

Conference for Food Protection – Committee FINAL Report

Template approved: 08/14/2013

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COMMITTEE NAME: Program Standards

COUNCIL or EXECUTIVE BOARD ASSIGNMENT: Executive Board

DATE OF REPORT: 12/18/2015

SUBMITTED BY: David Lawrence, Chair
Caroline Friel, Co Vice-Chair
Debbie Watts, Co Vice-Chair

COMMITTEE CHARGE(s):

The charges to the 2014 – 2016 Program Standards Committee were designated as follows in two 2014 CFP issues:

Issue #: 2014 II-005:

Charges:

1. Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation; and
2. Work on a project to recognize levels of performance of Program Standards enrollees that will demonstrate the progress of enrollees in a meaningful way and acknowledging the enrollees for taking the necessary incremental steps toward meeting the Program Standards. As part of this project:
 - a. Provide a Cost/Benefit Analysis for recognizing partial achievement of the Retail Program Standards;
 - b. Identify different approaches that could be used to recognize partial achievement of the Retail Program Standards that would not require additional resources to perform or administer; and
 - c. Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards.
3. Review the current verification audit requirement and:
 - a. Identify strengths of the current verification audit requirement;
 - b. Identify weaknesses of the current verification audit requirement, with emphasis on any barriers that may result from the current requirement; and
 - c. Determine whether there are potential changes to the requirement, or the administration of the requirement, that could maintain the credibility of the Retail Program Standards while reducing barriers to achievement that may result from the current verification audit requirement.
4. Serve as a sounding board for FDA with respect to ideas generated during collaboration with the other entities such as NACCHO, PFP, AFDO.
5. Formulate resolutions to issues brought before the committee and report back at the 2016 CFP Biennial Meeting.

Issue #: 2014 II-003:

Charges:

To solicit the support of industry to:

1. Identify the benefits to industry for regulatory authorities to achieve Standard 2, Standard 4, and Standard 7 of the Voluntary National Retail Food Regulatory Program Standards.
2. Examine methods to support regulatory efforts to achieve Standard 2, Standard 4, and Standard 7 of the Voluntary National Retail Food Regulatory Program Standards.

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3. Report back at the 2016 CFP Biennial Meeting with recommendations on how the Conference can collaborate with industry to facilitate enrollment and achievement of the Voluntary National Retail Food Regulatory Program Standards.

COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

1. Progress on Overall Committee Activities:

- a. The Program Standards Committee membership included recruitment efforts to gain additional food industry and local regulatory members across the CFP regions. Per the Constitution and Bylaws, a balanced ratio of regulatory to industry members has been maintained. In April 2015, the Executive Board approved an updated roster that maintains this ratio by listing eight (8) regulatory and eight (8) food industry representatives as voting members. Any CFP members who expressed interest in the committee but who were not selected as voting members were designated as either electives or “at large” members. These electives and “at large” members have been included in all committee activities.
- b. The first full committee call was held on September 17, 2014. The committee chair and co vice-chairs presented the recommendation that the charges be worked on at a subcommittee level to stay ahead of the Executive Board’s due dates and to complete the charges by December 2015 or sooner. The committee members supported the recommendation. Two subcommittees were formed: (1) **Issue 2014 II-003 Subcommittee** with co-leads Caroline Friel (food service industry) and Todd Mers (regulatory - state), and (2) **Issue 2014 II-005 Subcommittee** with co-leads Debbie Watts (regulatory - local) and Angie Cyr (regulatory - state). Each full committee member expressed their interest in serving on either or both subcommittees.
- c. Meetings were held via conference call and using GoToMeeting and Adobe Connect (arranged by the FDA consultants) to share reference documents online. To facilitate work on the current charges, a familiarization of all members with the Voluntary National Retail Food Regulatory Program Standards (hereafter referred to as Retail Program Standards) was established by ensuring access to the FDA resources. The full committee has met seven times (September 17, 2014 kick-off call; April 15, 2015; May 20, 2015; June 17, 2015; July 22, 2015; August 19, 2015; and September 23, 2015). During the initial meetings, time was allocated to introduce new members to the historical perspective of the committee. Subcommittee updates were provided as part of the full committee calls. Work on requests from the FDA regarding proposed revisions to Standards 4, 7 and 9 were conducted by the full committee.

