inspection staff. The ATN protocol and forms are still considered working documents. Enhancements will be based on input from regulatory, industry, academia and consumer stakeholder groups through a process that includes the Conference for Food Protection to allow for on-going program improvement and promotion of national uniformity.

Flexibility has been built into the ATN to allow regulatory jurisdictions the ability to customize training so that it reflects a jurisdiction’s administrative policies, sampling
procedures, and inspection protocol. Instructions on how to use, and if appropriate, customize the process to specific jurisdictional needs are presented later in this document.

**ASSESSMENT OF TRAINING NEEDS**
The Assessment of Training Needs (ATN) provides forms to assist food program managers/trainers with a structured approach for determining whether a FSIO has the required knowledge, skills, and abilities to perform specific competencies related to retail food and foodservice inspections.

- A **Field Training Worksheet** provides a representative baseline of competencies (criteria) expected to be performed by regulatory retail food program FSIOs. It is to be used during joint field training inspections.
- The **Documentation of Successful Completion** provides verification that the FSIO has successfully demonstrated the ability to perform all the required competencies (criteria) needed to conduct independent retail food and foodservice inspections. It is completed once at the end of the joint field training process.

These forms are an integral part of a training process that provides both the candidate and the trainer feedback on specific elements of effective institutional foodservice, restaurant, and retail food store inspections.

- The ATN is NOT intended to be used for certification, audit, or licensure purposes.
- Regulatory jurisdictions are NOT to use the ATN for administrative purposes including but not limited to job classifications, promotions, or disciplinary actions up to and including termination.

Used for its intended purpose, the ATN addresses a significant gap in existing regulatory retail food training programs. It provides a structure for preparing a FSIO to conduct independent retail food and foodservice inspections. It is NOT a test or audit but an ongoing field assessment of training that focuses on a candidate’s continuous improvement.

In addition, the ATN provides critical feedback to program managers and trainers on the effectiveness of their retail food training and orientation process. Competencies (criteria) that are not consistently performed well by FSIOs may be an indication that the regulatory jurisdiction has significant gaps in their training program, coursework, or materials used to prepare staff for field inspections. The ATN provides a framework for assessing and strengthening existing regulatory retail food training programs.

The ATN provides regulatory retail food protection programs with performance elements upon which to make sound assessments of a FSIO’s understanding of their job responsibilities, as well as their ability to consistently apply those knowledge elements within the environment of retail food and foodservice inspections.

**WHO MUST COMPLETE THE FIELD TRAINING PROCESS?**
All new employees or individuals new to the regulatory retail food protection program must complete a field training process similar to the one presented in this document. The Program Standard 2 criteria require a FSIO to complete specified pre-requisite coursework prior to conducting independent inspections. Program Standard 2 does not stipulate any pre-requisite coursework (curriculum) for participating in the ATN.
Completion of pre-requisite coursework, particularly training in the jurisdiction’s prevailing statutes, regulations, and/or ordinances should be considered when making a determination as to when to begin the ATN process. In addition, it is highly recommended that an appropriate number of demonstration (trainer-led) inspections be conducted prior to the ATN to provide the candidate an opportunity to observe an experienced FSIO perform specific inspection elements that will be included in the field training process. The jurisdiction’s trainer, or designated staff member, is responsible for determining when the ATN process should be initiated.

An ATN should be conducted when an experienced FSIO joins, or is assigned to, the regulatory retail food program staff. In order to accommodate experienced FSIOs, the Program Standard 2 criteria allows a waiver of the 25 joint inspections if the food program manager/trainer includes a signed statement or affidavit in the employee’s training file explaining the background and/or experience that justifies the waiver. In lieu of the 25 joint field training inspections, an ATN is required to determine if any performance elements are in need of improvement.

**WHO CAN CONDUCT AN ASSESSMENT OF TRAINING NEEDS?**
The management of the regulatory retail food protection program has the discretion of deciding who will serve as the assessor and conduct the ATN. The jurisdiction’s assessor, or designated staff member, must have completed all the training and standardization elements (Steps 1 – 4) required in Program Standard 2 – Trained Regulatory Staff.

**FIELD TRAINING FORMS AND PROTOCOL**
Two forms are used during the Assessment of Training Needs:

- Retail Food, Restaurant, and Institutional Foodservice – Food Safety Inspection Officer, **Field Training Worksheet**, and
- Retail Food, Restaurant, and Institutional Foodservice – Food Safety Inspection Officer, **Documentation of Successful Completion**.

The Field Training Worksheet is to be used as a training tool during the joint field training inspections. The Documentation of Successful Completion is used at the end of the joint field training inspection process to document a FSIOs successful completion of the field training process and readiness to conduct independent retail food and foodservice inspections.
Field Training Worksheet

Overview of the Field Training Worksheet: The Field Training Worksheet is presented in Attachment A and contains a representative baseline of competencies (criteria) expected to be performed by state, local, and tribal FSIOs. As its name implies, the Field Training Worksheet is the form that is to be used during joint field training inspections to provide the FSIO continuous feedback as to their strengths/weaknesses for specific performance elements. All performance elements that are applicable to the FSIO’s inspection responsibilities must be evaluated during the Assessment of Training Needs (ATN).

Description of the Header Information on the Field Training Worksheet: The Field Training Worksheet contains basic header information that should be completed for each joint field inspection for which it is used.

Establishment Name: The full name of the establishment where the ATN is conducted.

Establishment Address: The full address of the establishment where the ATN is conducted.

Permit #: The regulatory jurisdiction’s food permit number or identification code for the establishment where the ATN is conducted.

Date: The date the ATN is conducted at the establishment.

Time In: The time the ATN is started at the selected establishment.

Time Out: The time the ATN is completed at the selected establishment.

NOTE: A pilot project to evaluate the ATN process is planned for 2006-2007. An important component of that project will be to obtain data on the amount of time needed to perform a field ATN. From that data, jurisdictions will have a basis for developing work plans that incorporate the appropriate amount of time to conduct field training of regulatory retail food protection program staff.

Food Safety Inspection Officer Name (FSIO): The name of the trainee FSIO being trained.

FSIO’s Agency: The name of jurisdiction for which the FSIO (trainee) is employed.

Assessor’s Name: The name of the trainer or the jurisdiction’s designated individual who has completed all the Program Standard 2 training and standardization requirements (Steps 1-4) performing the evaluation of the FSIO on the performance elements that comprise the Field Training Worksheet.
Assessor’s Agency: The regulatory jurisdiction where the assessor is employed. The assessor may work for a different jurisdiction than the FSIO being trained.

Performance Elements The Field Training Worksheet includes 6 inspection training areas in which a FSIO must demonstrate acceptable performance.

I. Pre-Inspection
II. Inspection Observations and Performance
III. Sample Collection and Evidence Development
IV. Oral Communication
V. Written Communication
VI. Professionalism

The FSIO (trainee) must take the lead during joint field training inspections when an ATN is being performed. Taking the lead means the FSIO is responsible for:

- Initiating contact with the person in charge;
- Explaining the purpose of the inspection;
- Directing the inspection process;
- Establishing a dialogue with the person in charge/employees;
- Making the observations of food safety practices within the establishment;
- Obtaining immediate corrective actions for contributing factors to foodborne illness;
- Preparing the inspections report; and
- Conducting the exit interview with the person in charge.

The Field Training Worksheet contains 25 “performance elements” sorted among the 6 inspection training areas.

Summary of FSIO Performance Elements for the 6 Inspection Training Areas

I. Pre-Inspection – (3 Performance Elements)
- Has successfully completed the pre-requisite training (“Pre”) courses as specified in the FDA Draft Voluntary National Retail Food Regulatory Program Standards: Standard 2 – Trained Regulatory Staff.
- Has the required equipment and forms to conduct the inspection.
- Reviews the establishment file for the previous inspection report and, if applicable, documents or complaints on file.

II. Inspection Observations and Performance – (7 Performance Elements)
- Provides identification as a regulatory official to the person in charge, confirming agency authority for the inspection, and stating the purpose of the visit.
- Has knowledge of the jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.
- Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation and service of food.
- Obtains immediate corrective action for out of compliance employee practices and management procedures essential to the safe storage, preparation and service of food.
- Correctly assesses the compliance status of other regulations (Good Retail Practices) that are included in the jurisdiction’s prevailing statutes, regulations and/or ordinances.
- Verifies correction of out of compliance observations identified during the previous inspection.
- Correctly uses inspection equipment during the joint inspection.
III. Sample Collection and Evidence Development – (3 Performance Elements)
   • Photographs taken support the regulatory findings or conditions observed.
   • Uses an aseptic food sample collection method consistent with criteria established by laboratory serving the jurisdiction.
   • Uses an aseptic water sample collection method consistent with criteria established by the laboratory serving the jurisdiction.

IV. Oral Communication – (6 Performance Elements)
   • Asks questions and engages in a dialogue with the person in charge/employees to obtain information relevant to the inspection.
   • Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.
   • Uses available means (e.g., interpreter, drawings, demonstrations, diagrams) to overcome language or communication barriers.
   • Follows the jurisdiction’s policy with regard to disclosure of confidential information.
   • Uses effective communication and conflict resolution techniques to overcome inspection barriers.
   • Conducts the exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.

V. Written Communication – (3 Performance Elements)
   • Completes inspection form per the jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reasons; applicable code references; compliance dates).
   • Includes with the inspection report any compliance or regulatory documents (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices) identified or cross-referenced in written statements.
   • Presents the inspection report, and when necessary cross referenced documents, to the person in charge.

VI. Professionalism – (3 Performance Elements)
   • Maintains a professional appearance consistent with the jurisdiction’s policy (e.g., clean outer clothing, hair restraint).
   • Demonstrates proper sanitary practices as expected from a food service employee.
   • Only reports substantiated findings as violations.

Performance elements appear in the shaded areas of the tables on the Field Training Worksheet in Attachment A.

Preparing to Conduct an Assessment of Training Needs

A. Reviewing the Performance Elements

Though the overwhelming majority of the 25 identified performance elements apply to every jurisdiction, there may be a few instances where select performance elements may not be part of a FSIO’s job responsibilities. For example, FSIOs in some jurisdictions may not have responsibility for collecting aseptic food or water samples.

In preparing to conduct an ATN, the assessor/trainer should identify those performance elements that are not applicable to the FSIO’s job responsibilities within the jurisdiction. These performance elements can be removed from the Field Training Worksheet or the assessor/trainer may simply choose to circle “not applicable “ (NA) in the adjoining box on the Field Training Worksheet as depicted in the following illustration.
2. Uses an aseptic food sample collection method consistent with criteria established by laboratory serving the jurisdiction.

If the performance element is part of the FSIO’s job responsibility it must be assessed. Performance elements that are applicable to the FSIO’s job tasks can not be arbitrarily removed or deleted from the Field Training Worksheet.

B. Specific Competencies/Criteria for each Performance Element.

The specific competencies/criteria listed under each performance element are intended to serve as examples of observations that can be used to assess a FSIO during joint field training inspections.

As an example, six specific criteria are provided for assessing the FSIO’s use of inspection equipment.

**Performance Element**
Correctly uses inspection equipment during the joint inspections.

**Specific Competencies/Criteria for Assessing the Performance Element**
- Used temperature measuring devices/probes in accordance with manufacturer’s instructions.
- Cleaned and sanitized (alcohol swabs) temperature measurement probes to prevent food contamination.
- Used infrared thermometer in accordance with manufacturer’s instructions. Verifies any out of compliance product temperatures registered on the infrared with a thermocouple.
- Used maximum registering thermometer or heat sensitive tapes in accordance with manufacturer’s instructions to verify final rinse dishwasher temperature.
- Used chemical test strips in accordance with manufacturer’s instructions to measure sanitizer concentrations in manual and mechanical dishwashing operations; wiping cloth solutions; and spray bottle applicators.
- Used flashlight to assess observations in areas with no or low light.

Some of the criteria listed for a performance element may not be applicable to a FSIO within a given jurisdiction. In the example above, infrared thermometers may not be part of the standard issued equipment for inspection staff. The FSIO would not, therefore, be responsible for using this type of equipment. If this were the case, the assessor/trainer would mark this criteria not applicable (NA) as depicted in the following illustration.

Conversely, there may be criteria not listed under the performance element that are important for a jurisdiction to include. The Field Training Worksheet has been designed to allow the addition of “OPTIONAL” criteria. For example, a jurisdiction may issue pH test kits to all FSIOs for product assessments during inspections. If this is the case, a
jurisdiction may want to include an evaluation of the use of pH test kits in accordance with manufacturer’s instructions as part of the Field Training Worksheet as depicted in the following illustration.

<table>
<thead>
<tr>
<th>7. Correctly uses inspection equipment during the joint inspections.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Used temperature measuring devices/probes in accordance with manufacturer’s instructions.</td>
<td></td>
<td></td>
<td></td>
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<tr>
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</tr>
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</tr>
<tr>
<td>Used chemical test strips in accordance with manufacturer’s instructions to measure sanitizer concentrations in manual and mechanical dishwashing operations; wiping cloth solutions; and spray bottle applicators.</td>
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<tr>
<td>Used flashlight to assess observations in areas with no or low light.</td>
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<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items): Used pH test kits in accordance with manufacturer’s instructions.</td>
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</tbody>
</table>

Comments:

C. Determine the Appropriate Number of Assessments for each FSIO

The level of preparedness and time needed to assimilate knowledge from on-the-job training will vary with each FSIO. The jurisdiction’s trainer, or designated staff member, is responsible for determining the number of ATNs that will be performed during the joint field training inspections. A sufficient number of field ATNs must be conducted during trainee-led joint field training inspections to properly assess a FSIO’s performance for each of the applicable performance elements and competencies/criteria.

The primary purpose of the ATN is to facilitate a continuous improvement learning experience for the FSIO. The ATN is part of a training process NOT an examination/audit process. The ATN provides a structured, disciplined process for preparing a FSIO to conduct independent retail food and foodservice inspections.

D. Choosing Establishments for the Field Training Process

The ideal retail food or foodservice establishment for conducting an ATN is one that will provide an opportunity to observe the greatest number of performance elements and competencies/criteria. The ATN should be conducted in retail food and foodservice establishments identified in risk categories 2, 3, and 4 as presented in Appendix B-3 (taken from Annex 5, Table 1 of the 2005 FDA Food Code). As a general rule, establishments in risk categories 3 and 4 provide an opportunity to observe a greater number of the performance elements. The majority of the ATNs should be completed in establishments that are representative of the highest risk categories within the jurisdiction or the FSIO’s assigned training area.
Conducting the Assessment of Training Needs

A. Methodology

There is no single “correct” method for conducting an ATN. There are, however, two outcomes that must be achieved regardless of the approach used.

- All performance elements that are specific to the FSIO’s job responsibilities must be assessed; and
- The FSIO must demonstrate a consistent pattern of behavior showing they have the knowledge, skills and ability to competently conduct retail food and foodservice inspections.

Two approaches that can be used are:

- Conducting an ATN during every joint field training inspection; or
- Conducting an ATN at set interval points during the joint field training process.

These two approaches are examples only and are not intended to restrict the use of other formats by a jurisdiction. The following summary of strengths-challenges for each approach provides some guidance to regulatory retail food programs on ways to implement the ATN process.

**Approach #1: Conducting an ATN during every joint field training inspection**

**Strengths:** This approach provides continual feedback to the FSIO on the performance elements they have mastered and those for which improvement is needed. In the early stages of the joint field inspection process, conducting ATNs can be an important tool in determining whether more demonstration (trainer-led) inspections need to be performed. In later stages of the process, the focus of the training can concentrate on specific performance elements needing improvement.

In addition, this approach will provide important feedback on the jurisdiction’s training and orientation program used to prepare FSIOs for their joint field inspections. Performance elements that are consistently not performed well by FSIOs during the joint field training exercises may be an indication of gaps within the jurisdiction’s program, coursework requirements, or administrative materials used to prepare staff for field inspections.

**Challenges:** Using this approach, trainers may focus too much on the assessment, rather than the training, of the FSIO. The ATN process is an integral part of training. It is not an audit or standardization process traditionally used to evaluate a candidate’s performance. Continuous instruction is encouraged during each of the field ATNs and trainers should take the opportunity to demonstrate and/or review correct procedures and skills for performance elements that are not understood or properly carried out by the FSIO during each joint field inspection.
Moreover, competing program priorities and limited resources may impede a jurisdiction’s ability to conduct an ATN during every joint training inspection. At this stage, it is difficult to determine how much time will be needed for the ATN process since it is a new element of the Program Standards 2 criteria. The ATN Field Training Worksheet has been designed, however, to acknowledge that an opportunity may not exist during every inspection to observe all required performance elements. The “Not Observed” (NO) marking option should be used for performance elements that are part of the FSIO’s assigned responsibilities but not observed during the inspection.

Approach 2: Conducting an ATN at set interval points during the joint field training process.

Strengths: A trainer may choose to conduct an ATN at set interval points during the joint field inspection process. For example, if 25 joint field inspections (trainee-led) are planned, an ATN could be conducted during every fifth inspection (i.e., inspections 5, 10, 15, 20 and 25). This process provides set checkpoints to assess continuous improvement for specific performance elements. The joint field training inspections conducted between each ATN can be used to enhance a FSIO’s knowledge and skills for performance elements in need of improvement.

Challenges: The interval process may not provide as consistent of an assessment of a FSIO’s command of specific performance elements as that obtained by conducting an ATN during each joint inspection. The objective of the ATN is to observe a consistent pattern of acceptable performance from the FSIO on each performance element. Depending on the frequency a performance element is observed, an interval approach could reveal fluctuations in performance. It may be difficult, however, for the trainer to determine whether these fluctuations are isolated occurrences or are more reflective of the FSIO’s need to enhance their understanding and skills for the specific performance element.

For either of the above approaches, the trainer should continue to conduct ATNs as part of the joint field training process until the FSIO achieves acceptable performance for all the relevant competencies/criteria within each element.

B. Observing Performance Elements

Some of the performance elements on the Field Training Worksheet frequently occur as part of the inspection process and will provide multiple opportunities for the trainer to assess the FSIO performance during the course of the joint training inspections. These performance elements include verifying that the FSIO:

- Has successfully completed the pre-requisite (“Pre”) training courses as specified in the FDA Draft Voluntary National Retail Food Regulatory Program Standards: Standard 2 – Trained Regulatory Staff;
- Has the required equipment and forms to conduct the inspection;
- Reviews the establishment file for the previous inspection report and, if applicable, documents or complaints on file;
• Provides identification as a regulatory official to the person in charge; confirming agency authority for the inspection and stating the purpose of the visit
• Correctly uses inspection equipment during the joint inspections;
• Conducts the exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations;
• Presents the inspection report and when necessary, cross-referenced documents, to the person in charge; and
• Maintains a professional appearance that is consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraints).

Some of the performance elements, though they frequently occur during field inspections, will have to be evaluated through the course of the entire joint field training process in order to assess a consistent pattern of performance on the part of the FSIO. Most of the performance elements fall into this category and include verifying that the FSIO:

• Has knowledge of the jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections;
• Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food;
• Obtains immediate corrective actions for out of compliance employee practices and management procedures essential to the safe storage, preparation, and service of food;
• Verifies correction of out of compliance observations identified during the previous inspection;
• Asks questions and engages in a dialogue with the person in charge/employees to obtain information relevant to the inspection;
• Provides the operator with accurate answers to inspection-related questions or admits not knowing the answer;
• Uses available means (e.g. interpreter, drawings, demonstrations, diagrams) to overcome language or communication barriers;
• Completes inspection form per the jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reasons; applicable code reference; compliance dates);
• Includes with the inspection report any compliance or regulatory documents (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices) identified or cross-referenced in written statements;
• Demonstrates proper sanitary practices as expected from a food service employee; and
• Only reports substantiated findings as violations.

There are, however, some performance elements that are important FSIO inspection responsibilities but will be difficult to observe as part of the joint field training process. These performance elements include knowledge and skills to perform very specific tasks or are integral to enhancing the effectiveness of the inspection process and include verifying that the FSIO:

• Photographs support the regulatory findings or conditions observed;
• Uses an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction;
• Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction;
• Follows the jurisdiction’s policy in regard to disclosure of confidential information; and
• Uses effective communication and conflict resolution techniques to overcome inspection barriers.

If possible, performance elements are to be assessed in the field inspection environment. If this is not feasible, field, laboratory, classroom, or office exercises may be used to assess performance elements that are difficult to observe in the field. Examples of such training exercises may include the:
• FSIO demonstrating aseptic food and/or water sampling in the laboratory;
• Designating a specific field training inspection for the FSIO to demonstrate aseptic collection of a food and/or water sample;
• FSIO photographing a specific object in the office/field/lab;
• FSIO explaining to the assessor/trainer the jurisdiction’s policy in regard to disclosure of confidential information; or
• FSIO explaining to the assessor/trainer the jurisdiction’s policy in regard to conflict resolution. The assessor/trainer may develop scenarios for the FSIO to review and discuss appropriate conflict resolution techniques.

C. Assessing FSIO Training Needs

Each field ATN is just one step in the continuous improvement training process. The Field Training Worksheet provides a framework for identifying a FSIO’s strengths and areas for focused training to improve performance.

A FSIO must be evaluated on each of the performance elements that are applicable to the jurisdiction. Under each performance element there is a list of competencies/criteria that a trainer can use to assess the FSIO. As mentioned earlier in this guidance document, the competencies/criteria listed are intended only to serve as examples.

For each of the competencies/criteria, the assessor determines the FSIO’s performance using one of four markings as depicted in the following illustration:

- **Acceptable (A)** – FSIO meets the performance element criteria
- **Needs Improvement (NI)** – FSIO does not meet the performance element criteria. Written comments must be provided for any criteria needing improvement.
- **Not Observed (NO)** – Performance element criteria is part of the FSIO’s assigned responsibilities but was not observed during the inspection.
- **Not Applicable (NA)** – Performance element criteria is not part of the FSIO’s assigned responsibilities
7. Correctly uses inspection equipment during the joint inspections.

<table>
<thead>
<tr>
<th>A</th>
<th>NI</th>
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<tr>
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</table>

OPTIONAL (Jurisdiction specific items):

Comments:

For a FSIO to successfully demonstrate the required competencies/criteria of the performance element being assessed, none of the applicable and observable criteria for that performance element can indicate “Needs Improvement.” The assessor/trainer must provide written comments that address any criteria needing improvement.

Criteria marked as “Not Observed” (NO) and/or “Not Applicable” (NA) are not to be included in assessing the FSIO’s performance. Only observable criteria are used to assess the FSIO during an ATN.

The Field Training Worksheet is not intended to be used as a “Pass/Fail” evaluation. The ATN is not an examination or audit. It is a structured training approach with defined criteria to prepare a FSIO to conduct independent inspections of retail food and foodservice establishments.

D. Reviewing the Field Training Worksheet with the FSIO

The assessor/trainer should review the results of each completed Field Training Worksheet with the FSIO as soon as possible (ideally after each joint training inspection). The review should include a discussion of both performance elements that were acceptable and those needing improvement. The assessor/trainer should review with the FSIO methods for improving KSAs in performance elements needing improvement. Upon completion of the discussion, both the assessor/trainer and the FSIO sign and date the Field Training Worksheet.

After conducting a minimum of 25 joint field training inspections (or lesser number for an experienced FSIO if authorized by the food program manager/trainer), the trainer will need to make a determination as to whether additional joint field training with the FSIO is needed. A review of all the performance elements is conducted to determine a FSIO’s readiness to conduct independent retail food and/or foodservice inspections. The
Documentation of Successful Completion form is used to verify that the FSIO has successfully demonstrated the required knowledge, skills and abilities to perform all applicable competencies/criteria.

**Field Training Process**

**Documentation of Successful Completion**

**Purpose of the Documentation of Successful Completion** The Field Training Process - Documentation of Successful Completion (DSC) is presented in Attachment B. Since the Assessment of Training Needs is a continuous improvement process, some of the performance elements must be assessed over time. The DSC provides a tool for the assessor/trainer to review the results from all the Field Training Worksheets. It provides verification that the FSIO has achieved an acceptable level of performance in each of the inspection elements.

**Descriptions of the Header Information on the Documentation of Successful Completion** The DSC contains basic header information that should be verified at the end of the joint field training inspection process.

*Date Assessment of Training Needs Began:* The date the first Field ATN was conducted.

*Date Assessment of Training Needs is Completed:* The date the last Field ATN was conducted. Upon completion of the last Field Training Worksheet, the FSIO has demonstrated an acceptable performance for each inspection element.

*Print Name – Food Safety Inspection Officer:* Print the full name of the FSIO in training.

*Signature – Food Safety Inspection Officer:* Signature of the FSIO in training indicates acknowledgement of receipt and review of the assessor/trainer’s assessment and comments contained in the DSC.

*Print Name – Assessor(s):* The name of the assessor(s)/trainer(s) responsible for conducting the field ATNs. Some jurisdictions may choose to have all field ATNs performed by a single individual such as a training officer. Other jurisdictions may have multiple individuals conduct the field ATNs. In cases where multiple trainers are used to conduct the ATNs, the names of all trainers should be printed in the header box.

*Signature of Assessor:* The signature of the assessor should be the food program manager/trainer/or designated staff member who has responsibility for determining when a FSIO is ready to conduct independent retail food and foodservice inspections.

**Assessing FSIO Readiness to Conduct Independent Inspections** As previously stated, the collective results from all the Field Training Worksheets are used to determine a FSIOs readiness to conduct independent inspections. Demonstration of competence in all applicable performance elements and criteria is needed for a FSIO to successfully complete the ATN process.
Almost all performance elements contain judgments or actions that must be successfully demonstrated by the FSIO. It is to be expected that new hires and employees new to the regulatory retail food program will not be perfect on all criteria that comprise a performance element. The assessor/trainer will need to evaluate the progress of the FSIO, as noted on each of the Field Training Worksheets, over the course of the joint field training inspections.

A score is not used to demonstrate competence of a performance element. Rather an assessment of all the Field ATNs conducted must indicate a consistent pattern of behavior that demonstrates widespread understanding or skill competency in the performance element. A consistent pattern of behavior would be one where the FSIO’s almost always meets the criterion that comprises a performance element. There should be only a few, if any, instances where the FSIO did not meet the expected criteria.

**Acceptable** – indicates that the FSIO meets expectations; or in only a few instances is the performance element not met.

Should the FSIO fail to achieve an “Acceptable” evaluation on one or more of the performance elements, the assessor/trainer will develop a **corrective action plan** specific to the areas in need of improvement. Corrective action plans may include, but are not limited to:

- additional joint field training inspections;
- additional field, laboratory, classroom, or office exercises;
- additional coursework;
- review of the jurisdiction’s administrative procedures and/or policies; or
- additional field ATNs.

Once a FSIO achieves an acceptable evaluation on all performance elements they have successfully completed the ATN.

The “Comments” section is designed to be used by the assessor/trainer as a continuous improvement tool. For example, trainers may note a FSIO specific strengths or note items on which inspection knowledge, skills, and abilities, while generally acceptable, can be furthered enhanced.

The DSC is to be reviewed with the FSIO to discuss any items requiring clarification and to share mutual perspectives on the joint field training experience. For the FSIO, the discussion can lay out the next steps in training to prepare for standardization. For the trainer, the discussion can identify strengths and gaps in the jurisdiction’s training process.

After the final discussion, both the FSIO and assessor/trainer sign the form. The DSC form should be kept as part of the FSIO’s training records.
### Step-By-Step Summary – Field Training Process

#### I. Preparing for the Assessment of Training Needs (ATN)

<table>
<thead>
<tr>
<th>Regulatory Jurisdiction’s Designated Trainer</th>
<th>Food Safety Inspection Officers (Trainees)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.</strong> Review the guidance in this document for conducting an ATN of regulatory retail food and foodservice inspection officers.</td>
<td><strong>1.</strong> Complete all pre-requisite coursework required to prepare for joint field training inspections.</td>
</tr>
</tbody>
</table>
| **2.** Determine if any of the performance elements listed on the Field Training Worksheet are not applicable (NA) to the FSIOs job responsibilities.  
  - Mark these performance elements not applicable (NA), or  
  - Remove them from the Field Training Worksheet. | **2.** Review the performance elements included on the jurisdiction’s Field Training Worksheet. |
| **3.** Determine if the criteria listed under each performance element is specific to the FSIO job responsibilities.  
  - Indicate on the Field Training Worksheet criteria that is not applicable (NA)  
  - Criteria marked not applicable (NA) is not to be used as part of the ATN process. | **3.** Review the criteria that will be assessed for each of the performance elements that comprise the jurisdiction’s Field Training Worksheet. |
| **4.** Determine if any criteria, specific to the regulatory jurisdiction, needs to be added.  
  - New criteria can be added in the “OPTIONAL” section for each of the performance elements. | **4.** Participate in an appropriate number of joint field demonstration inspections (trainer-led), as determined by the jurisdiction’s trainer, in preparation for joint field training inspections (trainee-led). |
| **5.** Determine the format that will be used to conduct the ATN.  
  - Jurisdiction can determine the appropriate format for conducting the ATN. Some examples include:  
    - conducting an ATN during every joint field training inspection (trainee-led);  
    - conducting ATNs at set interval points during the joint field training inspections; or  
    - having the jurisdiction develop an ATN format to meet its specific training needs.  
  - A sufficient number of field ATNs must be conducted to evaluate the FSIO for each of the performance elements. | |
| **6.** Schedule the field ATN  
  - In retail food and foodservice establishments identified in risk categories 2, 3, and 4 as presented in Appendix B-3 (taken form Annex 5, Table 1 of the 2005 FDA Food Code). | |
| **7.** Complete an appropriate number of joint field demonstration inspections (trainer-led) to prepare the FSIO for joint field training inspections (trainee-led). | |

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## II. Conducting the Assessment of Training Needs (ATN)

<table>
<thead>
<tr>
<th>Regulatory Jurisdiction’s Designated Trainer</th>
<th>Food Safety Inspection Officers</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>(Trainer must have successfully completed all Program Standard 2 training and standardization criteria)</em></td>
<td><em>(Trainees)</em></td>
</tr>
</tbody>
</table>
| **1. Explain to the FSIO the format** for the ATN. Options may include:  
  - as part of every joint field training inspection;  
  - at set intervals during the joint field training inspections process; or  
  - per a jurisdiction-specific format. | **1. Review the regulatory jurisdiction’s format for conducting the ATN.** The regulatory jurisdiction’s trainer should provide an orientation to the training process and format. |
| **2. Conduct a sufficient number of field ATNs.**  
  - to properly assess a FSIO’s performance for each of the applicable performance elements.  
  - laboratory, classroom, or office exercises may be used to assess performance elements that are difficult to observe as part of the joint field training inspection process. | **2. Assume the lead during joint field training inspections.** FSIO is responsible for:  
  - initiating contact with the person in charge;  
  - explaining the purpose of the inspection;  
  - directing the inspection process;  
  - establishing a dialogue with the management/employees;  
  - making the observations of food safety practices  
  - obtaining corrective actions for out of compliance foodborne illness contributing factors, and  
  - preparing the report and conducting the exit interview.  
  **NOTE:** The trainer observes the FSIO conducting inspection performance elements and participates only when the inspection process dictates their assistance or intervention. |
| **3. Observe the FSIO (trainee) conducting inspections** in retail food and foodservice establishments identified in risk categories 2, 3, and 4 as presented in Appendix B-3 (taken form Annex 5, Table 1 of the 2005 FDA Food Code). | **3. Follow the regulatory jurisdiction’s administrative procedures for conducting retail food and foodservice inspections – including use of the jurisdiction’s inspection forms.**  
  - FSIO concentrates on the retail food and/or foodservice inspection.  
  - Only trainer completes the Field Training Worksheet. |
| **4. Use the jurisdiction’s Field Training Worksheet** to assess FSIO on each of the applicable and observable performance elements. | **4. Meet with the jurisdiction’s trainer to discuss the results of the Field Training Worksheet** upon completion of the joint training inspection. The trainer reviews observations documented on the Field Training Worksheet with the FSIO. The FSIO obtains feedback on  
  - areas performed well  
  - performance elements needing improvement  
  - FSIO discusses with the trainer options for enhancing their performance for elements needing improvement. |
| **5. Use the criteria under each of the performance elements to assess the FSIO using one of the four markings:**  
  - **Acceptable (A)** – FSIO meets the performance element criteria;  
  - **Needs Improvement (NI)** – FSIO does not meet the performance element criteria. Written comments must be provided for any criteria needing improvement.  
  - **Not Observed (NO)** – Performance element criteria are part of the FSIO’s assigned responsibilities but were not observed during the joint field training inspection.  
  - **Not Applicable (NA)** – Performance element criteria are not part of the FSIO’s assigned responsibilities. | **5. Sign the Field Training Worksheet** upon completion of the review of the results from the assessment. |
| **6. Review with, or demonstrate to, the FSIO the correct procedure for any performance element criteria marked as needing improvement** during the Field ATN. | **7. Conduct a comprehensive review of the Field Training Worksheet** with the FSIO. Review should include:  
  - performance elements that the FSIO performed well.  
  - performance elements needing improvement and corrective action plan for those performance element criteria needing improvement. |
| **8. Sign, and obtain the signature of the FSIO, on each Field Training Worksheet.** The Field Training Worksheet is retained in the FSIO’s training file and used as part of their DSC. | **8. Sign, and obtain the signature of the FSIO, on each Field Training Worksheet.** The Field Training Worksheet is retained in the FSIO’s training file and used as part of their DSC. |
### Step-By-Step Summary – Field Training Process

#### III. Completing the Documentation of Successful Completion (DSC)

<table>
<thead>
<tr>
<th>Regulatory Jurisdiction’s Designated Trainer (Trainer must have successfully completed all Program Standard 2 training and standardization criteria)</th>
<th>Food Safety Inspection Officers (Trainees)</th>
</tr>
</thead>
</table>
| 1. **Review the Field Training Worksheets conducted during the joint field training process.** A review of all the Field Training Worksheets must indicate that the FSIO demonstrated a consistent pattern of:  
  - understanding or skill competency for each of the performance elements.  
  - almost always meeting the criteria that comprises a performance element. There should be only a few, if any, instances where the FSIO did not meet the expected criteria.  
  - The “Comments” section can be used by the trainer as a continuous improvement tool. For example, trainers may note a FSIO specific strengths or note items on which inspection KSAs can be further enhanced. FSIO should review comments to focus on areas which will enhance their inspection performance. |
| 2. **Verify that an assessment of the FSIO has been conducted for all applicable performance elements.** Laboratory, classroom, or office exercises may be used to assess performance elements that are difficult to observe during the joint field training inspection process. |
| 3. **Complete the DSC based on the results compiled from the Field Training Worksheets.** A FSIO must achieve an “Acceptable” marking on all the applicable performance elements.  
  - Acceptable – indicates that the FSIO meets expectations; in only a few instances is the performance element not met.  
  - The “Comments” section can be used by the trainer as a continuous improvement tool. For example, trainers may note a FSIO specific strengths or note items for which inspection KSAs can be further enhanced. |
| 4. **Review the DSC with the FSIO.** FSIOs that receive an “Acceptable” marking on all applicable performance elements have successfully completed the field training process.  
  - Should the FSIO fail to achieve an “Acceptable” evaluation on one or more of the performance elements the trainer will develop a corrective action plan specific for the areas in need of improvement. |
| 5. **Sign the DSC in the header box titled, “Signature of Assessor.”** The trainer signature indicates that the FSIO has successfully completed the field training process. |
| 6. **Obtain the signature of the FSIO on the DSC.** The FSIO’s signature indicates that the trainer has reviewed the results of the ATN with them. The DSC should be kept as part of the FSIO’s training records. |
| 1. **Review with the trainer the results of the ATN process.**  
  - The “Comments” section can be used by the trainer as a continuous improvement tool. For example, trainers may note a FSIO specific strengths or note items on which inspection KSAs can be further enhanced. FSIO should review comments to focus on areas which will enhance their inspection performance. |
| 2. **Should FSIO not receive an “Acceptable” marking for any performance element, a continuous improvement action plan is to be developed** with the trainer to address areas needing improvement.  
  - The FSIO should adhere to the corrective action plan developed by the trainer until all performance elements receive an “Acceptable” marking. |
| 3. **Sign the DSC.**  
  - Comments on the DSC from the trainer should be used to prepare for Food Code standardization.  
  - Signed DSC will be placed in the FSIO’s training file. |
Assessment of Training Needs

Retail Food, Restaurant, and Institutional Foodservice
Food Safety Inspection Officer

Field Training Worksheet

<table>
<thead>
<tr>
<th>Establishment Name:</th>
<th>Permit #:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Establishment Address:</th>
<th>Time In:</th>
<th>Time Out:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Food Safety Inspection Officer (FSIO) Name:</th>
<th>FSIO’s Agency:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Assessor’s Name:</th>
<th>Assessor’s Agency:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Acceptable (A) FSIO meets performance element criteria

Needs Improvement (NI) FSIO does not meet the criteria expected for the performance element. Written comments must be provided for any criteria marked as needing improvement.

Not Observed (NO) Performance element criterion is part of the FSIO’s assigned responsibilities but was not observed during the inspection.

Not Applicable (NA) Performance element criterion is not part of the FSIO’s assigned responsibilities

A sufficient number of joint field training inspections must be conducted to assess a FSIO’s performance for each of the applicable performance elements (performance elements are in BOLD font in the shaded area of each Table).

Criteria listed under each performance element are intended to serve as examples of observations that can be used to assess a FSIO’s performance. Criteria not specific to the FSIO job responsibilities in a jurisdiction are to be marked “Not Applicable” (NA).

