

Manager Training, Testing, and Certification Committee Report to Executive Board and Conference

Date: December 19, 2005

Prepared by: Roger Hancock, Chair

Committee charge:

- Study education and training as it relates to the CFP Standards, the Committee and Food Safety;
- Determine the proper relationship between education/training and the Committee (Should education/training be a component of the Committee's work or moved to a new Committee?);
- Recommend a course of action for the Committee and the Conference in regards to education/training by the next Conference;
- Maintain Standards for Accreditation of Food Protection Manager Certification Programs;
- Consider the addition of food allergens to the training and/or certification process.

Committee Members:

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Consultants (non-voting):

John Marcello	U.S. FDA
Marsha Robbins	Marsha Robbins Consulting
Roy Swift	ANSI
Jim Lewis	NSF
Jill Hollingsworth	Food Marketing Institute

Progress Report:

Following the 2004 Conference for Food Protection biennial meeting, the Standing Committee met three times and had three conference calls. The meetings and calls focused on answering the charges listed above which all have been addressed successfully. To begin the work, the committee restructured the way that it would conduct business. This restructuring involved the formation of subcommittees to address the work at hand while spreading the burden of work across the committee so that it didn't all rest with the Chair and Vice Chair.

Subcommittee

Logistics
 Communication
 Education & Training
 Standards

Function

Arrange for meetings, conf. calls, minutes, etc.
 Prepare communication re: standards, etc. to audiences
 Develop guidelines for training necessary for certification
 Maintain the Standards and the need for amendment as required

The reorganized structure served the committee very well during the intervening two years. This report will follow the committee structure in communicating the work that was done.

Logistics: Exceptional 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: A Frequently Asked Questions (FAQ) document was developed by the Communication subcommittee and presented to the full committee for review and approval. That document, which provides answers to frequently asked questions about the Standard and the certification process that are asked by a wide audience of interested parties, has been completed and posted on the CFP web site.

Also the subcommittee updated the Conference web site to include the version of the Standard that reflects edits made during the 2004 Conference meeting, and other technical changes to keep the web site current.

The need for increased communication with the Board from ANSI and from the ANSI-CFP Accreditation Committee (ACAC) to provide progress on contractual obligations came to light. The Committee unanimously passed a motion for ANSI to provide the Board with an annual report, delivered in person, during the Fall CFP Board meeting, and written progress reports to every other Board meeting.

Education & Training: In response to the charge to study education and training as it relates to the CFP Standards, the Committee and Food Safety, the Education and Training subcommittee investigated the question and presented their findings to the full committee. By consensus, the committee recognized the importance of training to prepare people for the certification process. However, the exact role of training in the certification process generated lively debate. The discussion ranged from creating standards for training based on a specific, uniform job task analysis, to providing no guidance for training in order to prevent creating a *de facto* standard that would undermine the test-driven certification standard that exists. The identified discussion points included the following:

- Training definition
- Separation of Training and Certification
- Trainer qualifications
- Committee structure and conflict of interest
- Specificity of Conference-provided guidance
- Call from regulatory bodies for training guidelines
- Regulatory bodies using Annex B as training guidelines
- Evaluation and maintenance of training plans

The committee came to recognize that it lacked the subject matter expertise to fairly resolve these points with consensus in a way that maintained the integrity of the committee process and would not compromise the valid, reliable, and legal defensible Standard that exists. So the committee, with Executive Board approval and Conference funds, hired Dr. Sharon Goldsmith as a consultant to facilitate the committee work.

Dr. Goldsmith is an internationally recognized expert on standards development, certification and accreditation. She has held several academic appointments and authored over 100 articles, papers and book chapters. She was a 2003 recipient of the Distinguished Service Award from the American National Standards Institute (ANSI) in recognition of her leadership in international standards, accreditation and certification. She currently serves on several national boards, including ANSI's, addressing standards, accreditation and certification issues. She is the Chair of The Conference for Food Protection- ANSI Accreditation Board that accredits programs for food protection managers internationally.

Dr. Goldsmith led the committee through a very structured process to respond to the committee's charges related to training. Beginning with an overview of definitions and different industry applications of training and certification, the committee considered a variety of alternatives for how to address the need for training within the established Standard for Accreditation of Food Protection Manager Certification Programs. The committee was encouraged to think about the advantages and disadvantages held by each of the options as they relate to the Conference's goals for manager certification.