2. Progress on Issue 2014 II-003 Activities:

- a. The **Issue 2014 II-003 Subcommittee** (hereafter referred to as Competency of Inspectors Subcommittee) met via phone conferencing (October 15, 2014, November 12, 2014, January 14, 2015, February 11, 2015, March 11, 2015, April 8, 2015, and May 13, 2015) and by email from October 2014 until September 2015. The Subcommittee developed and distributed a survey questionnaire (*see Industry Support for Standards 2, 4 and 7 Survey Tool attached to this report*) to assess industry’s opinion regarding the benefits, if any, of having regulatory authorities achieve Standard 2, Standard 4, and Standard 7 of the Retail Program Standards. The Subcommittee gathered information from industry stakeholders regarding the value to industry of having a regulatory agency involved with the Retail Program Standards and provided recommendations to support regulatory efforts to achieve the Retail Program Standards.
- b. This part of the Program Standards Committee’s final report outlines the disposition of issues worked on by the Competency of Inspectors Subcommittee and its recommendations to the Conference. Along with being a foundation and system upon which all regulatory programs can build through a continuous improvement process, the Retail Program Standards provide a template of what a quality regulatory food establishment program needs. Per the specific charges, this report will refer to only Standards 2, 4, and 7.
 - i. Standard 2 provides the essential elements of a training program for regulatory staff.

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- ii. Standard 4 pertains to implementing an on-going quality assurance program that evaluates inspection uniformity to ensure inspection quality, inspection frequency and consistency among the regulatory staff.
- iii. Standard 7 relates to enhancing communication with industry and consumers through forums designed to solicit input to improve the food safety program.
- c. *Charge 1: To solicit the support of industry to identify the benefits to industry for regulatory authorities to achieve Standard 2, Standard 4, and Standard 7 of the Voluntary National Retail Food Regulatory Program Standards.* The 2011 Food Safety Modernization Act (FSMA) requires the FDA to partner with state and local food safety regulatory agencies to build a national Integrated Food Safety System (IFSS). The goal of a national IFSS is to develop a seamless partnership and operation of federal, state, and local food safety regulatory agencies to meet the public health mission of achieving a safer food supply.

The benefits of having a regulatory authority meet the Retail Program Standards contributes to an IFSS by improving the confidence in the food safety work being conducted by other agencies, focusing efforts on the reduction of risk factors known to contribute to foodborne illness, and encouraging retail food establishments to implement active managerial control over these risk factors.

The Competency of Inspectors Subcommittee developed and distributed the Industry Support for Standards 2, 4 and 7 Survey Tool to assess industry's opinion regarding the benefits to industry, if any, of having regulatory authorities achieve Standard 2, Standard 4, and Standard 7 of the Retail Program Standards:

- i. The original survey was disseminated to the Food Marketing Institute (FMI) and the National Restaurant Association (NRA). 133 responses were received. Incomplete surveys were removed and the remaining 116 surveys were combined and analyzed.
- ii. Most respondents were food service operations/restaurants (n=55) and retail food establishments (n=49). Wholesale distribution and national grocery stores were represented one time each, and there were 10 respondents who did not respond to the self-identification question.
- iii. The Subcommittee analyzed the survey responses and identified that the most important benefits to industry of having regulatory authorities achieve the Retail Program Standards are that the Standards:
 - 1. Support a consistent approach to inspections;
 - 2. Focus inspector and industry time on the true risk factors to reduce foodborne illness versus focusing time, money and limited resources on Good Retail Practices that have little impact on preventing foodborne illnesses;
 - 3. Enable “apple to apple data analyses” on a National basis; and
 - 4. Enable trend analysis for identifying opportunities and long-term solutions.
- iv. The Subcommittee's analysis of survey responses found that the most important benefits to industry of having regulatory authorities achieve Standard 2 are:
 - 1. Supporting a consistent, credible approach to inspections;
 - 2. Providing more time for industry to focus on food safety rather than disputing improper citations or managing non-uniform regulations;
 - 3. Focusing both industry and regulators on solving complex public health problems; and
 - 4. Increasing consumer confidence.
- v. The Subcommittee's analysis of survey responses found that the most important benefits to industry of having regulatory authorities achieve Standard 4 are:
 - 1. Quality assurance is needed due to the diversity in inspector competency;