The Field Training Worksheet has been designed to accommodate criteria specific to a jurisdiction’s retail food protection program. A space has been provided under each performance element for additional or new criteria specific to a jurisdiction. Under each Performance Element there is a space titled, “OPTIONAL.” The “OPTIONAL” area under each performance element can be used by a jurisdiction to add assessment criteria to meet the specific needs of the regulatory retail food protection program.
### 1. Pre-Inspection

<table>
<thead>
<tr>
<th>1. Food Safety Inspection Officer (FSIO) has successfully completed pre-requisite training courses as specified in <em>FDA Voluntary National Retail Food Regulatory Program Standards</em>: Standard 2 – Trained Regulatory Staff.</th>
<th>A</th>
<th>NI</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>OPTION 1: Completed the FDA ORA-U pre-requisite (&quot;Pre&quot;) courses/examinations AND training on the jurisdiction’s prevailing statutes, regulations, and/or ordinances.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>OPTION 2: Submitted documentation of completing coursework equivalent to the FDA-ORA pre-requisite (&quot;Pre&quot;) curriculum, training on the jurisdiction’s prevailing statutes, regulations, and/or ordinances, AND has certificate or documentation of successfully passing one of the written examination options in Program Standard 2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Has required equipment and forms to conduct inspection.</th>
<th>A</th>
<th>NI</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Necessary inspection forms and administrative materials.</td>
<td></td>
<td></td>
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<tr>
<td>Lab coat or equivalent protection to cover street clothes.</td>
<td></td>
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<tr>
<td>Head cover: baseball cap; hair net; or equivalent.</td>
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<tr>
<td>Calibrated thermocouple temperature measuring device.</td>
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<tr>
<td>Maximum registering thermometer or temperature sensitive tapes for verifying hot water warewashing final rinse temperature.</td>
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<tr>
<td>Chemical test kits for chlorine, iodophor, and quaternary ammonia sanitizers.</td>
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<tr>
<td>Flashlight.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Alcohol swabs.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Reviews establishment file for previous inspection report and, if applicable, documents or complaints on file.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewed previous inspection report noting documented out of compliance observations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed establishment file for complaint reports.</td>
<td></td>
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</tr>
<tr>
<td>Reviewed establishment file for documentation indicating a need for a HACCP Plan.</td>
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<tr>
<td>Reviewed establishment file for documentation of food production or processes operating under a variance issued by the jurisdiction.</td>
<td></td>
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<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
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</tbody>
</table>

(continue on page 3)
## I. Pre-Inspection (continued)

(continued from page 2)

<table>
<thead>
<tr>
<th>Comments:</th>
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</tbody>
</table>

## II. Inspection Observations and Performance

### 1. Provides identification as a regulatory official to person in charge, confirming agency authority for inspection, and stating the purpose of visit.

| Verbally provided name and agency to the person in charge. | A | NI | NO | NA |
| Presenting regulatory identification or business card.    |   |    |    |
| Stated the purpose of the visit.                          |   |    |    |
| Requests and confirmed permission to conduct inspection from the person in charge prior to initiating the inspection. |   |    |    |

**OPTIONAL** (Jurisdiction specific items):

<table>
<thead>
<tr>
<th>Comments:</th>
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<tbody>
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</tbody>
</table>

### 2. Has knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.

| Verified the correct critical limit and or standard specified in the jurisdiction’s rules/regulations to the observation made. | A | NI | NO | NA |
| Correctly cited the rule/regulation for each out of compliance observation. |   |    |    |

**OPTIONAL** (Jurisdiction specific items):

<table>
<thead>
<tr>
<th>Comments:</th>
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<tbody>
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</tbody>
</table>

### 3. Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food.

| Verified Demonstration of Knowledge of the person in charge. | A | NI | NO | NA |
| Verified approved food sources (e.g., food from regulated food processing plants; shellfish documentation; game animal processing; parasite destruction for certain species of fish intended for raw consumption; receiving temperatures). |   |    |    |
| Verified food safety practices for preventing cross-contamination of ready-to-eat food. |   |    |    |
| Verified food contact surfaces are clean and sanitized, protected from contamination from soiled cutting boards, utensils, aprons, etc., or raw animal foods. |   |    |    |

(continued on page 4)
II. Inspection Observations and Performance (continued)

3. Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food.

<table>
<thead>
<tr>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verified the restriction or exclusion of ill employees.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified no bare hand contact with ready-to-eat foods (or use of a pre-approved, alternative procedure).</td>
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</tr>
<tr>
<td>Verified employee handwashing.</td>
<td></td>
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</tr>
<tr>
<td>Verified cold holding temperatures of foods requiring time/temperature control for safety (TCS food), or when necessary, verified that procedures are in place to use time alone to control bacterial growth and toxin production.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified date marking of ready-to-eat foods TCS food held for more than 24 hours.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified cooking temperatures to destroy bacteria and parasites.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified hot holding temperatures of TCS food or when necessary, that procedures were in place to use time alone to prevent the outgrowth of spore-forming bacteria.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified cooling temperatures of TCS food to prevent the outgrowth of spore-forming or toxin-forming bacteria.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified reheating temperatures of TCS food for hot holding.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verified the availability of a consumer advisory for foods of animal origin served raw or undercooked.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identified food processes and/or procedures that require a HACCP Plan per the jurisdiction’s regulations.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

OPTIONAL (Jurisdiction specific items):

Comments:

4. Obtains immediate corrective action for out of compliance employee practices and management procedures (listed in Item 3 above) essential to the safe storage, preparation, and service of food.

<table>
<thead>
<tr>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notified the person in charge/employee(s) of the out of compliance observations.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed corrective actions with the person in charge/employee(s).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Observed the person in charge/employee(s) immediately take corrective action for out of compliance observations (e.g., movement of food to ensure product temperature or prevent contamination; reconditioning food; restriction/exclusion of ill employees; discarding of food product) in accordance with local jurisdiction’s procedures.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identified conditions requiring issuance of an embargo/stop sale/food destruction order per jurisdiction’s administrative procedures.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

OPTIONAL (Jurisdiction specific items):

Comments:
II. Inspection Observations and Performance (continued)

5. Correctly assesses compliance status of other regulations (not included in Item 4 – Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

Correctly assessed compliance status of other regulations (not included in Item 4 above - Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

OPTIONAL (Jurisdiction specific items):

Comments:

6. Verifies correction of out of compliance observations identified during previous inspection.

Verified correction of out of compliance observations identified during previous inspection

OPTIONAL (Jurisdiction specific items):

Comments:

7. Correctly uses inspection equipment during joint inspections.

Used temperature measuring devices/probes in accordance with manufacturer’s instructions.

Cleaned and sanitized (alcohol swabs) temperature measurement probes to prevent food contamination.

Used infrared thermometer in accordance with manufacturer’s instructions. Verified any out of compliance product temperatures registered on the infrared with a thermocouple.

Used maximum registering thermometer or heat sensitive tapes in accordance with manufacturer’s instructions to verify final rinse dishwasher temperature.

Used chemical test strips in accordance with manufacturer’s instructions to measure sanitizer concentrations in manual and mechanical dishwashing operations; wiping cloth solutions; and spray bottle applicators.

Used flashlight to assess observations in areas with no or low light.

OPTIONAL (Jurisdiction specific items):

Comments:
### III. Sample Collection and Evidence Development

<table>
<thead>
<tr>
<th>1. Photographs taken support regulatory findings or conditions observed.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Photographs taken support regulatory findings or conditions observed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Uses an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Used sample collection method specified by the jurisdiction (e.g., original container if available; collection of a representative sample from a large quantity or container).</td>
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<td></td>
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</tr>
<tr>
<td>Used sterile, leak-proof lidded container or zipper-lock type bags.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Used a separate sterile utensil to collect each different sample item.</td>
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</tr>
<tr>
<td>Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Initiated written chain of custody including use of evidence seal.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Maintained sample refrigerated or frozen until transport or shipping to laboratory.</td>
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</tr>
<tr>
<td>Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant (wet or dry ice) via the most rapid and convenient means available (e.g., courier, bus, express mail).</td>
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</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Sample taken at site closest to source of water (prior to any treatment) if possible, or at a site (post treatment) per jurisdiction’s procedures.</td>
<td></td>
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</tr>
<tr>
<td>Sample taken from operational fixed type faucet – no swing type or leaking faucets.</td>
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</tr>
<tr>
<td>Removed aerator (if present) from faucet prior to sampling.</td>
<td></td>
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<tr>
<td>Disinfected faucet with bleach or flame.</td>
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<tr>
<td>Ran water through faucet for several minutes to clear line.</td>
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</tbody>
</table>

*(continued on page 7)*
### III. Sample Collection and Evidence Development (continued)

| 3. Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction. |
|---|---|---|---|
| (continued from page 6) | A | NI | NO | NA |
| Used a sterile, leak-proof lidded container, “whirl-pak” or zipper-lock type bag. | | | | |
| Sample taken from midstream of the flowing faucet. | | | | |
| Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms. | | | | |
| Initiated written chain of custody including use of evidence seal. | | | | |
| Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period. | | | | |
| Maintained sample refrigerated until transport or shipping to the laboratory. | | | | |
| Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant via the most rapid and convenient means available (e.g., courier, bus, express mail). | | | | |

**OPTIONAL (Jurisdiction specific items):**

**Comments:**

---

### IV. Oral Communication

| 1. Asks questions and engages in a dialogue with person in charge/employees to obtain information relevant to inspection. |
|---|---|---|---|
| | A | NI | NO | NA |
| Asked open ended questions (questions that can not be answered with “yes” or “no”). | | | | |
| Did not interrupt when the person in charge/employee was speaking. | | | | |
| Paraphrased/summarized statements from the person in charge to confirm understanding. | | | | |

**OPTIONAL (Jurisdiction specific items):**

**Comments:**

---
## IV. Oral Communication (continued)

2. Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.

<table>
<thead>
<tr>
<th></th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answered inspection-related questions accurately.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Admitted not knowing the answer to a question and arranges to contact the establishment with the answer.</td>
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</tr>
<tr>
<td>Used trainer as a resource when unsure of an answer.</td>
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</tbody>
</table>

**OPTIONAL** (Jurisdiction specific items):

**Comments:**

---

3. Uses available means (e.g., interpreter, drawings, demonstrations, diagrams) to overcome language or communication barriers.

<table>
<thead>
<tr>
<th></th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Avoided using jargon and acronyms, without explanation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Used interpreter, drawings, demonstrations, or diagrams to overcome language or communication barriers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Checked the person in charge’s understanding of information/instructions by asking the operator to paraphrase or demonstrate the information/instructions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OPTIONAL** (Jurisdiction specific items):

**Comments:**

---

4. Follows jurisdiction’s policy in regard to disclosure of confidential information.

<table>
<thead>
<tr>
<th></th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Explained confidentiality laws, policies and procedures to the person in charge when necessary. (If the need to explain confidentiality laws did not occur during the joint field training inspections, the FSIO explained confidentiality laws, policies and procedures to the trainer).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Applied the confidentiality policy per the jurisdictional requirements (e.g., FSIO did not reveal confidential information to the operator during the inspection).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OPTIONAL** (Jurisdiction specific items):

**Comments:**

---
### IV. Oral Communication (continued)

<table>
<thead>
<tr>
<th>5. Uses effective communication and conflict resolution techniques to overcome inspection barriers.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identified challenges faced by the person in charge and offered possible solution(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Did not become argumentative (e.g., remained calm and focused).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Removed himself/herself from a confrontation or threat that may impact personal safety.</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**OPTIONAL** (Jurisdiction specific items):

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comments:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. Conducts exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Explained the public health significance of the inspection observations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed all findings with the person in charge with emphasis on contributing factors to foodborne illness and Food Code Interventions (listed in Section II, Item 3).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Used foodborne illness data to highlight contributing factors.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answered all questions or concerns pertaining to items on the inspection report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provided contact information to the person in charge for follow up questions or additional guidance.</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**OPTIONAL** (Jurisdiction specific items):

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comments:</strong></td>
<td></td>
</tr>
</tbody>
</table>

### V. Written Communication

<table>
<thead>
<tr>
<th>1. Completes inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Used correct inspection form.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completed a legible report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accurately documented observations made during inspection.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completed inspection form in accordance with jurisdiction’s administrative procedures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cited correct code provisions/rules/regulations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Documented immediate corrective action for out-of-compliance foodborne illness contributing factors and Food Code Interventions (listed in Section II, Item 3).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Documented time frames for correcting each out of compliance observation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Signed completed inspection report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*(continued on page 10)*
### V. Written Communication (continued)

<table>
<thead>
<tr>
<th>1. Completes inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>(continued from page 9)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>OPTIONAL (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Includes with inspection report any compliance or regulatory documents (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices) identified or cross-referenced in written statements.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Referenced attached documents in inspection report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Referenced documents are legible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Referenced documents are accurate and reflect observations made during the inspection.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached referenced document(s) to the inspection report per jurisdiction’s administrative procedures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OPTIONAL (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Presents inspection report, and when necessary cross-referenced documents, to person in charge.</th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presented complete inspection report, with referenced documents when necessary, to person in charge during exit interview.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Followed jurisdiction’s administrative procedures for delivering written inspection report.</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Obtained signature of person in charge on inspection report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OPTIONAL (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
### VI. Professionalism

<table>
<thead>
<tr>
<th></th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Maintains a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maintained a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Demonstrates proper sanitary practices as expected from a food service employee.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washed hands as needed (e.g., prior to conducting inspection, after using restroom, after touching dirty surfaces, after touching face/body, after sneezing/coughing).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protected bandages on hands, when necessary, to prevent contamination of food or food contact surfaces.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Did <strong>NOT</strong> contact ready-to-eat foods with bare hands.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Did <strong>NOT</strong> show any obvious signs of illness in accordance with jurisdiction’s employee health policy and/or current food code.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>A</th>
<th>NI</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Only reports substantiated findings as violations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Only reported findings that were directly observed or substantiated in accordance with jurisdiction’s policies and procedures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Findings are supported by fact (e.g., are <strong>NOT</strong> based on hunch or suspicion; are witnessed, are investigated).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Did <strong>NOT</strong> note violations without visiting the establishment.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Did <strong>NOT</strong> exaggerate details related to findings to support report conclusions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Did <strong>NOT</strong> modify report after leaving the establishment except as allowed by jurisdiction’s administrative procedures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OPTIONAL</strong> (Jurisdiction specific items):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Assessor Signature: ______________________________ Date: __________________

FSIO Signature: ______________________________ Date: __________________
## Documentation of Successful Completion – Field Training Process

### Retail Food, Restaurant, and Institutional Foodservice – Food Safety Inspection Officer

<table>
<thead>
<tr>
<th>Date Assessment of Training Needs Began:</th>
<th>Date Assessment of Training Needs Completed:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Print Name – Food Safety Inspection Officer (candidate):</th>
<th>Signature – Food Safety Inspection Officer:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Print Name – Assessor(s):</th>
<th>Signature of Assessor:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Signature indicates FSIO has successfully completed the Field Training Process*

### Acceptable (A) FSIO meets expectations; performance element not demonstrated in a few instances

### Not Applicable (NA) Performance element not part of the FSIO’s assigned responsibilities

<table>
<thead>
<tr>
<th>Item</th>
<th>I. Pre-Inspection Performance Elements</th>
<th>A</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Successfully completed pre-requisite training courses as specified in FDA Voluntary National Retail Food Program Standards: Standard 2 – Trained Regulatory Staff.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Had required equipment and forms to conduct inspection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Reviewed establishment file for previous inspection report and, if applicable, documents or complaints file.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Comments**

<table>
<thead>
<tr>
<th>Item</th>
<th>II. Inspection Observation and Performance Elements</th>
<th>A</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Provided identification as a regulatory official to person in charge, confirmed agency authority for inspection, and stated purpose of visit.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Had knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Used a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation and service of food.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Obtained immediate corrective action for employee practices and management procedures (listed in Item 3 above) essential to the safe storage, preparation and service of food.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Correctly assessed compliance status of other regulations (Good Retail Practices).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Verified correction of out of compliance observations identified during previous inspection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Correctly used inspection equipment during joint inspections.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Comments**
### III. Sample Collection and Evidence Development Performance Elements

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Photographs taken support regulatory findings or conditions observed.</td>
</tr>
<tr>
<td>2</td>
<td>Used an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction.</td>
</tr>
<tr>
<td>3</td>
<td>Used an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Comments</th>
</tr>
</thead>
</table>

### IV. Oral Communication Performance Elements

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Asked questions and engaged in dialogue with person in charge/employees to obtain information relevant to inspection.</td>
</tr>
<tr>
<td>2</td>
<td>Provided operator with accurate answers to inspection-related questions or admitted he/she did not know the answer.</td>
</tr>
<tr>
<td>3</td>
<td>Used available means (e.g., interpreter, drawings, demonstrations, diagrams) to overcome language or communication barriers.</td>
</tr>
<tr>
<td>4</td>
<td>Followed department policy with regard to disclosure of confidential information.</td>
</tr>
<tr>
<td>5</td>
<td>Used effective communication and conflict resolution techniques to overcome inspection barriers.</td>
</tr>
<tr>
<td>6</td>
<td>Conducted exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Comments</th>
</tr>
</thead>
</table>

### V. Written Communication Performance Elements

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Completed inspection forms per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).</td>
</tr>
<tr>
<td>2</td>
<td>Included with inspection report any compliance or regulatory documents (e.g., exhibits, attachments, sample forms, embargo forms; destruction forms; suspension notices) identified or cross-referenced in written statements.</td>
</tr>
<tr>
<td>3</td>
<td>Presented inspection report and when necessary, cross-referenced documents, to person in charge.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Comments</th>
</tr>
</thead>
</table>

### VI. Professionalism Performance Element

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Had a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).</td>
</tr>
<tr>
<td>2</td>
<td>Demonstrated proper sanitary practices as expected from a food service employee.</td>
</tr>
<tr>
<td>3</td>
<td>Only reported substantiated findings as violations.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Comments</th>
</tr>
</thead>
</table>
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
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<tbody>
<tr>
<td>Glossary of Terms</td>
<td>iv</td>
</tr>
<tr>
<td>I. Introduction</td>
<td>1</td>
</tr>
<tr>
<td>Background</td>
<td>1</td>
</tr>
<tr>
<td>Overview – CFP Field Training Manual</td>
<td>2</td>
</tr>
<tr>
<td>II. Pre-Requisite Curriculum</td>
<td>3</td>
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<tr>
<td>Pre-Requisite Courses</td>
<td>3</td>
</tr>
<tr>
<td>OPTION 1 – FDA ORA U Web-base Training</td>
<td>3</td>
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<tr>
<td>OPTION 2 – Equivalent Coursework and Recognized Examination</td>
<td>3</td>
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<tr>
<td>III. The CFP Training Plan and Log</td>
<td>5</td>
</tr>
<tr>
<td>CFP Training Plan and Log</td>
<td>5</td>
</tr>
<tr>
<td>Description of Header Information</td>
<td>6</td>
</tr>
<tr>
<td>Jurisdiction’s Training Methods</td>
<td>7</td>
</tr>
<tr>
<td>Inspection Training Areas</td>
<td>7</td>
</tr>
<tr>
<td>Performance Elements</td>
<td>7</td>
</tr>
<tr>
<td>IV. Creating Your Training Plan</td>
<td>9</td>
</tr>
<tr>
<td>STEP 1 – Determine Performance Elements to be Included in Your Training Plan</td>
<td>9</td>
</tr>
<tr>
<td>STEP 2 – Determine Competencies for Each Selected Performance Element</td>
<td>10</td>
</tr>
<tr>
<td>STEP 3 – Determine Need for Additional Performance Elements and Competencies</td>
<td>11</td>
</tr>
<tr>
<td>STEP 4 – Determine Appropriate Training Method for Each Competency</td>
<td>12</td>
</tr>
<tr>
<td>V. Preparing for Joint Field Training Inspections</td>
<td>16</td>
</tr>
<tr>
<td>STEP 1 – Identify Source Documents for Orientation</td>
<td>16</td>
</tr>
<tr>
<td>STEP 2 – Review List of Pre-Requisite Curriculum with Trainee</td>
<td>16</td>
</tr>
<tr>
<td>STEP 3 – Review Training Plan with Trainee</td>
<td>17</td>
</tr>
</tbody>
</table>
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## VI. Conducting Field Training Inspections

<table>
<thead>
<tr>
<th>Step</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEP 1 – Selecting Appropriate Trainers</td>
<td>18</td>
</tr>
<tr>
<td>STEP 2 – Conducting Demonstration (Trainer-Led) Inspections</td>
<td>18</td>
</tr>
<tr>
<td>STEP 3 – Preparing for Inspections Led by Trainee</td>
<td>19</td>
</tr>
<tr>
<td>Trainer’s Role</td>
<td>19</td>
</tr>
<tr>
<td>Trainee’s Role</td>
<td>20</td>
</tr>
<tr>
<td>STEP 4 – Selecting Establishments for Inspections Led by Trainee</td>
<td>20</td>
</tr>
<tr>
<td>STEP 5 – Determining the Number of Inspections Led by Trainee</td>
<td>20</td>
</tr>
<tr>
<td>STEP 6 – Observing Trainees Demonstrate Competencies</td>
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GLOSSARY OF TERMS

**Competency:** is the state or quality of being adequately or well qualified; having the ability to perform a specific duty, task or role as measured by comparison against a standard of performance.

As used in the context of this Field Training Manual, “competency” means:

- The demonstration of one or more skills (job tasks) based on knowledge derived from educational programs and experience;
- The ability to perform a task with expected outcomes under the varied circumstances of the real world; and
- The effective application of knowledge and skill in the work setting.

Moreover, “competencies” also refers to a specific list of job tasks appropriate for each performance element.

**Conference for Food Protection (CFP):** is a biennial forum comprised of representatives from the food industry, government (local, state, federal), academia, and consumer organizations to identify and address emerging problems of food safety and to formulate consensus recommendations through a balanced and deliberative process. Although the Conference has no formal regulatory authority, it is an organization that profoundly influences model food safety laws and regulations among all government agencies and minimizes different interpretations and implementation.

**Consistent pattern of behavior:** is a recurring pattern of action or performance that is recognizable and distinctive. As used in the context of this Field Training Manual, a “consistent pattern of behavior” means:

- The trainee can explain the purpose/objective of a job task and the steps necessary to carry it out effectively;
- The demonstration of a clear understanding of a given competency; and
- A collective set of trainer observations which indicate that the trainee can successfully demonstrate the competency correctly and repeatedly.

**Demonstration inspection:** is a method used by an experienced trainer or designated staff member to physically illustrate and explain to a trainee the processes and procedures used to conduct a regulatory retail food safety inspection.

**Establishment risk categories:** are a defined grouping of types of food establishments for risk based inspections; Standard 3 of the FDA Program Standards requires that regulatory jurisdictions use a process that groups food establishments into categories based on potential and inherent food safety risks. Annex 5, Table 1 of the FDA Food Code provides an illustration for using risk categorization of food establishments with
four categories. Jurisdictions can use their own system for grouping establishments into categories based on potential food safety risks.

**FDA Voluntary National Retail Food Regulatory Program Standards:** are a voluntary set of standards developed through the CFP process and offered by the US Food and Drug Administration to promote continuous improvement and uniformity among regulatory retail food protection programs. The Program Standards serve as a model foundation and are designed to assist managers of regulatory retail food protection programs in their ability to enhance the services they provide to the public. When applied in the intended manner, the Program Standards should:

- Identify program areas where an agency can have the greatest impact on retail food safety;
- Promote wider application of effective risk-factor intervention strategies;
- Assist in identifying program areas most in need of additional attention;
- Provide information needed to justify maintenance or increase program budgets;
- Lead to innovations in program implementation and administration; and
- Improve industry and consumer confidence in retail food protection programs by enhancing uniformity within and between regulatory agencies.

This *Field Training Manual* was developed using the *FDA Draft Voluntary National Retail Food Regulatory Program Standards, Standard 2 – Trained Regulatory Staff* as the basis for required elements. Standard 2 – Trained Regulatory Staff applies to the essential elements of a training program for regulatory staff and requires that staff have the knowledge, skills and abilities to adequately perform their required duties. Additional information can be found at [http://www.cfsan.fda.gov/~dms/ret3intr.html](http://www.cfsan.fda.gov/~dms/ret3intr.html).

**Field Training Worksheet:** is an optional form that can be used by a trainer to record their observations while a trainee is demonstrating the various competencies essential to conducting effective food safety inspections. The minimum performance element competencies (specific job related skills and tasks) a Food Safety Inspection Officer is expected to perform in the work setting are identified in the jurisdiction’s Training Plan and included on the *Field Training Worksheet*.

**Food Safety Inspection Officer (FSIO):** is a regulatory employee responsible for conducting food safety inspections of one or more of the following types of establishments:

- Institutional foodservice;
- Restaurants and other facilities involved in retail foodservice; and
- Grocery stores or other retail food facilities.
Inspection Training Area: is a generalized grouping of like or similar performance elements combined together under a single category. As used in the context of this Field Training Manual, there are six (6) Inspection Training Areas:

I. Pre-Inspection;
II. Inspection Observations and Performance;
III. Oral Communication;
IV. Written Communication;
V. Professionalism; and
VI. Additional Inspection Areas (jurisdiction specific).

Performance Element: is a general description of a group of competencies (job tasks) to be performed by an employee in a particular area of work. Performance Element descriptions are highlighted in the gray shaded boxes of the CFP Training Plan and Log and the Field Training Worksheets included with this Field Training Manual.

Pre-Requisite Curriculum: is a specified food safety training curriculum designed to provide Food Safety Inspection Officers (FSIO) with an understanding of the essential food safety and public health principles needed to effectively conduct food safety inspections. Areas of study include:

- Public health principles;
- Prevailing statutes, regulations, and ordinances;
- Communication skills; and
- Microbiology.

FSIOs newly hired or newly assigned to the regulatory retail food protection program should successfully complete the pre-requisite curriculum prior to conducting independent food safety inspections. Specific web-based courses and learning objectives for the pre-requisite curriculum are available on the FDA ORA-U website at: http://www.fda.gov/ora/training/.

Trainee: is an individual newly hired or newly assigned to the regulatory retail food protection program. These individuals (regardless of their previous inspection experience) are in the process of learning and successfully demonstrating the competencies identified in the jurisdiction’s training plan as essential for conducting effective food safety inspections.

Trainee-Led Inspections: is a joint field-training inspection that includes both the jurisdiction’s designated trainer and the trainee: where the trainee takes the lead and is responsible for conducting the inspection per the jurisdiction’s administrative procedures and policies. The trainee’s inspecional approach, communication techniques, and food safety priorities should reflect those followed as if he/she were conducting an independent inspection.
Trainee-led inspections provide an opportunity for the jurisdiction’s trainer to observe the trainee as he/she demonstrates competencies, and to identify those competencies that have yet to be learned or were not properly demonstrated.

**Trainer:** is an individual recognized by the regulatory jurisdiction’s food safety program manager as having the field experience and communication skills necessary to train other Food Safety Inspection Officers, and who has been assigned this training responsibility.

The trainer is responsible for observing the trainee as he/she demonstrates competencies identified in the jurisdiction’s training plan, and providing feedback to the trainee throughout the course of the training process on their ability to demonstrate these competencies.

For jurisdictions enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*, the trainer or designated staff member responsible for documenting the FSIOs demonstration of a competency must have completed all the training elements in Steps 1-3 of Standard 2 – Trained Regulatory Staff. It is highly recommended that the trainer be standardized in a process similar to the ‘FDA Standardization Procedures’.

**Training Plan and Log:** is a structured approach for a regulatory retail food protection program to identify and document training content, determine training methods, and track a Food Safety Inspection Officer’s progress in demonstrating competencies specific to their job responsibilities and essential for conducting independent food safety inspections.

An example of a training plan and log is offered as an attachment to this *Field Training Manual*. 
I. Introduction

BACKGROUND

The Conference for Food Protection (CFP) has progressed through multiple stages in the development of a nationally recognized model for training and standardizing regulatory Food Safety Inspection Officers (FSIO) responsible for conducting food safety inspections. Research conducted by CFP revealed that existing training and standardization programs were nearly as varied as the number of regulatory jurisdictions throughout the country. In response, a model multi-tiered approach for training and standardizing FSIOs was developed using the FDA Voluntary National Retail Food Regulatory Program Standards, Standard 2 – Trained Regulatory Staff.

This Field Training Manual focuses on two components of this multi-tiered approach contained in Standard 2 – the pre-requisite coursework and the field training model for preparing newly hired FSIOs or individuals newly assigned to the regulatory retail food protection program to conduct independent food safety inspections. The instructions and worksheets provided in this manual constitute a training process, not a certification or audit process.

The model developed through the CFP process, consists of a training plan, trainer’s worksheets, and procedures that may be used by any regulatory retail food protection program. Jurisdictions do not have to be enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards to use, and benefit from, this training structure for preparing FSIOs to conduct independent food safety inspections. This manual was developed to assist jurisdictions that do not have the available staff resources and funding necessary to develop a comprehensive training process. The training model presented in this manual can be readily integrated into existing regulatory retail food protection programs.

The work within this document represents the culmination of years of research and review by subject matter experts comprised of psychometricians and representatives from state and local regulatory retail food protection programs; industry trade associations; retail food and foodservice operations; academia; and the FDA’s Office of Regulatory Affairs University (ORA U). The coursework and training process are the basis for much of the criteria that is contained in Steps 1 and 2 of Standard 2 – Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards. This manual is a working document and improvements will be made through the CFP Committee process.

With the availability of this document, state, local, and tribal regulatory retail food protection programs now have a nationally recognized model upon which to design basic training programs for FSIOs. Moreover, ongoing use of this model will both enhance the effectiveness of regulatory retail food safety inspections across the country and increase uniformity among regulatory professionals.
OVERVIEW – FIELD TRAINING MANUAL

All new employees or individuals new to the regulatory retail food protection program should complete pre-requisite coursework and a field training process similar to that presented in this document. The national research conducted by CFP has been used to identify the minimum performance element competencies needed to conduct effective regulatory retail food safety inspections. The CFP Training Plan and Log along with the Field Training Worksheets provided in this manual are based on these minimum performance element competencies.

Flexibility has been built into the process to allow regulatory jurisdictions the opportunity to customize training content and methods to represent a jurisdiction’s own administrative policies, procedures, and inspection protocol. As you read through this manual, it is important to keep in mind that jurisdictions are not obligated to use the forms; equivalent forms or training processes can be developed. The ultimate objective is to ensure FSIOs are trained on, and provided an opportunity to successfully demonstrate, the performance element competencies that are a vital part of their job responsibilities.
II. Pre-Requisite Curriculum

PRE-REQUISITE COURSES

The CFP has worked with the FDA to identify a pre-requisite curriculum designed to provide a FSIO with a solid understanding of essential food safety and public health principles needed to conduct effective retail food safety inspections. The FSIO should complete the pre-requisite coursework prior to conducting independent inspections. A trainer can, however, conduct joint field training inspections with the newly-hired FSIO while they are in the process of completing the pre-requisite coursework.

The pre-requisite curriculum, as available on the FDA ORA U web site, is reprinted below with the estimated amount of time (in minutes) to complete each module indicated in parenthesis followed by the course number.

PUBLIC HEALTH PRINCIPLES

Public Health Principles (90) FDA36

PREVAILING STATUTES, REGULATIONS, ORDNANCES

Basic Food Law for State Regulators (60) FDA35
Basics of Inspection
Beginning an Inspection (90) FDA38
Issues & Observations (90) FDA39
An Introduction to Food Security Awareness (60) FD251
2005 Food Code

NOTE: Specific state/local laws & regulations to be addressed by each jurisdiction

MICROBIOLOGY

Food Microbiological Control (series):

1. Overview of Microbiology (60) MIC01
2A. Gram-Negative Rods (60) MIC02
2B. Gram-Positive Rods & Cocci (90) MIC03
3. Foodborne Viruses (60) MIC04
4. Foodborne Parasites (90) MIC05
Mid-Series Exam (30) MIC16
5. Controlling Growth Factors (90) MIC06
6. Control by Refrigeration & Freezing (60) MIC07
7A. Control by Thermal Processing (90) MIC08
7B. Control by Pasteurization (90) MIC09
10. Aseptic Sampling (90) MIC13
12. Cleaning & Sanitizing (90) MIC15

COMMUNICATION SKILLS

Communication Skills for Regulators

NOTE: Specific state/local laws & regulations to be addressed by each jurisdiction

Two options are available for FSIOs to complete the pre-requisite coursework:

OPTION 1 – FDA ORA U Web-base Training

All pre-requisite courses can be completed via web-base training and are available from FDA’s ORA University at: http://www.fda.gov/ora/training/. Employees of regulatory agencies can obtain free access to these course offerings; access passwords can be obtained on line. The time needed to complete the pre-requisite courses will vary from one trainee to another. FDA ORA U has estimated the total time needed to complete the pre-requisite coursework to be 42 hours.

OPTION 2 – Equivalent Coursework and Recognized Examination

A jurisdiction’s trainer or food protection program manager can allow credit for coursework that a FSIO has completed from sources other than FDA ORA U. A course is deemed equivalent if it can be demonstrated to cover at least 80% of the learning objectives of the comparable ORA U course and documentation of successful completion is provided. The learning objectives for each of the ORA U courses are available from the FDA web site link listed under Option 1 above.
FSIOs submitting documentation of equivalent coursework should also demonstrate a basic level of food safety knowledge by successfully passing a written examination from one of the following four (4) categories:

1. The Certified Food Safety Professional (CFSP) examination offered by the National Environmental Health Association (NEHA); or

2. A state sponsored food safety examination that is based on the current version of the FDA Food Code (and supplement) and developed using methods that are psychometrically valid and reliable; or

3. A food manager certification examination provided by an ANSI/CFP accredited certification organization; or

4. A Registered Environmental Health Specialist (REHS) or Registered Sanitarian (RS) examination offered by NEHA or a State Registration Board.

**NOTE:** Within the context of this manual, the written examinations are part of a training process... not a standardization or certification process. The examinations listed above are not to be considered equivalent to each other; they are to be considered only as training tools and have been incorporated as part of this Field Training Manual because each provide a method for determining whether a FSIO has attained a basic level of food safety knowledge. Any jurisdiction has the option and latitude to mandate a particular examination based on the laws and rules of that jurisdiction.
III. The CFP Training Plan and Log

CFP TRAINING PLAN AND LOG

The CFP Training Plan and Log (see Attachment A) provides a structured approach for identifying the training content, determining the training methods, and tracking the FSIO’s progress in successfully demonstrating performance elements and competencies specific to their job responsibilities.

The CFP Training Plan and Log provides areas for documenting:

- Trainee and Trainer information;
- A jurisdiction’s method of training for each of the competencies;
- Completion of performance elements and/or competencies for each training area;

and optional areas for:

- Maintaining a weekly training log for tracking accomplishments and identifying future training goals; and
- Tracking the number and type of retail food and/or foodservice establishments included as part of the field training inspections.
DESCRIPTION OF HEADER INFORMATION

Food Safety Inspection Officer’s (FSIO) Name – The name of the individual who will receive the training.

Food Safety Inspection Officer’s (FSIO) Agency – The name of the regulatory retail food protection program where the FSIO receiving training is employed.

Start Date of the Training Process – The date any part of the FSIO’s training for conducting independent food safety inspections is initiated; this includes review of the jurisdiction’s procedures, rules, manuals; classroom or web-based coursework; joint field training inspections; or other training methods identified in the jurisdiction’s training plan.

Trainer’s Name (if multiple trainers, list all) – The name(s) of the individual(s) delivering or overseeing the training of the FSIO.

Trainer’s Agency – The name of the regulatory retail food protection program or agency where the trainer is employed.

Completion Date of Pre-requisite Coursework – The date the trainee completes all pre-requisite coursework identified by the Conference for Food Protection as essential for conducting independent food safety inspections. Two options are available for completing the pre-requisite course work:

OPTION 1 – Box is checked to indicate the FSIO has completed the FDA ORA U pre-requisite (“Pre”) courses/examinations/exercises, and has completed training on the jurisdiction’s prevailing statutes, regulations, and or ordinances.

OR

OPTION 2 – Box is checked to indicate the FSIO has submitted documentation of completing coursework equivalent to the FDA ORA U pre-requisite (“Pre”) curriculum, and has completed training on the jurisdiction’s prevailing statutes, regulations, and/or ordinances, and has certification or other documentation of successfully passing one of the written examination options in Standard 2 – Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards.

Completion Date – (Performance Elements & Competencies) – The date the FSIO has successfully demonstrated all performance element competencies identified in the jurisdiction’s training plan. At this point, the jurisdiction’s trainer and/or retail food protection program manager has determined that the FSIO is now ready to conduct independent food safety inspections of retail food and/or foodservice establishments.

Food Safety Inspection Officer’s (FSIO) Signature – Signature of the FSIO is applied when all performance element competencies have been successfully demonstrated.

Trainer’s or Food Program Manager’s Signature – Signature of the individual responsible for making the determination that the trainee has completed all the training
areas and successfully demonstrated all the performance element competencies.

**JURISDICTION’S TRAINING METHODS**

The *CFP Training Plan and Log* is designed to incorporate a variety of training methods appropriate for each of the performance element competencies. Jurisdictions are free to select the training method most appropriate for their individual situation and needs. A table (see example below) is included in the *CFP Training Plan and Log* to document and summarize the various training methods a jurisdiction may use. Examples of training methods include, but are not limited to, classroom presentations or exercises, laboratory workshops, office demonstrations, and joint field training inspections.

