

Conference for Food Protection Committee FINAL Report

COMMITTEE NAME: Food Protection Manager Training, Testing, and Certification Committee

COUNCIL: Council II

DATE OF REPORT: January 8, 2010

SUBMITTED BY: Joyce Jensen, Committee Chair

COMMITTEE CHARGE(S):

2008 CFP Issue II-037

The Conference recommends this standing committee be charged to continue working with the Conference for Food Protection (CFP) Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the standards in an up-to-date format.

2008 CFP Issue II-039

To evaluate Annex B Section B3, to consider incorporating the training recommendations suggested by the Committee as shown below.

Annex B Section 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 and content outlined based on job task analyses developed by accredited certification organizations.

COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

Following the 2008 CFP biennial meeting, the Food Protection Manager Training, Testing, and Certification Committee (FPMTTC) met in person twice and held several conference calls to address the charges and to review and revise the Committee Bylaws.

The Committee Chair would like to thank the Committee Vice-Chair, Jeff Hawley, for his valued assistance, and all of the Committee Members for their hard work and input on addressing the CFP charges. The Committee would like to thank: Jeff Hawley and Harris Teeter, Inc. for hosting the September 10, 2008 conference call; Dr. Cynthia Woodley and David Cox and Professional Testing for hosting the January 14 and 15, 2009 face-to-face meeting at in Orlando, Florida; Frank Ferko and US Foodservice for hosting the August 26 and 27, 2009 face-to-face meeting in Rosemont, Illinois; and Katie Piche and National Restaurant Association Solutions for hosting the November 19, 2009 Committee web conference call.

The Committee completed work on the two charges from the 2008 CFP Biennial Meeting. For the first charge (from 2008 Issue II-037), several concerns came up relative to the *Standards for Accreditation of Food Protection Manager Certification Programs* (hereafter referred to as *Standards*) that were discussed, and proposed revisions to the Standards have been submitted as Issues. For the second charge (from 2008 Issue II-039) to propose a revision to the Annex B Section B3, the Committee came up with alternative language that gives guidance on training; this language has been submitted as a separate Issue.

The proposed changes to the *Standards* Section 5 were the most challenging for the Committee. It is important to remember the history of Food Protection Manager Certification. This program had been thoroughly researched and debated over many years when the CFP determined that a legally defensible nationally recognized third party accreditation of certification programs was needed.

To have a certification program, standards are necessary, and then certification organizations would be accredited by an accrediting organization that would independently evaluate if the certification organization’s program meets the standards. A certification is not a record of training attended by an individual. A certification is the result of a legally defensible process based on a current job analysis that demonstrates an individual has the knowledge required to protect the public from foodborne illness.

It may help to refer to the attached *Standards for Accreditation of Food Protection Manager Certification Programs* in Annex A and the definitions in Section 1 to assist with understanding the accreditation and certification process. The following comparison table assists in clarifying the differences between “certification” programs and “certificate” programs.

CERTIFICATION Program	CERTIFICATE Program
Results from an assessment process	Results from an educational process
Awarded by a third party	Awarded by training and educational programs
Indicates mastery-demonstration of required competencies to practice	Indicates successful completion of a course/s
Has on-going requirements; holder must demonstrate s/he continues to meet the requirements	No on-going requirements. Individuals may or may not demonstrate knowledge of course at the end of a set period in time
Certification owned by the certification body- can be taken away	Certificate owned by the certificate holder.

A certification examination is developed and administered by an independent third party so that the outcome is valid. “Teaching to the test,” assisting in the “understanding” of the questions, or otherwise “helping” with the test by an instructor, trainer, or educator would invalidate the certification process, no matter how good the intentions. However, when the *Standards* were developed, it became evident a system to train and test thousands of food protection managers was already in place across the country, and that it would be a challenge to change the existing process. So to compromise, the CFP *Standards* included requirements to provide a “firewall” that separates “training” and “testing” while allowing an instructor, trainer, or educator to administer the test. Allowing a trainer to administer the examination is unique for a certification

process and has continually been the source of problems and/or concerns for food protection manager certification programs, ANSI, and ACAC.

To address this challenge, the FPMTTC Committee is proposing a change to the *Standards* Section 5 that would **NOT** allow an instructor, trainer, or educator to be a test administrator or proctor. The *Standards* Section 5, as proposed, would still allow an instructor, trainer, or educator and a test administrator or proctor to be part of the same organization/agency. Test administrators and proctors would, however, be restricted from participating with training.