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2. Quality assurance drives uniformity in the inspection process. This is important with the increased use of inspection information by media to report results to the public; and
3. Standard 4 criteria help to drive continuous improvement.
- vi. The Subcommittee's analysis of survey responses found that the most important benefits to industry of having regulatory authorities achieve Standard 7 are:
 1. The more collaboration industry and regulatory authorities have, the better off we are – as we are on the same team;
 2. Standard 7 criteria enable free, open communication and sharing to align priorities;
 3. Relationship building is of the utmost importance as it enables problem solving and improvement; and
 4. Standard 7 promotes the establishment of partnerships to facilitate swift responses to future outbreaks and crises.
- vii. The Subcommittee identified the following trends after compiling the survey data:
 1. There is a positive correlation between the length of time in business and the perceived value of Standards 2, 4, and 7.
 2. Having a larger number of employees was statistically associated with perceived value of Standard 2.
- d. *Charge 2: To solicit the support of industry to examine methods to support regulatory efforts to achieve Standard 2, Standard 4, and Standard 7 of the Voluntary National Retail Food Regulatory Program Standards.* The Retail Program Standards offer a systematic approach to, through a continuous improvement process, enhance retail food regulatory programs. They define and provide a framework designed to accommodate both traditional and emerging approaches of a regulatory food safety system. To address the charge, the Subcommittee interviewed regulatory agencies enrolled in the Retail Program Standards, mostly those who had achieved Standards 2, 4, and 7 and who conduct direct (not contracted) inspections, to examine and provide methods to support regulatory efforts to achieve Standard 2, Standard 4, and Standard 7.

e. Recommendations from Issue 2014 II-003. Based on the work done by the Competency of Inspectors Subcommittee, the Program Standards Committee has the following recommendations (**in bold**) for consideration by Council (See Issue PSC 2):

- i. Develop a roadmap. When an enrolled regulatory agency implements the Retail Program Standards correctly, there is a cultural transition in the agency that supports continuous improvement. **The committee recommends that the FDA develops a Retail Program Standards guide or template to help regulatory agencies to enroll in the Retail Program Standards, realize what they are getting involved in prior to enrollment, provide recommendations about where an enrollee should begin, and provide a roadmap to allow management to plan for proper staffing and resources to actually complete and sustain the activities associated with the Retail Program Standards.**
- ii. Involve industry in the funding and benchmark achievement processes. While the committee does not support an agency enrolling in the Retail Program Standards solely to receive accolades, there is reason to celebrate along the way as an agency progresses through meeting various levels of the Retail Program Standards. Industry members of this committee made it very clear that industry would like to be a formal part in developing a recognition process but feel that development of such a process is beyond the scope of the current Issue 2014 II-003 charges. The committee recommends the continuation of charge 2 of Issue 2014 II-005 by the 2016 - 2018 Program Standards Committee with support from the FDA to further examine a process for recognizing partial achievement of the Retail Program Standards. *Note: This recommendation will be made in Issue PSC 3.*

