

Conference for Food Protection 2004-2006
Executive Board Meeting Committee Update

Council II – Certification of Food Safety Regulation Professionals
Sub-Committee Report
(a Workgroup of the Program Standards Committee)

Date of Committee Report: March 7, 2005

Submitted By: David McSwane, H.S.D., Co-Chair
John Marcello, Co-Chair

Committee Charge:

Facilitating the following six recommendations contained within the 2002 Program Standards Committee Work Group report (Issues 2004-II-015 and 2004-II-017):

- In future Conference discussions relative to training or credentialing of individuals responsible for the regulation of retail food establishments, these members of the regulatory authority should be referred to as "food safety regulation professionals."
- That the Conference charge the Program Standards Committee with developing a multi-tiered approach to the credentialing of regulatory officials and evaluates the potential incorporation of existing training and/or certification programs.
- That the Conference charge the Program Standards Committee with using the FDA Program Standards - Standard No. 2 as the model for the evaluation of other training or credentialing programs for food safety regulatory professionals.
- That the Conference request FDA provide guidance on how subpart 8-402.10 can be practicably implemented within a regulatory food program and what may be the resulting legal ramifications to state or local jurisdictions that have adopted Chapter 8 by reference.
- That the Conference charge the Program Standards Committee with conducting a joint review with FDA of the FDA ORA University training curriculum as it pertains to Standard No. 2.
- That the Conference charge the Program Standards Committee with formally approaching FDA on the concept of forming a cooperative partnership with a focus on training, standardization and/or certification of food safety regulation professionals.

Committee Members:

See committee roster under separate cover

Progress Report / Committee Activities:

Key Outcomes to Date

- A survey has been conducted of State and local regulatory agencies to assess their current procedures/protocols for training and/or certification of retail food/foodservice inspection. Results have been assimilated in a series of PowerPoint presentations and will be shared in the near future with the agencies participating in the study. Should the CFP Executive Board request a copy of the results, they will be made available to them when the data analysis phase of the study is complete. The results will be made available (in a form yet to be determined) at the 2006 Conference.
- The work group has obtained training models, curricula and food safety competency areas from regulatory agencies with established food program training and assessment protocols. This information is serving to provide important input into the design and structure of the competency assessment model the work group is preparing for submittal to the 2006 Conference.
- The work group held a face-to-face meeting in December. Several representatives of FDA's Division of Human Resource Development (DHRD), including the Director, Gary German,

participated in the meeting. The purpose of the meeting was to explore ways CFP could work in partnership with FDA's ORA-U's initiative to develop and deliver training to regulatory food safety professionals and assess their competency levels. This meeting set the foundation and direction for the work group and created a framework for an ongoing collaborative working arrangement with FDA ORA-U on this CFP initiative. Specific outcomes from the meeting included:

1. The selection of a CFP representative, Lee Cornman-Florida Department of Business and Professional Regulation to the FDA Certification Board for Retail Foods.
2. Determination that the ORA-U on-line courses developed in support of the Program Standards #2 curriculum reflect the competencies needed by regulatory food safety inspection professionals. Recommendations for increasing and enhancing the retail focus of the content of some ORA-U courses have been presented to FDA's DHRD representative.
3. Continued work on the development of a protocol and criteria for assessing equivalency of coursework/workshops/training obtained by food safety regulation professionals "outside" the ORA-U system.
4. Agreement to focus efforts on revising the criteria in Program Standard #2 rather than developing standards for regulatory food safety personnel certification programs. The Program Standards criterion focuses on the regulatory retail food protection program not individuals. By addressing the issue through revision of the Program Standard #2 criteria the work group will be developing competency areas for which regulatory agencies should work to have their individual staffs achieve. This Program Standard #2 criterion will serve as the impetus for establishing a model for competencies that should be inherent to any regulatory food safety inspector in the field.
5. Consensus that the final evaluation of a regulatory food safety inspection officer's competencies must be based on a performance-based "field" assessment. Since Program Standard #2 will focus on the competencies to be assessed, the work group reach consensus to use the term performance-based competency assessment in Program Standard #2 rather than certification. Certification pertains to the individual and denotes a specific meaning within the credentialing community. The Program Standards are focused on the regulatory retail food program and a process for determining whether the regulatory food inspection staff possesses the minimum competency for performing foodservice and/or retail food inspections.
6. A Draft revision of the current Program Standard #2 criteria (Attachment A). Using the format in the Program Standards, Standard #2 has been extensively revised so that it reflects three levels of training and assessment:
 - A. Pre-Level I (includes criteria for what competency a food inspector must attain before they do an independent inspection of any sort)
 - B. Level I - Food Safety Inspection Officer Performance-Assessment
 - C. Level II - Food Safety Inspection Officer Performance-Based Assessment

Besides the development of a multi-tiered approach to competency assessment, the model also incorporates written examinations as means to assess certain curriculum elements. In keeping with the consensus of the group, however, a performance-based audit is required at Level I and Level II.