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<tr>
<td>OD</td>
<td>Office Demonstration</td>
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<tr>
<td>LE</td>
<td>Laboratory Exercise</td>
</tr>
<tr>
<td>JFT</td>
<td>Joint Field Training Inspection</td>
</tr>
<tr>
<td>O</td>
<td>Other (described in Training Plan)</td>
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The column with the heading ‘Code’ can be used to record an abbreviation that describes the training method. For example, the abbreviation ‘LE’ in the above table is used to describe ‘Laboratory Exercise’. The abbreviation ‘JFT’ is used to describe ‘Joint Field Training Inspections’.

**INSPECTION TRAINING AREAS**

The *CFP Training Plan and Log* is divided into six (6) inspection training areas:

I. **Pre-Inspection**
II. Inspection Observations and Performance
III. Oral Communication
IV. Written Communication
V. Professionalism
VI. Additional Inspection Areas (jurisdictions can add performance elements and competencies not contained in the *CFP Training Plan and Log*)

**PERFORMANCE ELEMENTS**

The *CFP Training Plan and Log* contains a total of 23 “performance elements” within the six (6) inspection training areas.

I. **Pre-Inspection – (2 Performance Elements)**
   - Has the required equipment and forms to conduct the inspection.
   - Reviews establishment file for the previous inspection report, complaints on file, and if applicable, required HACCP Plans or documents supporting the issuance of a variance.
II. Inspection Observations and Performance – (7 Performance Elements)

- Provides identification as a regulatory official to the person in charge, confirming agency authority for the inspection, and stating the purpose of the visit.
- Has knowledge of the jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.
- Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food.
- Obtains immediate corrective action for out of compliance employee practices and management procedures essential to the safe storage, preparation and service of food.
- Correctly assesses the compliance status of other regulations (Good Retail Practices) that are included in the jurisdiction’s prevailing statutes, regulations, and/or ordinances.
- Verifies correction of out of compliance observations identified during the previous inspection.
- Correctly uses inspection equipment during the joint inspection.

III. Oral Communication – (6 Performance Elements)

- Asks questions and engages in a dialogue with the person in charge/employees to obtain information relevant to the inspection.
- Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.
- Uses available means (e.g., interpreter, drawings, demonstrations, diagrams, international food safety icons) to overcome language or communication barriers.
- Follows the jurisdiction’s policy with regard to disclosure of confidential information.
- Uses effective communication and conflict resolution techniques to overcome inspection barriers.
- Conducts the exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.

IV. Written Communication – (3 Performance Elements)

- Completes inspection form per the jurisdiction’s administrative procedures (e.g., observations, corrective actions, public health reasons, applicable code references, compliance dates).
- Includes with the inspection report any compliance or regulatory documents identified or cross-referenced in written statements (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices).
- Presents the inspection report, and when necessary cross referenced documents, to the person in charge.

V. Professionalism – (3 Performance Elements)

- Maintains a professional appearance consistent with the jurisdiction’s policy (e.g., clean outer clothing, hair restraint).
- Demonstrates proper sanitary practices as expected from a food service employee.
- Only reports substantiated findings as violations.

VI. Additional Performance Elements – (Jurisdiction Specific)

- Uses an aseptic food sample collection method consistent with criteria established by laboratory serving the jurisdiction.
- Uses an aseptic water sample collection method consistent with criteria established by the laboratory serving the jurisdiction.
- Other performance elements identified by the jurisdiction.

NOTE: The CFP Training Plan lists 2 Performance Elements (aseptic food and water sample collection) under additional performance elements. The responsibility for aseptic sampling of food and water varies greatly from one jurisdiction to another. If FSIOs will be expected to collect aseptic samples of food and/or water, even if it is to be done on a limited basis, these performance elements should be included in the jurisdiction’s training plan.
IV. Creating Your Training Plan

This section presents four (4) basic steps jurisdictions should consider when developing a training plan for your regulatory retail food protection program:

**STEP 1 – Determine Performance Elements to be Included in Your Training Plan**

**STEP 2 – Determine Competencies for Each Selected Performance Element**

**STEP 3 – Determine Need for Additional Performance Elements and Competencies**

**STEP 4 – Determine Appropriate Training Method for Each Competency**

**STEP 1 – Determine Performance Elements to be Included in Your Training Plan**

Performance elements appear in the shaded areas of the *CFP Training Plan and Log*. The jurisdiction’s trainer should review the performance elements contained in the *CFP Training Plan and Log* and determine those that are part of the job responsibility of a FISO in their jurisdiction. If a performance element is conducted by a FSIO, it is to be included in the training plan. An ‘X’ is to be placed in the box adjacent to each performance element included in your jurisdiction’s training plan.

Using the graphic above as an example, an ‘X’ appears in the box for included performance elements within the ‘Pre-Inspection’ training area. The trainer has determined that both of these performance elements are part of the FSIO’s job responsibility in their jurisdiction.
STEP 2 – Determine Competencies for Each Selected Performance Element

The *CFP Training Plan and Log* provides a list of competencies (job tasks) under each performance element. These competencies are intended to serve as examples of job related tasks a FSIO will be expected to successfully demonstrate during field training inspections.

The jurisdiction’s trainer should review competencies listed under the selected performance elements and place an ‘X’ in the box for each of the competencies that are part of the FSIO’s job responsibility in their jurisdiction.

Some of the competencies listed for a performance element may not be applicable to a FSIO within a given jurisdiction. In the graphic below, the use of infrared thermometers and cameras are not part of the standard issued equipment for inspection staff. The FSIO would not, therefore, be responsible for using this type of equipment. If this is the case, the boxes adjacent to these competencies are to be left blank as they would not be included in that jurisdiction’s training plan.

Competencies that are applicable to the FSIO’s job should not be arbitrarily removed or deleted from the *Field Training Worksheet*. 

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[Image of the CFP Model Training Plan Worksheet]
Conversely, there may be competencies not listed under a performance element that are important for a jurisdiction to include in a FSIO’s training. The CFP Training Plan and Log has been designed to accommodate ‘Additional’ jurisdiction specific competencies. In the example from the previous graphic, the jurisdiction issues pH test kits to all FSIOs for product assessments during inspections. If this is the case, the FSIO will need to successfully demonstrate the use of the pH test kit during their training and it is to be included as part of the training plan.

**STEP 3 – Determine Need for Additional Performance Elements and Competencies**

The performance element competencies that comprise the CFP Training Plan and Log represent a national model and the overwhelming majority of these apply to every jurisdiction. There will be instances, however, where a jurisdiction may need to add performance elements and competencies that are not listed on the CFP Training Plan and Log.

Section VI – Additional Performance Elements includes blank templates which a jurisdiction can use to further customize their training plan. Additional Performance Elements are placed in the shaded boxes circled in the graphic below. Any competencies that a FSIO will need to successfully demonstrate during the training process for this performance element need to be identified and listed in the spaces indicated with the arrows.
Feedback received from some jurisdictions that field tested the CFP training process suggested inclusion of the following additional performance element competencies in a training plan:

- Applies HACCP principles in the assessment of food processes and/or preparation procedures to determine if food safety hazards are controlled.
- Conducts menu-based reviews to determine inspection priorities based on potential food safety hazards.
- Demonstrates a thorough understanding of how the Food Code is organized and proper application of Food Code conventions.
- Develops risk control plans or other intervention strategies in accordance with the jurisdiction’s administrative procedures to obtain long term control of contributing factors to foodborne illnesses.

STEP 4 – Determine Appropriate Training Method for Each Competency

Once the FSIO competencies have been identified in the training plan, consideration needs to be given as to how the training will be delivered. Training methods vary from jurisdiction to jurisdiction, and resources available to a jurisdiction (time, money, personnel, etc.) may have a significant impact on determining the type of training that can be provided. Whatever training methods are selected, it is important to ensure that the process will cover all the competencies (job tasks) FSIOs will be expected to successfully demonstrate during food safety inspections.

Training is most effective when it is delivered within the context or environment in which an individual would be expected to apply the knowledge and skills. For FSIOs, the appropriate training environment is one that mirrors the actual experience of inspecting retail food, restaurant, and/or institutional foodservice establishments. When developing the training plan, every effort should be made to provide the FSIO with opportunities to demonstrate a competency during actual field training inspections.

In an ideal training environment, the selection of establishments used for training will provide adequate opportunity to demonstrate all competencies. However, for a variety of reasons, it may not always be possible for the trainee to demonstrate all competencies during joint field training inspections. Should this occur, other training options will need to be considered and implemented.

Some of the performance elements that comprise the CFP Training Plan and Log include competencies that frequently occur as part of the inspection process giving multiple opportunities for the trainer to observe the trainee demonstrating these job tasks during joint field training inspections. These performance elements include:

- Has the required equipment and forms to conduct the inspection;
- Reviews establishment file for previous inspection report, complaints on file, and, if applicable, required HACCP Plans or documents supporting the issuance of a variance;
- Provides identification as a regulatory official to the person in charge; confirming agency authority for the inspection and stating the purpose of the visit;
• Uses inspection equipment correctly during the inspection;
• Conducts the exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations;
• Presents the inspection report and, when necessary, cross-referenced documents, to the person in charge; and
• Maintains a professional appearance that is consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraints).

Some of the performance elements, though they frequently occur during field inspections, will have competencies that the FSIO will need to successfully demonstrate throughout the course of the joint field training process. These performance elements represent competencies for which the trainer will observe a trainee’s continued development and improvement with each subsequent training inspection. Most of the performance elements fall into this category and include:

• Has knowledge of the jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections;
• Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food;
• Obtains immediate corrective actions for out of compliance employee practices and management procedures essential to the safe storage, preparation, and service of food;
• Verifies correction of out of compliance observations identified during the previous inspection;
• Asks questions and engages in a dialogue with the person in charge/employees to obtain information relevant to the inspection;
• Provides the operator with accurate answers to inspection-related questions or admits not knowing the answer;
• Uses available means (e.g. interpreter, drawings, demonstrations, diagrams, international food safety icons) to overcome language or communication barriers;
• Completes inspection form per the jurisdiction’s administrative procedures (e.g., observations, corrective actions, public health reasons, applicable code reference, compliance dates);
• Includes with the inspection report any compliance or regulatory documents identified or cross-referenced in written statements (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices);
• Demonstrates proper sanitary practices as expected from a food service employee; and
• Only reports substantiated findings as violations.

There are, however, some performance elements that are important inspection responsibilities but may seldom or rarely occur during the FSIO field training process. Due to the variable nature of inspections, the trainee may not be presented with an opportunity to demonstrate these competencies as part of the joint field training process. Although less frequently encountered, these performance elements include
knowledge and skills integral to enhancing the effectiveness of the inspection process and include:

- Follows the jurisdiction’s policy in regard to disclosure of confidential information;
- Uses effective communication and conflict resolution techniques to overcome inspection barriers; and
- Uses an aseptic food or water sample collection method consistent with criteria established by laboratory serving jurisdiction.

Whenever possible, competencies are to be assessed in the field inspection environment. If this is not feasible laboratory, classroom, or office exercises may be used to assess performance elements difficult to observe in the field. Examples of such training exercises may include:

- Trainee photographing a specific object in the office, field, or laboratory;
- Trainee explaining to the trainer the jurisdiction’s policy in regard to disclosure of confidential information;
- Trainee explaining to the trainer the jurisdiction’s policy in regard to conflict resolution (the trainer may develop scenarios for the trainee to review and discuss appropriate conflict resolution techniques); or
- Trainee demonstrating aseptic food and/or water sampling in the office, laboratory, or during a designated field training inspection.

The graphic below provides an illustration to document alternative training methods.
In this example, the types of establishments selected for the joint training process did not present an inspection environment that required the trainee to overcome language barriers. An opportunity for the trainee to demonstrate these competencies was addressed by incorporating a classroom exercise as an alternative training method.
V. Preparing for Joint Field Training Inspections

STEP 1 – IDENTIFY SOURCE DOCUMENTS FOR ORIENTATION

Information that a regulatory jurisdiction should review as part of the FSIO’s orientation to the retail food protection program includes but is not limited to:

- The jurisdiction’s retail food training plan that identifies the specific performance element competencies a FSIO will need to successfully demonstrate during joint field training inspections;
- The jurisdiction’s current regulations, code, or ordinances governing foodservice and/or retail food under its inspection authority;
- Any written policies or interpretations implemented by the jurisdiction that carry the same weight as their prevailing rules and regulations;
- The jurisdiction’s current retail food protection program inspection form;
- Any marking instructions the jurisdiction may have developed to assist staff with documenting inspection findings;
- The pre-requisite curriculum posted on FDA’s ORA U web site and the web address for obtaining an access password; and
- Other documents specific to the jurisdiction that the trainer has determined are integral to the retail food protection training program.

The inclusion of the above list of source documents is not meant to imply that all material must be reviewed during a single dedicated FSIO orientation session. These documents are included here to provide a starting point for a checklist of materials a trainer will likely need to review with the FSIO over the first weeks of employment or assignment to the retail food protection program.

STEP 2 – REVIEW LIST OF PRE-REQUISITE CURRICULUM WITH TRAINEE

The courses listed as part of the pre-requisite curriculum (see page 3) should be reviewed with the FSIO. The trainer or food program manager is to make a determination whether a candidate has met any or all of the pre-requisite curriculum requirements and has documentation indicating successful completion. If the FSIO needs to complete coursework, the trainer should assist him/her with obtaining an access password to the FDA ORA U web site, or make a determination as to whether equivalent courses are a more viable option.

Reserving designated blocks of time each week for the FSIO to devote to this curriculum often facilitates timely completion of the pre-requisite coursework. Keep in mind that the FSIO can participate and even take the lead in conducting joint field training inspections while they are in the process of completing the pre-requisite coursework.

NOTE: The pre-requisite coursework includes a listing for the FDA 2005 Food Code. While most jurisdictions use the FDA Food Code as the foundation for their own rules and regulations, there will be some differences unless the jurisdiction has adopted the entire FDA Food Code by reference. Jurisdictions should use their own Food Code as the pre-requisite course for training FSIOs. State, local, and tribal jurisdictions are
strongly encouraged to conduct a frequent review of their existing Food Code provisions against the current version of the FDA Food Code to ensure that it provides a scientifically sound technical and legal basis for regulating the retail food segment of the industry.

STEP 3 – REVIEW TRAINING PLAN WITH TRAINEE

A review of the jurisdiction’s retail food protection training plan should include a discussion of:

- The performance elements, how they were determined, and their impact on conducting effective food safety inspections;
- The specific competencies that comprise each performance element so the trainee has a clear understanding of what job tasks they will be expected to successfully demonstrate during the course of the field training process;
- Training methods and approaches that will be offered to facilitate a trainee’s demonstration of the competencies;
- How field training objectives will be determined and communicated to the trainee;
- How the trainer will observe the trainee perform competencies during field training inspections and share feedback on their observations;
- How progress and accomplishments will be documented on the training plan; and
- The jurisdiction’s criteria for determining a trainee’s readiness to conduct independent inspections of retail food and/or foodservice facilities.
VI. Conducting Field Training Inspections

Field training inspections are a core component for preparing a FSIO to perform their job responsibilities independently. There are two types of field training inspections: demonstration (trainer-led) and those where the trainee takes the lead (trainee-led).

Field training will initially be comprised of demonstration (trainer-led) inspections. Providing an opportunity for the FSIO to observe experienced staff conducting food safety inspections is an essential step in preparing a trainee for taking the lead during field training inspections.

Trainee-led inspections provide the opportunity for the jurisdiction’s trainer to observe the trainee build their skills and successfully demonstrate competencies. Inspections led by a trainee are not part of an examination or audit process. They are intended to be part of a structured training process where learning is still occurring, where trainers are providing feedback, and where correct demonstration of competencies is continually being re-enforced.

A sufficient number of field training inspections led by the trainee are to be conducted to allow the demonstration of all competencies identified in the jurisdiction’s training plan. Upon completion of the field training process, the trainee should have successfully demonstrated all competencies in the training plan and be ready to conduct independent inspections of retail food and/or foodservice facilities.

STEP 1 – SELECTING APPROPRIATE TRAINERS

The manager of the regulatory retail food protection program has the discretion of deciding who will serve as trainers. In making this decision, available training resources (e.g., personnel, time, funding) and overall program objectives will need to be considered when selecting staff to oversee and conduct the FSIO field training.

A trainee can garner important knowledge and perspective from observing different inspection approaches from experienced staff. During the course of these joint inspections, it is expected that a trainee will observe experienced staff demonstrate all performance element competencies that are part of the jurisdiction’s training plan.

STEP 2 – CONDUCTING DEMONSTRATION (TRAINER-LED) INSPECTIONS

When selecting staff for trainer-led inspections, management should consider experienced staff with a solid command of all the competencies the FSIO will be expected to demonstrate in the training process. These experienced staff members will lay the foundation for the trainee’s assimilation of the knowledge and skills needed to conduct food safety inspections as they will be initially demonstrating how to correctly perform specific job tasks.

If possible, management should consider pairing the trainee with several different FSIOs during demonstration inspections to allow exposure to different inspection approaches and techniques. Moreover, these trainer-led inspections should be conducted in a variety
of establishments that cover the spectrum of retail food and foodservice operations that the FSIO will eventually be inspecting on their own.

The level of preparedness and time needed to assimilate knowledge from observations made during demonstration inspections will vary with each trainee. When a determination has been made that the trainee is ready to take the lead during an inspection, it is important to keep in mind that training has not stopped. Trainees will still need trainers to demonstrate competencies and provide feedback. The CFP training process is designed to facilitate a continuous improvement learning experience.

**STEP 3 – PREPARING FOR INSPECTIONS LED BY THE TRAINEE**

Inspections led by the trainee consist of two inter-related but separate activities: one is specific to the role of the jurisdiction’s trainer, the other relates to the role and responsibilities of the trainee.

- The **trainer** is responsible for observing the trainee as he/she demonstrates competencies identified in the jurisdiction’s training plan.
- The **trainee** is responsible for conducting the inspection in the presence of the trainer, per the jurisdiction’s administrative procedures and policies.

Even though there is a relationship between these activities, it is important to recognize the need to view them separately.

**Trainer’s Role**

During trainee-led inspections, the trainer observes the trainee conducting the inspection and demonstrating the competencies. The trainer participates **only** when the inspection process dictates their assistance or intervention.

No single field training inspection will provide an opportunity for the trainee to demonstrate all the competencies listed in the training plan. The trainer should allow the inspection process to unfold as it normally would; in other words, the jurisdiction’s training plan should **not** be used as a checklist for structuring the inspection to accommodate observations of a trainee demonstrating competencies. Requesting that a trainee demonstrate a competency that is not integral to the inspection that is occurring may be disruptive and create unwanted confusion and stress for the trainee.

As the field training process progresses, the trainer may note that the selection of establishments has not provided the trainee an opportunity to demonstrate some competencies. The trainer can try to remedy this situation by selecting establishments that may provide appropriate environments where the trainee can demonstrate the job tasks. If this is not feasible, the trainer can set up field exercises during inspections led by the trainee; however, the exercise should be conducted at a time that will not disrupt the flow of the inspection and the trainer should discuss these exercises with the trainee prior to the inspection so expectations are clear.
Trainee’s Role

Since the trainee will be taking the lead during these field training inspections, their focus should be on observations of food safety practices and procedures within the establishment. During these inspections the trainee is responsible for:

- Initiating contact with the person in charge;
- Explaining the purpose of the inspection;
- Directing the inspection process;
- Establishing a dialogue with management and employees;
- Making the observations of food safety practices;
- Obtaining corrective actions for out of compliance foodborne illness contributing factors;
- Preparing the inspection report; and
- Facilitating and conducting the exit discussion of the report.

The trainee’s inspection approach, communication techniques, and food safety priorities should be reflective of those they would implement if inspecting independently. The inspection should not be structured solely around the demonstration of competencies. The trainee should concentrate on conducting an effective food safety inspection. Providing an appropriate variety of establishments will help ensure the competencies listed on the jurisdiction’s training plan do not drive the inspection approach.

STEP 4 – SELECTING ESTABLISHMENTS FOR INSPECTIONS LED BY TRAINEE

The ideal establishment for conducting a food safety inspection led by the trainee is one that will provide an opportunity for the trainee to successfully demonstrate the greatest number of competencies. The majority of these inspections should be completed in establishments that are representative of the highest risk categories within the jurisdiction or the FSIO’s assigned training area.

Jurisdictions can use their own system for grouping establishments into categories based on potential or inherent food safety risks. Annex 5, Table 1 of the 2005 FDA Food Code can also be used as a reference for assigning risk categories.

STEP 5 – DETERMINING THE NUMBER OF INSPECTIONS LED BY TRAINEE

There is no definitive number of inspections led by the trainee that can be used as a standard for all newly hired employees. The number of inspections necessary is one that provides adequate opportunity for all competencies to be demonstrated. Some of the competencies, such as those related to conducting a risk-based inspection, must be continually demonstrated throughout the course of the field training process.

NOTE: For jurisdictions enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards, staff conducting food safety inspections must conduct a minimum of 25 joint field inspections comprised of both “demonstration” (trainer-led) and trainee-led inspections, and include a variety of establishment types available within
the jurisdiction.

The CFP field training process is not intended to be part of an audit or evaluation process, therefore a ‘scoring system’ has not been included. The primary objective of this process is to ensure that the FSIO has received training for all the competencies that are part of the job responsibilities within that jurisdiction. As part of this training, the FSIO is to successfully demonstrate their ability to perform each of these competencies. No single inspection or observation should be used by the trainer(s) as the standard of measurement; the jurisdiction’s trainer(s) need to evaluate the trainee’s ability to demonstrate competencies throughout the entire process.

NOTE: FSIOs should successfully complete the field training process prior to conducting independent inspections and re-inspections of retail food establishments equivalent to Risk Categories 2, 3, and 4 as noted in Annex 5, Table 1 of the 2005 FDA Food Code. However a jurisdiction’s trainer or food program manager can make a determination as to the FSIO’s readiness to conduct independent inspections of Risk Category 1 establishments at any time during the training process.

STEP 6 – OBSERVING TRAINEES DEMONSTRATE COMPETENCIES

NOTE: For jurisdictions enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards, the trainer or designated staff member responsible for documenting the FSIOs demonstration of a competency must have completed all the training elements in Steps 1-3 required in Standard 2 – Trained Regulatory Staff. It is highly recommended that this trainer be standardized in a process similar to the ‘FDA Standardization Procedures’.

There is no single ‘correct’ method for making a determination as to when a trainee has successfully demonstrated a competency during field training inspections. Throughout the series of training inspections, the trainer will observe the trainee demonstrate many competencies. For some competencies, the trainer will be able to ascertain relatively quickly whether a trainee has demonstrated the job task correctly. For example, once a trainee successfully demonstrates the proper use of inspection equipment, he/she generally will maintain that skill throughout the training process.

Almost all of the competencies listed, however, should be demonstrated by the trainee several times. The trainer should observe the trainee successfully demonstrate a consistent pattern of behavior for each competency. As defined in this document, a ‘consistent pattern of behavior’ means:

- The trainee can explain the purpose/objective of the job task and the steps necessary to carry it out effectively;
- The demonstration of a clear understanding of a given competency; and
- A collective set of trainer observations which predominately indicate that the trainee can successfully demonstrate the competency correctly and repeatedly.

Trainees will be on a continuous learning curve throughout the training process; inconsistencies in their inspection approach from one facility to another should be
expected. Trainers will need to determine whether these inconsistencies are due to a lack of understanding, an inability to successfully demonstrate a competency, or simply inexperience.

In some cases a trainee may be capable of successfully demonstrating a competency but fails to do so during an inspection. For example, he/she may not address an important food safety risk (such as employee health) with the person in charge. The trainee may understand and can demonstrate the proper approach to assessing an employee health policy within an establishment, but forgets to do so because they may have become distracted by other risk related observations and the need to work with management to obtain corrective actions. This is an example of a trainee who is still in the process of developing his/her own organized risk-based inspection approach.

It is important for trainers to recognize that during the training process, trainees are not only learning competencies but are also becoming acclimated to their working environment. Trainer’s decisions regarding a trainee demonstrating a competency should be based on a collective set of observations which predominately indicate the job task is being performed correctly.

When the trainee successfully demonstrates a competency, the jurisdiction’s trainer or designated staff person documents the completion of the skill on the training plan. Some options and forms for tracking the trainee’s progress and accomplishments are presented in Section VII of this document.
VII. Documenting Training Progress and Accomplishments

Each regulatory retail food protection program will need to develop a system to track a FSIO’s training progress and accomplishments. A jurisdiction can customize the forms provided in this manual or develop their own. Any system for documenting training should provide a method for:

- Recording competencies that have been demonstrated by a FSIO;
- Determining competencies a FSIO has not yet demonstrated;
- Identifying the trainer(s) responsible for observing a FSIO demonstrating a competency;
- Providing feedback to the FSIO on training objectives; and
- Obtaining confirmation from both the FSIO and trainer that competencies have been demonstrated correctly.

CFP TRAINING PLAN AND LOG USED AS A SINGLE SOURCE DOCUMENT

The CFP Training Plan and Log (Attachment A) can be used as a single source document for recording a FSIO’s training progress and accomplishments.

The graphic below provides an illustration of how a FSIO’s training status can be tracked with documentation entered for the four competencies listed under this performance element.
For each of the competencies, the trainer records the date a determination was made that the trainee successfully demonstrated the competency. The trainee’s initials (represented by ‘R.T.’ in the graphic on the previous page), indicate his/her agreement with the date recorded (represented as 5-21-07). The training officer’s name or signature indicates confirmation that the trainee successfully demonstrated the competency. When the trainee has demonstrated all the competencies for a performance element, the bottom row is completed as indicated with the arrow in the graphic.

Documentation on the CFP Training Plan and Log does not have to follow this format exactly. For example, a jurisdiction that has only one trainer may find it redundant to record the trainee’s initials and trainer’s name for all competencies within each performance element. In scenarios like this, a trainer may choose to simply record the date when each competency was demonstrated under the ‘Date Demonstrated by the Trainee’ column. Then, when the trainee has demonstrated all the performance element competencies, he/she places their initials in the bottom row (indicated with the arrow in the graphic), and the trainer signs confirming completion.

However, if multiple trainers are used, competencies demonstrated by the trainee may be confirmed by different individuals. In a case like this, in order to ensure open communication between the training staff and the trainee throughout the field training process, it may be important to know which trainer actually observed that the trainee demonstrated a specific competency.

A ‘comment’ section is provided at the bottom of each of the performance element tables. This area can be used to describe future training objectives or to provide a method of communicating training observations among multiple trainers. It can also be used to describe changes to the training plan to ensure opportunity to demonstrate a competency that may be difficult to observe during field training inspections.

From the example presented on the previous page, the comment section includes the following note:

*Trainee did not observe a condition during the joint field training inspections that required issuance of an embargo/stop sale/food destruction order. Office scenarios were set up. Trainee demonstrated steps that would be implemented for the issuance of an embargo/stop sale/food destruction order and completed the required forms per the jurisdiction’s administrative protocol. (John Smith)*

In this example, the scheduled field training inspections were coming to an end. The field inspections had not provided an opportunity for the trainee to demonstrate the jurisdiction’s procedure for issuance of an embargo/stop sale/food destruction order. The trainer set up an office exercise for the trainee to demonstrate this competency and the ‘OD’ designation under training method in the graphic indicates ‘Office Demonstration’.
OPTIONAL TRAINING LOGS

Two optional training logs are included at the end of the *CFP Training Plan and Log* that can be used to track a FSIO’s progress and achievements.

- FSIO Training Log; and
- Joint Field Training Inspections – Establishment Log

A determination on whether to use these optional training logs should be made by the manager of the regulatory retail food protection program before initiating field training so their intended use and purpose can be communicated to FSIOs in training and staff who will serve as trainers.

**FSIO Training Log**

The optional *FSIO Training Log* provides a method for tracking a FSIO’s progress and accomplishments from one week to another by noting competencies demonstrated each week. Training objectives for the upcoming week can be established and communicated with the trainee to clarify expectations and assist in focusing on specific competencies. This weekly training log can also be an important means of sharing information in situations where multiple trainers are working with a FSIO.
**Joint Field Training Inspections – Establishment Log**

The optional *Joint Field Training Inspections – Establishment Log* provides a method of tracking the number and type of establishments within which training has been conducted. A ‘Risk Category’ column provides a quick reference as to the complexity of food preparation processes that have been included in the FSIO’s training and assists in determining what types of establishments to include in future field training inspections.

In addition, the establishment log provides a quick method for distinguishing trainer-led (demonstration) inspections from those which were trainee-led. An “X” is placed in the appropriate column to denote the type of field training inspection conducted. In the above graphic, the first 9 inspections were trainer-led, and the trainee first took the lead during joint field training inspections when establishment #10 was visited.

**SUPPLEMENTAL FIELD TRAINING WORKSHEET FOR TRAINERS**

Some jurisdictions who field tested the CFP training process requested optional *Field Training Worksheets* that trainers could use during trainee-led inspections to record observations that will aid in determining when a competency has been consistently demonstrated. The *Field Training Worksheet* also provides a means for identifying competencies that the trainee has not had the opportunity to successfully demonstrate.
Two versions of such as worksheet have been developed:

- **Field Training Worksheet**: a distilled version of the CFP Training Plan and Log.
- **Abbreviated Field Training Worksheet**: listing only the performance elements.

Either version can be used in conjunction with the CFP Training Plan and Log to track a FSIO’s progress and accomplishments. The manager of the regulatory retail food protection program has the discretion of determining whether to use a Field Training Worksheet as part of their training process.

**Field Training Worksheet**

The Field Training Worksheet, included as Attachment B, is a distilled version of the CFP Training Plan and Log.

In this worksheet, all *performance element competencies* for which the most appropriate training method is ‘Joint Field Training Inspections – JFT’ have been included.

For each of the competencies included in the jurisdiction’s Field Training Worksheet, the trainer:

- Determines whether or not there was an opportunity to demonstrate a competency; and
• Determines when a FSIO consistently demonstrates a competency correctly.

The Field Training Worksheet contains two major columns for recording observations:

- **Opportunity occurred for FSIO to demonstrate competency during field training inspection.**
  
  **YES** – An “X” is placed in this box if the trainee had an opportunity to successfully demonstrate the listed competency during the inspection. In the graphic above, the trainee had opportunity to demonstrate competencies pertaining to ‘avoiding the use of acronyms/jargon’ and ‘checking the person in charge’s understanding of information.’

  **NO** – An “X” is placed in this box if the inspection environment did not require or present an opportunity for the trainee to successfully demonstrate the competency. Using the graphic above, an opportunity did not occur during the field training for the trainee to demonstrate ‘the use of interpreters/drawings/demonstrations, etc., to overcome language or communication barriers.’ If this pattern continues throughout the field training inspections an alternative training method may need to be considered.

- **Competency demonstrated during field training inspections.**
  
  **YES** – An “X” is placed in this box if the trainee successfully demonstrates the competency during the inspection. When possible, a trainer should observe a
trainee demonstrating a competency several times. In the graphic displayed on the previous page, the trainer has indicated that the trainee has successfully demonstrated the ability to avoid acronyms/jargon when providing explanations to food employees during inspections.

NO – An “X” is placed in this box if the trainee has an opportunity to demonstrate a competency during the inspection but does not do so correctly or does not act correctly on the inspectional situation. It is important to emphasize that a ‘NO’ determination for the competency does not in any way denote or indicate that the trainee has failed. It is simply part of the continuous learning process and is intended to identify areas where additional training is needed. When a ‘NO’ determination is made regarding a specific competency, the trainer should take immediate steps to review or demonstrate the correct procedure or protocol with the trainee. In the graphic on the previous page, the trainer has indicated that the trainee needs additional training related to communication techniques for determining the person in charge’s level of understanding for the information presented during the inspection.

Comments – The trainer can provide detailed descriptions of observations made during joint training inspections in the ‘comments’ section at the bottom of each performance element table, as well as additional training provided and future training objectives. In the example used for this discussion, the trainer has provided the following statements in the comment section:

Reviewed techniques with the FSIO for asking open-ended questions when checking food employees understanding of information presented during the inspection. Discussed the importance of demonstrating, when possible, a specific procedure when it appears that management or food employees may not clearly understand a verbal explanation. For example, setting up the wash, rinse, and sanitize bins of a 3 compartment sink, then checking for understanding by having the food employees demonstrate the procedure. I will continue to work with the FSIO on this competency during the field training inspections scheduled for next week. (Mary Jones)

The Field Training Worksheet is a method for trainers to organize and record their notes from observations made of the trainee demonstrating competencies during training inspections.

As indicated in the graphic at the top of the next page, information from the Field Training Worksheet can be transferred to the CFP Training Plan and Log when a trainee has demonstrated a competency.
In this example, the trainee has demonstrated the first 3 competencies during ‘Joint Field Training Inspections – JFT’. The trainer, ‘Mary Jones’ has recorded the date the trainee demonstrated each of the competencies in the CFP Training Plan and Log.
Abbreviated Field Training Worksheet

The *Abbreviated Field Training Worksheet*, included as Attachment C, lists only the performance elements and is an even shorter version of the worksheet just discussed.

The use of this worksheet is intended for experienced trainers with a strong working knowledge of the competencies that FSIOs are expected to successfully demonstrate during field training inspections.
As an example, the abbreviated worksheet segment that lists the performance elements pertaining to oral communication is displayed in the graphic below. All six (6) of the performance elements for the ‘Oral Communication’ inspection area are included. Noe of the competencies (job tasks), however, are listed for these performance elements. The two column format and comment section for documenting training observations is the same as for the longer Field Training Worksheet.

A reference list of example competencies for each performance element is provided at the end of the Abbreviated Field Training Worksheet for trainers to use during trainee-led inspections. The graphic that appears at the top of the next page displays competencies for some of the oral communication performance elements used as examples throughout this discussion.
It is important to keep in mind that using either of the worksheets is a determination to be made by the regulatory jurisdiction’s management. These documents have been included with this manual to support a jurisdiction’s effort to ensure a FSIO has received training and demonstrated all competencies needed to conduct effective independent food safety inspections.

**USING A SUPPLEMENTAL FIELD TRAINING WORKSHEET**

In determining how to integrate a supplemental *Field Training Worksheet* into the training process, two approaches are generally considered:

- Using a worksheet during every trainee-led inspection; or
- Using a worksheet at set interval points during the trainee-led field training process.

These two approaches are only examples and are **not** intended to restrict the use of other formats by a jurisdiction. The following summary of strengths and challenges for each approach provides some guidance to regulatory retail food protection programs on ways to integrate a *Field Training Worksheet* into their training process.
**Approach #1: During every inspection led by a trainee**

**Strengths:** This approach provides continual feedback to the trainee on the competencies they have demonstrated and those for which more focused training is still needed. In the early stages of the training process, the *Field Training Worksheet* can be an important tool in determining whether more demonstration (trainer-led) inspections need to be performed. In later stages, the worksheet will help focus training on competencies the trainee is having difficulty with.

In addition, using the *Field Training Worksheet* with every inspection will provide important feedback on the jurisdiction’s training and orientation program. The *Field Training Worksheet* can assist trainers with identifying potential gaps in the orientation/training program, coursework requirements, or administrative materials used to prepare staff to take the lead during field training inspections.

**Challenges:** Using the *Field Training Worksheet* during every inspection may cause trainers to focus too much on completing the form rather than on the training of the FSIO. The *Field Training Worksheet* is simply a tool to assist the trainer to track competencies as demonstrated during inspections led by a trainee.

Competing program priorities and limited resources may impede a jurisdiction’s ability to use a *Field Training Worksheet* during every trainee-led inspection. Jurisdictions will need to balance the need to track the training process and communicate results effectively with the time commitment associated with completing forms used to support the training process.

**Approach #2: At set interval points.**

**Strengths:** A trainer may choose to use the *Field Training Worksheet* at set interval points during trainee-led inspections. For example, a *Field Training Worksheet* could be completed after every fifth inspection (i.e., inspections 5, 10, 15, 20 and 25). This process provides set checkpoints for determining when training observations indicate the trainee has successfully demonstrated a competency.

The trainer can set achievable objectives for the trainee using this interval process, working on a few competencies at a time. Trainee-led inspections conducted between each use of the *Field Training Worksheet* can enhance a trainee’s knowledge and skills for competencies or provide additional training when needed.

**Challenges:** The interval process requires trainers to work from notes or inspection reports to determine competencies that have been observed and/or demonstrated over a period of time. The primary objective during trainee-led inspections is for the trainer to observe a consistent pattern of behavior in the trainee’s ability to successfully demonstrate a competency. Depending on the frequency a competency is observed, an interval approach could reveal fluctuations in a trainee’s ability to demonstrate a job task. The interval process
may not provide as structured a method for providing continuous feedback to the trainee as that provided if the Field Training Worksheet is used during every trainee-led inspection.

The ‘Joint Field Training Inspection – Establishment Log’ can be an important tool for documenting the use of the Field Training Worksheet when using the interval approach. The establishment log provides a means to note the point in time when the worksheet was completed and the time frame covered during the training period. In the illustration below, the trainer completed a Field Training Worksheet after the inspection of Establishment #15 and Establishment #20.

In the above example, the trainee-led inspections began with Establishment #10. The first Field Training Worksheet was completed after Establishment #15 and contains a collective set of observations of the trainee demonstrating competencies for Establishments 10 through 15, encompassing the period, April 9 through 12, 2007.

In this example, the jurisdiction’s training staff completes a Field Training Worksheet using 5 establishment inspection intervals. The second Field Training Worksheet was completed after Establishment #20 and the trainer’s observations again represented observations over a cumulative period of time. The notes from one Field Training Worksheet build on observations made on previous documents. The observations on the second Field Training Worksheet, therefore, represents the period when the
trainee began taking the lead during the training process on April 9, 2007 until the date the second Field Training Worksheet was completed on April 20, 2007.