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- iii. Recognize that meeting the Retail Program Standards is a primary means to reducing foodborne illness within enrolled jurisdictions. One regulatory agency with 47,000 food establishments reports that implementation of the Retail Program Standards within their agency was instrumental in achieving a 90% reduction in foodborne illness outbreaks within their jurisdiction since 1997. The committee recommends that the FDA seek forums for enrollees to share their success stories that correlate with the implementation of the Retail Program Standards. *Note: This recommendation has redundancy with the recommendation presented below in viii.*
- iv. Provide extra points on the grant application to encourage the regulatory agencies who are actively achieving the Retail Program Standards. While the different funding mechanisms are not a prerequisite for enrollment in the Retail Program Standards, only the top-scoring eligible proposals in each FDA Region are awarded grants. The committee found that those applicants who are actively achieving the Retail Program Standards are treated no differently than a regulatory agency who is applying for the first time. This existing approach may encourage more agencies to enroll in the Retail Program Standards but it does not encourage completion of the Retail Program Standards. Those actively enrolled in the Retail Program Standards should receive extra points on the application process. This would financially facilitate an agency's progress in achieving and sustaining the Retail Program Standards. **This committee recommends that the FDA reward achievement of the Retail Program Standards by giving extra credit during the application review and scoring process for grants.**
- v. Establish and conduct regularly scheduled meetings, conferences, and/or webinars of state or FDA regional workgroups that will encourage regulatory agencies in their efforts with the Retail Program Standards. Trying to meet the Retail Program Standards without having someone to mentor you along the way can be an arduous task. The Retail Program Standards have been around since 2001. The FDA reports that as of October 2015, 119 enrollees have completed self-assessments AND have met three or more Standards. However, there are only 14 regulatory agencies that conduct direct inspections and have achieved Retail Program Standards 2, 4 and 7. **This committee recommends that the FDA establish additional formal networks to complement the existing NACCHO Program Standards Mentorship Program (e.g., workgroups in each state or by FDA region with routinely scheduled webinars, conference calls) to assist regulatory agencies in their efforts with the Retail Program Standards.**
- vi. Promote the utilization of FoodSHIELD. The Retail Program Standards requires the creation of many documents, many of which can be obtained from others already enrolled in the Retail Program Standards. FoodSHIELD provides a means where federal, state and local governmental regulatory agencies may share documents by creating a workgroup and inviting others to see/review such documents. FoodSHIELD was designed to facilitate collaboration among the federal regulatory agencies, laboratories, state and local government entities, military branches, and academics involved in protecting the food supply and responding to foodborne illness outbreaks and safety concerns. The upcoming FoodSHIELD Program Standards Resource Center should further provide additional help for program managers who are developing the Program Standards within their agency. **The committee recommends that the FDA engages in a promotion of the FoodSHIELD Program Standards Resource Center when it goes live.**
- vii. Ensure that FDA Regional Retail Food Specialists are highly knowledgeable regarding the Retail Program Standards. The FDA has 25 Regional Retail Food Specialists located throughout the United States and are assigned to one of the five FDA regions. The Specialists work with their assigned state, local, tribal, and territorial regulatory agencies to provide technical assistance. Any wisdom that can be shared along the way

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with enrollees is invaluable. Testimonials describing the competency and proficiency of their Regional Retail Food Specialist regarding the Retail Program Standards were mixed. However, the successful retail food regulatory programs reportedly had very supportive Regional Retail Food Specialists. Having FDA Regional Retail Food Specialists who provide accurate and timely answers helps maintain momentum as one moves through the Standards. **The committee recommends that the FDA provides a means to ensure that each of the FDA Regional Retail Food Specialists has a minimum level of knowledge regarding implementation of the Retail Program Standards.**

- viii. Champion the cause of implementing the Retail Program Standards. It is very unlikely a regulatory agency will successfully sustain meeting the Retail Program Standards without first getting the full support of management and then authorizing someone to responsibly drive forward the discussions regarding the Standards. All of the success stories shared with the committee spoke of one or two individuals who constantly championed the cause of implementing the Retail Program Standards. They always required the decision makers to ask the question, "How will this activity/initiative further achievement of the Retail Program Standards?" **The committee recommends that the FDA seeks the expansion of existing forums (e.g., NACCHO sharing sessions, NEHA AEC Retail Program Standards Workshop, and cooperative agreements with NACCHO and AFDO) for enrollees to share their success stories with the Retail Program Standards.** Note: This recommendation will encompass the recommendation made in iii.