The work group is continuing its efforts to refine the proposed revisions to Program Standard #2. Agreement has been obtained on the conceptual framework for assessing regulatory food safety inspection staff competency. Now that this foundation is in place, the work group can begin to provide the necessary detail. This will be an integral part of the agenda for the work group's next face-to-face meeting that will be held in conjunction with the NEHA AEC in Providence.

7. Research into the development of the Level I performance based competency assessment. This will be a major focus of the group's effort of the next few months.

Next Steps

The work group has identified 3 deliverables that need to be completed for review and discussion at the face-to-face meeting in Providence, RI.

- Draft of the revised criteria for Program Standards #2 (most of the draft revision has been completed – Attachment A);
- Draft of the competency elements and protocol for a Level I performance-based assessment, and
- Draft the process/criteria for determining equivalency of courses/workshops/training obtained “outside” the FDA-ORA-U system.

The work group’s next face to face meeting is scheduled for Friday and Saturday, June 25 and 26 in Providence, Rhode Island. The support provided by Trevor Hays and the members of the Executive Board for the activities of the work group is greatly appreciated.

STANDARD NO. 2 TRAINED REGULATORY STAFF

This standard applies to the essential elements of a training program for regulatory staff.

Requirement Summary

The regulatory retail food program inspection staff shall have the knowledge, skills, and ability to adequately perform their required duties.

Description of Requirement

The regulatory training program includes components for:

1. All retail food program inspection staff to demonstrate the minimum knowledge, skills and abilities required as part of their initial field training prior to conducting independent routine inspections;
2. All staff to complete all pre-requisite training elements required for a Level I – Food Safety Inspection Officer (FSIO) performance-based assessment.
3. All retail food inspection staff to demonstrate basic competencies required to conduct retail food and/or food service inspection by successfully completing a Level I (FSIO) performance-based audit.
4. Having the required number of Level II (FSIOs) required to assess retail food inspection staff competencies.

1. Curriculum

Within 12 months of employment or assignment to the retail food program, the all regulatory staff conducting inspections of retail food establishments must satisfactorily complete of training that includes the following components:

1. prevailing statutes, regulations, ordinances;
2. public health principles;
3. communication skills;
4. microbiology;
5. epidemiology; and
6. HACCP.

All courses for each of the curriculum areas **(an Appendix to be added to the Standards to provide a listing of courses for these curriculum areas)** must be successfully completed in order for staff to be eligible for a Level I (FSIO) Performance-Based Assessment.

Credit for each component may be gained by:

- Completing the FDA-ORA U courses and examinations related to each of the these curriculum areas **(Appendix will be added)**; or
- Completing college courses, military training, technical workshops deemed by a competency assessment board as being equivalent to the FDA ORA-U curriculum **(elements of an equivalency assessment must be developed)**; or
- Successful completion of a written examination, recognized by a competency assessment board, that is based on a job task analysis that reflects the knowledge, skills, and abilities (KSAs) required of Food Safety Regulation Professionals and incorporates the curriculum areas required to be eligible for a Level I (FSIO) performance based assessment **(protocol for recognizing appropriate examinations to be determined)**.

Satisfactory completion of each training component is documented in the individual's training plan. A Sample Training Plan is provided in Appendix K.

2. Field Training and Experience

Prior to conducting any type of independent field inspections, the regulatory staff conducting inspections of retail food establishments must satisfactorily complete training in the following areas:

1. Prevailing statutes, regulations, ordinances **(courses will be included in an Appendix listed for this curriculum area)**;

Attachment A – DRAFT

2. Public Health Principles (**courses will be included in an Appendix listed for this curriculum area**);
3. Food Microbiology (**courses will be include in an Appendix listed of this curriculum area**); and
4. (As a measure of basic knowledge of food safety), successfully passing an examination from a Conference for Food Protection (CFP)/American National Standards Institute (ANSI) accredited Food Protection Manager Certification Program.
5. Completion of Twenty-five joint training inspection with a Level II (FSIO).

To be eligible for a Level I (FSIO) performance based assessment a candidate must complete all field training requirements in addition all 6 curriculum areas presented in Section I. Field training consists of at least twenty-five joint training inspections with a Level II FSIO. After completing the joint training inspections, the candidate completes at least twenty-five independent inspections of the various types of retail food establishments regulated by the jurisdiction.