The Field Training Worksheet is **not** intended to be used as a checklist during inspections nor should it drive the inspection approach used by the trainee. Continuous instruction is encouraged during each of the inspections led by a trainee. Trainers should take the opportunity to demonstrate and/or review correct procedures and skills for competencies that are not understood or properly performed by the trainee during each inspection.

**REVIEWING FIELD TRAINING**

Consistent and on-going feedback regarding inspection competencies is the cornerstone of the FSIO field training process presented in this manual. The trainer should share his/her observations with the trainee during each of the inspections. Discussions should include competencies successfully demonstrated by the trainee as well as those where additional training is needed. Trainers should provide continuous positive reinforcement for competencies correctly demonstrated by the trainee.

For areas where additional training is needed, the trainer should demonstrate to the trainee the competency during joint inspections and determine if other training methods may benefit the trainee’s understanding and application of the competency. Field training objectives should continually be reviewed with the trainee and updated as needed.

Equally as important, the field training process provides critical feedback to managers and trainers on the effectiveness of their retail food training and orientation programs. Competencies (job tasks) that are not consistently performed well by trainees may be an indication that the regulatory jurisdiction has significant gaps in their training program, coursework, or materials used to prepare staff for field inspections. Field training, where observations are made of a trainee demonstrating specific competencies, provides a framework for evaluating and enhancing the effectiveness of a jurisdiction’s existing regulatory retail food training programs.

**DOCUMENTATION OF COMPLETION**

The trainer’s and trainee’s signature in the header of the CFP Training Plan and Log indicates they both concur that all pre-requisite coursework has been completed and competencies listed on the jurisdiction’s training plan have been demonstrated.
When a FSIO has completed all the pre-requisite coursework and demonstrated all the competencies identified in the jurisdiction’s training plan, the retail food protection program managers has a basis for determining the FSIO’s readiness to conduct independent food safety inspections. The completed and signed CFP Training Plan and Log should be placed in the FSIO’s training file and a copy of the completed document given to the FSIO for their records.
VIII. Continuing Training

The pre-requisite coursework (see page 3), training plan, and field training inspection process presented in this manual are based on the minimum performance competencies a FSIO should be able to successfully demonstrate prior to conducting independent food safety inspections. This process should be considered but a first step in the development of inspection staff in a regulatory retail food protection program. Additional training opportunities and standardization should be provided on a continual basis to advance the development of a FSIO’s ability to implement a risk-based inspection approach and communicate food safety principles to the regulated industry and the public.

Additional Food Safety Courses

Over 100 food safety related courses are accessible from the FDA ORA U web site. The Conference for Food Protection has worked with FDA to identify courses that a FSIO should complete within the first 18 months of hire or assignment to the retail food program. It is expected that most FSIOs would complete this second phase of coursework after they have started to conduct independent inspections.

This additional coursework is part of the criteria contained in Standard 2 – Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards and includes:

**MICROBIOLOGY**

- Food Microbiological Control (series):
  - 7C. Control by Retorting (90) MIC10
  - 8. Technology-Based Food Processes (120) MIC11
  - 9. Natural Toxins (90) MIC12

**HACCP**

- Basics of HACCP (series):
  - 1. Overview of HACCP (60) FDA16
  - 2. Prerequisite Programs & Preliminary Steps (60) FDA17
  - 3. The Principles (60) FDA18

**EPIDEMIOLOGY**

- Foodborne Illness Investigation (series):
  - 1. Collecting Surveillance Data (90) F101
  - 2. Beginning the Investigation (90) F102
  - 3. Expanding the Investigation (90) F103
  - 4. Conducting a Food Hazard Review (90) F104
  - 5. Epidemiological Statistics (90) F105
  - 6. Final Report (30) F106

*Note: the estimated amount of time (in minutes) to complete each module is indicated in parenthesis followed by the course number.*

The jurisdiction should also conduct or provide an opportunity for FSIOs to attend an Application of the Basics of Inspection/Investigations Course. This course addresses all retail food program inspection areas in which a FSIO should receive training and contains a practicum that provides an opportunity to demonstrate inspection techniques and procedures. The Application Course provides an important confirmation that retail food safety program training objectives have been achieved.

A fully developed Application Course is available on CD through FDA’s Division of Human Resource Development’s lending library. A jurisdiction’s trainer can conduct their own Application Course using these materials or develop one that addresses at least 80% of the learning objectives and exercises contained in the course. In addition, the Association of Food and Drug Officials (AFDO) at www.afdo.org/ has, upon request, conducted the course for state and local retail food protection programs.
Standardization

Managers of regulatory retail food protection programs are encouraged to implement a standardization process similar to what is included in FDA’s Standardization Procedures for FSIOs to complete within 18 months of hire. A copy of FDA’s standardization process can be obtained from the following web link:

NOTE: The CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers (FSIOs) should be reviewed prior to using the CFP Training Plan and Log. The manual provides jurisdictions with information that will be helpful in customizing a FSIO training plan and implementing a training process that meets the specific needs of the jurisdiction.

<table>
<thead>
<tr>
<th>Food Safety Inspection Officer’s (FSIO) Name:</th>
<th>Start Date of the Training Process:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food Safety Inspection Officer’s (FSIO) Agency:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trainer’s Name (if multiple trainers list all):</th>
<th>Trainer’s Agency:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
</tr>
</tbody>
</table>

Signatures below indicate FSIO has completed all curriculum and field training elements and is ready to conduct independent retail food and/or foodservice inspections

<table>
<thead>
<tr>
<th>Completion Date of Pre-requisite Coursework:</th>
<th>OPTION 1: ☐ or OPTION 2: ☐</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completion Date - (Performance Elements &amp; Competencies):</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Food Safety Inspection Officer’s (FSIO) Signature:</th>
<th>Trainer’s or Food Program Manager’s Signature:</th>
</tr>
</thead>
</table>

The CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers includes two components. One includes completion of pre-requisite coursework outlined in Program Standard 2 – Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards. The second component focuses on the FSIO’s ability to demonstrate performance element competencies that are needed to conduct effective regulatory food safety inspections. A FSIO should successfully complete both components prior to conducting independent inspections.

PRE-REQUISITE COURSEWORK
The CFP Field Training Manual outlines the courses included in the pre-requisite curriculum and provides options for completing this component of the CFP training process. A jurisdiction can begin the field training process with FSIOs while they are still in the process of completing their pre-requisite coursework. The jurisdiction’s trainers and/or food program managers are given the discretion to determine the appropriate time frame within which FSIOs are to complete pre-requisite coursework during the field training process.
The CFP Training Plan and Log is designed to incorporate a variety of training methods appropriate for each of the performance element competencies. A sufficient number of field training inspections should be conducted to provide an opportunity for the FSIO to successfully demonstrate the applicable competencies. The jurisdiction’s trainer can use the table below to identify the training methods that will be used.

<table>
<thead>
<tr>
<th>Code</th>
<th>Training Method</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

The Conference for Food Protection (CFP) has conducted a national research study and identified the minimum performance elements and competencies for each of the inspection training areas needed to perform regulatory retail safety inspections. The CFP Training Plan and Log contains a national model that regulatory retail food protection programs can readily integrate into their existing field training of Food Safety Inspection Officers (FSIOs).

The CFP Training Plan lists the basic performance elements (in BOLD font in the shaded areas of the Worksheet). Under each performance element is a list of competencies provided as examples of job tasks that a jurisdiction should ensure the FSIO receives training on in order to perform their job responsibilities effectively. The jurisdiction’s trainer should identify those performance element competencies that are applicable to the FSIO’s job responsibilities within their jurisdiction. A small box appears adjacent to each of the performance elements and competencies on the worksheet. If the performance element and/or competency is applicable to the jurisdiction it is to be checked and included as part of the training process.
## INSPECTION TRAINING AREAS

### I. Pre-Inspection

1. **Has required equipment and forms to conduct inspection.**

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Necessary inspection forms and administrative materials.</td>
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</tr>
<tr>
<td>Lab coat or equivalent protection to cover street clothes.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Head cover: baseball cap; hair net; or equivalent.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Calibrated thermocouple temperature measuring device.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum registering thermometer or temperature sensitive tapes for verifying hot water warewashing final rinse temperature.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemical test kits for chlorine, iodophor, and quaternary ammonia sanitizers.</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Flashlight.</td>
<td></td>
<td></td>
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<tr>
<td>Alcohol swabs.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**ADDITIONAL (Jurisdiction specific competencies)**

- 
- 
- 

**Comments:**

   Trainee has demonstrated acceptable performance for all competencies listed

   **Date:**

   **Trainee’s Initials:**

   **Trainer’s Signature:**

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.**

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewed previous inspection report noting documented out of compliance observations.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed establishment file for complaint reports.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed establishment file for documentation indicating a need for a HACCP Plan.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reviewed establishment file for documentation of food production or processes operating under a variance issued by the jurisdiction.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**ADDITIONAL (Jurisdiction specific competencies)**

- 
- 
- 

**Comments:**

   Trainee has demonstrated acceptable performance for all competencies listed

   **Date:**

   **Trainee’s Initials:**

   **Trainer’s Signature:**
## II. Inspection Observations and Performance

<table>
<thead>
<tr>
<th></th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Provides identification as a regulatory official to person in charge, confirming agency authority for inspection, and stating the purpose of visit.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>(Training method and selected competencies for this performance element are to be indicated below)</td>
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<td></td>
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</tr>
<tr>
<td></td>
<td>□ Verbally provided name and agency to the person in charge.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>□ Presented regulatory identification or business card.</td>
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<tr>
<td></td>
<td>□ Stated the purpose of the visit.</td>
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<tr>
<td></td>
<td>□ Requests and confirmed permission to conduct inspection from the person in charge prior to initiating the inspection.</td>
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</tr>
<tr>
<td></td>
<td>□ ADDITIONAL (Jurisdiction specific competencies)</td>
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<td></td>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Trainee has demonstrated acceptable performance for all competencies listed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>Trainee's Initials:</td>
<td>Trainer’s Signature:</td>
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<td></td>
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</tr>
<tr>
<td>2. Has knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.</td>
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<tr>
<td></td>
<td>(Training method and selected competencies for this performance element are to be indicated below)</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>□ Verified the correct critical limit and or standard specified in the jurisdiction’s rules/regulations to the observation made.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>□ Correctly cited the rule/regulation for each out of compliance observation.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ ADDITIONAL (Jurisdiction specific competencies)</td>
<td></td>
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<td>Comments:</td>
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<td></td>
<td>Trainee has demonstrated acceptable performance for all competencies listed</td>
<td></td>
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<tr>
<td>Date:</td>
<td>Trainee’s Initials:</td>
<td>Trainer’s Signature:</td>
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<td></td>
<td></td>
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</tbody>
</table>
II. Inspection Observations and Performance (continued)

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>Training method and selected competencies for this performance element are to be indicated below</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified Demonstration of Knowledge of the person in charge.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified approved food sources (e.g., food from regulated food processing plants; shellfish documentation; game animal processing; parasite destruction for certain species of fish intended for raw consumption; receiving temperatures).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified food safety practices for preventing cross-contamination of ready-to-eat food.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified food contact surfaces are clean and sanitized, protected from contamination from soiled cutting boards, utensils, aprons, etc., or raw animal foods.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified the restriction or exclusion of ill employees.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified no bare hand contact with ready-to-eat foods (or use of a pre-approved, alternative procedure).</td>
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</tr>
<tr>
<td>□ Verified employee handwashing.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified cold holding temperatures of foods requiring time/temperature control for safety (TCS food), or when necessary, verified that procedures are in place to use time alone to control bacterial growth and toxin production.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified date marking of ready-to-eat foods TCS food held for more than 24 hours.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified cooking temperatures to destroy bacteria and parasites.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified hot holding temperatures of TCS food or when necessary, that procedures were in place to use time alone to prevent the outgrowth of spore-forming bacteria.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified cooling temperatures of TCS food to prevent the outgrowth of spore-forming or toxin-forming bacteria.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified reheating temperatures of TCS food for hot holding.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Verified the availability of a consumer advisory for foods of animal origin served raw or undercooked.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Identified food processes and/or procedures that require a HACCP Plan per the jurisdiction’s regulations.</td>
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<tr>
<td><strong>ADDITIONAL (Jurisdiction specific competencies)</strong></td>
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</tbody>
</table>

Comments:

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Trainee has demonstrated acceptable performance for all competencies listed

Date: ____________________________  Trainee’s Initials: ____________________________  Trainer’s Signature: ____________________________
## II. Inspection Observations and Performance (continued)

4. Obtains immediate corrective action for out of compliance employee practices and management procedures (listed in Item 3 above) essential to the safe storage, preparation, and service of food.

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Training method and selected competencies for this performance element are to be indicated below</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Notified the person in charge/employee(s) of the out of compliance observations.
- Reviewed corrective actions with the person in charge/employee(s).
- Observed the person in charge/employee(s) immediately take corrective action for out of compliance observations (e.g., movement of food to ensure product temperature or prevent contamination; reconditioning food; restriction/exclusion of ill employees; discarding of food product) in accordance with local jurisdiction’s procedures.
- Identified conditions requiring issuance of an embargo/stop sale/food destruction order per jurisdiction’s administrative procedures.

**ADDITIONAL (Jurisdiction specific competencies)**

Comments:

Trainee has demonstrated acceptable performance for all competencies listed

<table>
<thead>
<tr>
<th>Date:</th>
<th>Trainee’s Initials:</th>
<th>Trainer’s Signature:</th>
</tr>
</thead>
</table>

5. Correctly assesses compliance status of other regulations (not included in Item 4 – Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

<table>
<thead>
<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Training method and selected competencies for this performance element are to be indicated below)</td>
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<td></td>
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</tbody>
</table>

- Correctly assessed compliance status of other regulations (not included in Item 4 above - Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

**ADDITIONAL (Jurisdiction specific competencies)**

Comments:

Trainee has demonstrated acceptable performance for all competencies listed

<table>
<thead>
<tr>
<th>Date:</th>
<th>Trainee’s Initials:</th>
<th>Trainer’s Signature:</th>
</tr>
</thead>
</table>
II. Inspection Observations and Performance (continued)

<table>
<thead>
<tr>
<th></th>
<th>6. Verifies correction of out of compliance observations identified during previous inspection.</th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Training method and selected competencies for this performance element are to be indicated below)</td>
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<tr>
<td></td>
<td>☐ Verified correction of out of compliance observations identified during previous inspection</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ ADDITIONAL (Jurisdiction specific competencies)</td>
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</table>

Comments:

Trainee has demonstrated acceptable performance for all competencies listed

<table>
<thead>
<tr>
<th>Date:</th>
<th>Trainee’s Initials:</th>
<th>Trainer’s Signature:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th></th>
<th>7. Correctly uses inspection equipment during joint inspections.</th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Training method and selected competencies for this performance element are to be indicated below)</td>
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<tr>
<td></td>
<td>☐ Used temperature measuring devices/probes in accordance with manufacturer’s instructions.</td>
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</tr>
<tr>
<td></td>
<td>☐ Cleaned and sanitized (alcohol swabs) temperature measurement probes to prevent food contamination.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>☐ Used infrared thermometer in accordance with manufacturer’s instructions. Verified any out of compliance product temperatures registered on the infrared with a thermocouple.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>☐ Used maximum registering thermometer or heat sensitive tapes in accordance with manufacturer’s instructions to verify final rinse dishwasher temperature.</td>
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<td></td>
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</tr>
<tr>
<td></td>
<td>☐ Used chemical test strips in accordance with manufacturer’s instructions to measure sanitizer concentrations in manual and mechanical dishwashing operations; wiping cloth solutions; and spray bottle applicators.</td>
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<tr>
<td></td>
<td>☐ Used flashlight to assess observations in areas with no or low light.</td>
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<tr>
<td></td>
<td>☐ Photographs taken support regulatory findings or conditions observed.</td>
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<tr>
<td></td>
<td>☐ ADDITIONAL (Jurisdiction specific competencies)</td>
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</tbody>
</table>

Comments:

Trainee has demonstrated acceptable performance for all competencies listed

<table>
<thead>
<tr>
<th>Date:</th>
<th>Trainee’s Initials:</th>
<th>Trainer’s Signature:</th>
</tr>
</thead>
</table>
### III. Oral Communication

<table>
<thead>
<tr>
<th></th>
<th>1. Asks questions and engages in a dialogue with person in charge/employees to obtain information relevant to inspection.</th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
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<td>❑ Asked open ended questions (questions that can not be answered with “yes” or “no”).</td>
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<td></td>
<td>❑ Did not interrupt when the person in charge/employee was speaking.</td>
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<td>❑ Paraphrased/summarized statements from the person in charge to confirm understanding.</td>
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<th>2. Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.</th>
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<td>❑ Answered inspection-related questions accurately.</td>
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<td>❑ Admitted not knowing the answer to a question and arranges to contact the establishment with the answer.</td>
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<td>❑ Used trainer as a resource when unsure of an answer.</td>
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### III. Oral Communication (continued)

| 3. Uses available means (e.g., interpreter, drawings, diagrams demonstrations, international food safety icons) to overcome language or communication barriers. |
|                                                                                                                                   |

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</table>

(Training method and selected competencies for this performance element are to be indicated below)

- [ ] Avoided using jargon and acronyms, without explanation.
- [ ] Used interpreter, drawings, demonstrations, or diagrams to overcome language or communication barriers.
- [ ] Checked the person in charge’s understanding of information/instructions by asking the operator to paraphrase or demonstrate the information/instructions.

**ADDITIONAL (Jurisdiction specific competencies)**

- [ ]
- [ ]
- [ ]

Comments:

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**Trainee has demonstrated acceptable performance for all competencies listed**

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| 4. Follows jurisdiction’s policy in regard to disclosure of confidential information. |
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(Training method and selected competencies for this performance element are to be indicated below)

- [ ] Explained confidentiality laws, policies and procedures to the person in charge when necessary. (If the need to explain confidential laws did not occur during the joint field training inspections, the FSIO explained confidentiality laws, policies and procedures to the trainer).
- [ ] Applied the confidentiality policy per the jurisdictional requirements (e.g., FSIO did not reveal confidential information to the operator during the inspection).

**ADDITIONAL (Jurisdiction specific competencies)**

- [ ]
- [ ]
- [ ]

Comments:

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**Trainee has demonstrated acceptable performance for all competencies listed**

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## III. Oral Communication (continued)

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<th>5. Uses effective communication and conflict resolution techniques to overcome inspection barriers.</th>
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## 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).

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<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
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(Training method and selected competencies for this performance element are to be indicated below)

- Used correct inspection form.
- Completed a legible report.
- Accurately documented observations made during inspection.
- Completed inspection form in accordance with jurisdiction’s administrative procedures.
- Cited correct code provisions/rules/regulations.
- Documented immediate corrective action for out-of-compliance foodborne illness contributing factors and Food Code Interventions (listed in Section II, Item 3).
- Documented time frames for correcting each out of compliance observation.

ADDITIONAL (Jurisdiction specific competencies)

Comments:

Trainee has demonstrated acceptable performance for all competencies listed

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</table>

2. Includes with inspection report any compliance or regulatory documents (identified or cross-referenced in written statements e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices).

(Training method and selected competencies for this performance element are to be indicated below)

- Referenced attached documents in inspection report.
- Referenced documents are legible.
- Referenced documents are accurate and reflect observations made during the inspection.
- Attached referenced document(s) to the inspection report per jurisdiction’s administrative procedures.

ADDITIONAL (Jurisdiction specific competencies)

Comments:

Trainee has demonstrated acceptable performance for all competencies listed

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<tr>
<th>Date:</th>
<th>Trainee’s Initials:</th>
<th>Trainer’s Signature:</th>
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</thead>
</table>
### IV. Written Communication (continued)

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<tr>
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<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
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*(Training method and selected competencies for this performance element are to be indicated below)*

- □ Presented complete inspection report, with referenced documents when necessary, to person in charge during exit interview.
- □ Followed jurisdiction’s administrative procedures for delivering written inspection report.
- □ Obtained signature of person in charge on inspection report.

**ADDITIONAL (Jurisdiction specific competencies)**

- □
- □
- □

**Comments:**

Trainee has demonstrated acceptable performance for all competencies listed

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<th>Date:</th>
<th>Trainee’s Initials:</th>
<th>Trainer’s Signature:</th>
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<tbody>
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</table>
### V. Professionalism

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<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee's Initials</th>
<th>Training Officer</th>
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</thead>
<tbody>
<tr>
<td>1. Maintains a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).</td>
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<tr>
<td></td>
<td>☐ Maintained a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).</td>
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<td></td>
<td>☐ ADDITIONAL (Jurisdiction specific competencies)</td>
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<td>Comments:</td>
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<td>Trainee has demonstrated acceptable performance for all competencies listed</td>
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<th>Trainee's Initials:</th>
<th>Trainer’s Signature:</th>
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</table>

<table>
<thead>
<tr>
<th>2. Demonstrates proper sanitary practices as expected from a food service employee.</th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Training method and selected competencies for this performance element are to be indicated below)</td>
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<tr>
<td>☐ Washed hands as needed (e.g., prior to conducting inspection, after using restroom, after touching dirty surfaces, after touching face/body, after sneezing/coughing).</td>
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<tr>
<td>☐ Protected bandages on hands, when necessary, to prevent contamination of food or food contact surfaces.</td>
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<tr>
<td>☐ Did NOT contact ready-to-eat foods with bare hands.</td>
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<td>☐ Did NOT show any obvious signs of illness in accordance with jurisdiction’s employee health policy and/or current food code.</td>
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<tr>
<td>☐ ADDITIONAL (Jurisdiction specific competencies)</td>
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</table>
### V. Professionalism (continued)

<table>
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<tr>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
</table>

(Training method and selected competencies for this performance element are to be indicated below)

- [ ] Only reported findings that were directly observed or substantiated in accordance with jurisdiction’s policies and procedures.
- [ ] Findings are supported by fact (e.g., are **NOT** based on hunch or suspicion; are witnessed, are investigated).
- [ ] Did **NOT** note violations without visiting the establishment.
- [ ] Did **NOT** exaggerate details related to findings to support report conclusions.
- [ ] Did **NOT** modify report after leaving the establishment except as allowed by jurisdiction’s administrative procedures.

**ADDITIONAL (Jurisdiction specific competencies)**

- [ ]
- [ ]
- [ ]

**Comments:**

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**Trainee has demonstrated acceptable performance for all competencies listed**

<table>
<thead>
<tr>
<th>Date:</th>
<th>Trainee’s Initials:</th>
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</thead>
</table>

53
### VI. Additional Performance Elements – Jurisdiction Specific

<table>
<thead>
<tr>
<th>1. Uses an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction.</th>
<th>Training Method</th>
<th>Date Demonstrated By the Trainee</th>
<th>Trainee’s Initials</th>
<th>Training Officer</th>
</tr>
</thead>
</table>

*(Training method and selected competencies for this performance element are to be indicated below)*

- ☐ Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)
- ☐ Used sample collection method specified by the jurisdiction (e.g., original container if available; collection of a representative sample from a large quantity or container).
- ☐ Used sterile, leak-proof lidded container or zipper-lock type bags.
- ☐ Used a separate sterile utensil to collect each different sample item.
- ☐ Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.
- ☐ Initiated written chain of custody including use of evidence seal.
- ☐ Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.
- ☐ Maintained sample refrigerated or frozen until transport or shipping to laboratory.
- ☐ Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant (wet or dry ice) via the most rapid and convenient means available (e.g., courier, bus, express mail).

**ADDITIONAL (Jurisdiction specific competencies)**

- ☐
- ☐
- ☐

**Comments:**

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**Trainee has demonstrated acceptable performance for all competencies listed**

<table>
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<tr>
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</thead>
</table>
### VI. Additional Performance Elements – Jurisdiction Specific

| 2. Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction. |
|---|---|---|---|
| Training Method | Date Demonstrated By the Trainee | Trainee’s Initials | Training Officer |

*(Training method and selected competencies for this performance element are to be indicated below)*

- Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)
- Sample taken at site closest to source of water (prior to any treatment) if possible, or at a site (post treatment) per jurisdiction’s procedures.
- Sample taken from operational fixed type faucet – no swing type or leaking faucets.
- Removed aerator (if present) from faucet prior to sampling.
- Disinfected faucet with bleach or flame.
- Ran water through faucet for several minutes to clear line.
- Used a sterile, leak-proof lidded container, “whirl-pak” or zipper-lock type bag.
- Sample taken from midstream of the flowing faucet.
- Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.
- Initiated written chain of custody including use of evidence seal.
- Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.
- Maintained sample refrigerated until transport or shipping to the laboratory.
- Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant via the most rapid and convenient means available (e.g., courier, bus, express mail).

**ADDITIONAL (Jurisdiction specific competencies)**

- *

**Comments:**

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| Trainee has demonstrated acceptable performance for all competencies listed |
|---|---|---|
| Date: | Trainee’s Initials: | Trainer’s Signature: |
### VI. Additional Performance Elements – Jurisdiction Specific (continued)

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<th>Training Officer</th>
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</table>

*(Training method and selected competencies for this performance element are to be indicated below)*

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Comments:

Trainee has demonstrated acceptable performance for all competencies listed

Date: [ ] Trainee’s Initials: [ ] Trainer’s Signature: [ ]

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Comments:

Trainee has demonstrated acceptable performance for all competencies listed

Date: [ ] Trainee’s Initials: [ ] Trainer’s Signature: [ ]

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<th>Training Officer</th>
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*(Training method and selected competencies for this performance element are to be indicated below)*

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Comments:

Trainee has demonstrated acceptable performance for all competencies listed

Date: [ ] Trainee’s Initials: [ ] Trainer’s Signature: [ ]
## OPTIONAL - FSIO TRAINING LOG

**Trainee’s Name:** ____________________

<table>
<thead>
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<th>Week: 1</th>
<th>Date Ending: ___</th>
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<tbody>
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<td>Training Areas Demonstrated</td>
<td>Planned Training Areas for Upcoming Week</td>
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**Trainee’s Initials:** ____________________  **Trainer’s Signature:** ____________________

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<th>Date Ending: ___</th>
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**Trainee’s Initials:** ____________________  **Trainer’s Signature:** ____________________

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<th>Date Ending: ___</th>
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<tr>
<td>Training Areas Demonstrated</td>
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**Trainee’s Initials:** ____________________  **Trainer’s Signature:** ____________________
### Optional - FSIO Training Log

**Trainee's Name:** _____________________

<table>
<thead>
<tr>
<th>Week:</th>
<th>Date Ending:</th>
<th>Training Areas Demonstrated</th>
<th>Planned Training Areas for Upcoming Week</th>
<th>Additional Comments</th>
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<tr>
<th>Week:</th>
<th>Date Ending:</th>
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<th>Planned Training Areas for Upcoming Week</th>
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</table>
## OPTIONAL - FSIO TRAINING LOG

Trainee’s Name: ___________________

| Week: _____  Date Ending: _____ |
|-----------------|------------------|----------------|
| Training Areas | Planned Training Areas for Upcoming Week | Additional Comments |
| Demonstrated    |                                               |                   |
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Trainee’s Initials: _______________  Trainer’s Signature: ___________________

| Week: _____  Date Ending: _____ |
|-----------------|------------------|----------------|
| Training Areas | Planned Training Areas for Upcoming Week | Additional Comments |
| Demonstrated    |                                               |                   |
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Trainee’s Initials: _______________  Trainer’s Signature: ___________________

| Week: _____  Date Ending: _____ |
|-----------------|------------------|----------------|
| Training Areas | Planned Training Areas for Upcoming Week | Additional Comments |
| Demonstrated    |                                               |                   |
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Trainee’s Initials: _______________  Trainer’s Signature: ___________________
## OPTIONAL

### JOINT FIELD TRAINING INSPECTIONS - ESTABLISHMENT LOG

<table>
<thead>
<tr>
<th>#</th>
<th>Date</th>
<th>Permit #</th>
<th>Establishment Name</th>
<th>Establishment Address</th>
<th>Risk Category</th>
<th>Demonstration (Trainer-led) Inspection</th>
<th>FSIO-led (Trainee-led) Inspection</th>
<th>Field Training Worksheet Completed</th>
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CONFERENCE FOR FOOD PROTECTION

FIELD TRAINING WORKSHEET
(Performance Elements and Competencies)

Retail Food, Restaurant, and Institutional Foodservice
Food Safety Inspection Officer

NOTE: The CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers (FSIOs) should be reviewed prior to using the Field Training Worksheet. The manual provides jurisdictions with information that will be helpful in customizing the Field Training Worksheet and implementing a training process that meets the specific needs of the jurisdiction.

<table>
<thead>
<tr>
<th>Establishment Name:</th>
<th>Establishment Address:</th>
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</table>

<table>
<thead>
<tr>
<th>Food Safety Inspection Officer’s (FSIO) Name:</th>
<th>Food Safety Inspection Officer’s (FSIO) Agency:</th>
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<table>
<thead>
<tr>
<th>Trainer’s Name:</th>
<th>Trainer’s Agency:</th>
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<table>
<thead>
<tr>
<th>Date of Inspection led by Trainee:</th>
<th>Tine IN:</th>
<th>Tine OUT:</th>
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The Conference for Food Protection (CFP) has conducted a national research study and identified the basic minimum competencies needed to perform effective regulatory food safety inspections. The Field Training Worksheet has been designed as a trainer’s tool to be used in conjunction with the CFP Training Plan and Log. It provides a method for tracking a FSIO’s progress and accomplishments in successfully demonstrating performance element competencies during field training inspections.

There is no single correct way to use the worksheet. The CFP Field Training Manual provides examples of ways to incorporate the worksheet into existing retail food protection training programs.

The Field Training Worksheet lists the basic performance elements (in BOLD font in the shaded areas of the Worksheet). Under each performance element is a list of competencies provided as examples of job tasks that a jurisdiction should ensure a FSIO has received adequate training on in order to perform their job responsibilities effectively. The jurisdiction’s trainer should identify those performance elements and/or competencies that are applicable to the FSIOs job responsibilities within their jurisdiction. A small box appears adjacent to each of the performance element competencies on the worksheet; if the performance element and/or competency is applicable to the jurisdiction, it is to be checked and included as part of the training process.

Trainers should review with the FSIO the competencies that will be included as part of the field training inspections. FSIOs are expected to successfully demonstrate these minimum competencies correctly prior to conducting independent food safety inspections.
## I. Pre-Inspection

<table>
<thead>
<tr>
<th></th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Has required equipment and forms to conduct inspection.</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Necessary inspection forms and administrative materials.</td>
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<td></td>
<td>Lab coat or equivalent protection to cover street clothes.</td>
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<td>Head cover: baseball cap; hair net; or equivalent.</td>
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<td></td>
<td>Calibrated thermocouple temperature measuring device.</td>
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<td></td>
<td>Maximum registering thermometer or temperature sensitive tapes for verifying hot water warewashing final rinse temperature.</td>
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<td></td>
<td>Chemical test kits for chlorine, iodophor, and quaternary ammonia sanitizers.</td>
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<td></td>
<td>Flashlight.</td>
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<td></td>
<td>Alcohol swabs.</td>
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<td></td>
<td>ADDITIONAL (Jurisdiction specific competencies)</td>
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</tbody>
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Comments:

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<tr>
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</thead>
<tbody>
<tr>
<td>2.</td>
<td>Reviews establishment file for previous inspection report, complaints on file, and if applicable, required HACCP Plans or documents supporting the issuance of a variance.</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Reviewed previous inspection report noting documented out of compliance observations</td>
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<tr>
<td></td>
<td>Reviewed establishment file for complaint reports.</td>
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<td></td>
<td>Reviewed establishment file for documentation indicating a need for a HACCP Plan.</td>
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<td></td>
<td>Reviewed establishment file for documentation of food production or processes operating under a variance issued by the jurisdiction.</td>
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<td>ADDITIONAL (Jurisdiction specific competencies)</td>
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Comments:
### II. Inspection Observations and Performance

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<tr>
<td></td>
<td>YES</td>
<td>NO</td>
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</table>

#### 1. Provides identification as a regulatory official to person in charge, confirming agency authority for inspection, and stating the purpose of visit.

- **Verbally provided name and agency to the person in charge.**
- **Presented regulatory identification or business card.**
- **Stated the purpose of the visit.**
- **Requests and confirmed permission to conduct inspection from the person in charge prior to initiating the inspection.**

**ADDITIONAL (Jurisdiction specific competencies)**

**Comments:**

#### 2. Has knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.

- **Verified the correct critical limit and or standard specified in the jurisdiction’s rules/regulations to the observation made.**
- **Correctly cited the rule/regulation for each out of compliance observation.**

**ADDITIONAL (Jurisdiction specific competencies)**

**Comments:**

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64
II. Inspection Observations and Performance (continued)

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<tr>
<th></th>
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<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
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<td></td>
<td></td>
<td>YES</td>
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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.

- Verified Demonstration of Knowledge of the person in charge.
- Verified approved food sources (e.g., food from regulated food processing plants; shellfish documentation; game animal processing; parasite destruction for certain species of fish intended for raw consumption; receiving temperatures).
- Verified food safety practices for preventing cross-contamination of ready-to-eat food.
- Verified food contact surfaces are clean and sanitized, protected from contamination from soiled cutting boards, utensils, aprons, etc., or raw animal foods.
- Verified the restriction or exclusion of ill employees.
- Verified no bare hand contact with ready-to-eat foods (or use of a pre-approved, alternative procedure).
- Verified employee handwashing
- Verified cold holding temperatures of foods requiring time/temperature control for safety (TCS food), or when necessary, verified that procedures are in place to use time alone to control bacterial growth and toxin production.
- Verified date marking of ready-to-eat foods TCS food held for more than 24 hours.
- Verified cooking temperatures to destroy bacteria and parasites.
- Verified hot holding temperatures of TCS food or when necessary, that procedures were in place to use time alone to prevent the outgrowth of spore-forming bacteria.
- Verified cooling temperatures of TCS food to prevent the outgrowth of spore-forming or toxin-forming bacteria.
- Verified reheating temperatures of TCS food for hot holding.
- Verified the availability of a consumer advisory for foods of animal origin served raw or undercooked.
- Identified food processes and/or procedures that require a HACCP Plan per the jurisdiction’s regulations.

ADDITIONAL (Jurisdiction specific competencies)

Comments:

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65
## II. Inspection Observations and Performance (continued)

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<td>YES</td>
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### 4. Obtains immediate corrective action for out of compliance employee practices and management procedures (listed in Item 3 above) essential to the safe storage, preparation, and service of food

- Notified the person in charge/employee(s) of the out of compliance observations.
- Reviewed corrective actions with the person in charge/employee(s).
- Observed the person in charge/employee(s) immediately take corrective action for out of compliance observations (e.g., movement of food to ensure product temperature or prevent contamination; reconditioning food; restriction/exclusion of ill employees; discarding of food product) in accordance with local jurisdiction’s procedures.
- Identified conditions requiring issuance of an embargo/stop sale/food destruction order per jurisdiction’s administrative procedures.

**ADDITIONAL (Jurisdiction specific competencies)**

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### 5. Correctly assesses compliance status of other regulations (not included in Item 4 – Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

- Correctly assessed compliance status of other regulations (not included in Item 4 above - Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

**ADDITIONAL (Jurisdiction specific competencies)**

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### II. Inspection Observations and Performance (continued)

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<tr>
<td>☐</td>
<td>6. Verifies correction of out of compliance observations identified during previous inspection</td>
<td>YES</td>
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<td></td>
<td>Verified correction of out of compliance observations identified during previous inspection</td>
<td>YES</td>
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<td>ADDITIONAL (Jurisdiction specific competencies)</td>
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<tr>
<td>☐</td>
<td>7. Correctly uses inspection equipment during joint inspections.</td>
<td>YES</td>
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<td></td>
<td>Used temperature measuring devices/probes in accordance with manufacturer’s instructions.</td>
<td>YES</td>
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<td></td>
<td>Cleaned and sanitized (alcohol swabs) temperature measurement probes to prevent food contamination.</td>
<td>YES</td>
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<td></td>
<td>Used infrared thermometer in accordance with manufacturer’s instructions. Verified any out of compliance product temperatures registered on the infrared with a thermocouple.</td>
<td>YES</td>
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<td></td>
<td>Used maximum registering thermometer or heat sensitive tapes in accordance with manufacturer’s instructions to verify final rinse dishwasher temperature.</td>
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<td>Used chemical test strips in accordance with manufacturer’s instructions to measure sanitizer concentrations in manual and mechanical dishwashing operations; wiping cloth solutions; and spray bottle applicators.</td>
<td>YES</td>
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<td>Used flashlight to assess observations in areas with no or low light.</td>
<td>YES</td>
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<td>Photographs taken support regulatory findings or conditions observed.</td>
<td>YES</td>
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<td>ADDITIONAL (Jurisdiction specific competencies)</td>
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## III. Oral Communication

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<td></td>
<td><em>Asks questions and engages in a dialogue with person in charge/employees to obtain information relevant to the inspection.</em></td>
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<td><strong>Ask open ended questions (questions that can not be answered with “yes” or “no”).</strong></td>
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<td><strong>Did not interrupt when the person in charge/employee was speaking.</strong></td>
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<td><strong>Paraphrased/summarized statements from the person in charge to confirm understanding.</strong></td>
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<td><strong>ADDITIONAL (Jurisdiction specific competencies)</strong></td>
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<td>2.</td>
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<td><em>Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.</em></td>
<td>YES</td>
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<td></td>
<td><strong>Answered inspection-related questions accurately.</strong></td>
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<td></td>
<td><strong>Admitted not knowing the answer to a question and arranges to contact the establishment with the answer.</strong></td>
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<td><strong>Used trainer as a resource when unsure of an answer.</strong></td>
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<td><strong>ADDITIONAL (Jurisdiction specific competencies)</strong></td>
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### III. Oral Communication (continued)

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<th>Competency demonstrated during joint field training inspection</th>
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<tr>
<td>YES</td>
<td>NO</td>
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</table>

#### 3. Uses available means (e.g., interpreter, drawings, diagrams, demonstrations, international food safety icons) to overcome language or communication barriers.