Various roles CFP can play to promote quality food safety training programs:

- Hands off - let market distinguish between levels of training quality.
- Conduct research regarding stakeholders needs.
- Assist in publicizing existing information that can assist training programs; test blueprints, role/task descriptions, FDA guidelines, etc.
- Encourage some other group outside CFP to develop standards/guidelines
- CFP Certification accreditation standards to mandate training as part of certification
- Develop guidelines for training programs
- Develop standards for training programs
- Accredite training programs
- Design/provide training sessions/training materials

Specific questions to answer as part of addressing the committee charge:

What role, if any, CFP should play to promote quality food safety training programs?

- What's in conformance with international standards and guidance?
- What's best practice in other industry?
- What's feasible for CFP?
- What's wanted by the CFP's stakeholders?

Who should be responsible for overseeing the food safety training function?

- CFP MTTC Committee
- Split CFP MTTC Committee into two separate committees
- Assign to some other new entity
- Create new entity
- Other options

Discussion about the options available and the questions to answer covered a wide range of topics. The committee evaluated the consequence of developing guidelines that are then adopted by a state or local jurisdiction as code which changes the guidelines into standards. The committee also considered the legal liability of developing guidelines that then become standards. Following discussion, the committee voted on options available for addressing the training charge. Below are the options and votes:

Option 1: Keep hands off: let market distinguish between levels/quality/type of training that meets their needs.

Pros	Cons
<ul style="list-style-type: none"> • Easy for CFP to accomplish. • Shoddy training programs will go away if their students don't pass the exam. • We can't hold their hands forever. <p>Primary role – 8 Secondary role – 1 No role – 8 Abstain – 1</p>	<ul style="list-style-type: none"> • Allows shoddy training providers to come & go. • Doesn't stop shoddy trainers from starting new businesses. • Some small operations (mom & pop stores) will not receive training. • May lead to training to the test, if test pass rate is used to evaluate quality of training. • Doesn't address some stakeholders' needs for quality training. • If we don't do it, it may not be done right.

Option 2: Conduct research regarding stakeholders needs.

Pros	Cons
<ul style="list-style-type: none"> • Stakeholders have different needs; it would help CFP be more responsive. • Help CFP understand more about what regulators want/need <p>Primary role – 0 Secondary role – 0 No role – 17 Abstain – 1</p>	<ul style="list-style-type: none"> • Resources required (time, money, etc.) • Not necessary; this is a regulator's concern; some of them want a revenue source by offering training • Survey may lead us back to what we don't want to do • Will get inventory of conflicting wants/needs • It won't matter what the results show; everyone will still not be satisfied

Option 3: Assist in publicizing existing information that can assist training programs; test blueprints, role/task descriptions FDA guidelines, etc.

Pros	Cons
<ul style="list-style-type: none"> • Easy to do; publicize what is already there since it is readily available <p>Primary role – 0 Secondary role – 16 No role – 1 Abstain – 1</p>	<ul style="list-style-type: none"> • Redundant: training programs should already know this • Possibly encourage poor training

Option 4: Encourage some other group outside CFP to develop standards/guidelines: such as industry, government, private agencies, NEHA, AFDO, etc.

Pros	Cons
<ul style="list-style-type: none"> • Easy for CFP to do <p>Primary role – 0 Secondary role – 0 No role – 17 Abstain – 1</p>	<ul style="list-style-type: none"> • No other group we would trust to do this • Lose control of program

Option 5: Add to the CFP certification accreditation standards a mandate for training as part of certification requirements.

Pros	Cons
<ul style="list-style-type: none"> • Would satisfy some stakeholders <p>Primary role – 0 Secondary role – 0 No role – 16 Abstain – 2</p>	<ul style="list-style-type: none"> • Outside the charge to CFP • Create confusion as to the separation of training & testing required in the standards • Would possibly jeopardize the whole program that is currently in place • Onerous to some certification organizations • Regulators will not want this • Doesn't address most stakeholders' needs

Option 6: Develop guidelines for training programs.

