



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Public Health Service
Food and Drug Administration
College Park, MD 20740

AUG 2 2007

Elizabeth A. Nutt, Chair
Conference for Food Protection
1085 Denio Avenue
Gilroy, California 95020-9206

Dear Ms. Nutt:

This is in response to your letter dated June 4, 2007, requesting that the Food and Drug Administration (FDA) reconsider its decision to not concur with the recommendations contained in the Conference for Food Protection (CFP) Issues 2006-II-038 and 2006-II039. Your letter states that these Issues recommended that the FDA Voluntary National Retail Food Regulatory Program Standards be modified to require that "Standardization and Training Officers" possess a "Bachelor's degree with 30 semester hours in the basic sciences." As a point of clarification, Issue 2006-II-039 actually recommended Program Standard No.2 be revised to include a Bachelor's degree requirement for "Food Safety Inspection Officers," which is a term intended to apply to all inspectors rather than only Standardization and Training Officers.

Like the CFP, FDA recognizes that in order to be highly effective, food safety inspectors at the Federal, state, local and tribal level must be able to identify food safety hazards in foodservice and retail food establishments and to communicate those hazards and the appropriate corrective actions to facility operators. There is no question that inspectors need relevant education, training and hands-on experience to fully develop these competencies. In fact, the primary objective of Program Standard No.2 is to assist regulatory food inspection programs in their efforts to fully develop these key competencies in their inspection staff.

At this time, FDA remains unconvinced that this objective is best achieved by expanding the scope of Program Standard No. 2 such that any jurisdiction seeking to achieve full conformance with the Standard must have a minimum degree requirement established for its inspectors. Certainly there is a wide range of opinion about the most appropriate scope and content for each of the FDA Program Standards. As active participants in the CFP, FDA will continue to fully engage in related discussions and welcomes further recommendations of the Conference.

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FDA looks forward to working with CFP and its committees to identify other strategies that will help food inspection programs attract and employ inspectors with strong educational backgrounds in the sciences.

Sincerely,

Janice F. Oliver

Deputy Director
Center for Food Safety and Applied Nutrition