- [ ] □ Avoided using jargon and acronyms, without explanation.
- [ ] □ Used interpreter, drawings, demonstrations, or diagrams to overcome language or communication barriers.
- [ ] □ Checked the person in charge’s understanding of information/instructions by asking the operator to paraphrase or demonstrate the information/instructions.

**ADDITIONAL (Jurisdiction specific competencies)**

Comments:

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#### 4. Follows jurisdiction’s policy in regard to disclosure of confidential information.

- [ ] □ Explained confidentiality laws, policies and procedures to the person in charge when necessary. (if the need to explain confidentiality laws did not occur during the joint field training inspections, the FSIO explained confidentiality laws, policies and procedures to the trainer).
- [ ] □ Applied the confidentiality policy per the jurisdictional requirements (e.g., FSIO did not reveal confidential information to the operator during the inspection).

**ADDITIONAL (Jurisdiction specific competencies)**

Comments:
### III. Oral Communication (continued)

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<td>YES</td>
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</table>

5. Uses effective communication and conflict resolution techniques to overcome inspection barriers.

- Identified challenges faced by the person in charge and offered possible solution(s).
- Did not become argumentative (e.g., remained calm and focused).
- Removed himself/herself from a confrontation or threat that may impact personal safety.

6. Conducts exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.

- Explained the public health significance of the inspection observations.
- Reviewed all findings with the person in charge with emphasis on contributing factors to foodborne illness and Food Code Interventions (listed in Section II, Item 3).
- Used foodborne illness data to highlight contributing factors.
- Answered all questions or concerns pertaining to items on the inspection report.
- Provided contact information to the person in charge for follow up questions or additional guidance.

ADDITIONAL (Jurisdiction specific competencies)
# IV. Written Communication

<table>
<thead>
<tr>
<th></th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
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<tbody>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
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<tr>
<td>1.</td>
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<tr>
<td></td>
<td>Used correct inspection form.</td>
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<td></td>
<td>Completed a legible report.</td>
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<tr>
<td></td>
<td>Accurately documented observations made during inspection.</td>
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<td></td>
<td>Completed inspection form in accordance with jurisdiction’s administrative procedures.</td>
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<td></td>
<td>Cited correct code provisions/rules/regulations.</td>
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<td></td>
<td>Documented immediate corrective action for out-of-compliance foodborne illness contributing factors and Food Code Interventions (listed in Section II, Item 3).</td>
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<td></td>
<td>Documented time frames for correcting each out of compliance observation.</td>
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<td></td>
<td>ADDITIONAL (Jurisdiction specific competencies)</td>
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Comments:

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<tbody>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
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<tr>
<td>2.</td>
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<tr>
<td></td>
<td>Referenced attached documents in inspection report.</td>
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<td>Referenced documents are legible.</td>
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<td></td>
<td>Referenced documents are accurate and reflect observations made during the inspection.</td>
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<tr>
<td></td>
<td>Attached referenced document(s) to the inspection report per jurisdiction’s administrative procedures.</td>
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<td>ADDITIONAL (Jurisdiction specific competencies)</td>
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### IV. Written Communication (continued)

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</tr>
<tr>
<td>3.</td>
<td>Presents inspection report, and when necessary cross-referenced documents, to person in charge.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Presented complete inspection report, with referenced documents when necessary, to person in charge during exit interview.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Followed jurisdiction’s administrative procedures for delivering written inspection report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Obtained signature of person in charge on inspection report.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>ADDITIONAL (Jurisdiction specific competencies)</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

<p>| | | | | | |</p>
<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Comments:**

---

**Yes**

**No**

---

**Yes**

**No**

---

**Yes**

**No**

---

**Yes**

**No**

---

**Yes**

**No**

---

**Yes**

**No**

---

**Yes**

**No**

---

**Yes**

**No**
## V. Professionalism

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

### 1. Maintains a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).

- Maintained a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).
  - YES
  - NO

### ADDITIONAL (Jurisdiction specific competencies)

- Comments:
  

### 2. Demonstrates proper sanitary practices as expected from a food service employee.

- Washed hands as needed (e.g., prior to conducting inspection, after using restroom, after touching dirty surfaces, after touching face/body, after sneezing/coughing).
  - YES
  - NO
- Protected bandages on hands, when necessary, to prevent contamination of food or food contact surfaces.
  - YES
  - NO
- Did NOT contact ready-to-eat foods with bare hands.
  - YES
  - NO
- Did NOT show any obvious signs of illness in accordance with jurisdiction’s employee health policy and/or current food code.
  - YES
  - NO

### ADDITIONAL (Jurisdiction specific competencies)

- Comments:
  

73
### V. Professionalism (continued)

<table>
<thead>
<tr>
<th></th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>Only reported findings that were directly observed or substantiated in accordance with jurisdiction’s policies and procedures.</td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>Findings are supported by fact (e.g., are NOT based on hunch or suspicion; are witnessed, are investigated).</td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>Did NOT note violations without visiting the establishment.</td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>Did NOT exaggerate details related to findings to support report conclusions.</td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>Did NOT modify report after leaving the establishment except as allowed by jurisdiction’s administrative procedures.</td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>ADDITIONAL (Jurisdiction specific competencies)</td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>□</td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

**Comments:**

---

Attachment B – Field Training Worksheet: DRAFT 1-7-2008
### VI. Additional Performance Elements – Jurisdiction Specific

<table>
<thead>
<tr>
<th>Number</th>
<th>Task Description</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 1.</td>
<td>Uses an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Used sample collection method specified by the jurisdiction (e.g., original container if available; collection of a representative sample from a large quantity or container).</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Used sterile, leak-proof lidded container or zipper-lock type bags.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Used a separate sterile utensil to collect each different sample item.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Initiated written chain of custody including use of evidence seal.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Maintained sample refrigerated or frozen until transport or shipping to laboratory.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant (wet or dry ice) via the most rapid and convenient means available (e.g., courier, bus, express mail).</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>☐</td>
<td>ADDITIONAL (Jurisdiction specific competencies)</td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

**Comments:**

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## VI. Additional Performance Elements – Jurisdiction Specific

<table>
<thead>
<tr>
<th></th>
<th>Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction.</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>□ Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Sample taken at site closest to source of water (prior to any treatment) if possible, or at a site (post treatment) per jurisdiction’s procedures.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Sample taken from operational fixed type faucet – no swing type or leaking faucets.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Removed aerator (if present) from faucet prior to sampling.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Disinfected faucet with bleach or flame.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Ran water through faucet for several minutes to clear line.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Used a sterile, leak-proof lidded container, “whirl-pak” or zipper-lock type bag.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Sample taken from midstream of the flowing faucet.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Initiated written chain of custody including use of evidence seal.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Maintained sample refrigerated until transport or shipping to the laboratory.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>□ Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant via the most rapid and convenient means available (e.g., courier, bus, express mail).</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td><strong>ADDITIONAL (Jurisdiction specific competencies)</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

**Comments:**

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76
### VI. Additional Performance Elements – Jurisdiction Specific

<table>
<thead>
<tr>
<th>ADDITIONAL (Jurisdiction Specific Performance Element)</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>(Jurisdiction specific competencies for Performance Element listed above)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

Comments:

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### ADDITIONAL (Jurisdiction Specific Performance Element)

<table>
<thead>
<tr>
<th>ADDITIONAL (Jurisdiction Specific Performance Element)</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>(Jurisdiction specific competencies for Performance Element listed above)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

Comments:
Conference for Food Protection

ABBREVIATED - FIELD TRAINING WORKSHEET
(Performance Elements Only)
Retail Food, Restaurant, and Institutional Foodservice
Food Safety Inspection Officer

The CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers (FSIOs) should be reviewed prior to using the Abbreviated Field Training Worksheet. The manual provides jurisdictions with information that will be helpful in customizing the Field Training Worksheet and implementing a training process that meets the specific needs of the jurisdiction.

The Conference for Food Protection (CFP) has conducted a national research study and identified the basic minimum competencies that are needed to perform effective regulatory food safety inspections. The Abbreviated Field Training Worksheet has been designed to be used in conjunction with the CFP Training Plan and Log as a trainer’s tool during field training inspections. It provides a method for tracking a FSIO’s progress and accomplishments in successfully demonstrating performance element competencies specific to their job responsibilities.

There is no single correct way to use the worksheet. The Field Training Manual provides examples of ways to incorporate the worksheet into existing retail food protection training programs.

This abbreviated version of the Field Training Worksheet provides another option for regulatory retail food protection program trainers. It simply lists the performance elements for each of the inspection areas. It is intended to be used in conjunction with the CFP reference document – “Competencies for Each Performance Element” included at the end of this Attachment. It is intended for experienced trainers who have a solid command of the FSIO competencies that comprise each of the performance elements. The jurisdiction should determine the specific performance elements that apply to the FSIOs within their jurisdiction prior to initiating the field training process.

Included with this Abbreviated Field Training Worksheet is a reference document that lists examples of competencies for each performance element. Trainers should review with the FSIO the competencies that will be included as part of the field training inspections. FSIOs are expected to successfully demonstrate these minimum competencies correctly prior to conducting independent food safety inspections.
### Conference for Food Protection

**ABBREVIATED - FIELD TRAINING WORKSHEET**  
*(Performance Elements Only)*

**Retail Food, Restaurant, and Institutional Foodservice**  
Food Safety Inspection Officer

<table>
<thead>
<tr>
<th>Performance Element</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Has required equipment and forms to conduct inspection.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>2. Reviews establishment file for previous inspection report, complaints of file, and if applicable, required HACCP Plans or documents supporting the issuance of variance.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

**ADDITIONAL (Jurisdiction Specific Performance Elements)**

Comments:

---

**Establishment Name:**  
**Establishment Address:**

**Food Safety Inspection Officer’s (FSIO) Name:**  
**Food Safety Inspection Officer’s (FSIO) Agency:**

**Trainer’s Name:**  
**Trainer’s Agency:**

**Date of Inspection led by the Trainee:**  
**Time IN:**  
**Time OUT:**
II. Inspection Observations and Performance

<table>
<thead>
<tr>
<th>PERFORMANCE ELEMENTS</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ 1. Provides identification as a regulatory official to person in charge, confirming agency authority for inspection, and stating the purpose of visit.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 2. Has knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 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.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 4. Obtains immediate corrective action for out of compliance employee practices and management procedures (listed in Item 3 above) essential to the safe storage, preparation, and service of food.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 5. Correctly assesses compliance status of other regulations (not included in Item 4 – Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 6. Verifies correction of out of compliance observations identified during previous inspection.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 7. Correctly uses inspection equipment during joint inspections.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>ADDITIONAL (Jurisdiction Specific Performance Elements)</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
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<tr>
<td>□</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
</tbody>
</table>

Comments:
## III. Oral Communication

### PERFORMANCE ELEMENTS

<table>
<thead>
<tr>
<th></th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>1. Asks questions and engages in a dialogue with person in charge/employees to obtain information relevant to the inspection.</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>2. Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>3. Uses available means (e.g., interpreter, drawings, diagrams, demonstrations, international food safety icons) to overcome language or communication barriers.</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>4. Follows jurisdiction’s policy in regard to disclosure of confidential information.</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>5. Uses effective communication and conflict resolution techniques to overcome inspection barriers.</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>6. Conducts exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.</td>
<td>YES</td>
</tr>
</tbody>
</table>

### ADDITIONAL (Jurisdiction Specific Performance Elements)

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
</table>

Comments:

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## IV. Written Communication

### PERFORMANCE ELEMENTS

<table>
<thead>
<tr>
<th></th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>1. Completes inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>2. Includes with inspection report any compliance or regulatory documents identified or cross-referenced in written statements (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices).</td>
<td>YES</td>
</tr>
<tr>
<td>□</td>
<td>3. Presents inspection report, and when necessary cross-referenced documents, to person in charge.</td>
<td>YES</td>
</tr>
</tbody>
</table>

### ADDITIONAL (Jurisdiction Specific Performance Elements)

<p>| | | | |</p>
<table>
<thead>
<tr>
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</tr>
</thead>
</table>

Comments:
## V. Professionalism

<table>
<thead>
<tr>
<th>PERFORMANCE ELEMENTS</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ 1. Maintains a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 2. Demonstrates proper sanitary practices as expected from a food service employee.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 3. Only reports substantiated findings as violations.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td><strong>ADDITIONAL (Jurisdiction Specific Performance Elements)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## VI. Additional Inspection Area—Sample Collection and Evidence Development

<table>
<thead>
<tr>
<th>PERFORMANCE ELEMENTS</th>
<th>Opportunity occurred for FSIO to demonstrate competency during joint field training inspection</th>
<th>Competency demonstrated during joint field training inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ 1. Uses an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td>□ 2. Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction.</td>
<td>☐ YES ☐ NO</td>
<td>☐ YES ☐ NO</td>
</tr>
<tr>
<td><strong>ADDITIONAL (Jurisdiction Specific Performance Elements)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Conference For Food Protection

REFERENCE DOCUMENT

Competencies For Each Performance Element

PRE-REQUISITE TRAINING COURSES

Food Safety Inspection Officer (FSIO) has successfully completed pre-requisite training courses as specified in *FDA Voluntary National Retail Food Regulatory Program Standards: Standard #2 – Trained Regulatory Staff.*

- OPTION 1: Completed the FDA ORA-U *pre-requisite* ("Pre") courses/examinations AND training on the jurisdiction’s prevailing statutes, regulations, and/or ordinances.

- OPTION 2: Submitted documentation of completing coursework equivalent to the FDA-ORA *pre-requisite* ("Pre") curriculum, AND training on the jurisdiction’s prevailing statutes, regulations, and/or ordinances, AND has certificate or documentation of successfully passing one of the written examination options in Program Standard #2.

**NOTE:** A jurisdiction can begin the field training process with FSIOs while they are still in the process of completing their pre-requisite coursework. However, the pre-requisite coursework should be completed prior to conducting any independent inspections of foodservice or retail food facilities.

**INSPECTION AREAS**

The Food Safety Inspection Officer *Field Training Worksheet* is divided into (six) 6 inspection areas:

I. Pre-Inspection;
II. Inspection Observations and Performance;
III. Oral Communication;
IV. Written Communication;
V. Professionalism; and
VI. Additional Inspection Areas (*The Field Training Worksheet includes as an additional area Sample Collection and Evidence Development for those jurisdiction where Food Safety Inspection Officers are expected to take aseptic food and/or water samples.*)

The performance elements for each of the 6 inspection categories were derived from research of current regulatory retail food protection program training curriculums and competency areas. Flexibility has been built into the training process to allow regulatory jurisdictions the ability to customize training so that it reflects a jurisdiction’s administrative policies, procedures, and inspection protocol. If a performance element competency is part of the FSIO’s job responsibility it should be included in the training plan. Competencies that are applicable to the FSIO’s job should not be arbitrarily removed or deleted from the *Field Training Worksheet.*

The competencies listed under each performance element are intended to serve as examples of job tasks that should be successfully demonstrated by the FSIO during field training inspections. Some of the competencies listed for a performance element may not be applicable to a FSIO within a given jurisdiction. For example, infrared thermometers may not be part of the standard issued equipment for inspection staff. The FSIO would not, therefore, be responsible for using this type of equipment. In such cases this competency is not included as part of the training.

Conversely, there may be competencies not listed under the performance element that are important for a jurisdiction to include. The trainer should review these additional competencies with the FSIO and include him/her as part of the field training process.
INSPECTION AREAS

I. Pre-Inspection

1. **Has required equipment and forms to conduct inspection.**
   - Necessary inspection forms and administrative materials.
   - Lab coat or equivalent protection to cover street clothes.
   - Head cover: baseball cap; hair net; or equivalent.
   - Calibrated thermocouple temperature measuring device.
   - Maximum registering thermometer or temperature sensitive tapes for verifying hot water warewashing final rinse temperature.
   - Chemical test kits for chlorine, iodophor, and quaternary ammonia sanitizers.
   - Flashlight.
   - Alcohol swabs.

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.**
   - Reviewed previous inspection report noting documented out of compliance observations.
   - Reviewed establishment file for complaint reports.
   - Reviewed establishment file for documentation indicating a need for a HACCP Plan.
   - Reviewed establishment file for documentation of food production or processes operating under a variance issued by the jurisdiction.
II. Inspection Observations and Performance

1. Provides identification as a regulatory official to person in charge, confirming agency authority for inspection, and stating the purpose of visit.

- Verbally provided name and agency to the person in charge.
- Presented regulatory identification or business card.
- Stated the purpose of the visit.
- Requests and confirmed permission to conduct inspection from the person in charge prior to initiating the inspection.

2. Has knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.

- Verified the correct critical limit and or standard specified in the jurisdiction’s rules/regulations to the observation made.
- Correctly cited the rule/regulation for each out of compliance observation.

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.

- Verified Demonstration of Knowledge of the person in charge.
- Verified approved food sources (e.g., food from regulated food processing plants; shellfish documentation; game animal processing; parasite destruction for certain species of fish intended for raw consumption; receiving temperatures).
- Verified food safety practices for preventing cross-contamination of ready-to-eat food.
- Verified food contact surfaces are clean and sanitized, protected from contamination from soiled cutting boards, utensils, aprons, etc., or raw animal foods.
- Verified the restriction or exclusion of ill employees.
- Verified no bare hand contact with ready-to-eat foods (or use of a pre-approved, alternative procedure).
- Verified employee handwashing.
- Verified cold holding temperatures of foods requiring time/temperature control for safety (TCS food), or when necessary, verified that procedures are in place to use time alone to control bacterial growth and toxin production.
- Verified date marking of ready-to-eat foods TCS food held for more than 24 hours.
- Verified cooking temperatures to destroy bacteria and parasites.
- Verified hot holding temperatures of TCS food or when necessary, that procedures were in place to use time alone to prevent the outgrowth of spore-forming bacteria.
- Verified cooling temperatures of TCS food to prevent the outgrowth of spore-forming or toxin-forming bacteria.
- Verified reheating temperatures of TCS food for hot holding.
- Verified the availability of a consumer advisory for foods of animal origin served raw or undercooked.
- Identified food processes and/or procedures that require a HACCP Plan per the jurisdiction’s regulations.
INSPECTION AREAS

II. Inspection Observations and Performance (continued)

4. Obtains immediate corrective action for out of compliance employee practices and management procedures (listed in Item 3 above) essential to the safe storage, preparation, and service of food.

- Notified the person in charge/employee(s) of the out of compliance observations.
- Reviewed corrective actions with the person in charge/employee(s).
- Observed the person in charge/employee(s) immediately take corrective action for out of compliance observations (e.g., movement of food to ensure product temperature or prevent contamination; reconditioning food; restriction/exclusion of ill employees; discarding of food product) in accordance with local jurisdiction’s procedures.
- Identified conditions requiring issuance of an embargo/stop sale/food destruction order per jurisdiction’s administrative procedures.

5. Correctly assesses compliance status of other regulations (not included in Item 4 – Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

- Correctly assessed compliance status of other regulations (not included in Item 4 above - Good Retail Practices) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.

6. Verifies correction of out of compliance observations identified during previous inspection.

- Verified correction of out of compliance observations identified during previous inspection

7. Correctly uses inspection equipment during joint inspections.

- Used temperature measuring devices/probes in accordance with manufacturer’s instructions.
- Cleaned and sanitized (alcohol swabs) temperature measurement probes to prevent food contamination.
- Used infrared thermometer in accordance with manufacturer’s instructions. Verified any out of compliance product temperatures registered on the infrared with a thermocouple.
- Used maximum registering thermometer or heat sensitive tapes in accordance with manufacturer’s instructions to verify final rinse dishwasher temperature.
- Used chemical test strips in accordance with manufacturer’s instructions to measure sanitizer concentrations in manual and mechanical dishwashing operations; wiping cloth solutions; and spray bottle applicators.
- Used flashlight to assess observations in areas with no or low light.
- Photographs taken support regulatory findings or conditions observed.
INSPECTION AREAS

III. Oral Communication

1. Asks questions and engages in a dialogue with person in charge/employees to obtain information relevant to inspection.
   - Asked open ended questions (questions that can not be answered with “yes” or “no”).
   - Did not interrupt when the person in charge/employee was speaking.
   - Paraphrased/summarized statements from the person in charge to confirm understanding.

2. Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.
   - Answered inspection-related questions accurately.
   - Admitted not knowing the answer to a question and arranges to contact the establishment with the answer.
   - Used trainer as a resource when unsure of an answer.

3. Uses available means (e.g., interpreter, drawings, demonstrations, diagrams, international food safety icons) to overcome language or communication barriers.
   - Avoided using jargon and acronyms, without explanation.
   - Used interpreter, drawings, demonstrations, or diagrams to overcome language or communication barriers.
   - Checked the person in charge’s understanding of information/instructions by asking the operator to paraphrase or demonstrate the information/instructions.

4. Follows jurisdiction’s policy in regard to disclosure of confidential information.
   - Explained confidentiality laws, policies and procedures to the person in charge when necessary. (if the need to explain confidentiality laws did not occur during the joint field training inspections, the FSIO explained confidentiality laws, policies and procedures to the trainer).
   - Applied the confidentiality policy per the jurisdictional requirements (e.g., FSIO did not reveal confidential information to the operator during the inspection).

5. Uses effective communication and conflict resolution techniques to overcome inspection barriers.
   - Identified challenges faced by the person in charge and offered possible solution(s).
   - Did not become argumentative (e.g., remained calm and focused).
   - Removed himself/herself from a confrontation or threat that may impact personal safety.

6. Conducts exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.
   - Explained the public health significance of the inspection observations.
   - Reviewed all findings with the person in charge with emphasis on contributing factors to foodborne illness and Food Code Interventions (listed in Section II, Item 3).
   - Used foodborne illness data to highlight contributing factors.
   - Answered all questions or concerns pertaining to items on the inspection report.
   - Provided contact information to the person in charge for follow up questions or additional guidance.
INSPECTION AREAS

IV. Written Communication

<table>
<thead>
<tr>
<th>1. Completes inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Used correct inspection form.</td>
</tr>
<tr>
<td>• Completed a legible report.</td>
</tr>
<tr>
<td>• Accurately documented observations made during inspection.</td>
</tr>
<tr>
<td>• Completed inspection form in accordance with jurisdiction’s administrative procedures.</td>
</tr>
<tr>
<td>• Cited correct code provisions/rules/regulations.</td>
</tr>
<tr>
<td>• Documented immediate corrective action for out-of-compliance foodborne illness contributing factors and Food Code Interventions (listed in Section II, Item 3).</td>
</tr>
<tr>
<td>• Documented time frames for correcting each out of compliance observation.</td>
</tr>
<tr>
<td>• Signed completed inspection report.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Includes with inspection report any compliance or regulatory documents identified or cross-referenced in written statements (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices).</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Referenced attached documents in inspection report.</td>
</tr>
<tr>
<td>• Referenced documents are legible.</td>
</tr>
<tr>
<td>• Referenced documents are accurate and reflect observations made during the inspection.</td>
</tr>
<tr>
<td>• Attached referenced document(s) to the inspection report per jurisdiction’s administrative procedures.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Presents inspection report, and when necessary cross-referenced documents, to person in charge.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Presented complete inspection report, with referenced documents when necessary, to person in charge during exit interview.</td>
</tr>
<tr>
<td>• Followed jurisdiction’s administrative procedures for delivering written inspection report.</td>
</tr>
<tr>
<td>• Obtained signature of person in charge on inspection report.</td>
</tr>
</tbody>
</table>
INSPECTION AREAS

V. Professionalism

1. Maintains a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).
   - Maintained a professional appearance consistent with jurisdiction’s policy (e.g., clean outer clothing, hair restraint).

2. Demonstrates proper sanitary practices as expected from a food service employee.
   - Washed hands as needed (e.g., prior to conducting inspection, after using restroom, after touching dirty surfaces, after touching face/body, after sneezing/coughing).
   - Protected bandages on hands, when necessary, to prevent contamination of food or food contact surfaces.
   - Did NOT contact ready-to-eat foods with bare hands.
   - Did NOT show any obvious signs of illness in accordance with jurisdiction’s employee health policy and/or current food code.

3. Only reports substantiated findings as violations.
   - Only reported findings that were directly observed or substantiated in accordance with jurisdiction’s policies and procedures.
   - Findings are supported by fact (e.g., are NOT based on hunch or suspicion; are witnessed, are investigated).
   - Did NOT note violations without visiting the establishment.
   - Did NOT exaggerate details related to findings to support report conclusions.
   - Did NOT modify report after leaving the establishment except as allowed by jurisdiction’s administrative procedures.
**ADDITIONAL INSPECTION AREAS**

VI. Sample Collection and Evidence Development

1. Uses an aseptic food sample collection method consistent with criteria established by laboratory serving jurisdiction.
   - Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)
   - Used sample collection method specified by the jurisdiction (e.g., original container if available; collection of a representative sample from a large quantity or container).
   - Used sterile, leak-proof lidded container or zipper-lock type bags.
   - Used a separate sterile utensil to collect each different sample item.
   - Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.
   - Initiated written chain of custody including use of evidence seal.
   - Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.
   - Maintained sample refrigerated or frozen until transport or shipping to laboratory.
   - Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant (wet or dry ice) via the most rapid and convenient means available (e.g., courier, bus, express mail).

2. Uses an aseptic water sample collection method consistent with criteria established by laboratory serving jurisdiction.
   - Used proper hygiene before and during sample process (e.g., washed hands prior to sampling; did not touch sample container opening, inside lip, inside cap or did not blow into the bag to open it up.)
   - Sample taken at site closest to source of water (prior to any treatment) if possible, or at a site (post treatment) per jurisdiction’s procedures.
   - Sample taken from operational fixed type faucet – no swing type or leaking faucets.
   - Removed aerator (if present) from faucet prior to sampling.
   - Disinfected faucet with bleach or flame.
   - Ran water through faucet for several minutes to clear line.
   - Used a sterile, leak-proof lidded container, “whirl-pak” or zipper-lock type bag.
   - Sample taken from midstream of the flowing faucet.
   - Labeled all containers with required information (e.g., date, time, location, product name, FSIO initials) with corresponding information noted on inspection report or laboratory forms.
   - Initiated written chain of custody including use of evidence seal.
   - Stored and transported sample in a clean, refrigerated unit (e.g., ice chest with ice) within the prescribed time period.
   - Maintained sample refrigerated until transport or shipping to the laboratory.
   - Sample packed and shipped in sterile, leak-proof, insulated container with refrigerant via the most rapid and convenient means available (e.g., courier, bus, express mail).
STANDARD NO. 2 TRAINED REGULATORY STAFF

Step 2: Initial Field Training and Experience
The regulatory staff conducting inspections of retail food establishments must conduct a minimum of 25 joint field inspections with a trainer or the jurisdiction’s designated staff member, who has successfully completed all training elements (Steps 1–3) required by this Standard. The 25 joint field inspections are to be comprised of both “demonstration” (trainer-led) and trainee-led inspections and include a variety of retail food establishment types available within the jurisdiction.

Demonstration inspections are those in which the jurisdiction’s trainer and/or designated staff person takes the lead and the FSIO-trainee observes the inspection process. Training inspections are those in which the person being trained takes the lead and demonstrates competencies identified in the jurisdiction’s retail food program training plan. The jurisdiction’s trainer is responsible for determining the appropriate combination of demonstration and trainee-led inspections based on the FSIO-trainee’s, food safety knowledge and performance during the joint field inspections.

The 25 joint field inspections must be conducted using a field training process and forms similar to ones presented in the CFP Field Training Manual for Regulatory Retail Food Inspection Officers (Field Training Manual) included as Appendix B-2. The Field Training Manual consists of a Training Plan and Log, Field Training Worksheets and procedures that may be incorporated into any jurisdiction’s retail food training program. It is a national model upon which jurisdictions can design basic field training and provides a method for FSIOs to demonstrate competencies needed to conduct independent inspections of retail food, restaurant, and institutional foodservice establishments.

Jurisdiction’s are not required to use the forms or worksheets provided in the Field Training Manual. Equivalent forms or training process can be developed. To meet the intent of the Standard, documentation must be maintained that confirms FSIOs are trained on, and have demonstrated, the performance elements competencies needed to conduct independent inspections of retail food and/or foodservice establishments.

NOTE: The Field Training Manual is designed as a training approach providing a structure for continuous feedback between the FSIO-trainee and trainer on specific knowledge, skills and abilities that are important elements of effective retail food, restaurant, and institutional foodservice inspections.

• The Field Training Manual is NOT intended to be used for certification or licensure purposes.

• The Field Training Manual ATN is NOT intended to be used for administrative purposes including but not limited to job classifications, promotions, or disciplinary actions up to and including termination.

FSIOs must successfully complete a joint field training process similar to that presented in the Field Training Manual prior to conducting independent inspections and re-inspections of retail food establishments in risk categories 2, 3, and 4 as presented in Appendix B-3 (taken from Annex 5, Table 1 of the 2005 FDA Food Code). The jurisdiction’s trainer/food program manager can make a determination as to the FSIO’s readiness to conduct independent inspections of risk category 1 establishments as defined in Appendix B-3 at any time during the training process.

NOTE: The criterion for conducting a minimum of 25 joint field training inspections is intended for new employees or employees new to the food safety program. In order to accommodate an experienced FSIO, the supervisor/training officer can include a signed statement or affidavit in the employee’s training file explaining the background or experience that justifies a waiver of this requirement. When the 25 joint field inspections are waived, the supervisor/training officer must observe experienced FSIOs conduct
inspections to determine any areas in need of improvement. An individual corrective action plan should be developed outlining how any training deficiencies will be corrected and the date when correction will be achieved.
The ATN provides structure to the FSIO performance assessment. The performance assessment is part of a training process that provides both candidate and assessor feedback on
Program Standard #2
Curriculum for Retail Food Safety Inspection Officers
For state, local & tribal regulators to register on-line for free access to web courses, go to: http://www.fda.gov/ora/training/

Pre-requisite ("Pre") curriculum courses
(to be completed during the 25 joint inspection period AND prior to conducting any independent inspections)

PUBLIC HEALTH PRINCIPLES
Public Health Principles (90) FDA36

MICROBIOLOGY
Food Microbiological Control (series):
1. Overview of Microbiology (60) MIC01
2. A. Gram-Negative Rods (60) MIC02
   2B. Gram-Positive Rods & Cocci (90) MIC03
3. Foodborne Viruses (60) MIC04
4. Foodborne Parasites (90) MIC05
5. Mid-Series Exam (30) MIC16
6. Controlling Growth Factors (90) MIC06
7. A. Control by Thermal Processing (90) MIC08
   B. Control by Pasteurization (90) MIC09
10. Aseptic Sampling (90) MIC13
12. Cleaning & Sanitizing (90) MIC15

PREVAILING STATUTES, REGULATIONS, ORDINANCES
Basic Food Law for State Regulators (60) FDA35
Basics of Inspection:
   Beginning an Inspection (90) FDA38
   Issues & Observations (90) FDA39
An Introduction to Food Security Awareness (60) FD251 (ORA U internet site)

NOTE: Specific state/local laws & regulations to be addressed by each jurisdiction

COMMUNICATION SKILLS
Communication Skills for Regulators*

Curriculum ("Post") courses
(to be completed anytime prior to Food Code Standardization AND within 18 months of hire or assignment to the regulatory retail food program)

MICROBIOLOGY
Food Microbiological Control (series):
7C. Control by Retorting (90) MIC10
8. Technology-Based Food Processes (120) MIC11
9. Natural Toxins (90) MIC12

HACCP
Basics of HACCP (series):
1. Overview of HACCP (60) FDA16
2. Prerequisite Programs & Preliminary Steps (60) FDA17
3. The Principles (60) FDA18

EPIDEMIOLOGY
Foodborne Illness Investigations (series):
1. Collecting Surveillance Data (90) FI01
2. Beginning the Investigation (90) FI02
3. Expanding the Investigation (90) FI03
4. Conducting a Food Hazard Review (90) FI04
5. Epidemiological Statistics (90) FI05
6. Final Report (30) FI06

"Application" Courses and "Hands-On" Training
To provide application and transfer of web instruction to the jurisdiction’s work environment, although not required at this time, it is recommended that FSIOs complete one of the following options within their initial 18 months of hire or re-assignment to the regulatory retail food program:

1. Classroom Course: Application of the Basics of Inspection/Investigation FD170 (future schedule available at www.afdo.org/ or course contents are available on CD through FDA’s Division of Human Resource Development’s lending library.)
2. Courses developed by State/local regulatory jurisdictions or other entities containing learning objectives and exercises equivalent to Option 1 above.
3. Discussions Questions & Exercises * (Conducted in the office or during the 25 joint inspections)

* Under construction
( ) Average time in minutes required to take the course, 60 minutes equals .1 CEU, 90-120 minutes equals .2 CEUs
Estimated total hours for “Pre” courses are 42 hours.
Estimated total hours for “Post” courses are 13 hours.
Estimated total hours for completion of all Program Standard #2 coursework are 54 hours
Program Standard #2
Curriculum for Retail Food Inspection Officers
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Pre-requisite ("Pre") curriculum courses
(to be completed during the 25 joint inspection period AND prior to conducting any independent inspections)

PUBLIC HEALTH PRINCIPLES
Public Health Principles (90) FDA36

MICROBIOLOGY
Food Microbiological Control (series):
1. Overview of Microbiology (60) MIC01
2A. Gram-Negative Rods (60) MIC02
2B. Gram-Positive Rods & Cocci (90) MIC03
3. Foodborne Viruses (60) MIC04
4. Foodborne Parasites (90) MIC05
Mid-Series Exam (30) MIC16
5. Controlling Growth Factors (90) MIC06
6. Control by Refrigeration & Freezing (60) MIC07
7A. Control by Thermal Processing (90) MIC08
7B. Control by Pasteurization (90) MIC09
10. Aseptic Sampling (90) MIC13
12. Cleaning & Sanitizing (90) MIC15

PREVAILING STATUTES, REGULATIONS, ORDINANCES
Basic Food Law for State Regulators (60) FDA35
Beginning an Inspection (90) FDA38
Issues & Observations (90) FDA39
An Introduction to Food Security Awareness (60) FD251
(ORA U internet site)

2005 Food Code*
Note: Specific state/local laws & regulations to be addressed by each jurisdiction

COMMUNICATION SKILLS
Communication Skills for Regulators*

Curriculum ("Post") courses
(to be completed anytime prior to Food Code Standardization AND within 18 months of hire or assignment to the regulatory retail food program)

MICROBIOLOGY
Food Microbiological Control (series):
7C. Control by Retorting (90) MIC10
8. Technology-Based Food Processes (120) MIC11
9. Natural Toxins (90) MIC12

HACCP
Basics of HACCP (series):
1. Overview of HACCP (60) FDA16
2. Prerequisite Programs & Preliminary Steps (60) FDA17
3. The Principles (60) FDA18

EPIDEMIOLOGY
Foodborne Illness Investigations (series):
1. Collecting Surveillance Data (90) FI01
2. Beginning the Investigation (90) FI02
3. Expanding the Investigation (90) FI03
4. Conducting a Food Hazard Review (90) FI04
5. Epidemiological Statistics (90) FI05
6. Final Report (30) FI06

Deleted: "Application" Courses and "Hands-On" Training
To provide application and transfer of web instruction to the jurisdiction's work environment, although not required at this time, it is recommended that FSIOs complete one of the following options within their initial 18 months of hire or re-assignment to the regulatory retail food program:
<> Classroom Course: Application of the Basics of Inspection/Investigation FD170 (future schedule available at www.afdo.org/ or course contents are available on CD through FDA's Division of Human Resource Development's lending library.);
<> Courses developed by State/local regulatory jurisdictions or other entities containing learning objectives and exercises equivalent to Option 1 above;
<> Discussions Questions & Exercises *
        (Conducted in the office or during the 25 joint inspections);

* Under construction

Average time in minutes required to take the course, 60 minutes equals .1 CEU, 90-120 minutes equals .2 CEUs
Estimated total hours for "Pre" courses are 42 hours.
Estimated total hours for "Post" courses are 13 hours.
Estimated total hours for completion of all Standard 2 coursework are 55 hours
Program Standard #2
Curriculum for Retail Food Safety Inspection Officers

“Application” Courses and “Hands-On” Training

To provide application and transfer of web instruction to the FSIO’s work environment, a jurisdiction’s training program (inclusive of both classroom instruction and field training inspections) for staff newly hired or newly assigned to the retail food protection program must include a minimum of eighty percent (80%) of the learning objectives contained in the ORA U Application of the Basics of Inspection/Investigation Course (FD170). A jurisdiction may use any one of the following options to address learning objectives not covered in their existing training programs:

1. Classroom Course: Application of the Basics of Inspection/Investigation FD170 (available at www.afdo.org/ or course contents are available on CD through FDA’s Division of Human Resource Development’s lending library).
2. Courses and or field training exercises developed by State/local regulatory jurisdictions or other entities containing learning objectives and exercises equivalent to Option 1 above.
3. Discussions Questions & Exercises *(Conducted in the office or during the 25 joint inspections)

* Under construction

The learning objectives for the ORA U Application of the Basics of Inspection/Investigation course (FD170) are included below:

APPLICATION OF THE BASICS OF INVESTIGATION/INSPECTION – FD170

Applying Knowledge and Principles to the Real World of Inspection and Investigation of Food Establishments

Learning Objectives: Upon completion of this course, participants will be able to:

1. Demonstrate their knowledge of relevant food laws and regulations and how to apply them properly during inspections.
2. Demonstrate hands-on competency in the use of equipment and instruments used during food establishment inspections.
3. Successfully perform a hands-on exercise of aseptic sampling with sterile sampling containers using deli-style food samples.
4. Identify biological, physical, and chemical hazards and risks associated with foods and the operation of food establishments and will apply this knowledge to determine if a food establishment is in compliance.
5. Identify good basic inspection and communication techniques used in food processing, storage, and retail facilities.
6. Demonstrate their ability to identify the causes and symptoms of food borne illness, to identify implicated foods, to select proper foods for sampling, to determine individuals to interview, to identify the likely causative organism(s), and to recommend procedures that would prevent further outbreaks.
7. Demonstrate their ability to document quantitative observations, to distinguish fact from opinion, to gather, synthesize and document all facts, to avoid ambiguity, and to distinguish relevant from irrelevant facts.
Program Standard #2
Curriculum for Retail Food Safety Inspection Officers
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Pre-requisite (“Pre”) curriculum courses
(to be completed during the 25 joint inspection period AND prior to conducting any independent inspections)

PUBLIC HEALTH PRINCIPLES
Public Health Principles (90) FDA36

MICROBIOLOGY
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1. Overview of Microbiology (60) MIC01
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2B. Gram-Positive Rods & Cocci (90) MIC03
3. Foodborne Viruses (60) MIC04
4. Foodborne Parasites (90) MIC05
Mid-Series Exam (30) MIC16
5. Controlling Growth Factors (90) MIC06
6. Control by Refrigeration & Freezing (60) MIC07
7A. Control by Thermal Processing (90) MIC08
7B. Control by Pasteurization (90) MIC09
10. Aseptic Sampling (90) MIC13
12. Cleaning & Sanitizing (90) MIC15

PREVAILING STATUTES, REGULATIONS, ORDINANCES
Basic Food Law for State Regulators (60) FDA35
Beginning an Inspection (90) FDA38
Issues & Observations (90) FDA39
An Introduction to Food Security Awareness (60) FD251
(ORA U internet site)

NOTE: Specific state/local laws & regulations to be addressed by each jurisdiction

COMMUNICATION SKILLS
Communication Skills for Regulators*

Curriculum (“Post”) courses
(to be completed anytime prior to Food Code Standardization AND within 18 months of hire or assignment to the regulatory retail food program)

MICROBIOLOGY
Food Microbiological Control (series):
7C. Control by Retorting (90) MIC10
8. Technology-Based Food Processes (120) MIC11
9. Natural Toxins (90) MIC12

HACCP
Basics of HACCP (series):
1. Overview of HACCP (60) FDA16
2. Prerequisite Programs & Preliminary Steps (60) FDA17
3. The Principles (60) FDA18

EPIDEMIOLOGY
Foodborne Illness Investigations (series):
1. Collecting Surveillance Data (90) FI01
2. Beginning the Investigation (90) FI02
3. Expanding the Investigation (90) FI03
4. Conducting a Food Hazard Review (90) FI04
5. Epidemiological Statistics (90) FI05
6. Final Report (30) FI06

( ) Average time in minutes required to take the course, 60 minutes equals .1 CEU, 90-120 minutes equals .2 CEUs
Estimated total hours for “Pre” courses are 42 hours.
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Estimated total hours for completion of all Program Standard #2 coursework are 54 hours
Program Standard #2
Curriculum for Retail Food Safety Inspection Officers

“Application” Courses and “Hands-On” Training

To provide application and transfer of web instruction to the FSIO’s work environment, a jurisdiction’s training program (inclusive of both classroom instruction and field training inspections) for staff newly hired or newly assigned to the retail food protection program must include a minimum of eighty percent (80%) of the learning objectives contained in the ORA U Application of Basics of Inspection/Investigation Course (FD170). A jurisdiction may use any one of the following options to address learning objectives not covered in their existing training programs.