Pros	Cons
<ul style="list-style-type: none"> • Can address content • Some stakeholders want this • Allows flexibility • Less liability • More palatable to CFP • Help consumer distinguish between quality of training programs • Useful to regulatory agencies providing training <p>Primary role – 0 Secondary role – 2 No role – 10 Abstain – 6</p>	<ul style="list-style-type: none"> • Misuse of guidelines; they will be used as standards • Repetitive: guidelines already exist in the Food Code • If people don't follow the Food Code, why would they follow CFP guidelines

Option 7: Develop standards for training programs.

Pros	Cons
<ul style="list-style-type: none"> • Provides standard for regulators to use <p>Primary role – 0 Secondary role – 0 No role – 15 Abstain – 3</p>	<ul style="list-style-type: none"> • Requires resources (time, money, etc.) • Too restrictive • Lack of expertise • Content/process relationship • Lack of job task analysis (JTA) • Level of detail (how much?) in standards

Option 8: Encouraging programs to be accredited/approved by an external third party such as IACET or DETC, using generic existing standards.

1) Programs would independently apply to external agency for accreditation/approval.

2) Programs would be evaluated against generic standards for quality training.

Pros	Cons
<ul style="list-style-type: none"> Maintain some level of quality Would demonstrate training providers' commitment to quality <p>Primary role – 0 Secondary role – 0 No role – 17 Abstain – 1</p>	<ul style="list-style-type: none"> These third parties evaluate process, not content Legal liability to CFP Would put some providers out of business Cost to training program Makes certification process more complex Possible negative effects on CFP certification program Unknown: needs more exploration Reciprocity more complicated Does not fill stakeholders' needs Political problems Program content may not be appropriate

Option 9: Accredit training programs; Require training programs to be accredited by CFP

Pros	Cons
<ul style="list-style-type: none"> Uniformity Consistency Control <p>Primary role – 0 Secondary role – 0 No role – 16 Abstain – 2</p>	<ul style="list-style-type: none"> Requires resources (time, money, etc.) Not in mission Lack of expertise in accreditation

Option 10: Design/provide training sessions & training materials

Pros	Cons
<ul style="list-style-type: none"> Consistent Control of training materials <p>Primary role – 0 Secondary role – 0 No role – 17 Abstain – 1</p>	<ul style="list-style-type: none"> Lack of personnel, funds, time, etc. Doesn't fit with CFP mission

Option 11: Clarify existing standard to stress that CFP believes that training is outcome-based, and is to be acquired as individual candidate needs dictate

Discussion points	
<ul style="list-style-type: none"> Regulatory agencies think that since content guidelines were available in the past, they should be available again. Can be handled by MTTC committee Results indicate that we need to do a better job of informing, but not necessarily by changing the standard. <p>Primary role – 0 Secondary role – 0 No role – 17 Abstain – 1</p>	

Option 12: CFP should use the current version of the FDA Food Code 2-102.11(c) as the guidance for training content

Pros	Cons
<ul style="list-style-type: none"> • Approx. 80% of jurisdictions already use FDA Food Code • FDA had most up-to-date guidance • Other areas of Food Code provide additional guidance for training • Most jurisdictions are willing to use Food Code as basis for curriculum <p>Primary role – 10 Secondary role – 1 No role – 4 Abstain – 3</p>	<ul style="list-style-type: none"> • Not enough detail • Certification should be based on job task analysis; standard refers to JTA, but not Food Code • Some still have not adopted, or do not use Food Code

Of the twelve options available, only options 1 and 12 received any votes as the primary role for the committee. Option 3 unanimously received approval as a secondary position of the committee. Further discussion and clarification of the votes led to a consensus position combining options 1 and 12 into the following statement that recommends a course of action for the committee and the Conference in regards to education/training:

The Committee recognizes the importance and need for the provision of food safety training to all food employees and managers. The committee recommends the content of food protection manager training programs be consistent with Paragraph 2-102.11 (C) of the most recent FDA Food Code. CFP should continue promoting the information contained in the Food Code as well as any existing relevant public information that can assist training program providers in developing course content, instead of providing training standards or guidelines.

As rationale for this position, the committee added a brief explanation:

“In the absence of accreditation of training programs, any training recommendations or guidance provided by Conference for Food Protection becomes standards, requirements or guidelines that jurisdictions use to evaluate training programs. When jurisdictions evaluate training as a component of certification, it undermines the process that CFP has already put in place, because a stand alone test or certificate from an accredited provider can no longer serve as the sole determiner of knowledge competency.”