Note: The Competency of Inspectors Subcommittee would like to acknowledge and thank Elvir Begic, MPH and Genevieve Weseman, MPH of the Saint Louis County Department of Public Health for extrapolating and conducting the analysis of the survey data in this report and for designing and producing the Retail Program Standards - Competency of Inspectors infographic attached to this report.

3. Progress on Issue 2014 II-005 Activities:

- a. The **Issue 2014 II-005 Subcommittee** (hereafter referred to as the Retail Program Standards Subcommittee) met via phone conferencing (October 31, 2014; December 3, 2014; January 23, 2015; April 15, 2015; August 19, 2015; and September 23, 2015) and conducted additional business by email and phone. The Subcommittee developed and distributed a survey questionnaire (see *Verification Audit Survey Tool attached to this report*) to the jurisdictions currently enrolled in the Retail Program Standards to gather information about verification audits.
- b. This part of the Program Standards Committee's final report outlines the disposition of issues worked on by the Issue 2014 II-005 Subcommittee and its recommendations to the Conference.
- c. **Charge 1: Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation; and Charge 3: Review the current verification audit requirement and:** (a) Identify strengths of the current verification audit requirement; (b) Identify weaknesses of the current verification audit requirement, with emphasis on any barriers that may result from the current requirement; and (c) Determine whether there are potential changes to the requirement, or the administration of the requirement, that could maintain the credibility of the Retail Program Standards while reducing barriers to achievement that may result from the current verification audit requirement.
 - i. An excel spreadsheet identifying all enrolled jurisdictions, contact person and contact e-mail address was developed from data located in the [Listing of Jurisdictions Enrolled in the Voluntary Retail Food Regulatory Program Standards](http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/UCM434742.pdf) on the FDA website at: <http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/UCM434742.pdf>. The Verification Audit Survey Tool was developed which contained both jurisdictional demographic information in addition to specific inquiries regarding the audit process, resources, and solicitation for improvements. Questions were based on the most current version of the Retail Program Standards (December 2013).

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- ii. 550 invitations to participate in the Verification Audit Survey were sent out, 53 were returned undeliverable, and 102 responses were received, combined and analyzed.
- iii. The respondents were as follows: local (n=76); state (n=18); tribal (n=3); territory (n=1), and other (n=4).
- iv. Verification Audit Survey Summary Related to Charge 1: *Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation:*
 1. Regarding Retail Program Standard objectives being clearly outlined, respondents indicated that:
 - a) Retail Program Standard requirements need to be simplified;
 - b) Forms and procedures need to be simplified;
 - c) Previous version of the FDA's verification audit guide for the Retail Program Standards was preferred due to increased thoroughness with step-by-step instructions and screenshots of audit tools; and
 - d) Additional examples on how the individual Retail Program Standards can be met are desired.
- v. Verification Audit Survey Summary Related to Charge 3: *Review the current verification audit requirement and:*
 1. *Identify strengths of the current verification audit requirement;*
 - a) 90% of respondents indicated that the audit requirements clearly outline the specific objective needed to meet a standard, and
 - b) The FDA's self-assessment guide for the Retail Program Standards is helpful to prepare an enrollee for a successful verification audit.
 2. *Identify weaknesses of the current verification audit requirement, with emphasis on any barriers that may result from the current requirement;*
 - a) The lack of resources, both time and staffing, is a barrier to achieving the Retail Program Standards for the majority of the jurisdictions responding;
 - b) Individuals do not feel comfortable conducting verification audits;
 - c) Individuals feel that they do not meet the criteria to be a verification auditor;
 - d) Enrolled jurisdictions do not know who they can contact to conduct a verification audit; and
 - e) Additional funding is needed to assist jurisdictions in attaining the Retail Program Standards and for conducting a verification audit.
 3. *Determine whether there are potential changes to the requirement, or the administration of the requirement, that could maintain the credibility of the Retail Program Standards while reducing barriers to achievement that may result from the current verification audit requirement.*
 - a) Provide verification auditor training;
 - b) Create a mentor program for verification auditors;
 - c) Include information on the FDA website indicating if an enrolled jurisdiction is willing to conduct a verification audit of the Retail Program Standards for others,
 - d) Provide funding to assist enrolled jurisdictions, and
 - e) Allow for forms to be submitted electronically to auditor (*Note: Electronic submission is not specifically prohibited by the verification audit procedures.*)
 4. Related specifically to "maintaining the credibility of the Retail Program Standards":
 - a) Create a more clearly defined quality assurance step; and
 - b) Establish criteria to become an "authorized" auditor.
- vi. The FDA consultants requested that the Retail Program Standards Subcommittee brainstorm other models for who can conduct a verification audit. The subcommittee came up with four potential models for audits:
 1. An enrolled jurisdiction conducts a verification audit of another jurisdiction;
 2. FDA conducts the verification audits;
 3. A third party auditor gets trained and conducts the verification audits; and,
 4. No verification audit is required.