3. Level I – FSIO Performance-Based Assessment

Within 12 months of employment or assignment to the retail food program, staff conducting inspections of retail food establishments must satisfactorily complete a Level I (FSIO) performance-based assessment with a Level II Food Safety Inspection Officer. using a process to (**format and content (competency elements to be developed by the CFP Certification of Food Safety Regulation Professionals working group)**). The performance-based assessment shall determine the inspector's ability to apply the knowledge and skills obtained from the training curriculum, and address: 1) Risk-based inspections, 2) Good Retail Practices, 3) Inspection equipment, and 4) Communication.

Demonstration of a Level I Competency shall be maintained by successfully competing a Level I performance-based assessment with a Level II FSIO every three years.

4 Level II – FSIO Performance Based Assessment – (Field Standardization)

Jurisdictions with 10 or more individuals performing foodservice and retail food inspections must have the appropriate number of staff members who have successfully completed a Level II (FSIO) performance-based assessment (Field Standardization). Jurisdiction with 10 or more food inspection staff must have at least 1 Level II FSIO (Field Standardized) for every 10 individuals assigned foodservice and retail food inspection responsibilities.

Jurisdictions with less than 10 individuals performing foodservice and retail food inspections must have at least one Level II FSIO on staff OR have a written procedure for assuring food inspection staff can attain and maintain their Level I FSIO competency. Jurisdictions with less than 9 food inspection personnel that do not have a Level II FSIO on staff can have their food inspection staff Level I performance-based assessments conducted by a Level II FSIO from a Federal, State or local regulatory agency. The jurisdiction written procedure for assuring food inspection staff attain and maintain their Level I FSIO competency must include:

- a. the written training and Level I FSIO performance-based assessment protocol;
- b. identification of the Level II FSIO(s) assigned to complete the jurisdictions food inspection staff's Level I FSIO performance-based assessment;
- c. written documentation that the Level II FSIO has approval from their agency to perform the Level I FSIO performance-based assessments;
- d. identification of the jurisdiction's staff member responsible for coordinating and assuring that all food inspection staff attain and maintain their Level I FSIO competency.

A Level II FSIO performance-based assessment (Field Standardization) requires successful completion of eight joint inspections with a training standard using a process similar to the *FDA Procedures for Standardization and Certification of Retail Food Inspection/Training Officer*. The standardization procedures shall determine the inspector's ability to apply an advanced level of knowledge and skills obtained from the training curriculum needed to conduct performance based audits. The Level II performance based assessment must address all five following performance areas: 1) Risk-Based

Attachment A – DRAFT

Inspections, 2) Good Retail Practices, 3) Application of HACCP, 4) Inspection equipment, and 5) Communication.

Continuing standardization (Level II – FSIO) shall be maintained by performing six joint inspections with the “training standard” every three years.

5. Continuing Education and Training

Each employee conducting inspections accumulates 20 contact hours of continuing education every 36 months after the initial training (18 months) is completed. The candidate qualifies for 1 contact hour for each hour's participation in any of the following activities related to food safety or food inspectional work:

1. Attendance at FDA Regional seminars / technical conferences;
2. Professional symposiums / college courses;
3. Workshops;
4. Food-related training provided by government agencies.

Any changes in the regulatory agency's prevailing statutes, laws and or ordinances must be included as part of the continuing education hours. Documentation of training that covers changes in a regulatory agency's prevailing statutes, law, and or ordinance that occurs within the time frame when continuing education hours are compiled must be included as part of the individuals training record.

See Appendix B, Trained Regulatory Staff, as an example of a self-assessment tool containing all the essential information for documenting compliance with this Standard.

Outcome

The desired outcome of this standard is a trained regulatory staff with the skills and knowledge necessary to conduct quality inspections.

Documentation

The quality records needed for this standard include:

1. Certificates earned from the successful completion of course elements of the uniform curriculum;
2. Field inspection reports for twenty-five each joint and independent inspections;
3. Procedures for Level I FSIO performance-based assessment;
4. Level I FSIO certificates;
5. Level II FSIO certificates – Standardization certificates or other records showing proof of satisfactory standardization;
6. Contact hour certificates for continuing education;
7. Signed documentation from the agency's training officer or staff member responsible for food program continuing education records that food inspection personnel attended and successful completed the training program.
8. Date of hire records or assignment to the retail food program; and
9. Summary record of employees' compliance with the Standard (For an example see Appendix B)