As support for this direction, the committee unanimously recommended that the Conference website be amended to provide direct and clear links to public information references that can be used by training providers to guide their training efforts.

Finally, in response to the charge to determine the proper relationship between education/training and the committee, the committee unanimously declared that training and education remain a component of the standing committee, rather than being assigned to any other work group. This continuity is important to maintain consistency in the Conference’s approach to certification of food managers.

The committee continues to work with ANSI on the development of a marketing plan that will clearly communicate to all parties involved with food manager certification. Resolution of the training charges as captured above will provide a firmer foundation from which a marketing plan can be developed, addressing frustration that ANSI has felt with their contractual obligation to market the certification program. A work group has been created with members from the committee and ANSI to scrap the old plan and develop a new plan that focuses on acceptance of the program with a target completion date of March, 2006.

Standards:

The Standards subcommittee worked with ANSI, the accrediting body, to identify sections of the Standards that need clarification. Together with the ANSI-CFP Accrediting Committee (ACAC), the Standards subcommittee proposed changes to the Standard in order to keep it current (i.e. foreign language requirements, corrective action requirements, computer testing, etc.). The committee discussed each of the proposed changes at length to ensure that they maintain the intent of the document, clarify its meaning, and provide appropriate direction for stakeholders. **The recommended changes to the Standard are being submitted to the Conference as Issues for deliberation during the 2006 meeting.**

In addition to changes to the Standard, and in keeping with the direction on training covered above, the committee unanimously agreed to remove Annex B – Guidelines for Food Protection Manager Certification Training Programs – from the Standard. Removal of this Annex will prevent confusion that has arisen from its inclusion. The removal of Annex B does not mean that the committee is de-emphasizing the role training plays in preparing people for certification. Rather, it better positions the Standard to communicate clearly that role that training plays. **This recommended change to the Standard will also be submitted to the Conference as an Issue for deliberation during the 2006 meeting.**

Other Business:

The consideration of adding food allergens to the training and/or certification process was the other business discussed by the committee. Specifically, two questions were addressed:

- Are food allergy questions on the food manager exam?
- Questions concerning the training component

The role of allergen awareness for a food manager has changed since publication of the FDA's 2005 Model Food Code. Prior to publication, Anne Munoz-Furlong of the Food Allergy and Anaphylaxis Network (FAAN), raised this as an Issue to the Conference at its 2004 meeting. From that meeting, the charge was given to this committee to address the Issue. The committee received input on this Issue directly from Ms. Munoz-Furlong who mentioned that the Allergy committee of the CFP is further along with the Issue, currently using posters and making recommendations or comments on the posters that are available. The purpose of this Issue is to raise awareness about food allergies and the fact that we continue to see reactions and fatalities in restaurant settings.

Art Banks presented information about the 2005 Model Food Code's coverage of allergens and food manager responsibilities. Prompted by the Food Allergen Act of 2004, the Food Code now deals with allergens. Definition of "Major Food Allergen" has been added. Also, symptoms of food allergies have been included in Appendix 4 3.(A)(4). And a section has been added to 2-102.11 (Demonstration of Knowledge) requiring the "Person in Charge" to be able to describe foods identified as major food allergens and the symptoms of an allergic reaction.

Due to the time cycle of the Food Code, Job Task Analyses, and test item banks, to include new information in certification examinations requires an amount of time. With the inclusion of allergen language in the Food Code, this material will naturally become part of the certification process as job task analyses and test item banks are refreshed.

It was decided that the Allergen committee of the Conference had the lead role in addressing this Issue from the 2004 meeting, and that there was no need for this committee to present an Issue to the 2006 meeting because the Issue of allergens was appropriately handled through the existing certification process. A recommendation was made to include such information in the resources that are available on the CFP home page for reference.

Requested Board/other actions:

Please accept/approve this report as submitted.

Recommendation(s) for future charge:

The committee needs to be charged as follows from the 2006 Conference meeting:

1. Consider updates or changes necessary in the Standard to make it compatible with international certification accreditation standards, if international compatibility is desired.
2. Develop a process to review public information related to food manager training for relevance, and a process to make that information available through the Conference for Food Protection (i.e. web site or other appropriate means).