The Verification Audit Survey results indicated that agencies have limited staff time and financial resources in order to conduct audits for other jurisdictions. Additionally, several respondents indicated that they do not

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- feel qualified or comfortable conducting an audit of another agency. FDA resources are also limited. Potential third party auditors discussed were industry, students, and trade organizations or associations such as the National Environmental Health Association, Association of Food and Drug Officials, International Food Protection Training Institute, National Association of County and City Health Officials (NACCHO), Food Marketing Institute, and NSF International. These third party auditors would need additional training to be familiar with retail food and the Program Standards. **All of the subcommittee members felt strongly that the option to not require verification audits should not be considered.**
- vii. The Retail Program Standards Subcommittee discussed with the FDA consultants the barriers related to the knowledge of a verification auditor and the need to remove those barriers by:
1. Educating enrolled jurisdictions on the criteria for verification auditors;
 2. Providing auditor training courses to help create a pool of auditors and a support system for those conducting verification audits;
 3. Developing a mentorship program for verification auditors similar to the NACCHO Program Standards Mentorship Program; and
 4. Making jurisdictions and potential verification auditors aware of the FDA's 2011 Program Standards Self-Assessment & Audit resource disk that includes screenshots of the various worksheets and forms used to conduct a verification audit. *Note: This information can no longer be posted on the FDA's website due to the Americans with Disabilities Act accessibility requirements.*
- d. *Charge 2. Work on a project to recognize levels of performance of enrollees that will demonstrate the progress of enrollees in a meaningful way and acknowledging the enrollees for taking the necessary incremental steps toward meeting the standards.* Subcommittee members felt that recognizing an enrolled jurisdiction for partial achievement of the Retail Program Standards would be beneficial and recommend continuation of this charge for the 2016 - 2018 Program Standards Committee. Work on this charge was limited to a brainstorming session resulting in the following discussion points:
- i. Ways that partial recognition is beneficial are:
 1. Shows decision makers that the jurisdiction is making strides to improve the program;
 2. Aids jurisdictions in obtaining additional resources in order to meet the Retail Program Standards;
 3. Shows that the Retail Program Standards may need to be revised if there is a Standard that is almost impossible to meet;
 4. Recognition of "the small wins" may be important to keep a jurisdiction moving forward in meeting the Retail Program Standards; and
 5. Recognition of partial achievement of a Retail Program Standard could be part of the supporting documentation for agencies striving for Public Health Accreditation through the Public Health Accreditation Board.
 - ii. The committee discussed potential methods of recognition for partial achievement of a Standard and other issues related to partial achievement of a Standard. This cost/benefit analysis will depend on what the recognition is going to be. Options discussed were:
 1. Changing the FDA website to indicate/include partial achievement (cost)
 2. Verbal mention on enrollee achievements at regional conferences
 3. Letter from FDA recognizing partial achievement (cost)
 - iii. Other issues to be considered related to developing an approach to recognize a partial achievement are:
 1. Will the recognition for partial achievement involve more audits? (cost)
 2. If an audit to recognize partial achievement of a standard is required, will the audit be a formal audit or will an informal audit be developed? (cost)
 3. Criteria will need to be developed for each standard so it is clear when partial achievement is attained, e.g., 25% of the elements in the standard have been met. (cost)
 4. Currently not all of the Standards are easily quantified for partial achievement. The Standards may need to be rewritten which may make them more complex. (cost)
 5. Imposes additional reporting requirements for enrolled jurisdictions. (cost)
 6. The criteria developed for determining partial achievement would need to be designed so that it can be applied consistently. (cost)