This proposed change to the *Standards* Section 5 was not a unanimous decision by the Committee. The following are some advantages and concerns of the proposed revision as discussed by the Committee:

Advantages of separating the instructor/educator/trainer from the test administrator/proctor:

- CFP and FDA are supportive of a “certification” program which is legally defensible.
- It will be a step in the right direction, rather than forcing a total separation requiring a separate organization to administer the test.
- According to ANSI, typical certification programs beyond the food industry do not allow an instructor/educator/trainer to be a test administrator/proctor. Our current process blurs the lines and gives the appearance of a certificate program (take a course and an exam) rather than a certification program.
- Not taking action may result in jurisdictions dropping the certification requirement because of an invalid process.
- The current process has created opportunities for violation of exam security by allowing an instructor/educator/trainer to have direct contact with the exams.
- The credibility of the CFP and the *Standards for Accreditation of Food Protection Manager Certification Programs* will be jeopardized if this issue is not addressed.
- What a program is worth is the value it takes to achieve it. The expense, training, and degree of knowledge needed to be certified reflect the value of the certification. If the process is not valid or if there are opportunities in the process that allow individuals to get around the requirements, it devalues the programs for all others who have achieved the certification.
- The certification providers would have more control over the integrity and accountability of the exam administration process by restricting who has access to the examinations.
- There have been studies that indicate that when there is clear singular role identity (such as “test administrator” vs. “trainer”) there is better adherence to the rules and requirements for that specific role, and less chance of deviation from the role.

Concerns of separating the instructor/educator/trainer from the test administrator/proctor:

- Having an instructor/educator/trainer separate from a test administrator/proctor may add to the expense of the certification process. This may discourage access to manager certification rather than encourage it.
- When training and testing are not combined, there is additional time needed if the candidate has to take the exam at a different location.
- The separation could decrease in-person trainings and increase “online training” options, which may not be completely embraced by some regulatory jurisdictions.
- The separation could have a negative impact on the training and testing opportunities in rural and low population areas.
- The separation could have a negative impact on entities that currently have one person that both instructs a course and administers the test.
- There are alternatives to certification, including certificate programs where the manager would be trained and then pass a non-certified exam; however, the result may not have the same degree of assurance that a manager has the knowledge required to protect the public from foodborne illness.
- Dishonest people will always be a problem that has to be addressed and separating the roles may not necessarily add any greater security to the process.

The above concerns were discussed by the Committee and were found to be very legitimate but the overarching factor is maintaining the credibility of the Food Protection Manager Certification Program. The intent is to have a certification process that minimizes the chances of inappropriate activity and gives the certification organizations the ability to address situations of concern.

ANSI has recommended that the Committee look at how the *Standards* could be brought more in alignment with International Standard ISO17024 which sets out general requirements for an organization's certification program for individual persons.

In the continuing process to maintain the *Standards* in an up-to-date format per 2008 Issue II-037, the Committee completed draft revisions to the FPMTTC Committee Bylaws and is presenting the following proposals as Issues:

- To change and shorten the Committee name.
- To modify composition of the Committee to include representatives of training providers while not increasing the total number of Committee members.
- To define a quorum to be one (1) more than half of the filled Committee positions, rather than a specific number.
- To allow the Committee Chair and Vice-Chair to be selected from any representative group on the Committee.

- Other non-substantive clean-up bylaw changes.

The Committee agreed that a future charge is to determine how Committee membership vacancies and change of membership representation are addressed in the Committee bylaws and propose changes if needed.

REQUESTED ACTION:

The Committee submits the following Issues to the 2010 CFP Biennial Meeting:

1) **Report – FPMTTC Committee**

This Issue requests that the Conference acknowledge the final report as submitted, and thanks the Committee members for their effort in addressing the charges from the 2008 Biennial Meeting.

2) **Amend training language in *Standards for Accreditation***

This Issue addresses charge from 2008 CFP Issue II-039 with proposed clarification to Annex B Section B3 regarding training recommendations.

3) **Amend Section 5 of the *Standards for Accreditation***

This proposed Section 5 revision includes new and revised subsections establishing the following: an instructor, trainer, or educator cannot serve as test administrator, or proctor; roles and responsibilities for certification personnel; competency requirements for test administrators and proctors; item and examination exposure controls; and establishes formal agreements with test administrators/proctors that include a code of conduct, conflict of interest, and a statement of consequences for breach of the agreement. In addition, some of the subsections have been reorganized for clarity and renumbered accordingly.

4) **Remove reference to “monitor” in the *Standards for Accreditation***

The term monitor is not currently used by certification organizations and was defined as a proctor. The term is no longer applicable

5) **Change name of the “FPMTTC Committee”**

The proposed revision to change the Committee name from “Food Protection Manager Training, Testing and Certification Committee” to “Food Protection Manager Certification Committee” to more accurately reflect the actual food protection manager certification program as written by the standards.

6) **Revise Bylaws of the FPMTTC Committee**

This FPMTTC Committee proposed Bylaw revision includes: adding training providers to the composition of the Committee, establishing that a quorum is based on the number of filled positions, and some non-substantive clean-up language.

7) **New or Continuation Charges for the renamed Committee**

The Conference recommends that this standing committee be charged to:

- continue working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the *Standards for Accreditation of Food Protection Manager Certification Programs* in an up-to-date format.
- investigate if the *Standards for Accreditation of Food Protection Manager Certification Programs* should create more alignment with ISO17024 and propose changes if needed.
- determine how Committee membership vacancies and change of membership representation are addressed in the Committee bylaws and propose changes if needed.

ATTACHMENTS:

Standards for Accreditation of Food Protection Manager Certification Programs

Food Protection Manager Training, Testing, and Certification Committee Bylaws

Food Protection Manager Training, Testing, and Certification Committee Member Roster

COMMITTEE MEMBER ROSTER:

Attached