COMMITTEE NAME: Criticality Implementation and Education Committee

COUNCIL (I, II, or III): Council I

DATE OF REPORT: March 27, 2009

SUBMITTED BY: Deborah Marlow and Rick Barney, Co-chairs

COMMITTEE CHARGE(S): CFP Issue 2008 I-022 specified that CFP create a Criticality Implementation and Education Committee to work on the following:

1. Develop a training program, educational information and identify issues of concern to all stakeholders.
2. Recommend revised terminology based on focus group consideration. The recommended revised terms will be forwarded for review and acceptance to the Executive Board by December 2008.

PROGRESS REPORT / COMMITTEE ACTIVITIES WITH ACTIVITY DATES:

The committee met as a whole six times, September 22, 2008; October 13, 2008; November 10, 2008; December 8, 2008; January 12, 2009; and March 16, 2009. In addition, the committee formed two smaller sub-committees. The first smaller committee discussed in length how to revise terminology “based on focus group considerations”. It was found that a true focal group does not develop terminology; a focus group is designed to test terminology and then only after a complete understanding of how the terms will be used and trained. Based on time constraints, the sub-committee determined that the whole committee, being a good cross section of end users and already educated on how the terms would be used, should act as the “focal group” required in the original charge. Details regarding the work of the first focus group were provided in the January report to the Executive Board, but will be summarized later in this report.

A second sub-committee was formed to review the re-designation of terms, “Critical Item” and “Noncritical” with the terms, “Category 1, Category 2, or Category 3”, as recommended in Issue 2008 I-022. The sub-committee reviewed all the proposed changes in order to be able to proceed with the development of the implementation and educational information needed to complete the committee’s second charge.

The report submitted to the Executive Board on January 16, 2009, reflected the work conducted by the committee from September to January to recommend a revised set of
terms. A summary of the work of the committee and a summary of the January report follows:

- The committee supports the re-designation of two terms to three terms.
- The committee supports the work of the FDA Criticality Committee and the definitions approved by the 2008 CFP for the three new terms.
- The committee is not able to reach consensus on the revised terms.
- The committee did not have the resources or the time required to develop and implement a formal focus group that followed formal, standardized focus group methodology before December 2008. The committee used the committee members and CFP academia members to conduct its research feedback tool (focus group).
- The committee asked the Board to accept the report and recommend to the FDA that based on our work and majority opinion, “Priority – Foundation – Core” replace Category 1, 2 and 3 as the new terminology for the 2009 Food Code.
- The committee members that supported the minority opinion and a different set of terms were given an opportunity to write a minority report. The minority members recommended the terms, “Priority 1, Priority 2, and Priority 3”.

FUTURE WORK/PLANS

It has been indicated to the committee that there is a possibility that FDA may be able to assist with the development of a new focus group, depending on available resources. The committee is very interested and willing to work with FDA on the development of a new focus group. It is understood that work could not be completed in time to impact the 2009 Food Code and provide a different set of terms before the printing deadline.

The committee plans to continue its work with the development of a training program, and educational information and to identify other issues of concern. The committee will use the placeholder terms, “Category 1, Category 2, and Category 3” until new terms have been selected and approved.

The committee chairs will continue to work with the committee and will be prepared to represent the committee at the Executive Board meeting.

REQUESTED BOARD (OR OTHER) ACTIONS: The committee asks the Board to accept our report. It is understood that the Board would like further discussion at the upcoming Executive Board meeting in April to resolve the issue regarding the recommended terminology.

The committee also asks the Board to allow the committee to continue with its work to complete its other charge.