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- e. Recommendations from Issue 2014 II-005. Based on the work done by the Retail Program Standards Subcommittee, the Program Standards Committee has the following recommendations for consideration by Council (See Issue PSC 3):
- i. To continue charges 1, 2 and 4 from Issue 2014 II-005 to the 2016 - 2018 Program Standards Committee as follows:
 1. Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation; and
 2. Work on a project to recognize levels of performance of Program Standards enrollees that will demonstrate the progress of enrollees in a meaningful way and acknowledging the enrollees for taking the necessary incremental steps toward meeting the Program Standards. As part of this project:
 - a. Provide a Cost/Benefit Analysis for recognizing partial achievement of the Retail Program Standards;
 - b. Identify different approaches that could be used to recognize partial achievement of the Retail Program Standards that would not require additional resources to perform or administer; and
 - c. Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards.
 4. Serve as a sounding board for FDA with respect to ideas generated during collaboration with the other entities such as NACCHO, PFP, AFDO.
 - ii. That a letter be sent to the FDA with the recommendations to encourage the FDA to:
 - a) Work on removing the barriers identified related to conducting a Retail Program Standard verification audit by: (1) providing auditor training; (2) creating a mentorship program for auditors; (3) including information on the online Listing of Enrolled Jurisdictions document indicating which enrollees are willing to serve as verification auditors for other enrollees; and (4) continuing to work to simplify the forms and procedures for the Program Standards in an effort to reduce the amount of time required to complete the required documentation.
 - b) Expand funding opportunities to help support and sustain the Retail Program Standards-related activities of enrollees.
 - c) Better publicize and promote the work that is being done by the FDA Clearinghouse Workgroup as an important resource for Retail Program Standards enrollees.
4. Additional progress on Issue 2014-005, *Charge 1: Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation*. The FDA requested work by the full Program Standards Committee on the Retail Program Standards as follows:
- a. Review and provide feedback on proposed revisions to Standard 7. The committee members reviewed, deliberated, and supported the proposed revisions. The proposed revisions allow for electronic mechanisms, such as social media and web-based meetings or forums, to be used as a method to satisfy the Standard 7 requirement for two-way interaction between regulatory authorities and industry/community stakeholders. The committee will submit an issue to recommend that Council II accepts the proposed revisions to Standard 7 (See Issue PSC 5).
 - b. Review and provide feedback on the FDA's proposed response to the recommendations for Standard 4 submitted by the Certification of Food Safety Regulatory Professionals Committee in Issue 2012 II-025: Recommendations from Uniform Inspection Program Audit Pilot Project. The FDA consultants to the committee reviewed each of their proposed responses, including changes to Standard 4 and the CFP Field Training Manual. The committee members provided feedback with minor revisions to the proposed responses, including changes to Standard 4 language, and indicated no lack of support. The FDA will submit an issue to recommend that Council II accepts the proposed revisions to Standard 4.
 - c. Review and provide feedback on proposed revisions to Standard 9. The committee members reviewed, deliberated, and indicated no lack of support for the proposed revisions. The FDA will submit an issue to recommend that Council II accepts the proposed revisions to Standard 9.