1. Classroom Course: Application of the Basics of Inspection/Investigation FD170 (available at www.afdo.org/ or course contents are available on CD through FDA’s Division of Human Resource Development’s lending library).
2. Courses and or field training exercises developed by State/local regulatory jurisdictions or other entities containing learning objectives and exercises equivalent to Option 1 above.
3. Discussions Questions & Exercises * (Conducted in the office or during the 25 joint inspections)

* Under construction

The learning objectives for the ORA U Application of the Basics of Inspection/Investigation course (FD170) are included below:

APPLICATION OF THE BASICS OF INVESTIGATION/INSPECTION – FD170

Applying Knowledge and Principles to the Real World of Inspection and Investigation of Food Establishments

Learning Objectives: Upon completion of this course, participants will be able to:

1. Demonstrate their knowledge of relevant food laws and regulations and how to apply them properly during inspections.
2. Demonstrate hands-on competency in the use of equipment and instruments used during food establishment inspections.
3. Successfully perform a hands-on exercise of aseptic sampling with sterile sampling containers using deli-style food samples.
4. Identify biological, physical, and chemical hazards and risks associated with foods and the operation of food establishments and will apply this knowledge to determine if a food establishment is in compliance.
5. Identify good basic inspection and communication techniques used in food processing, storage, and retail facilities.
6. Demonstrate their ability to identify the causes and symptoms of food borne illness, to identify implicated foods, to select proper foods for sampling, to determine individuals to interview, to identify the likely causative organism(s), and to recommend procedures that would prevent further outbreaks.
7. Demonstrate their ability to document quantitative observations, to distinguish fact from opinion, to gather, synthesize and document all facts, to avoid ambiguity, and to distinguish relevant from irrelevant facts.
Council II – Interdisciplinary Foodborne Illness Training Committee Report
(a sub-committee of the Programs Standards Committee)

Date of Committee Report: December 4, 2007

Submitted By: Frank Ferko and Michéle Samarya-Timm

Committee Charge(s):
Cataloging existing foodborne illness investigation training programs, optimizing the training and materials used, and developing recommendations to improve sustainability and rapidly broaden dissemination of the programs.

STATE REGULATORY (3)

Adler  William  Minnesota Department of Health  507-285-7289
Rochester District Office  507-285-7445 (f)
18 Woodlake Drive SE
Rochester MN 55904-4744
bill.adler@health.state.mn.us

Julian, Ph.D.  Ernest M.  Rhode Island Department of Health  (401) 222-2749
3 Capitol Hill, Rm 203, Cannon Bldg.  (401) 222-7725
Providence RI 02908-5097
ernie.julian@health.ri.gov

Vigue  Rebecca  Maine DHHS, CDC & P  (207) 287-1978
11 State House Station  (207) 287-3165
Augusta ME 04333-0010
rebecca.vigue@maine.gov

LOCAL REGULATORY (6)

Church  Vickie  County of San Diego  619-338-2274
Department of Environmental Health
PO Box 129261
San Diego CA 92112-9261
Vickie.Church@sdcounty.ca.gov

Samarya-Timm Michele  Franklin Township Health Department  (732) 873-2500 ext 372
C0-CHAIR
935 Hamilton Street  (732) 214-0969
Somerset NJ 08873
Michele.Samarya-Timm@twp.franklin.nj.us

Miller  Tomeji  City of Plano Environmental Health  972-941-7143
1520 Avenue K  972-941-7142 (f)
Plano TX 75074
Tomejim@plano.gov

Hanley  Kathleen  Washoe County District Health Department  775-328-2400
Harrington  Robert  Casper-Natrona County Health Department  475 S. Spruce  307-235-9340
(Casper WY 82601  307-237-2036 (f)  rharrin@cnchd.org

Pearson  Ken  Knox County Health Department  400 Main Street  865-215-5219
(Knoxville TN 37902  kenneth.pearson@knoxcounty.org

Bradley  Renee C.  Lorain County General Health District  9880 South Murray Ridge Road  (440) 284-3253
(ALTERNATE  9880 South Murray Ridge Road  (440) 322-0911
(Elyria OH  44035  rbradley@loraincounty.health.com

Echols  Tara  Cleveland Department of Public Health  1925 St. Clair Avenue  (216) 664-2455
(ALTERNATE  1925 St. Clair Avenue  (312) 746-8035
(Cleveland OH 44114  tne0711@yahoo.com

Guichard  Frances  Chicago Dept. of Public Health - Food Protection  2133 West Lexington, 2nd Floor  (312) 746-8040
(ALTERNATE  2133 West Lexington, 2nd Floor  (312) 746-8035
(Chicago IL 60612  patch_francis@cdph.com

ORGANIZATIONS (6)

CSTE
Matyas  Bela  Massachusetts Department of Public Health  617-983-6847
(305 South Street  bela.matyas@state.ma.us

NACCHO
Chester  Becki  NACCHO  1100 17th Street, NW, 2nd Floor  202-783-5550
(Washington DC 20036  202-783-1583 (f)  bchester@naccho.org

CDC
Sharp  Donald  CDC  1600 Clifton Road, MS G24  202-783-1583 (f)
(Atlanta GA 30333  (404) 639-2213  das8@cdc.gov

FDA
Fear  Jim (James)  Food and Drug Administration –ORA  11919 Rockville Pike  301-827-8725
(ROCKVILLE MD 20852  (fax) 301-827-8708  jfear@ora.fda.gov
APHL
Carpenter David Ph.D., MBA  Department of Medical Microbiology/Immunology 217-545-8465
Associate Professor
SIU School of Medicine
Springfield, IL  62794
dcarpenter@siumed.edu

NEHA
Cummings Matt  National Environmental Health Association
303.756.9090 ext. 346
720 S. Colorado Blvd., Suite 970S
Denver, CO  80246
mcummings@neha.org

INDUSTRY (8)
Armatis David Guckenheimer  #3 Lagoon Drive, Suite 325
Redwood Shores  CA  94065
darmatis@guckenheimer.com
(650) 274-8573

Costa Jon Applebee's  4551 W. 107th St.
Overland Park KS  66207
jon.costa@applebees.com
(913) 967-2866  (913) 967-3266

Ferko Francis RARE Hospitality International, Inc.
8215 Roswell Road, Bldg. 600
Atlanta GA  30350
fferko@loho.com
(678) 320-9288  (770) 901-6643

Garren Donna M. National Restaurant Association
1200 Seventeenth St. NW
Washington DC  20036-3097
dgarren@dineout.org
(202) 331-5986  (202) 973-3671

Williams Pam H. Yum! Brands, Inc.
675 Mansell Rd, Suite 200
Roswell GA  30076
pam.williams@yum.com
(770) 990-2000  (678) 352-8874

Ades Gary EHA Consulting Group, Inc.
3900 NE Nightingale
Bentonville AR  72712
gades@ehagroup.com
(479) 254-9026  (479) 254-9027

Hernandez Jorge A. US Foodservice
9399 Higgins Road, Suite 500
Rosemont IL  60018
jorge.hernandez1@usfood.com
(847) 720-8030  (847) 720-8099

Hollingsworth Jill Food Marketing Institute
655 15th St. NW, Ste 700
Washington DC  20005
jhollingsworth@fmi.org
(202) 220-0658  (202) 220-0876
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<th>Phone</th>
<th>Alternate Phone</th>
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</tr>
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<tbody>
<tr>
<td>Coleman</td>
<td>Gary</td>
<td>Underwriters Laboratories, Inc.</td>
<td>(919) 549-1732</td>
<td>(919) 547-6459</td>
<td>12 Laboratory Drive</td>
<td><a href="mailto:gary.coleman@us.ul.com">gary.coleman@us.ul.com</a></td>
</tr>
<tr>
<td></td>
<td>ALTERNATE</td>
<td></td>
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<td>Research Triangle Park</td>
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<td>NC 27709-3995</td>
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<tr>
<td>Cannon</td>
<td>Beth</td>
<td>Steritech</td>
<td>(720) 252-4196</td>
<td></td>
<td>10066 Owens Drive</td>
<td><a href="mailto:beth.cannon@steritech.com">beth.cannon@steritech.com</a></td>
</tr>
<tr>
<td></td>
<td>ALTERNATE</td>
<td></td>
<td></td>
<td></td>
<td>Westminster CO 80021</td>
<td></td>
</tr>
<tr>
<td>Miller</td>
<td>Dr. Arthur J.</td>
<td>Exponent Inc./Food &amp; Chemical Practice</td>
<td>(301) 464-4063</td>
<td>(301) 464-4099</td>
<td>401 Telsa Drive, Suite L</td>
<td><a href="mailto:amiller@exponent.com">amiller@exponent.com</a></td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Arnold MD 20715</td>
<td></td>
</tr>
<tr>
<td>Pimentel</td>
<td>Patrick</td>
<td>NSF International</td>
<td>(734) 827-6893</td>
<td>(734) 827-7171</td>
<td>789 N Dixboro Rd</td>
<td><a href="mailto:pimentel@nsf.org">pimentel@nsf.org</a></td>
</tr>
<tr>
<td></td>
<td>ALTERNATE</td>
<td></td>
<td></td>
<td></td>
<td>Ann Arbor MI 48105</td>
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</tr>
<tr>
<td>Posey</td>
<td>Stephen</td>
<td>Brinker International</td>
<td>(972) 770-1716</td>
<td>(972) 628-8142</td>
<td>6700 LBJ Freeway, Suite 3105</td>
<td><a href="mailto:stephen.posey@brinker.com">stephen.posey@brinker.com</a></td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Dallas TX 75240</td>
<td></td>
</tr>
<tr>
<td>Gasbarro</td>
<td>Everett</td>
<td>Dunkin' Brands Inc.</td>
<td>(781) 737-3904</td>
<td></td>
<td>130 Royall Street</td>
<td><a href="mailto:everett.gasbarro@dunkinbrands.com">everett.gasbarro@dunkinbrands.com</a></td>
</tr>
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<td></td>
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**ACADEMIA (1)**

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</tr>
</thead>
<tbody>
<tr>
<td>Bowman</td>
<td>Patricia</td>
<td>Johnson and Wales University</td>
<td>(401) 598-4625</td>
<td>(401) 598-4764</td>
<td>8 Abbott Park Place</td>
<td><a href="mailto:patricia.bowman@jwu.edu">patricia.bowman@jwu.edu</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Providence RI 02903</td>
<td></td>
</tr>
<tr>
<td>O'Connor</td>
<td>Therese</td>
<td>Cornell University</td>
<td>(607) 255-4338</td>
<td></td>
<td>School of Hotel Administration</td>
<td><a href="mailto:tao3@sha.cornell.edu">tao3@sha.cornell.edu</a></td>
</tr>
<tr>
<td></td>
<td>ALTERNATE</td>
<td></td>
<td></td>
<td></td>
<td>Ithaca NY 14853</td>
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**CONSUMER (1)**

TBD

**Progress Report/Committee Activities:**

In continuing to progress towards this committee’s charge, we welcomed an offer of assistance from the National Restaurant Association (NRA) to contact all the state Departments of Health to gather details regarding existing training. To standardize information collection, our committee developed a list of questions regarding each state’s foodborne outbreak response training and available training materials. NRA’s intern, VA Tech University graduate, Justin Carter, obtained a 50% response rate from the states, and developed Excel sheets cataloging the responses.
All responding states indicated utilizing some form of foodborne epi education programs. Some programming is from national organizations (AFDO, CDC, ORA-U, NEHA), and many are also developed by the states themselves. Most of the responding states indicated willingness to share their training materials with this committee, although none have been received. This Committee recommends that copies of these training materials be collected on behalf of CFP, and housed as a resource at CDC, FDA, or a place to be determined.

The survey results confirmed what this committee surmised – that training is occurring, but there is great variability in training offerings. Also, mere existence of programs does not guarantee efficacy of the training.

This committee recognizes that states may wish to continue to develop and offer training customized to their own practices and regulations. Conversely, states also seem to embrace the model training programs from recognized national organizations (AFDO, CDC, ORA-U, NEHA). This study did not include programs academia may be offering in epi training for food safety professionals.

CFP recommends re-creating the Interdisciplinary Foodborne Illness Training Committee to explore the benefits of developing criteria for standardizing foodborne epi programs among the states, or establishing voluntary accreditation standards for these programs.

**Requested Actions:** The Interdisciplinary Foodborne Illness Training Committee is submitting two issues:

- Issue 1: Acknowledgement of the Interdisciplinary Foodborne Illness Training Committee Report
- Issue 2: Re-Create: Interdisciplinary Foodborne Illness Training Committee
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Dr. J.P. Lofgren</td>
<td>State Epidemiologist</td>
</tr>
<tr>
<td>Jeff Warner</td>
<td>Program Coordinator for Food Safety and Sanitation</td>
</tr>
<tr>
<td>Joli Weiss</td>
<td>FoodBorne Disease Epidemiologist</td>
</tr>
<tr>
<td>Dennis Berry</td>
<td>Senior Epidemiologist</td>
</tr>
<tr>
<td>Benson J. Yee, Chief</td>
<td>Emergency Response Unit</td>
</tr>
<tr>
<td>Susan Parachini</td>
<td>Retail Food Program Manager</td>
</tr>
<tr>
<td>Dr. Matthew Cartter</td>
<td>Assistant State Epidemiologist</td>
</tr>
<tr>
<td>Susan Shore, MT (ASCP)</td>
<td>Foodborne Epidemiologist</td>
</tr>
<tr>
<td>Roberta M. Hammond, Ph.D., R.S.</td>
<td>Food and Waterborne Disease Coordinator</td>
</tr>
<tr>
<td>Carrie Shuler</td>
<td>Foodborne Outbreak Investigation Coordinator</td>
</tr>
<tr>
<td>Becky Kanenaka</td>
<td>Foodborne Disease Surveillance &amp; Response Coordinator</td>
</tr>
<tr>
<td>Patrick Guzzle</td>
<td>Food Protection Program Manager</td>
</tr>
<tr>
<td>Lori Saathoff-Huber</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Lynae Granzow, MPH</td>
<td>Enteric Epidemiologist</td>
</tr>
<tr>
<td>Patty Quinlisk</td>
<td>State Epidemiologist</td>
</tr>
<tr>
<td>Sheri Anderson, MPH, MS</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Dave Jones</td>
<td>Epidemiologist</td>
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<tr>
<td>Raoult Ratard, MD, MPH</td>
<td>State Epidemiologist</td>
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<tr>
<td>Anthony K. Yartel, MPH</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Alvina K. Chu, MHS</td>
<td>Chief-Division of Outbreak Investigations</td>
</tr>
<tr>
<td>Tara Harris</td>
<td>Foodborne Illness Coordinator</td>
</tr>
<tr>
<td>Mary Grace Stobierski, DVM, MPH</td>
<td>Section Manager</td>
</tr>
<tr>
<td>Kirk Smith, DVM, Ph.D.</td>
<td>Supervisor-Foodborne, Vectorborne, &amp; Zoonotic Disease Unit</td>
</tr>
<tr>
<td>Jo Ann Rudroff</td>
<td>Epidemiologist Specialist</td>
</tr>
<tr>
<td>Sheryl Hand, RN, BSN</td>
<td>Nurse Epidemiologist</td>
</tr>
<tr>
<td>Todd Damrow, Ph.D., MPH</td>
<td>State Epidemiologist</td>
</tr>
<tr>
<td>Dennis Leschinsky</td>
<td>Communicable Disease Surveillance Coordinator</td>
</tr>
<tr>
<td>Rick Sowadsky</td>
<td>Senior Epidemiologist</td>
</tr>
<tr>
<td>Joyce J. Welch</td>
<td>Administrator</td>
</tr>
<tr>
<td>Michelle Malavet, MSA, HO, REHF</td>
<td>Foodborne Disease Surveillance Coordinator</td>
</tr>
<tr>
<td>Christina Ewers</td>
<td>Disease Surveillance Team Member</td>
</tr>
<tr>
<td>David Bergmire-Sweat, MPH</td>
<td>Epidemiologist Section, GCDC</td>
</tr>
<tr>
<td>Julie Goplin, MS</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Name</td>
<td>Position</td>
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</tr>
<tr>
<td>Madhu Anond</td>
<td>Research Scientist</td>
</tr>
<tr>
<td>Ellen Salehi, MPH</td>
<td>Foodborne, Waterborne &amp; Emerging Infections Disease Program</td>
</tr>
<tr>
<td>Carmen Clarke, MPH</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>William E. Keene, PhD, MPH</td>
<td>Senior Epidemiologist</td>
</tr>
<tr>
<td>Veronica V. Urdaneta, MD, MPH</td>
<td>State Epidemiologist &amp; Director</td>
</tr>
<tr>
<td>Utpala Bandy, MD, MPH</td>
<td>Assistant Medical Director</td>
</tr>
<tr>
<td>Julie H. Schlegel, MSP</td>
<td>Foodborne Epidemiologist</td>
</tr>
<tr>
<td>Nicholas Hill, MPH</td>
<td>Disease Surveillance Manager</td>
</tr>
<tr>
<td>Ryan M. Mason</td>
<td>Environmental Specialist V</td>
</tr>
<tr>
<td>Deborah L. Marlow, R.S.</td>
<td>Manager-Food Establishments Group, Mail Code 1987</td>
</tr>
<tr>
<td>Diane Raccasi</td>
<td>Epidemiologist II</td>
</tr>
<tr>
<td>Mary Spayne, MPH</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Seth Levine, MPH</td>
<td>Foodborne Disease Epidemiologist</td>
</tr>
<tr>
<td>J. Kathryn MacDonald, PhD</td>
<td>Communicable Disease Epidemiologist</td>
</tr>
<tr>
<td>Suzanne Wilson, MPH</td>
<td>Food and Waterborne Disease Epidemiologist</td>
</tr>
<tr>
<td>John Archer</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Dean Finkenbinder</td>
<td>Program Manager</td>
</tr>
<tr>
<td>Dina Passman, MPH</td>
<td>Epidemiologist</td>
</tr>
<tr>
<td>Health Department</td>
<td>Physical Address</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>-------------------------------------------------------</td>
</tr>
<tr>
<td>Alabama State Department of Public Health</td>
<td>The RSA Tower, 201 Monroe St., Montgomery, AL 36104</td>
</tr>
<tr>
<td>Alaska Department of Environmental Conservation</td>
<td>555 Cordova Ave., Anchorage, AK 99501</td>
</tr>
<tr>
<td>Arizona Department of Health Services</td>
<td>150 North 18th Avenue, Phoenix, AZ 85007</td>
</tr>
<tr>
<td>Arkansas Department of Health</td>
<td>State Health Bld., 4815 W. Markham, slot H32, Little Rock, AR 72205</td>
</tr>
<tr>
<td>California Department of Public Health</td>
<td>P.O. Box 997435 MS-7602, Sacramento, CA 95899</td>
</tr>
<tr>
<td>Colorado Department of Public Health &amp; Environment</td>
<td>4300 Cherry Creek Dr. South, Denver, CO 80246</td>
</tr>
<tr>
<td>Connecticut Department of Public Health</td>
<td>410 Capitol Avenue, P.O. Box 340308, Hartford, CT 06134</td>
</tr>
<tr>
<td>Delaware Department of Public Health</td>
<td>417 Federal St., Dover, DE 19901</td>
</tr>
<tr>
<td>Florida Department of Health</td>
<td>4052 Bald Cypress Way, Bin #A08, Tallahassee, FL 32399</td>
</tr>
<tr>
<td>Georgia Department of Human Resources</td>
<td>19 Martin Luther King Dr., S.W., Atlanta, GA 30334</td>
</tr>
<tr>
<td>Hawaii Department of Health</td>
<td>1132 Bishop St., Ste 1900, Honolulu, HI 96813</td>
</tr>
<tr>
<td>Idaho Department of Health &amp; Welfare</td>
<td>450 West State St., Boise, ID 83702</td>
</tr>
<tr>
<td>Illinois Department of Public Health</td>
<td>525 West Jefferson St., Springfield, IL 62761</td>
</tr>
<tr>
<td>Indiana State Department of Health</td>
<td>2 North Meridian St., Indianapolis, IN 46204</td>
</tr>
<tr>
<td>Iowa Department of Public Health</td>
<td>Lucas State Office Building, 321 East 12th St, Des Moines, IA 50319</td>
</tr>
<tr>
<td>Kansas Department of Health &amp; Environment</td>
<td>1000 SW Jackson, Ste 210, Topeka, KS 66612</td>
</tr>
<tr>
<td>Kentucky Department of Public Health</td>
<td>275 East Main St, Frankfort, KY 40621</td>
</tr>
<tr>
<td>Louisiana Office of Public Health</td>
<td>3101 W. Napoleon Ave., Metairie, LA 70001</td>
</tr>
<tr>
<td>Maine Department of Health &amp; Human Services</td>
<td>286 Water St. Augusta, ME 04330</td>
</tr>
<tr>
<td>Maryland Department of Health &amp; Mental Hygiene</td>
<td>201 W. Preston St., Rm. 329, Baltimore, MD 21201</td>
</tr>
<tr>
<td>Massachusetts Department of Public Health</td>
<td>305 South St., Jamaica Plain, MA 02130</td>
</tr>
<tr>
<td>Michigan Department of Community Health</td>
<td>Capitol View Bld., 201 Townsend St., Lansing, MI 48913</td>
</tr>
<tr>
<td>Minnesota Department of Health</td>
<td>P.O. Box 64975, St. Paul, MN 55164</td>
</tr>
<tr>
<td>Missouri Department of Health and Senior Services</td>
<td>P.O. Box 570, Jefferson City, MO 65102</td>
</tr>
<tr>
<td>Mississippi Department of Health</td>
<td>570 E. Woodrow Wilson, Jackson, MS 39216</td>
</tr>
<tr>
<td>Montana Department of Public Health &amp; Human Services</td>
<td>Cogswell Building, Rm C-216, Helena, Montana 59620</td>
</tr>
<tr>
<td>Nebraska Department of Health and Human Services</td>
<td>301 Centennial Mall South, P.O. Box 95007, Lincoln, NE 68509</td>
</tr>
<tr>
<td>Nevada Department of Health &amp; Human Services</td>
<td>40150 Technology Way, Carson City, NV 89706</td>
</tr>
<tr>
<td>New Hampshire Division of Public Health Services</td>
<td>29 Hazen Dr., Concord, NH 03301</td>
</tr>
<tr>
<td>New Jersey Department of Health &amp; Senior Services</td>
<td>P.O. Box 369, Trenton, NJ 08625</td>
</tr>
<tr>
<td>IDEB/ERD/New Mexico Department of Health</td>
<td>1190 St. Francis Dr., N-1350, Santa Fe, NM 87502</td>
</tr>
<tr>
<td>North Carolina Department of Health &amp; Human Services</td>
<td>225 N. McDowell St., Raleigh, NC 27699</td>
</tr>
<tr>
<td>North Dakota Department of Health</td>
<td>600 E. Boulevard Avenue, Department 301, Bismark, ND 58505</td>
</tr>
<tr>
<td>Department</td>
<td>Address</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>New York State Department of Health</td>
<td>Corning Tower, Empire State Plz, Albany, NY 12237</td>
</tr>
<tr>
<td>Ohio Department of Health</td>
<td>P.O. Box 118, Columbus, OH 43216</td>
</tr>
<tr>
<td>Oklahoma State Department of Health</td>
<td>1000 N.E. 10th St., Rm. 605, Oklahoma City, OK 73117</td>
</tr>
<tr>
<td>Oregon Department of Health &amp; Human Services</td>
<td>800 NE Oregon St., Ste. 772, Portland, OR 97232</td>
</tr>
<tr>
<td>Pennsylvania Department of Health</td>
<td>7th and Forster St., Health &amp; Welfare Bld Rm. 933, Harrisburg, PA 17120</td>
</tr>
<tr>
<td>Rhode Island Department of Health</td>
<td>3 Capitol Hill, Providence, RI 02908</td>
</tr>
<tr>
<td>South Carolina Department of Health &amp; Environmental Control</td>
<td>1751 Calhoun St., Columbia, SC 29201</td>
</tr>
<tr>
<td>South Dakota Department of Health</td>
<td>615 E. 4th St., Pierre, SD 57501</td>
</tr>
<tr>
<td>Tennessee Department of Health</td>
<td>Cordell Hull Bld.-3rd floor, 425 5th Avenue North, Nashville, TN 37243</td>
</tr>
<tr>
<td>Texas Department of State Health Services</td>
<td>1100 W. 49th St., Austin, TX 78756</td>
</tr>
<tr>
<td>Utah Department of Health</td>
<td>288 N. 1460 W., P.O. Box 142104, Salt Lake City, 84114</td>
</tr>
<tr>
<td>Vermont Department of Health</td>
<td>108 Cherry St., Burlington, VT 05401</td>
</tr>
<tr>
<td>Virginia Department of Health</td>
<td>James Madison Bld, 5th floor, 109 Governor St., Richmond, VA 23219</td>
</tr>
<tr>
<td>Washington Department of Health</td>
<td>1610 NE 150 St., Shoreline, WA 98155</td>
</tr>
<tr>
<td>West Virginia Department of Health &amp; Human Resources</td>
<td>State Capitol Complex, Bld. 3, Rm. 206, Charleston, WV 25305</td>
</tr>
<tr>
<td>Wisconsin Department of Health &amp; Family Services</td>
<td>1 W. Wilson St., Madison, WI 53703</td>
</tr>
<tr>
<td>Wyoming Department of Agriculture</td>
<td>2219 Carey Ave., Cheyenne, WY 82002</td>
</tr>
<tr>
<td>Washington D.C. Department of Health</td>
<td>825 N. Capitol St., NE 3rd floor, Washington, DC 20002</td>
</tr>
<tr>
<td>Mail Address</td>
<td>Email</td>
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<tr>
<td>----------------------------------</td>
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</tr>
<tr>
<td>P.O. Box 303017 Montgomery 36130-3017</td>
<td><a href="mailto:jlofgren@adph.state.al.us">jlofgren@adph.state.al.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Jeff.Warner@alaska.gov">Jeff.Warner@alaska.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:WeissJ@azdhs.gov">WeissJ@azdhs.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:dennis.berry@arkansas.gov">dennis.berry@arkansas.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Benson.Yee@cdph.ca.gov">Benson.Yee@cdph.ca.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Susan.Parachini@state.co.us">Susan.Parachini@state.co.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:matthew.carter@ct.gov">matthew.carter@ct.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:susan.shore@state.de.us">susan.shore@state.de.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:roberta.hammond@doh.state.fl.us">roberta.hammond@doh.state.fl.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:cmshuler@dhr.state.ga.us">cmshuler@dhr.state.ga.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Guzzlep@dhw.Idaho.gov">Guzzlep@dhw.Idaho.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Iori.saathoff@illinois.gov">Iori.saathoff@illinois.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Igranzow@isdh.IN.gov">Igranzow@isdh.IN.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:pquiniis@idph.state.IA.us">pquiniis@idph.state.IA.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:saanderson@kdhe.state.ks.us">saanderson@kdhe.state.ks.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:davide.jones@ky.gov">davide.jones@ky.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:rratard@dhh.la.gov">rratard@dhh.la.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:anthony.yartel@maine.gov">anthony.yartel@maine.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Achu@dhmh.state.md.us">Achu@dhmh.state.md.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:tara.harris@state.ma.us">tara.harris@state.ma.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:stobierskim@michigan.gov">stobierskim@michigan.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:kirk.smith@state.mn.us">kirk.smith@state.mn.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:JoAnn.Rudroff@dhhss.mo.gov">JoAnn.Rudroff@dhhss.mo.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:sheryl.hand@msdh.state.ms.us">sheryl.hand@msdh.state.ms.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:tdamrow@mt.gov">tdamrow@mt.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:dennis.leschinsky@dhss.ne.gov">dennis.leschinsky@dhss.ne.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:rsowacksky@health.nv.gov">rsowacksky@health.nv.gov</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:jjwelch@dhhs.state.nh.us">jjwelch@dhhs.state.nh.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:michelle.malavet@doh.state.nj.us">michelle.malavet@doh.state.nj.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:christina.ewers@state.nm.us">christina.ewers@state.nm.us</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:david.bergmire-sweat@ncmail.net">david.bergmire-sweat@ncmail.net</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:jgoplin@nd.gov">jgoplin@nd.gov</a></td>
</tr>
<tr>
<td>Email Address</td>
<td>Phone 1</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td><a href="mailto:mma02@health.state.ny.us">mma02@health.state.ny.us</a></td>
<td>(518) 473-4439</td>
</tr>
<tr>
<td><a href="mailto:Ellen.Salehi@odh.ohio.gov">Ellen.Salehi@odh.ohio.gov</a></td>
<td>(614) 466-0231</td>
</tr>
<tr>
<td><a href="mailto:carmenfc@health.ok.gov">carmenfc@health.ok.gov</a></td>
<td>(405) 271-4060</td>
</tr>
<tr>
<td><a href="mailto:william.e.keene@state.or.us">william.e.keene@state.or.us</a></td>
<td>(971) 673-1111</td>
</tr>
<tr>
<td><a href="mailto:vurdaneta@state.pa.us">vurdaneta@state.pa.us</a></td>
<td>(717) 787-3350</td>
</tr>
<tr>
<td><a href="mailto:Utpala.Bandy@health.ri.gov">Utpala.Bandy@health.ri.gov</a></td>
<td>(401) 222-2432</td>
</tr>
<tr>
<td><a href="mailto:schlegh@dhec.sc.gov">schlegh@dhec.sc.gov</a></td>
<td>(803) 898-3838</td>
</tr>
<tr>
<td><a href="mailto:nick.hill@state.sd.us">nick.hill@state.sd.us</a></td>
<td>(605) 773-6528</td>
</tr>
<tr>
<td><a href="mailto:ryan.mason@state.tn.us">ryan.mason@state.tn.us</a></td>
<td>(615) 741-6075</td>
</tr>
<tr>
<td><a href="mailto:deborah.marlow@dshs.state.tx.us">deborah.marlow@dshs.state.tx.us</a></td>
<td>(512) 834-6753</td>
</tr>
<tr>
<td><a href="mailto:dracassi@utah.gov">dracassi@utah.gov</a></td>
<td>(801) 538-6191</td>
</tr>
<tr>
<td><a href="mailto:mspayne@vdh.state.vt.us">mspayne@vdh.state.vt.us</a></td>
<td>(802) 951-1220</td>
</tr>
<tr>
<td><a href="mailto:seth.levine@vdh.virginia.gov">seth.levine@vdh.virginia.gov</a></td>
<td>(804) 864-8116</td>
</tr>
<tr>
<td><a href="mailto:kathryn.macdonald@doh.wa.gov">kathryn.macdonald@doh.wa.gov</a></td>
<td>(206) 418-5432</td>
</tr>
<tr>
<td><a href="mailto:suzannewilson@wvdhhr.org">suzannewilson@wvdhhr.org</a></td>
<td>(304) 558-5358</td>
</tr>
<tr>
<td><a href="mailto:archejr@dhfs.state.wi.us">archejr@dhfs.state.wi.us</a></td>
<td>(608) 267-9009</td>
</tr>
<tr>
<td><a href="mailto:dfinke@state.wy.us">dfinke@state.wy.us</a></td>
<td>(307) 777-6587</td>
</tr>
<tr>
<td><a href="mailto:dina.passman@dc.gov">dina.passman@dc.gov</a></td>
<td>(202) 442-8141</td>
</tr>
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</table>
## Interdisciplinary Foodborne Illness Training Committee
### Foodborne Epi State Trainings
### NATIONAL RESTAURANT ASSOCIATION & CFP SURVEY QUESTIONNAIRE ANSWERS