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5. Request from the Executive Board to plan and facilitate the Retail Program Standards Session to be held at the 2016 CFP biennial meeting. The purpose of the session is to provide a forum to share information about the Retail Program Standards, to gain insight from industry about the value of implementation of the Retail Program Standards by regulators, and to facilitate a discussion about success stories related to implementation of the Retail Program Standards. The Program Standards Committee has formed a planning team/workgroup consisting of industry and regulatory members to plan and facilitate the Retail Program Standards Session to be held on Tuesday, April 19, 2016.
6. Support for establishing workgroups within the Program Standards Committee to address charges previously assigned to the Certification of Food Safety Regulation Professionals Committee/Workgroup and the Interdisciplinary Foodborne Illness Training Committee.
 - a. The members of the Program Standards Committee view the work of both the Certification of Food Safety Regulation Professionals Committee (CFSRP) and the Interdisciplinary Foodborne Illness Committee (IFIC) as being within the scope of the Retail Program Standards, respectively Standards 2 and 5.
 - b. The Program Standards Committee encourages Council II to accept the recommendation in an issue submitted by the CFSRP to assign charges previously assigned to that committee to the 2016 - 2018 Program Standards Committee as follows:

Issue 2014 II-002, Charge 1:

Collaborate with the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to:

1. Continue review of all initiatives: existing, new or under development; involving the training, evaluation and/or certification of food safety inspection officers. This collaborative working relationship will ensure the sharing of information so as not to create any unnecessary redundancies in the creation of work product or assignment of tasks/responsibilities.
2. Review the results of the partnership for food protection training and certification work group recommendations for the nationally recognized Retail Food Curriculum based on the Retail Food Job Task Analysis (JTA) to determine if changes are needed in the Standard 2 curriculum. Identify any gaps and recommendations for change and review the time frame for completion of Steps 1 through 4 for new hires or staff newly assigned to the regulatory retail food protection program.
3. Review the results of the partnership of food protection training and certification work group recommendations to determine if the Conference for Food Protection Field Training Manual for Regulatory Retail Food Safety Inspection Officers and forms need to be revised.

CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. Report – Program Standards Committee (PSC)
 - a. Acknowledgement by Council II of the 2014-2016 Program Standards Committee Final report.
 - b. Acknowledgement and thanks by Council II to the members of the committee. Acknowledgement of the work done by the co-leads of the two subcommittees for their diligence in facilitating work to address the charges.
2. PSC 2 – Recommendations from Issue 2014 II-003
 - a. The Program Standards Committee is submitting recommendations with requests to the FDA regarding the Retail Program Standards.
3. PSC 3 – Recommendations from Issue 2014 II-005
 - a. The Program Standards Committee is submitting recommendations with requests to the FDA regarding the Retail Program Standards and resources for the verification audit process.
4. PSC 4 – Posting of Retail Program Standards Infographic on CFP Website

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- a. The Program Standards committee requests the posting of the infographic on the CFP website as a resource to exhibit the value to industry of regulators achieving Standards 2, 4 and 7 of the Retail Program Standards.
5. PSC 5 – Amend Retail Program Standard 7
 - a. The committee recommends amendment of Standard 7 to allow electronic mechanisms, such as social media and web-based meetings for forums, to be used as a method to satisfy the requirement for two-way interaction between regulatory authorities and industry/community stakeholders.

Attachments:

Content Documents:

1. 2014 – 2016 Program Standards Committee Final Report
2. 2014 – 2016 Program Standards Committee Membership Roster
3. Retail Program Standards - Competency of Inspectors Infographic

Support Documents:

4. Verification Audit Survey Tool
5. Industry Support for Standards 2, 4 and 7 Survey Tool
6. Verification Audit Survey Results
7. Industry Support for Standards 2, 4 and 7 Survey Results (FMI Summary)
8. Industry Support for Standards 2, 4 and 7 Survey Results (NRA Summary)

COMMITTEE MEMBER ROSTER (attached):