<table>
<thead>
<tr>
<th>1. Methods of Training</th>
<th></th>
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<tbody>
<tr>
<td>1A. Tell us some of the ways your health department officials can be trained in foodborne outbreak response</td>
<td></td>
</tr>
<tr>
<td><strong>Alabama</strong></td>
<td>meetings/classroom formats, FDA online ORA-U section on Foodborne Illness Investigation</td>
</tr>
<tr>
<td><strong>Alaska</strong></td>
<td>ORAU - in-service training &amp; on-the-job training</td>
</tr>
<tr>
<td><strong>Arizona</strong></td>
<td>Counties- foodborne disease &amp; outbreak investigation training annually States &amp; Counties- online courses through Epi AIDS</td>
</tr>
<tr>
<td><strong>Delaware</strong></td>
<td>Initial training- completion of FDA course &quot;Fundamentals of Foodborne Illness Investigation&quot; or completion of the course offered by the EPI branch public health schools &amp; CDC, CDC training studies Refresher training- annual refresher training by the FDA or EPI branch, take part in actual investigation to count for annual refresher training requirement</td>
</tr>
<tr>
<td><strong>Georgia</strong></td>
<td>Notifiable Disease Epidemiology Section, District Epidemiologists</td>
</tr>
<tr>
<td><strong>Hawaii</strong></td>
<td>FDA training branch, ORAU online courses, supervisors/senior sanitarians, state disease investigation branch</td>
</tr>
<tr>
<td><strong>Idaho</strong></td>
<td>FDA foodborne outbreak course (2003), NEHA's Epi-Ready course (2006), Office of Epidemiology hold semi-annual training conferences (fall/spring)</td>
</tr>
<tr>
<td><strong>Illinois</strong></td>
<td>Foodborne and Waterborne investigations manual, Sanitarian training and Orientation course</td>
</tr>
<tr>
<td><strong>Indiana</strong></td>
<td>Epi-Ready training, On-the-job training</td>
</tr>
<tr>
<td><strong>Kentucky</strong></td>
<td>NEHA- Epi-Ready training, Epi rapid responder training- refresher &amp; conference, Food Core training</td>
</tr>
<tr>
<td><strong>Louisiana</strong></td>
<td>Field Epidemiology training, Yearly Video conference, On-the-job training, &quot;Learnlink&quot; sessions</td>
</tr>
<tr>
<td><strong>Maryland</strong></td>
<td>Outbreak investigation training course taught by state epidemiologists, On-the-job training for state epidemiologists</td>
</tr>
<tr>
<td><strong>Massachusetts</strong></td>
<td>&quot;Conducting Foodborne Illness Investigations&quot; course, HAACP training series</td>
</tr>
<tr>
<td><strong>Missouri</strong></td>
<td>Aseptic technique, Principles of Epidemiology, Each regional office may have specific training each year on foodborne outbreaks</td>
</tr>
<tr>
<td><strong>Mississippi</strong></td>
<td>AFDO &amp; ORA- applications course, FDA state training branch- Foodborne investigation course, foodborne illness policy, District FBI teams</td>
</tr>
<tr>
<td><strong>Montana</strong></td>
<td>FDA course 325-state level, ORA-U courses-local level</td>
</tr>
<tr>
<td><strong>Nebraska</strong></td>
<td>Applied Epidemiology Course, Food Safety Workgroup/Nebraska Environmental Health Assoc. Annual Education Meeting</td>
</tr>
<tr>
<td><strong>North Dakota</strong></td>
<td>FDA- food inspector training, ND Environmental Health Assoc. annual meeting, CDC, Epi-Ready training</td>
</tr>
<tr>
<td><strong>Ohio</strong></td>
<td>BEH offers a 3 week course to new hired sanitarians, FDA Foodborne Disease Investigations Class, BEH organizes the Midwest workshop conference, BIDC personnel speak at regional and statewide meetings of the Ohio EHA, BIDC give training sessions on outbreak investigations to LHD</td>
</tr>
<tr>
<td><strong>Tennessee</strong></td>
<td>Workshop or tabletop exercise, Review of the TN outbreak manual</td>
</tr>
<tr>
<td><strong>Texas</strong></td>
<td>FDA ORA-U training program, FDA face to face foodborne illness investigation training courses, jurisdictional in-service training classes</td>
</tr>
<tr>
<td><strong>Vermont</strong></td>
<td>Centralized food inspection program so training variability is not an issue in Vermont</td>
</tr>
<tr>
<td><strong>Virginia</strong></td>
<td>Orientation training provided for new health staff members-covering foodborne outbreak investigations, multi-disciplinary foodborne outbreak training provided regionally around the state</td>
</tr>
<tr>
<td>State</td>
<td>Training Details</td>
</tr>
<tr>
<td>-----------</td>
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</tr>
<tr>
<td>Wisconsin</td>
<td>CDS distributes a food &amp; waterborne disease manual, staff meetings, FDA trainings, ORA University</td>
</tr>
<tr>
<td>Wyoming</td>
<td>FDA/ORA-U classes, in class training by FDA personnel, training from state health dept. epidemiologists</td>
</tr>
</tbody>
</table>

**1B. How often does this training occur?**

<table>
<thead>
<tr>
<th>State</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>ORA-U-one time for certification, meetings/classroom format is sporadic</td>
</tr>
<tr>
<td>Alaska</td>
<td>ORAU- upon hire into the program, In-service training- annually, On the job training- ongoing</td>
</tr>
<tr>
<td>Arizona</td>
<td>most training is ad hoc, but annually</td>
</tr>
<tr>
<td>Delaware</td>
<td>Refresher training occurs annually, On the job is continuously, Practice investigation is biennially, at a minimum</td>
</tr>
<tr>
<td>Georgia</td>
<td>Varies, full day training-annually, monthly &amp; quarterly trainings are also offered</td>
</tr>
<tr>
<td>Hawaii</td>
<td>whenever training is provided by FDA-new employees</td>
</tr>
<tr>
<td>Idaho</td>
<td>varies, state conference is held twice each year</td>
</tr>
<tr>
<td>Illinois</td>
<td>FBI &amp; WBI manual training is taught as changes are made, new sanitarian training is twice each year</td>
</tr>
<tr>
<td>Indiana</td>
<td>Epi-Ready- 5-6 yrs, as outbreaks occur or with our field reps one-on-one training</td>
</tr>
<tr>
<td>Kentucky</td>
<td>Annually</td>
</tr>
<tr>
<td>Louisiana</td>
<td>Field Epidemiology training-twice a yr, Video conference-annually, On-the-job training- annually, &quot;Learnlink&quot; sessions-every two weeks</td>
</tr>
<tr>
<td>Maryland</td>
<td>Outbreak investigation training-annually, On-the-job training-as needed</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>training is twice a yr or as needed</td>
</tr>
<tr>
<td>Missouri</td>
<td>Aseptic technique- 8 times at different locations around the state, Principles of Epidemiology-anytime with internet access, Principles of Epidemiology class- 2-3x/yr</td>
</tr>
<tr>
<td>Mississippi</td>
<td>annually, more often with new staff, On-going monitoring and review</td>
</tr>
<tr>
<td>Montana</td>
<td>3-5 yrs</td>
</tr>
<tr>
<td>Nebraska</td>
<td>Applied Epidemiology Course-annually, Food Safety Workgroup/Nebraska EHA annual Education Meeting-biannually</td>
</tr>
<tr>
<td>North Dakota</td>
<td>FDA-2 yrs, CDC-annually, Epi-Ready- annually, Food Inspector training-3 yrs, ND EHA meeting- annually</td>
</tr>
<tr>
<td>Ohio</td>
<td>BEH-biannually, FDA Foodborne Disease Investigations Class-annually, Midwest workshop conference-annually, BIDC personnel speak at regional and statewide meetings-</td>
</tr>
<tr>
<td>Tennessee</td>
<td>annually, BIDC training sessions- as requested</td>
</tr>
<tr>
<td>Texas</td>
<td>ORA-U training- as needed basis, FDA face to face- 3yr cycle</td>
</tr>
<tr>
<td>Vermont</td>
<td>Epidemiology and field epi program staff-annual training, depends on materials offered by FDA &amp; ORA-U</td>
</tr>
<tr>
<td>Virginia</td>
<td>orientation training- 1x for new hires, Multi-disciplinary foodborne outbreak training- regionally around the state-6 courses/yr</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>annually</td>
</tr>
<tr>
<td>Wyoming</td>
<td>annually</td>
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</table>

**1C. Who is trained?**

<table>
<thead>
<tr>
<th>State</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>Sanitarians, Nurses, Lab personnel</td>
</tr>
<tr>
<td>Alaska</td>
<td>Food safety inspection officers (FSIO)</td>
</tr>
<tr>
<td>Arizona</td>
<td>Epidemiologists, Nurses, Sanitarians</td>
</tr>
<tr>
<td>Delaware</td>
<td>Environmental Health Field Services team, Epidemiology team, Public Health Laboratory</td>
</tr>
<tr>
<td>Georgia</td>
<td>Epidemiologists environmental health specialists, communicable disease specialists</td>
</tr>
<tr>
<td>Hawaii</td>
<td>Sanitarians, Food &amp; Drug Inspectors</td>
</tr>
<tr>
<td>Idaho</td>
<td>Epidemiologists, Environmental health staff</td>
</tr>
<tr>
<td>State</td>
<td>Roles and Responsibilities</td>
</tr>
<tr>
<td>------------</td>
<td>-------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Illinois</td>
<td>Local health dept inspectors, Illinois Dept of Public Health Field Staff, Epidemiologists, Env. Health Directors, Long Term Care Surveyors, New Sanitarians</td>
</tr>
<tr>
<td>Indiana</td>
<td>State food program staff, Env. Health dept, Nurses</td>
</tr>
<tr>
<td>Kentucky</td>
<td>Nurses, epidemiologists, environmentalists, lab, doctors, planners</td>
</tr>
<tr>
<td>Louisiana</td>
<td>Sanitarians, nurses, clerks, lab technicians, disease investigation specialists</td>
</tr>
<tr>
<td>Maryland</td>
<td>Local health dept. staff, new state health dept. epidemiologists working for the Division of Outbreak investigation</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>Local health dept health officials/inspectors, state inspectors/staff</td>
</tr>
<tr>
<td>Missouri</td>
<td>Environmental health specialist, communicable disease nurses, epidemiology specialists, local health administrators</td>
</tr>
<tr>
<td>Mississippi</td>
<td>New staff in the Food program, Epi nurses in the Districts, all environmentalists with responsibility for Food</td>
</tr>
<tr>
<td>Montana</td>
<td>Local Environmental health specialists, Public health nurses</td>
</tr>
<tr>
<td>Nebraska</td>
<td>Surveillance coordinators, epidemiologists, public health nurses, environmental health specialists</td>
</tr>
<tr>
<td>North Dakota</td>
<td>Foodborne epi, food inspectors at local, regional, state &amp; IHS, agriculture inspectors</td>
</tr>
<tr>
<td>Ohio</td>
<td>Sanitarians, epidemiologists, nurses</td>
</tr>
<tr>
<td>Tennessee</td>
<td>Environmentalist, Supervisor in the state</td>
</tr>
<tr>
<td>Texas</td>
<td>Food safety inspection officials, epidemiologists</td>
</tr>
<tr>
<td>Vermont</td>
<td>all Sanitarian staff</td>
</tr>
<tr>
<td>Virginia</td>
<td>Environmental health staff, communicable disease staff, Virginia dept of Agriculture, Consumer Services, food &amp; dairy inspectors</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>Field inspectors, contract inspectors</td>
</tr>
<tr>
<td>Wyoming</td>
<td>Consumer Health services of Wyoming dept of Agriculture, Local health dept staff</td>
</tr>
</tbody>
</table>

### 2. Frequency of Training

#### 2A. For each of the ways identified (name each way), how often is that training provided?

<table>
<thead>
<tr>
<th>State</th>
<th>Frequency of Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>ORA-U is one time for certification, meeting/classroom is sporadic</td>
</tr>
<tr>
<td>Alaska</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Arizona</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Delaware</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Georgia</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Hawaii</td>
<td>when provided by FDA and as deemed necessary</td>
</tr>
<tr>
<td>Idaho</td>
<td>refer to 1a &amp; 1b</td>
</tr>
<tr>
<td>Illinois</td>
<td>ORA-U-all times, New sanitarian training- 2x/yr, FDA State Training Branch-5 yrs, IDPH FBI &amp; WBI manual training-5 yrs</td>
</tr>
<tr>
<td>Indiana</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Kentucky</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Louisiana</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Maryland</td>
<td>one training course per yr consisting of didactic lectures &amp; practical exercises, As needed for new hires for state level epidemiologists</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>Foodborne illness investigation &amp; HAACP training-2x/yr or as needed basis</td>
</tr>
<tr>
<td>Missouri</td>
<td>refer to 1b</td>
</tr>
<tr>
<td>Mississippi</td>
<td>Applications course is done annually &amp; semi-annually when needed, In-service provided in each District at least 1x/yr, Web based complaint system is monitored each month</td>
</tr>
<tr>
<td>Montana</td>
<td>3-5 yrs</td>
</tr>
<tr>
<td>Nebraska</td>
<td>Applied Epidemiology Course-once, Food Safety Workgroup/Wyoming Environmental Health Association</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>Annual Education Meeting-unlimited</td>
</tr>
<tr>
<td>Wyoming</td>
<td></td>
</tr>
</tbody>
</table>
North Dakota- refer to 1b
Ohio- refer to 1b
Tennessee- refer to 1b
Texas- refer to 1b, Texas dept of State Health Services has info regarding the local jurisdiction courses
Vermont- refer to 1b
Virginia- Orientation-one time for new hires, Regional training-six times
Wisconsin- Communicable Disease Section food & waterborne disease manual-daily basis, Staff meeting-statewide annual meeting,
FDA trainings-whenever FDA has time,
ORAU-available at any time
Wyoming- FDA/orau- once for new employees, FDA personnel-annually, State Health Dept. Epidemiologists-annually

2B. Approximately how many people take advantage of this training each year?

Alabama- ORAU-50, Meeting/Classroom-varies
Alaska- 27
Arizona- 40
Delaware- 30-50
Georgia- Epidemiologists & communicable disease specialists-18-45, Environmental health specialists-20-40
Hawaii- average of 8, but when FDA training classes are provided-55+
Idaho- varies, but training courses-20-50, conferences-35-50
Illinois- 60+
Indiana- Not enough, the ones that are interested will seek out the training and the ones that are not don't attend any kind of training offered
Kentucky- Epi-Ready training-40, Epi rapid responder training-50, Food Core training-20
Louisiana- Field Epidemiology training-20-40, On the job training-25
Maryland- Outbreak investigation training-40, On the job training-variable
Massachusetts- Foodborne illness training-50, HACCP training-70
Missouri- Aseptic training-200 staff, Principles of Epidemiology class-25
Mississippi- Applications course-20-25, In-service-130, Web based training-continuous review process
Montana- 80
Nebraska- 30-40
North Dakota- One foodborne Epi & about 20 food inspectors
Ohio- BEH offers a 3 week course to new hired sanitarians- 15, FDA Foodborne Disease Investigations Class-97, BEH organizes the Midwest workshop conference-235,
BIDC personnel speak at regional and statewide meetings of the Ohio EHA-100, BIDC give training sessions on outbreak investigations to local health dept-variable
Tennessee- 55
Texas- ORAU training-6, FDA face to face training-50
Vermont- 10 staff from food and lodging program
Virginia- Regional foodborne outbreak training-40-60, EH staff at the course would range from a quarter to a half of the entire class
Wisconsin- Statewide inspector meeting-100+
Wyoming- 30

2C. Are health department officials requested to share the training with other colleagues at the state or local level?
<table>
<thead>
<tr>
<th>State</th>
<th>Does your state utilize foodborne outbreak training provided by someone else?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>Yes</td>
</tr>
<tr>
<td>Alaska</td>
<td>No</td>
</tr>
<tr>
<td>Arizona</td>
<td>Yes</td>
</tr>
<tr>
<td>Delaware</td>
<td>Yes</td>
</tr>
<tr>
<td>Georgia</td>
<td>Yes</td>
</tr>
<tr>
<td>Hawaii</td>
<td>No</td>
</tr>
<tr>
<td>Idaho</td>
<td>Yes</td>
</tr>
<tr>
<td>Illinois</td>
<td>No</td>
</tr>
<tr>
<td>Indiana</td>
<td>Yes</td>
</tr>
<tr>
<td>Kentucky</td>
<td>Yes</td>
</tr>
<tr>
<td>Louisiana</td>
<td>Yes</td>
</tr>
<tr>
<td>Maryland</td>
<td>Yes, no</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>No, but can if they choose to do so</td>
</tr>
<tr>
<td>Missouri</td>
<td>No</td>
</tr>
<tr>
<td>Mississippi</td>
<td>Yes</td>
</tr>
<tr>
<td>Montana</td>
<td>Yes</td>
</tr>
<tr>
<td>Nebraska</td>
<td>N/A</td>
</tr>
<tr>
<td>North Dakota</td>
<td>Yes</td>
</tr>
<tr>
<td>Ohio</td>
<td>Yes</td>
</tr>
<tr>
<td>Tennessee</td>
<td>No</td>
</tr>
<tr>
<td>Texas</td>
<td>Yes</td>
</tr>
<tr>
<td>Vermont</td>
<td>Yes, in other areas of the dept., but not in the food program</td>
</tr>
<tr>
<td>Virginia</td>
<td>No</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>N/A</td>
</tr>
<tr>
<td>Wyoming</td>
<td>Yes</td>
</tr>
</tbody>
</table>

3. Materials Used to Train

3A. Does your state utilize foodborne outbreak training provided by someone else?

<table>
<thead>
<tr>
<th>State</th>
<th>Does your state utilize foodborne outbreak training provided by someone else?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>Yes</td>
</tr>
<tr>
<td>Alaska</td>
<td>Yes, ORAU</td>
</tr>
<tr>
<td>Arizona</td>
<td>One training session from DA ORA-U</td>
</tr>
<tr>
<td>Delaware</td>
<td>Yes</td>
</tr>
<tr>
<td>Georgia</td>
<td>N/A</td>
</tr>
<tr>
<td>Hawaii</td>
<td>ORAU online courses, materials provided by FDA</td>
</tr>
<tr>
<td>Idaho</td>
<td>Yes</td>
</tr>
<tr>
<td>Illinois</td>
<td>ORA-U &amp; FDA State Training Branch</td>
</tr>
<tr>
<td>Indiana</td>
<td>NEHA, CDC and our own</td>
</tr>
<tr>
<td>Kentucky</td>
<td>Yes</td>
</tr>
<tr>
<td>Louisiana</td>
<td>Most training is home grown</td>
</tr>
<tr>
<td>Maryland</td>
<td>Yes</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>Yes</td>
</tr>
<tr>
<td>State</td>
<td>Training Details</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Missouri</td>
<td>yes, we use FDA, ORA, &amp; ORA-U, AFDO, CDC</td>
</tr>
<tr>
<td>Mississippi</td>
<td>Our staff, Food staff, as well as the nine public health districts, EPI staff, Lab personnel</td>
</tr>
<tr>
<td>Montana</td>
<td>no</td>
</tr>
<tr>
<td>Nebraska</td>
<td>Food Safety Workgroup/Nebraska Environmental Health Association Annual Education Meeting-NEHA</td>
</tr>
<tr>
<td>North Dakota</td>
<td>no</td>
</tr>
<tr>
<td>Ohio</td>
<td>no</td>
</tr>
<tr>
<td>Tennessee</td>
<td>no</td>
</tr>
<tr>
<td>Texas</td>
<td>ORA-U &amp; FDA’s Foodborne Illness Investigation Course</td>
</tr>
<tr>
<td>Vermont</td>
<td>yes</td>
</tr>
<tr>
<td>Virginia</td>
<td>no</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>ORAU-individual basis, FDA when we can get them to visit Wisconsin to conduct training</td>
</tr>
<tr>
<td>Wyoming</td>
<td>yes</td>
</tr>
</tbody>
</table>

### 3B. If so, who uses this training?

<table>
<thead>
<tr>
<th>State</th>
<th>Who Uses the Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>Public health Environmentalists</td>
</tr>
<tr>
<td>Alaska</td>
<td>Food Safety Inspection officers (FSIO)</td>
</tr>
<tr>
<td>Arizona</td>
<td>Five state employees &amp; 25 local health officials from both environmental &amp; epidemiology</td>
</tr>
<tr>
<td>Delaware</td>
<td>Foodborne Epidemiologist</td>
</tr>
<tr>
<td>Georgia</td>
<td>N/A</td>
</tr>
<tr>
<td>Hawaii</td>
<td>Inspectional staff, Food safety educators</td>
</tr>
<tr>
<td>Idaho</td>
<td>Staff of the 7 district health departments</td>
</tr>
<tr>
<td>Indiana</td>
<td>Local environmentalists, Nurses</td>
</tr>
<tr>
<td>Kentucky</td>
<td>State and local health depts.</td>
</tr>
<tr>
<td>Louisiana</td>
<td>N/A</td>
</tr>
<tr>
<td>Maryland</td>
<td>Local health depts.</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>MA local and state food safety regulatory officials</td>
</tr>
<tr>
<td>Missouri</td>
<td>Communicable disease staff, environmental health specialists, epidemiology specialist</td>
</tr>
<tr>
<td>Mississippi</td>
<td>Our staff, Food staff, as well as the nine public health districts, EPI staff, Lab personnel</td>
</tr>
<tr>
<td>Montana</td>
<td>N/A</td>
</tr>
<tr>
<td>Nebraska</td>
<td>Food Safety Workgroup/Nebraska Environmental Health Assoc. Annual Education Meeting</td>
</tr>
<tr>
<td>North Dakota</td>
<td>N/A</td>
</tr>
<tr>
<td>Ohio</td>
<td>N/A</td>
</tr>
<tr>
<td>Tennessee</td>
<td>N/A</td>
</tr>
<tr>
<td>Texas</td>
<td>New retail food inspectors take the ORA-U course within 18 months of date of hire, training officers (FDA &amp; State) for the local jurisdictions use the training</td>
</tr>
<tr>
<td>Vermont</td>
<td>Sanitarian staff</td>
</tr>
<tr>
<td>Virginia</td>
<td>N/A</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>State &amp; local health inspectors</td>
</tr>
<tr>
<td>Wyoming</td>
<td>refer to 1c</td>
</tr>
</tbody>
</table>

### 3C. Approximately how many professionals in your state are trained in this/each fashion each year?
<table>
<thead>
<tr>
<th>State</th>
<th>Number of Participants</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>- ORAU-50</td>
<td></td>
</tr>
<tr>
<td>Alaska</td>
<td>- 20 in our program &amp; 7 in the Muni</td>
<td></td>
</tr>
<tr>
<td>Arizona</td>
<td>- 30 last year</td>
<td></td>
</tr>
<tr>
<td>Delaware</td>
<td>- Not sure, only a few</td>
<td></td>
</tr>
<tr>
<td>Georgia</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Hawaii</td>
<td>- 8</td>
<td></td>
</tr>
<tr>
<td>Idaho</td>
<td>- refer to 2b</td>
<td></td>
</tr>
<tr>
<td>Illinois</td>
<td>- Unknown, no way to track the specific training that they are obtaining</td>
<td></td>
</tr>
<tr>
<td>Indiana</td>
<td>- Random, 100 people attend when the training is provided</td>
<td></td>
</tr>
<tr>
<td>Kentucky</td>
<td>- refer to 2b</td>
<td></td>
</tr>
<tr>
<td>Louisiana</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Maryland</td>
<td>- 40</td>
<td></td>
</tr>
<tr>
<td>Massachusetts</td>
<td>300</td>
<td></td>
</tr>
<tr>
<td>Missouri</td>
<td>- Varies, 250-275</td>
<td></td>
</tr>
<tr>
<td>Mississippi</td>
<td>- 130</td>
<td></td>
</tr>
<tr>
<td>Montana</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Nebraska</td>
<td>- 30</td>
<td></td>
</tr>
<tr>
<td>North Dakota</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Ohio</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Tennessee</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Texas</td>
<td>- N/A, no way of determining how many individuals in the state utilize the training provided</td>
<td></td>
</tr>
<tr>
<td>Vermont</td>
<td>- 10</td>
<td></td>
</tr>
<tr>
<td>Virginia</td>
<td>- Orientation-varies, Regional training- 250-300</td>
<td></td>
</tr>
<tr>
<td>Wisconsin</td>
<td>- 100+</td>
<td></td>
</tr>
<tr>
<td>Wyoming</td>
<td>- 30</td>
<td></td>
</tr>
<tr>
<td>Alabama</td>
<td>- yes</td>
<td></td>
</tr>
<tr>
<td>Alaska</td>
<td>- All materials are on the ORAU website</td>
<td></td>
</tr>
<tr>
<td>Arizona</td>
<td>- yes, but nothing unique or innovative</td>
<td></td>
</tr>
<tr>
<td>Delaware</td>
<td>- yes</td>
<td></td>
</tr>
<tr>
<td>Georgia</td>
<td>- N/A</td>
<td></td>
</tr>
<tr>
<td>Hawaii</td>
<td>- Sorry, no formal training is provided by the state</td>
<td></td>
</tr>
<tr>
<td>Idaho</td>
<td>- Information is provided by the office of Epidemiology &amp; is topic specific for the semi-annual conferences</td>
<td></td>
</tr>
<tr>
<td>Illinois</td>
<td>- yes</td>
<td></td>
</tr>
<tr>
<td>Indiana</td>
<td>- yes</td>
<td></td>
</tr>
<tr>
<td>Kentucky</td>
<td>- yes</td>
<td></td>
</tr>
<tr>
<td>Louisiana</td>
<td>- yes</td>
<td></td>
</tr>
<tr>
<td>Maryland</td>
<td>- no</td>
<td></td>
</tr>
<tr>
<td>Massachusetts</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>State</td>
<td>Notes</td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>----------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Missouri</td>
<td>yes, Aseptic Technique &amp; Principles can be shared, on-line modules are made available to staff scheduled for the course, SPHL has developed a handbook on Foodborne disease</td>
<td></td>
</tr>
<tr>
<td>Mississippi</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>Montana</td>
<td>no state training course</td>
<td></td>
</tr>
<tr>
<td>Nebraska</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>North Dakota</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Ohio</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>Tennessee</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>Texas</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>Vermont</td>
<td>N/A, use materials already obtained from FDA</td>
<td></td>
</tr>
<tr>
<td>Virginia</td>
<td>yes, need to get permission from others for their sections</td>
<td></td>
</tr>
<tr>
<td>Vermont</td>
<td>yes, complaint form used jointly with Epidemiology</td>
<td></td>
</tr>
<tr>
<td>Virginia</td>
<td>refer to #3</td>
<td></td>
</tr>
<tr>
<td>Wisconsin</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>Wyoming</td>
<td>yes</td>
<td></td>
</tr>
</tbody>
</table>

4. If possible, we would like to receive any forms or descriptions you can provide that are used during an outbreak investigation. Are you willing to provide copies of such materials?

<table>
<thead>
<tr>
<th>State</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>yes, generic forms</td>
</tr>
<tr>
<td>Alaska</td>
<td>I could provide a copy of our data collection/interview form</td>
</tr>
<tr>
<td>Arizona</td>
<td>yes</td>
</tr>
<tr>
<td>Delaware</td>
<td>N/A</td>
</tr>
<tr>
<td>Georgia</td>
<td>N/A</td>
</tr>
<tr>
<td>Hawaii</td>
<td>yes</td>
</tr>
<tr>
<td>Idaho</td>
<td>Generally used CDC forms during an investigation</td>
</tr>
<tr>
<td>Illinois</td>
<td>yes</td>
</tr>
<tr>
<td>Indiana</td>
<td>yes</td>
</tr>
<tr>
<td>Kentucky</td>
<td>yes</td>
</tr>
<tr>
<td>Louisiana</td>
<td>yes</td>
</tr>
<tr>
<td>Maryland</td>
<td>yes</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>yes</td>
</tr>
<tr>
<td>Missouri</td>
<td>Materials may be shared, a customized questionnaire may be developed for an outbreak</td>
</tr>
<tr>
<td>Mississippi</td>
<td>yes</td>
</tr>
<tr>
<td>Montana</td>
<td>Uses the CDC toolbox</td>
</tr>
<tr>
<td>Nebraska</td>
<td>N/A</td>
</tr>
<tr>
<td>North Dakota</td>
<td>yes</td>
</tr>
<tr>
<td>Ohio</td>
<td>Subject to supervisor decision</td>
</tr>
<tr>
<td>Tennessee</td>
<td>yes</td>
</tr>
<tr>
<td>Texas</td>
<td>yes</td>
</tr>
<tr>
<td>Vermont</td>
<td>yes, complaint form used jointly with Epidemiology</td>
</tr>
<tr>
<td>Virginia</td>
<td>refer to #3</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>yes</td>
</tr>
<tr>
<td>Wyoming</td>
<td>yes</td>
</tr>
</tbody>
</table>
Draft National Voluntary Environmental Assessment Information System: Strengthening the Role of Food-Safety Programs in Foodborne Disease Surveillance

Abstract

This document proposes and describes a national information system of environmental factors to foodborne outbreaks for review and comment by technical experts. Many information systems used to support public health surveillance activities were developed for other purposes. Food-control authorities who manage retail foodservice regulatory programs are uniquely positioned to develop and use an information system of environmental factors to foodborne outbreaks that can identify environmental factors that can be monitored by food-control authorities to prevent or reduce the risk for foodborne illness outbreaks. Such a system can also support the existing foodborne disease outbreak surveillance system in the United States. If designed using the framework of public health surveillance systems as a model, such an information system could provide a more holistic view of foodborne disease outbreaks and provide a critical data source needed to begin to measure the impact of food-safety programs.
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Introduction

Background
With an estimated 76 million illnesses, 325,000 hospitalizations, and 5,000 deaths in the United States each year, foodborne illness is a significant public health issue (Mead et al. 1999). In addition to the number of illnesses, hospitalizations, and deaths caused by foodborne disease, the annual cost for six foodborne bacterial pathogens has been estimated as $6.7 billion (Buzby et al. 1996).

A review of foodborne outbreaks occurring in 1998 and 1999 in the seven states participating in active foodborne disease surveillance through the Foodborne Disease Active Surveillance Network (FoodNet) revealed that 66% (222 of 336 outbreaks) were associated with restaurants and an additional 9% (30 outbreaks) were associated with catered events (Jones et al. 2004a). A number of case control studies involving sporadic foodborne disease cases have found that people with foodborne illness were more likely to have eaten outside the home, specifically in restaurants or other commercial foodservice establishments, than were non-ill controls (Friedman et al. 2004; Hennessy T 1998; Kassenborg et al. 1998, 2004; Kimura et al. 2004). Reviews of foodborne outbreaks reveal that factors identified as contributing to those outbreaks include factors found in commercial foodservice establishments (e.g., poor personal hygiene, time/temperature abuse of foods) (B Bryan 1978, 1988).

According to the 2008 National Restaurant Association (NRA) industry overview, 945,000 restaurant locations will have more than 70 billion meal and snack occasions (National
Restaurant Association [NRA] 2007). In the United States, 44% of adults eat at a restaurant on a typical day (Jones et al. 2004). Although foodborne disease can be linked to many other points of final service—for example, the home—food handling policies and practices in restaurants and other commercial foodservice establishments provide the greatest opportunity to affect a larger number of people. Given the potential impact of poor policies or practices in commercial foodservice establishments and the findings from the studies described previously, commercial foodservice establishments play an important role in the epidemiology of foodborne disease.

Food-Safety Programs for Commercial Foodservice

Approximately 75 state and territorial agencies and approximately 3,000 local agencies assume the primary responsibility for preventing foodborne illness and licensing and inspecting retail foodservice establishments (Food and Drug Administration [FDA] 2005a). These establishments include restaurants, delicatessens, quick-service establishments, institutional food service (e.g., schools, daycare centers, hospitals), and temporary foodservice establishments (e.g., fairs, festivals). These food-safety programs collect data through their inspection programs; most aspects and uses of those data, such as frequency of collection, collection methods, and any regulatory action taken, are mandated by local or state statutes. These statutes or food codes are often based on a federal recommended model developed by the U.S. Food and Drug Administration (FDA) called Food Code (FC). The FC is developed using a collaborative process involving all stakeholders (local, state, tribal, territorial, federal, industry, consumer groups) through the Conference for Food Protection (CFP). Through the CFP, representatives from all stakeholder groups meet once every other year to consider and develop recommendations to the FDA with regard to FC content. Local, state, territorial, tribal, and federal agencies recognize the FC as the standard for regulatory requirements and although food-
safety programs may not adopt the FC in its entirety, much of it is adopted or incorporated into
food-safety programs in one form or another across the United States.

FDA and CFP members use many sources to develop the FC. Various epidemiologic data
sources including foodborne outbreak investigations provide the basis for recommendations
found in the FC. For instance, because foodborne outbreak investigations have repeatedly
identified five major factors related to employee behavior and preparation practices in retail
establishments, FDA developed control measures for the FC to address each of these factors
(Food and Drug Administration [FDA] 2005a):

- improper holding temperatures,
- inadequate or undercooking,
- contaminated equipment,
- food from unsafe sources,
- poor personal hygiene

In addition to these control measures, FDA developed five key public health interventions to
protect consumer health (Food and Drug Administration [FDA] 2005a):

- demonstration of knowledge,
- employee health controls,
- controlling hands as a vehicle of contamination,
- time and temperature parameters for controlling pathogens, and
- consumer advisory (for hygiene).
Food-control authorities who focus inspections on implementation of these control measures and public health interventions refer to their inspections as Hazard Analysis Critical Control Point (HACCP) inspections. Using factors that contribute to foodborne outbreaks to develop control and intervention measures and then targeting inspection focus toward implementation of these measures is the basis for one type of foodborne disease surveillance called hazard surveillance (Guzewich et al. 1997). During 2001, more than 2.5 million inspections of food establishments were conducted by state food safety programs (Smoak 2005). These inspections are based, at least to some degree, on FC control measures and intervention strategies.

Food-control authorities have a regulatory and public health mandate to prevent diseases that can be transmitted through food. This task is enormous because more than 200 known diseases are transmitted through food—causes include viruses, bacteria, parasites, toxins, metals, and prions—and the health impacts range from a mild inconvenience to death (Mead et al. 1999). The 2007 FDA Food Protection Plan outlines the increasing complexities associated with the food supply; although the plan outlines FDA’s challenges in assuring the safety of the food supply, the same challenges are reflected at the local and state levels (Food and Drug Administration [FDA] 2007). Challenges for food-control authorities’ at all governmental levels include

- an aging population that is more susceptible to foodborne illness,
- increased production and consumption of convenience foods,
- a shift from eating locally grown foods to eating foods grown across the globe, and
- additions to an ever-increasing list of diseases known to be transmitted by food.
Like all environmental public health service programs, food-safety programs exist within a public health framework that is often referred to as fragmented. For food-safety programs, this fragmentation begins with the organizational structure for food safety in this country. Food-safety responsibilities do not reside with a single agency at any government level but are scattered across a variety of federal, state, and local regulatory agencies that are often criticized for not adequately assuring the safety of the nation’s food supply. From the public health perspective, the most troubling challenge for food-control authorities is the fact that “public health surveillance and outbreak investigation programs have evolved independently from food safety programs, and current human health statistics address the questions of communicable disease control officials better than the questions of food control authorities” (International Commission on Microbiological Specifications for Foods [ICMSF] 2006).

Surveillance is the critical first step in the cycle of public health prevention (Allos et al. 2004).

**Foodborne Disease Surveillance**

In a four-part series of articles on foodborne disease surveillance, Guzewich, Bryan, and Todd (Bryan et al. 1997a, 1997b; Guzewich et al. 1997; Todd et al. 1997)

- describe the purpose and types of surveillance systems and networks
- summarize and present descriptive data and epidemiologic patterns,
- summarize and present data on vehicles and contributory factors, and
- describe dissemination and uses of surveillance data.
Medical and scientific literature provides little information or guidance on developing foodborne disease surveillance systems, improving presentation of tabular data, or using the data to improve food-safety programs (Guzewich et al. 1997). This series of articles on surveillance helped fill that void with an emphasis on the data to collect, its review and inclusion in a surveillance dataset, its presentation, and how it can be used to improve food-safety programs.

In the first article of the series, Guzewich et al. (1997) describes at least four types of foodborne disease surveillance—reports of incidents (includes outbreaks), laboratory isolation of pathogens from human beings, sentinel community studies, and hazard surveillance—all of which are currently under way in the United States in some form (Figure 1).

The Centers for Disease Control and Prevention (CDC) conducts surveillance of food-related diseases through 20 systems. Three of those systems are the key pillars of foodborne disease surveillance in the United States:

- **Foodborne Disease Outbreak Surveillance System (FDOSS)**: Data from foodborne disease outbreaks (FBDOs; defined as the occurrence of two or more cases of a similar illness resulting from the ingestion of a food in common) are reported through FDOSS to CDC by state, local, and territorial health departments (Lynch et al. 2006).
• FoodNet: FoodNet conducts active surveillance for seven bacterial and two parasitic
diseases to determine more precisely the frequency and severity of foodborne diseases in
the United States, monitor trends in specific foodborne diseases, and determine the
proportion of foodborne disease attributable to specific foods (Allos et al. 2004). FoodNet is a collaborative effort by CDC’s Emerging Infections Program, U.S.
Department of Agriculture’s (USDA’s) Food Safety Inspection Service, FDA, and nine
state health departments.

• PulseNet: PulseNet is a network of laboratories that are able to identify and electronically
share genetic DNA fingerprints of specific pathogens, enhancing the ability to detect,
investigate, and control geographically distant yet related foodborne outbreaks (MMWR
1999). PulseNet supports the activities of both FoodNet and FDOSS.

Independent as well as collectively, these surveillance systems have provided guidance to food
safety programs in their foodborne disease prevention efforts. For instance, these surveillance
systems have played a role in identifying healthy food animals as reservoirs of foodborne
pathogens, linking apparently unrelated illnesses with specific food vehicles, and identifying
food vehicles previously unassociated with foodborne illness (MMWR 1999). These systems
also represent three of the four types of foodborne disease surveillance systems as described by
Guzewich et al (1997): reports of incidence (outbreaks), laboratory isolation of pathogens from
human beings, and sentinel community studies.

The fourth type of foodborne disease surveillance, hazard surveillance, is the assessment of the
occurrence of, distribution of, and secular trends in the prevalence of hazards (e.g., toxic
chemical agents, physical agents, biomechanical stressors, and biologic agents) responsible for disease and injury (Guzewich et al. 1997). Although the authors stated that hazard surveillance is not commonly practiced for foodborne disease concerns, they concluded that it is suited for that purpose. At about the same time the four-part series of articles was written in 1997 (Bryan et al. 1997a, 1997b; Guzewich et al. 1997; Todd et al. 1997), food-safety control authorities had been in the midst of a shift from inspections based on general sanitation (a focus on cleanliness of floors, walls, and ceilings) to a focus on factors that have been previously associated with foodborne outbreaks, such as time/temperature abuse of foods and employee health. These factors are referred to collectively as contributing factors.

Today, as a result of FDA’s leadership through the CFP, the FC, the National Voluntary Retail Food Regulatory Program Standards, FDA’s periodic reports on the occurrence of foodborne illness risk factors, and the individual independent initiative of food-control authorities, the inspection focus of many food-safety programs has moved from basic sanitation to contributing factor-based inspections of foodservice establishments. Although this shift to contributing factor-based inspections is not by any means uniform across all food-safety programs, it does represent a significant step toward laying the ground work for a national hazard surveillance system of factors linked to foodborne outbreaks. In fact, a CFP committee was formed to explore electronic data capture and sharing of data from state and local inspection programs. The committee’s 2007 report to the CFP Executive Board revealed that approximately 74% of those responding to a survey of potential participants expressed some level of willingness to participate in sharing inspection data (Cannon and Lancaster 2007). If a data sharing arrangement evolves from this committee’s work, it could be a precursor to a national hazard surveillance system that could be
used along with other epidemiologic data sources to measure the impact of food-safety programs on foodborne disease (International Commission on Microbiological Specifications for Foods [ICMSF] 2006).

**Foodborne Disease Outbreak Surveillance**

In 2006, the International Commission on Microbiological Specifications for Foods (ICMSF) published a position paper to describe epidemiologic data that are useful for evaluating the public health impact of food safety control programs and to identify how epidemiologic data can be used in the evaluative process (International Commission on Microbiological Specifications for Foods [ICMSF] 2006). The position paper states that the collection, synthesis, and analysis of data from a variety of sources are required to evaluate food-safety control programs. Foodborne outbreak investigations are one of those sources. One of the key elements of foodborne outbreak investigations is to identify the suspect food and factors that contribute to foodborne transmission of specific pathogens. According to the position paper, these data elements are infrequently determined by human disease surveillance systems, and they are critical for food-safety program evaluation.

Since 1973, CDC has maintained FDOSS for collection and periodic reporting of data on the occurrence and causes of FBDOs in the United States (Lynch et al. 2006). This surveillance system represents an important source for information on foodborne outbreak investigations in the United States and it includes information on identified food vehicles and contributing factors. Data from this public health surveillance system influenced FDA’s development of control measures and intervention strategies for the FC. Until 1999, contributing factor data reported to CDC were reported in the five categories described earlier (improper holding temperatures,
inadequate or undercooking, contaminated equipment, food from unsafe sources, and poor personal hygiene; an ‘other’ category was also included). In October 1999, CDC revised the outbreak reporting form, expanding the range of food items, places, and contributing factors that could be reported (Lynch et al. 2006). There have been other efforts to improve FDOSS; for instance, beginning in 2001, foodborne outbreak reports could be submitted to CDC electronically (Lynch et al. 2006). The surveillance summary for 1998-2002 noted a substantial increase in the average annual number of outbreaks reported during that time period (Lynch et al. 2006). Although the majority (67%) of reports did not note an etiology, the proportion of outbreaks for which an etiology was determined increased during the reporting period from 28% in 1998 to 37% in 2002 (Lynch et al. 2006). Even with these improvements, in many of the FBDOs reported, the factors most important to food-safety programs, such as the implicated food vehicle or the factors that may have contributed to the outbreak, are missing or incomplete (Lynch et al. 2006).

Food-control officials are faced with a challenging mission, as are state and federal officials involved with foodborne outbreak surveillance. Two basic challenges for CDC are the fact that not all foodborne outbreaks are reported to CDC and balancing between the needs of FDOSS data users and the practical aspects of reporting.

The contributing factor category of data reported to FDOSS is a good example of the difficult balance among user needs, identification of data to include, willingness of officials to report, and accuracy of officials’ reports. Before October 1999, contributing factor data was reported and summarized into five categories. Although the information was used by food-control authorities,
the broad categories did not fully meet their needs. The 1997 articles by Bryan et al., Guzewich et al., and Todd et al. (Bryan et al. 1997a, 1997b; Guzewich et al. 1997; Todd et al. 1997) framed foodborne disease surveillance systems in terms of the key end user—those charged with foodborne disease prevention. One article was devoted to data on vehicles and contributory factors and described the value and limitation of these data as well as how they can be summarized and presented (Bryan et al. 1997b). The article included a recommended list of specific contributing factors to be reported. CDC incorporated these contributing factors into the new FDOSS reporting form in October 1999. An additional factor, glove-handed contact by handler/worker/preparer, was added. Clearly this was an effort by FDOSS staff to try to meet the needs of data users.

With rare exception, communicable disease control officials or foodborne outbreak surveillance officials from state and local health departments report data into the FDOSS. They gather information on contributing factors in outbreaks from the environmental assessments conducted by food-control officials, from their own environmental assessments, or through some combination of the two. Although it may seem that the new contributing factors require little explanation, they are a sophisticated listing of factors based on the known microbiologic characteristics of and symptoms produced by specific pathogens, toxins, chemicals, etc., and historical associations between known pathogens, etc, and specific food vehicles. These factors, whether they are reported based on etiology identification or vehicle identification—or both—cannot be identified via a food-safety program inspection as conducted on a day-to-day basis by food-control authorities. The process of identifying contributing factors has to be driven by first describing what and how events likely unfolded, rather than by identifying regulation violations.
Failures to implement regulatory requirements will come to light over the course of this process. Unfortunately, many food-control authorities fail to adjust their day-to-day regulatory inspection process to adequately conduct an environmental assessment in the course of a foodborne outbreak investigation; therefore, contributing factors are not adequately assessed and reported.

Although CDC adjusted the FDOSS reporting form to address the needs of system users with regard to contributing factor data, the change is not without controversy among those who report and use this information. There are questions about whether food-control authorities have the expertise to accurately identify the most likely contributing factors from among the now complicated list of factors. Some believe the contributing factor list is too complex for a surveillance system and should be removed in its entirety or returned to the pre-1999 abbreviated list.

A brief review of the contributing factors reported in the 1998-2002 foodborne outbreak surveillance summary by Lynch et al. (2006) provides a glimpse of the concerns regarding contributing factor data. According to this summary, 657 norovirus outbreaks were identified and reported to CDC from 1998 to 2002. When contributing factors were reported, contamination factors were identified in 312 outbreaks, proliferation factors were reported in 28 outbreaks, and survival factors were reported in 319 outbreaks. People are the only known reservoir for Norwalk virus (norovirus) (Benenson 1995). Its mode of transmission is fecal-oral; the most likely factors contributing to norovirus outbreaks are infected persons touching ready-to-eat foods; shellfish harvested from sewage polluted waters; inadequate sewage disposal; and use of

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1 More than one contributing factor can be reported in any one outbreak. Contamination factors introduce or otherwise permit contamination. Proliferation factors allow proliferation of etiologic agents. Survival factors can allow survival of contaminants.
contaminated water (International Association for Food Protection [IAFP] 1999). Norovirus can be best prevented by using hygienic measures applicable to diseases transmitted via fecal-oral route and cooking foods that might be contaminated (e.g., raw shellfish harvested from contaminated water) (Benenson 1995). Contamination factors should be the most likely category of contributing factors to be noted in a norovirus outbreak; survival factors are possible contributing factors in some instances. Proliferation factors are not a contributing factor in a norovirus outbreak, yet proliferation factors were reported in 28 outbreaks. In addition, it is curious that more survival factors are reported than contamination factors for these norovirus outbreaks. This raises significant questions about the validity of the contributing factor data reported through FDOSS.

In addition to the challenge of balancing needs of users with reporting, FBDOs recognized and investigated by state and local food-control authorities are not all reflected in FDOSS. A 2002 survey conducted by the Association of Food and Drug Officials (AFDO) revealed that during 2001, state food-safety programs performed more than 3,000 foodborne illness investigations and investigated 46,000 consumer complaints (Smoak 2005). The AFDO report does not define foodborne illness investigations as foodborne outbreaks; however, only 1,243 foodborne outbreaks were reported to CDC for this time period (Lynch et al. 2006). A December 2006 report on food safety by the Center for Science in the Public Interest notes that 9% of outbreaks included in its report came from sources other than CDC (De Waal et al. 2006). Higgins reported that the state of Colorado did not report any cases of foodborne disease in 1986 and 1987, yet a review of records from six county health departments in Colorado revealed 52 possible foodborne outbreaks in 1986 and 67 in 1987 (Higgins 1994). Some of the local reports of these
possible outbreaks included information such as laboratory confirmation of pathogens and fairly complete epidemiologic information. Higgins found that local food-safety programs only reported possible foodborne outbreak events to state public health agencies when the events seemed ‘significant.’ Although this review took place in the early 1990s using data that is now 20 years old, it is not unlikely that the same scenario is playing out nationally in some form even today.

**Hazard Surveillance**

In addition to foodborne disease outbreak surveillance, hazard surveillance is considered part of the overall foodborne disease surveillance system. Current hazard surveillance activities conducted by food-control authorities in the form of HACCP inspections are often frustrating because violations and repeat violations frequently occur in the same establishments. For example, the 2004 FDA report (Food and Drug Administration [FDA] 2004) on the occurrence of foodborne illness risk factors identified poor personal hygiene in 31% of the agency’s personal hygiene observations in fast food restaurants and almost 42% of its observations in full-service restaurants. Improper holding and time/temperature abuse was noted in almost 64% of observations of these events in full-service restaurants and almost 42% in fast food restaurants. In a review of 4,044 restaurant inspection records from 31 counties in Oklahoma, Phillips reported that repeat violations of the food-safety regulations accounted for about half of all violations recorded (Phillips et al. 2006).

The self-reported food-handling practices of foodservice workers also indicates that lapses in safe food handling practices are not infrequent events. In one study (Green et al. 2005), 60% of workers reported not wearing gloves when handling ready to eat foods. They also reported not
always washing their hands (23%), not always changing their gloves between handling raw meat and ready to eat food (33%), not using thermometers to check food temperatures (53%), and working while sick with vomiting or diarrhea (5%).

Although unsafe food-handling practices are frequent occurrences acknowledged by foodservice workers and food-control authorities identify and record them repeatedly, little if any context for these practices exists in inspection reports. Higgins states that food-safety violations or lapses exist within the very complex system a restaurant or other foodservice establishment represents. He suggests violations must be understood within the context of the system before sustainable changes in the implementation of basic prevention measures can be achieved (Higgins and Hartfield 2004).

In Buchholz’s effort to identify restaurant characteristics that may be more likely to be associated with foodborne incident reporting in Los Angeles County, California, one study limitation included lack of information concerning the restaurant (e.g., number of meals served per day, menu complexity, preparation of meals for multiday use, egg-pooling practices, type of ownership, ethnicity of cuisine, and presence of a certified food handler on the shift) (Buchholz, Run et al. 2002). Thus, although inspection programs may focus on contributing factors, they must also record some context of their occurrence. The same is true of the environmental assessment conducted during foodborne outbreak investigations. Identification of one or two contributing factors, their occurrence lifted out of context, helps form a cycle of prevention activities that may or may not hit the foodborne disease prevention mark.

**Problem**
Foodborne disease surveillance is an essential component of a food safety program (Todd et al. 1997). Surveillance information is used to determine the need for food-safety actions, which involves planning and implementing programs and assessing the effectiveness of the actions taken (Todd et al. 1997). Hazard surveillance and foodborne outbreak investigations are two components of the foodborne disease surveillance system where food safety programs have a significant role. Although much has been done to focus their inspection activities within a hazard surveillance framework, food control authorities do not have the information necessary from foodborne outbreak investigations to understand the context of reported contributing factors or the food vehicles involved.

CDC’s FDOSS is an excellent source of information on foodborne disease outbreaks, but it can only capture a small portion of the information on outbreaks that is required by food-control authorities to formulate food-safety actions. The entire burden of meeting the needs of food-control authorities for environmental data from foodborne outbreaks cannot rest on state and federal communicable disease control or foodborne outbreak investigation authorities alone. Food-control authorities responsible for food safety in foodservice establishments often do not take active roles in foodborne outbreak investigations; when they do; they focus on agent and vehicle identification over identification of contributing factors and their antecedents. Many think in terms of the five contributing factors to foodborne outbreaks and are not aware of the complex list of contributing factors now available for reporting purposes. Additionally, many have not received training on identifying contributing factors from outbreak environmental assessments. Even if they are trained and active in the environmental assessment of foodborne outbreak investigations, many food-control authorities have no way to capture information from
these investigations that will enable them to formulate food-safety action or measure food-safety program impact. If a system for capturing the data existed, most food-safety programs do not have the epidemiologic capacity to analyze, interpret, and present data collected and incorporate the information into the foodborne disease surveillance system that could support food-safety action or measurement of food-safety program impact.

According to a survey of CFP members, the number of food establishments a food safety program is responsible for ranges from 7 to 50,000, with a median of 600 (Cannon and Lancaster 2007). Foodborne outbreaks may not be recognized and investigated very often in any one food-safety program’s jurisdiction. Even if food-control authorities were trained and active in environmental assessments of foodborne outbreak investigations and had the necessary epidemiologic capacity, foodborne outbreak events for most programs do not happen often. Thus, the quantity of data needed for meaningful analysis and use at the local level is inadequate.

**Solution**

To address the need for detailed environmental assessment data from foodborne disease outbreaks, a national voluntary environmental assessment information system (NVEAIS) is proposed to operate in conjunction with the existing CDC Foodborne Disease Surveillance System. Two articles will be used as models to justify the addition of this information system to the public health arena and to describe its proposed operation and attributes: one article describes a national public health surveillance system and its specifications (Meriwether 1995) and the other describes the evaluation of public health surveillance systems (MMWR 2001).
The purpose of an NVEAIS would be to identify factors that can be routinely monitored by food-safety programs to prevent or reduce the risk for foodborne outbreaks associated with foodservice establishments. Proposed objectives of the NVEAIS are to

- establish a detailed characterization of food vehicles and monitor food vehicle trends;
- identify and monitor contributing factors and their environmental antecedents;
- establish the basis for hypothesis generation regarding factors that may support foodborne outbreak events; and
- guide the planning, implementation, and evaluation of food-safety programs.

**Stakeholders**

Stakeholder involvement in the design and establishment of an NVEAIS must be broad. It must include food-safety program officials at all levels of government, officials responsible for communicable disease control and/or foodborne outbreak investigation, industry groups, and consumers. Stakeholder involvement can be facilitated through five avenues:

- Conference for Food Protection (CFP)
- Association of Food and Drug Officials (AFDO)
- Council to Improve Foodborne Outbreak Response (CIFOR)
- CDC’s National Center for Environmental Health (NCEH)
- CDC’s National Center for Zoonotic, Vector and Enteric Diseases (NCZVED).

**Conference for Food Protection**

CFP is a nonprofit organization established in 1971. The goal of the Conference is to identify problems, formulate recommendations and develop practices that promote food safety and consumer protection. It provides a unique opportunity for the balanced consideration of Issues in a deliberative forum. Issues may be submitted by anyone with a food safety or food protection
concern. Once issues are accepted they are assigned to one of three Councils for deliberation. The resulting Council recommendations are then sent to the Assembly of State Delegates, the official voting body of the Conference. Approved Conference recommendations may be incorporated into the FDA FC and offered for adoption by regulatory agencies to help establish nationwide uniformity. A Conference is convened every two years with work being carried on by committees and the Executive Board between the biennial meetings. (CFP 2008)

In addition to developing recommendations to FDA regarding its FC, CFP plays an important role in the development of recommendations to FDA regarding FDA’s Draft Voluntary National Retail Food Regulatory Program Standards (program standards). There are nine program standards that range from regulatory foundation to program assessment. Standard 5, Foodborne Illness and Food Security Preparedness and Response, applies to the surveillance, investigation, response, and subsequent review of alleged food-related incidents and emergencies, either unintentional or deliberate, which result in illness, injury, and outbreaks (Food and Drug Administration [FDA] 2005b). This standard provides a natural framework within which stakeholder involvement can be focused and decisions can be reached about the establishment and operation of an NVEAIS.

As a deliberative forum for those concerned with food safety issues and its process for consideration of issues, CFP provides the best avenue for stakeholder involvement in a discussion of the establishment an NVEAIS.

Association of Food and Drug Officials
AFDO successfully fosters uniformity in the adoption and enforcement of science-based laws, rules, and regulations regarding food, drug, medical devices, cosmetics, and product safety (Smoak 2005). It has a 100-year history as a major voice for food and drug officials in the United States and Canada. Some food-control officials participating in AFDO often are involved in CFP as well, others are not; thus, AFDO is a key stakeholder group representing food-control authorities. An avenue of engagement with AFDO regarding the NVEAIS could be through its committee on food.

**Council to Improve Foodborne Outbreak Response**

CIFOR is a collaborative forum composed of epidemiologists, environmental health specialists, and laboratory scientists from local, state, and federal agencies. CIFOR is co-chaired by the Council of State and Territorial Epidemiologists (CSTE) and the National Association of County and City Health Officials (NACCHO). Members include representatives from CSTE, NACCHO, CDC, Association of State and Territorial Health Officials (ASTHO), National Environmental Health Association, Association of Public Health Laboratories (APHL), FDA, and USDA.

"CIFOR was created to help develop model programs and processes that will facilitate the investigation and control of foodborne disease outbreaks. The agenda includes improving the performance and coordination of relevant local, state, and federal public health agencies involved in epidemiology, environmental health, laboratory sciences, and regulatory affairs" (National Association of County and City Health Officials [NACCHO] 2007).

This group will provide an avenue of engagement with not only food safety program leaders but communicable disease control and foodborne outbreak investigation authorities as well.
**Centers for Disease Control and Prevention**

CDC’s NCZVED and NCEH are also stakeholders. FDOSS is managed within NZVED and involvement and support by staff representatives of that surveillance system will be important in NVEAIS development and integration with FDOSS.

The prototype for NVEAIS emerged from the activities of the Environmental Health Specialists Network (EHS-Net) program in NCEH. EHS-Net was formed to conduct research on the environmental causes of foodborne illness and improve the practice of environmental health in relationship to foodborne illness prevention. EHS-Net is a network of environmental health specialists and epidemiologists at NCEH, FDA, USDA, and nine state health departments (California, Colorado [2000–2004], Connecticut, Georgia, Iowa, Minnesota, New York, Oregon, Rhode Island, and Tennessee). ([http://www.cdc.gov/nceh/ehs/EHSNet/default.htm](http://www.cdc.gov/nceh/ehs/EHSNet/default.htm))

The genesis for NVEAIS was sparked by EHS-Net’s Foodborne Illness Outbreak Study (unpublished). The study objective was to identify contributing factors to foodborne illness outbreaks in food-service facilities and to describe the characteristics, policies, and practices of those facilities. Much has been learned from this study that can be used in the development of NVEAIS. Because EHS-Net has played a significant role in the genesis of the proposal for an NVEAIS, it is expected to provide continued recommendations and guidance to CDC as the collaborative process with all stakeholders unfolds.

**System Specifications**

**Justification**
The systematic collection, analysis, interpretation, and dissemination of environmental data from foodborne disease outbreak investigations will support the overall foodborne disease surveillance system in the United States, strengthening the ability of food-control authorities at all levels of government to formulate food safety action and assess the effectiveness of those actions.

Potential justifications for an NVEIS include

- informing the need for regulatory or other appropriate actions to assure the safety of the food supply,
- better understanding food vehicles,
- developing, and/or modifying program policies and/or regulations,
- informing training programs for environmental health specialists regarding contributing factors to outbreaks, and
- measuring the impact of food safety programs.

**Resources**

A number of existing resources developed through EHS-Net can be used to support an NVEAIS, including the experience of this group in its focus on environmental assessment during foodborne outbreak investigations. For instance, EHS-Net has developed a systematic approach to the environmental assessment in an outbreak investigation, gained experience on what data should be collected, and gained experience determining what data can be collected with the least burden on food-control authorities and still be meaningful. Other experience and resources include the following.

- The Foodborne Illness Outbreak Study provides a model for a protocol and data collection instrument with specific data collection instructions.
• CDC is developing training materials for EHS-Net participants on how to conduct the environmental assessment during foodborne outbreak investigations and how to report data to CDC to support the outbreak study. This material could be a resource for those participating in an NVEAIS and serve as one means to ensure high-quality data.

• CDC has developed a Web-based application to support EHS-Net’s data collection activities (http://www.cdc.gov/nceh/ehs/EHSNet/ehsnis.htm). This system has the capacity to support an NVEAIS.

• NCEH resources can support the analysis and dissemination of the data collected from environmental assessments and can support analytic studies triggered by the NVEAIS data.

• CDC staff will see that all federal requirements such as Office of Management and Budget requirements are met.

These are a few resources that are available through CDC to support an NVEAIS. State and local food-control agencies from California, Florida, New York, Washington and others with experience collecting and using the type of data to be captured through an NVEAIS represent a wealth of experience that could inform the development of an NVEAIS. A dialogue on NVEAIS could reveal other resources.

**System Goals**

With the size of the foodservice establishment inventory for any one food-safety program ranging from 7 to 50,000, it may be difficult to articulate a generic goal for an NVEAIS at the local level. Generally, the primary goal of NVEAIS at the local level would be to monitor the effectiveness of control and intervention measures. In addition to this goal for the local level, the
state level goals would be to demonstrate the need for food-safety programs and resources and to allocate resources. At the national level, NVEIAS’ primary goals would be to judge the effectiveness of control and intervention measures from a national perspective and to develop hypotheses that can lead to analytic studies about environmental risk factors for foodborne outbreaks.

**Case Definition**

There is no case definition for NVAIS because it does not relate to ill people but rather foodservice establishments involved in outbreaks. The definition of a foodborne outbreak will be the same as that used by FDOSS: the occurrence of two or more cases of a similar illness resulting from the ingestion of a food in common (Lynch et al. 2006). Foodborne outbreaks can be identified in a number of ways via the federal, state, or local level, but generally the environmental assessment is conducted at the local level. Reporting will likely be dependent primarily on local food-control authorities. The data collected will be primarily from the environmental assessment of the foodborne outbreak investigation. Initially, NVEAIS would be considered a temporary system with an evaluation of the system planned after a 5-year period. Evaluation results could inform a decision as to whether it should become permanent.

**System Operation**

Foodborne outbreak events range from local events that are detected and investigated at the local level by a single agency to large multistate events involving local, state, and federal levels and a number of agencies (Figure 2). Food-control authorities involved may reside in an agriculture department or a public health agency or both.
An outbreak investigation does not occur in a linear fashion. Initially, most of the energy of the investigation is focused on the epidemiologic aspects of establishing person, time, and place (Hedberg 2007). Place identification, efforts to identify the mode of transmission and food vehicle initiates involvement of food-control authorities (Hedberg 2007). Determining contributing factors, conducting regulatory tracebacks, and implementing control measures are aspects of the environmental assessment and are led by food-control authorities (Hedberg 2007). Although data from clinical samples may help identify an outbreak event, once the investigation begins, information from laboratory analysis of clinical and environmental samples may support both the epidemiologic and environmental aspects of the investigation (Figure 3).

The steps in the environmental assessment information system begin with engagement of food-control authorities in a foodborne outbreak investigation, followed by the environmental assessment, the reporting of assessment data into NVEAIS, and, finally, feedback to stakeholders (Figure 4).
The process does not impact on the food control authorities’ involvement on the larger foodborne outbreak investigation team or on the reporting of outbreaks to CDC’s FDOSS by communicable disease control authorities. Generally, environmental assessments occur at the local level; thus, in the majority of events, local food-control authorities report environmental assessment data to the state food-control authorities. State food-control authorities review the assessments and work with local authorities where clarification is needed and communicate with disease control authorities as appropriate regarding epidemiologic data needed for the NVEAIS report. In the process, state food-control authorities assure that state communicable disease authorities are aware of outbreak events if the foodborne outbreak was locally contained, with the entire foodborne outbreak investigation conducted by local food-control authorities. At this point, the report will be included in the NVEAIS dataset where data can be analyzed, linked to CDC FDOSS as appropriate, and disseminated (Figure 5).
Data flow for the entire NVEAIS process occurs via the CDC Web application developed for EHS-Net data collection activities. The application complies with CDC and U.S. Department of Health and Human Services system security policies. No individual personal information is reported to NVEAIS. No information is reported regarding the identity of an outbreak establishment, but a code is assigned by the Web application to the environmental assessment record submitted by the state. CDC NVEAIS data are subject to the Freedom of Information Act and record codes are releasable. States may receive subsequent requests for outbreak establishment identity, but release of identifying establishment information regarding specific establishments involved in outbreaks is subject to the laws of the reporting state.

The Web application is maintained and administered by CDC NCEH staff (Figure 6).

A standardized data collection instrument is posted on the Web. State food-control agencies apply to use the application. Approval is based on completion of an orientation on the Web application and training regarding environmental assessments and the data collection instrument. Once training is complete, the state food-control authority is given a group account with all administrative rights for that group. A group administrator can add and/or delete users and assign access rights as may be appropriate for the user.
For example, read-only status may be appropriate for some users (e.g., the communicable disease control authority), whereas a read and write (data entry) status may be appropriate for other users (e.g., the local food control authority). Only the state food-control authority (group administrator) can close an environmental assessment record. As system administrator, CDC staff can only see that the group administrator has a record in process. Data from that record does not become a part of the dataset at CDC until the group administrator closes the record.

The state food control authority assigns user status and level of use for the local food and/or communicable disease control authorities. Input of environmental assessment data at the local level makes the entire reporting system a paperless process. With data entry taking place at the level where the actual environmental assessment was conducted, the clearest picture of circumstances for a specific assessment is more likely to be preserved. This arrangement may also reduce data entry errors. Ultimately, state food-control authorities are responsible for data quality of the environmental assessment records they close.

As group administrators, food-control authorities have full access to the data entered in the Web application by their assigned users. Data can be downloaded and analyzed by the group administrator to monitor and/or assess trends at the state level. In addition, the group administrator can monitor data quality provided by individual users, which may help identify general foodborne outbreak investigation training needs; specifically, training gaps in the environmental assessment of an outbreak investigation.
Although the Web application is designed with the group administrator level located at the state, it does not preclude local food-control authorities from applying for group administrator level rights for their jurisdictions. Some local food-control authorities oversee food-safety programs encompassing very large citizen and food establishment populations. An application to CDC for group administrator status for a local food-control authority must be made based on agreement by the state food-control authority.

**System Attributes**

NVEAIS is not a health surveillance system; however, it does represent the ongoing, systematic collection, analysis, interpretation, and dissemination of data regarding a health-related event for use in public health action as described in CDC’s Updated Guidelines for Evaluating Public Health Surveillance Systems (MMWR 2001). Even though public health surveillance is characterized primarily in a clinical or disease context in these guidelines, a public health service program context, which is more relevant for food-safety programs, is not excluded.

Public health surveillance systems are evaluated in part on usefulness and a number of potential system attributes such as simplicity, flexibility, data quality, acceptability, sensitivity, predictive value positive, representativeness, timeliness, and stability (MMWR 2001). Usefulness and system attributes are viewed in the context of the purpose and objectives of the surveillance system (Figure 7). Consideration of the evaluation process at the inception of an NVEAIS can guide its development and help assure accomplishment of purpose.
Usefulness

The CDC guidelines describe a system as useful ‘…if it contributes to the prevention and control of adverse health-events, including an improved understanding of the public health implications of such an event…’ Demonstrating a direct relationship between actions taken by food-safety programs based on information from NVEAIS and the actual prevention of foodborne disease is beyond the scope of this or any one aspect of the foodborne disease surveillance system. This might be possible if data sources such as hazard surveillance, foodborne outbreak surveillance including data from the NVEAIS, and sentinel foodborne disease surveillance such as that carried out by CDC’s FoodNet program are integrated along with other data sources and evaluated. Evaluation of NVEAIS usefulness must be framed in the context of the system objectives. The specific attributes of NVEAIS will play some role in overall system usefulness (Figure 8).

Questions an evaluator might ask to judge usefulness of the system include whether the system

- identified and characterized vehicles in enough detail to support monitoring of trends.
- identified contributing factors and environmental antecedents.
- generated information that led to improved environmental public health practice.
- stimulated research into new control or intervention measures.
- guided planning, implementation, and/or evaluation of food safety programs.
Simplicity

According to the CDC guidelines, public health surveillance systems that are simple, flexible, acceptable and stable will likely be more complete and useful for public health action. A number of features make NVEAIS simple:

- It is designed as an information system integrated into an existing disease surveillance program.
- The data collection method is integrated into the existing foodborne outbreak investigation process involving food-control authorities.
- System simplicity is reflected in the single Web application where data is entered once, accessed, and used at all levels of data management.
- The small amount of time anticipated for data entry and transfer will simplify system use.

Possible barriers to simplicity of the system may relate to staff training needs; the level of detail captured by the system; the amount of time required to review, approve, and close a record; and the time spent on integrating data between two systems, its analysis, and dissemination.

Flexibility

The CDC guidelines describe a flexible public health surveillance system as adaptable to changing information needs or operating conditions with little additional time, personnel, or allocated funds. NVEAIS uses a standard reporting format. It will allow the comparison of information across user groups and allow integration with FDOSS. Although the format can be changed, whether it is considered a flexible format probably will require a retrospective review. The Web application can support a state-specific form with additional questions; however, a standard reporting format may be a barrier to flexibility, at least to some extent.
Acceptability

Acceptability is described by the CDC guidelines as reflecting the willingness of persons and organizations to participate in the surveillance system. Food-safety programs, like all public health agencies, are challenged with substantial mandates and given limited resources to achieve those mandates. New program endeavors like an NVEAIS will be accepted by food-control authorities based in part on a combination of a general willingness and ability to try new programs. Acceptability must be judged in retrospect, but if the CFP survey of food-control authorities regarding inspection data sharing is an indicator, a significant number of officials may be willing to consider participation in an NVEAIS. Anticipated presentations on the type and uses of information gained from EHS-Net’s Foodborne Illness Outbreak Study (unpublished) may demonstrate the value in reporting environmental assessment data and provide an incentive for food-control authorities to participate in an NVEAIS. Concern over the time involved, however, may represent a barrier to participation.

Stability

A stable surveillance system refers to the reliability (the ability to collect, manage, and provide data properly without failure) and availability (the ability to be operational when needed) of the system (MMWR 2001). Stability is largely a resource-dependent attribute and includes resources at the federal, state, and local level. For NVEAIS, the larger outlay of resources in terms of the Web application that will support the system has already been made and experience with its use by nine states provides a history that indicates a relative stable infrastructure from an operational aspect. CDC’s NCEH is committed to maintaining this infrastructure in the near term and will base long-term decisions regarding its maintenance on NVEAIS use. Beyond the Web application infrastructure, considerable resources will be required to analyze data and
disseminate results. Of course, an investment of resources will be required by users as well. Timeliness of data entry for environmental evaluations as well as record review and closure by group administrators will have a significant impact on the stability of the system; analysis of data cannot begin before records are closed.

Questions an evaluator might ask regarding the stability of the system might include the amount of time taken for records to be closed after data has been entered into the system, the amount of time taken to analyze and disseminate information from the system, and the number of unscheduled downtimes for the system.

**Data Quality**

Although data quality was not included in the attributes used to describe a complete and useful surveillance system for public health action, it is an attribute that must be mentioned specifically for NVEAIS (Figure 9). Data quality as a system attribute is described in the CDC guidelines as reflecting the completeness and validity of the data recorded in the surveillance system. There may be a number of perspectives regarding the questions to ask and the data to collect; they must be balanced with the likelihood that the reporting form will be completed and the information reported actually reflecting the environmental factors of the outbreak. EHS-Net has gained a great deal of experience in the development of a standard environmental assessment report form for its Foodborne Illness Outbreak Study. Part of the difficulty in developing this reporting form involved completeness and validity issues. The
current form reflects the experience of actual collection of environmental assessment data in foodborne outbreaks and its subsequent analysis. Acceptance of NVEAIS will depend in large part on users’ beliefs that the data are of high quality and the system accurately represents the environmental circumstances of foodborne outbreaks; thus, the EHS-Net Foodborne Illness Outbreak Study’s data collection form will be recommended for the NVEAIS.

Integration with CDC’s Foodborne Disease Outbreak Surveillance System
The basis for integration between NVEAIS and FDOSS began with previous EHS-Net studies, including the Foodborne Illness Outbreak Study. Integration between the two systems requires duplication of key data elements. The expectation is that environmental assessments from outbreaks will have a matching report in FDOSS, but this may not always be the case. Some epidemiologic data from foodborne outbreak investigations will be needed to characterize environmental assessments and allow the consistent reporting of information from NVEAIS. As experience is gained with NVEAIS and integration with FDOSS improves, duplication of data elements will be refined. A strengthening in communication between food-control authorities and communicable disease control authorities may eventually eliminate the need for duplication of any epidemiologic data elements.

Starting the Dialogue
The dialogue regarding the establishment of an NVEAIS begins with submission of an Issue to the CFP (Attachment A). If accepted, CFP’s collaborative process will provide a variety of subject-matter experts, industry, academia, and consumer groups to provide recommendations and guidance in the establishment of an NVEAIS. CDC has planned other opportunities to
engage with stakeholders through other forums during 2008. The stage is set to begin the process of exploring the establishment of an NVEAIS.

References


FoodNet sites (California, Connecticut, Georgia, Minnesota, and Oregon). 1st International Conference on Emerging Infectious Diseases, Atlanta, GA, March 1998.


Attachment A

Conference for Food Protection
2008 Issue Pre-submission Form

Title: National Voluntary Environmental Assessment Information System (NVEAIS)

Issue you would like the Conference to consider:

BACKGROUND

In 2006 the International Commission on Microbiological Specifications for Foods (ICMSF) published a position paper to describe epidemiologic data that are useful for evaluating the public health impact of food safety control programs, and to identify how epidemiologic data can be used in the evaluative process. According to this report the collection, synthesis and analysis of data from a variety of sources is required to evaluate food safety control programs. Foodborne outbreak investigations are one of those sources. The report states that one of the key elements of foodborne outbreak investigations is identifying the suspect food and factors that contribute to foodborne transmission of specific pathogens. These data elements are infrequently determined by human disease surveillance systems, and they are critical for food safety program evaluation. (ICMSF 2006)

Since 1973 the CDC has maintained a collaborative surveillance program for collection and periodic reporting of data on the occurrence and causes of foodborne-disease outbreaks (FBDOs) in the United States. Much has been done to improve reporting of FBDOs to CDC, yet all FBOs recognized and investigated by local and state food safety authorities are not reported to CDC (Higgins 1994) and in many of the outbreaks that are reported, the factors most important to food safety authorities, such as implicated food vehicles, or the factors that may have contributed to the outbreak, are missing or incomplete (Lynch, Painter et al. 2006)

According to the ICMSF position paper, public health surveillance and outbreak investigation programs have evolved independently from food safety programs, and current human health statistics address the questions of communicable disease control officials better than questions of food control authorities and this is noted as one challenge in evaluating food control programs (ICMSF 2006). Thus, food safety programs must become more engaged in FBDO investigations and take responsibility for the collection, analysis and interpretation of data relevant to the environmental factors that cause FBDOs. To assist food safety programs CDC is currently considering the establishment of a national voluntary environmental assessment information system (NVEAIS) based on experience from the Environmental Health Specialists Network (EHS-Net) program.

ISSUE

This issue relates to establishing a NVEAIS for foodborne outbreak investigations. This voluntary program will augment the current Foodborne Disease Outbreak Surveillance System maintained by the Centers for Disease Control and Prevention (CDC) to strengthen the role of food safety authorities in foodborne disease outbreak surveillance and in turn, CDC’s ability to support their foodborne disease prevention and control efforts.

The purpose of a NVEAIS would be to identify factors that can be routinely monitored by food safety programs to prevent or reduce the risk of foodborne outbreaks associated with foodservice establishments. Proposed objectives of the NVEAIS are to:

- establish a detailed characterization of food vehicles and monitor food vehicle trends,
- identify and monitor contributing factors and their environmental antecedents,
• establish the basis for hypothesis generation regarding factors that may support foodborne outbreak events and,
• guide the planning, implementation and evaluation of food safety programs.

Public Health Significance:

Through the systematic collection, analysis, interpretation and dissemination of environmental data from foodborne disease outbreak investigations food safety authorities will have the information needed to take food safety action, assess its effectiveness, support program evaluation, develop and/or modify program policies and/or regulations based on sound epidemiologic data, train environmental health specialists regarding environmental factors related to foodborne outbreaks as well as how to conduct the environmental assessment in a foodborne outbreak investigation, and to justify program budgets.

Recommended Solution:

The Conference recommends the formation of a committee composed of interested stakeholders to consult with CDC regarding the establishment of a National Voluntary Environmental Assessment Information System (NVEAIS).

The recommended Committee charge:

1) review the concept of a NVEAIS as proposed in the attached background paper,
2) prepare a report on the NVEAIS concept for the fall 2009 Executive Board meeting to cover but not be limited to:
   o a brief description of a NVEAIS
   o a detailed description of the anticipated usefulness of a NVEAIS to food safety programs,
   o the feasibility of reporting environmental assessment data to CDC by food safety programs,
   o the acceptability of a NVEAIS by food safety program managers and the willingness to participate, and,
   o if appropriate, based on committee deliberations, a recommendation to continue the committee’s work; if not appropriate based on committee deliberations, report the committee’s work complete and recommend the committee be dissolved
3) determine how a NVEAIS could be best supported by the Conference for Food Protection
   o explore the appropriateness of an amendment to Standard 5, Foodborne Illness and Food Security Preparedness and Response, and,
   o as may be appropriate, develop a recommendation and/or issue for the 2010 Conference.

Submitter Information:

Name: Carol A. Selman
Organization: Centers for Disease Control and Prevention
Address: 4770 Buford Hwy
City/State/Zip: Atlanta, GA
Telephone: 770-488-4352
Fax: 770-488-7310
E-mail: zxg4@cdc.gov

Please enter name, email and phone of a possible second contact if we are unable to reach you.

Second Contact:

Art Liang, Centers for Disease Control and Prevention, National Center for Zoonotic, Vector-borne, and Enteric Diseases, Atlanta, GA 404-639-2237, e-mail – apfl@cdc.gov