

## Conference for Food Protection Executive Board Meeting Committee Report

COMMITTEE NAME: 2008 Certification of Food Safety Regulation Professionals Work Group Report

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

DATE OF REPORT: July 21, 2009

SUBMITTED BY: John Marcello and Susan Kendrick

COMMITTEECHARGE(S):

### **Conference Charges to the CFP CFSRP Work Group:**

This work group will meet from 2008-2010 to deliberate charges from the 2008 meeting and prepare Issues for the 2010 Conference. A primary focus for the work group will be on the continued development of Program Standard #2 - Trained Regulatory Staff - FDA Voluntary National Retail Food Regulatory Program Standards.

- Continue to review the results of the 2006-2007 Assessment of Training Needs Pilot Project that resulted in the development of the current CFP Field Training Manual and Forms. Consideration will be given as to whether additional revisions/updates are needed to the CFP Field Training and Forms.
- Determine if an evaluation tool that mirrors the CFP Field Training process should be developed, and if so, should it be incorporated into Standard #2 or left as a stand alone tool available for FDA's web site. For this initiative, the Work Group is charged to work in collaboration with FDA's Division of Human Resources Development
- Re-examine Step 4 of the current Program Standard 2 language as it relates to "standardization". Current language has raised some confusion among jurisdictions enrolled in the Standards as to what constitutes an acceptable process.
- Re-examine the Program Standard #2 time lines established for new hires to attain the specific milestones for pre-requisite curriculum, completion of field training, through standardization.
- New charge from Council 3 – Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 "Pre-Requisite Curriculum".
- Re-examine the need to include the requirement of 25 joint field training inspections as a specific criteria within Step 2, Standard 2.
- Consider/Deliberate the strengths/challenges associated with incorporating into the Program Standard #2 curriculum requirements, courses related to Food Defense including National Incident Management Systems (NIMS) and Incident

## Command Systems (ICS).

### PROGRESS REPORT / COMMITTEE ACTIVITIES WITH ACTIVITY DATES:

The work group has divided itself into 3 smaller sub-groups so that it can execute actions on several charges simultaneously. Each sub-group has Co-Leaders responsible for overseeing that action items and time lines are achieved. The Work Group Chairs oversee the progress of the sub-groups to ensure that issues are addressed completely and within specified time frames. These Sub Group Action Plans and Times Lines are included with this report as Attachments A, B, and C.

Over the past 6 months, the work group has conducted a follow-up survey with the jurisdictions that participated in the 2007 Assessment of Training Needs Pilot Project. These jurisdictions provided the primary input into revising the initial CFP Retail Food Safety Inspection Officer field training process and forms that had been developed by the work group and approved by the Conference. The survey was intended to ascertain the extent of continued use of the CFP Field Training Process and Form and to solicit any recommendations to improve the current document.

In addition, the survey was designed to obtain important information from these jurisdictions relating to issues currently under deliberation by the work group. These areas included, but not limited to:

- Determining whether the Standard 2 time frame of 18 months, from date of hire to completion of standardization, provides an appropriate time frame for jurisdictions to train and standardize retail food safety inspections officers;
- Assessing whether the Standard 2 criteria of a minimum of 25 joint field training inspections is appropriate and evaluate what other criteria might be a more effective barometer for jurisdictions to base their field training programs on;
- Obtaining input on the inclusion and placement of a requirement for new hires to complete an Allergen Management course as part of the Standard 2 curriculum;
- Obtaining input on the inclusion and placement of a requirement for new hires to complete Incident Command System and National Incident Management System training as part of the Standard 2 curriculum; and
- Determining the value of developing and including an audit tool for jurisdiction to use to confirm when a Food Safety Inspection Officer has master the performance elements and competencies outlined in the CFP Field Training Manual.

The survey developed by the work group is included as Attachment D. The surveys with the pilot jurisdictions have been completed and the results compiled. The work group will be reviewing the results of the survey during their 7-22-09 conference call. The information from the surveys will be an important resource, but not the only one, used to support work group recommendations that will be submitted to the Conference.

Subsequent conference calls are scheduled over the next couple of months to develop the specific work group recommendation for each of its Conference charges.

The Work Group had targeted August, 2009 for completing its deliberation of Conference charges. A more realistic time frame now appears to be sometime in October. The time period between the end of October and December 2009 will be used to prepare Conference Issues based on Work Group recommendations and prepare any supporting documents.

The CFP CFSRP Work Group will work in conjunction with the Allergen Committee on the review of the content for the Allergen Management course currently under development within FDA's Division of Human Resource Division. Whether or not the Allergen Management course is included as part of the Standard #2 criteria is contingent upon the availability of the course from DHRD and its review by the Allergen Management Committee. Given the short time frame until the submission of Conference issues, it now appears the Allergen Management course may not be available until sometime after the 2010 Conference.

**CFP CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS  
SUB-GROUP A  
ACTION PLAN AND TIME LINE**

**CONFERENCE CHARGE**

Continue to review the results of the 2006-2007 Assessment of Training Needs Pilot Project that resulted in the development of the current CFP Field Training Manual and Forms. Consideration will be given as to whether additional revisions/updates are needed to the CFP Field Training and Forms.

**Sub Group A Leaders:** David McSwane and Scott Gilliam

**Sub Group A Members:** Tom Dominick; Dot Horber; Garey Walker, Stephanie Mohn, Nancy Nesel, and Rebecca Petersen

**Reference Documents to Assist Sub Group A**

- Assessment of Training Needs Pilot Project Report
- CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers

**SUB-GROUP A  
ACTION PLAN AND TIME LINE**

<b>Sub-Group Activity</b>	<b>Specific Action Items</b>	<b>Completion Date</b>
<p>1. Review of the Assessment of Training Needs Pilot Project Report approved at the 2008 Conference and look for information that may require changes in the Manual and/or the training process.</p> <p>a. Brainstorm the type of information the work group might want to learn from jurisdictions that participated in the pilot project and who may be continuing to use the CFP Field Training Manual and Forms.</p>	<p>The draft follow-up survey tool will be sent to all members of the CFP work group</p>	<p align="center"><b>12-15-08</b></p>
	<p>The members of the work group and sub-group A will send comments and recommendations for revisions to the follow-up survey tool to Dave McSwane and Scott Gilliam</p>	<p align="center"><b>1-15-09</b></p>
<p>2. Dave McSwane and Scott Gilliam will revise a survey tool to collect information from jurisdictions that participated in the pilot test of the ATN/CFP Field Training Manual.</p>	<p>a. Identify areas where additional information may be needed and develop questions that can be incorporated into the telephone surveys</p>	<p align="center"><b>2a thru 2f to be completed by 1-23-09</b></p>
	<p>b. Determine if jurisdictions have trained additional Food Safety Inspection Officers since the end of the pilot project and to solicit information about their experiences.</p>	
	<p>c. Sub-group B wants us to add an item in the survey about evaluation.</p>	
	<p>d. Are the 25 joint inspections too much, too little or just right?</p>	
	<p>e. Should an allergen course be added to the post-inspection curriculum?</p>	
	<p>f. Should food defense courses be added as a pre-inspection requirement?</p>	

**SUB-GROUP A  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
3. Identify and survey jurisdictions that did not participate in the pilot study but who are currently using the ATN/Field Training Manual	a. John Marcello will work with the Regional Retail Food Specialists and will contact Richard Barnes to obtain an e-mail listserv for the state food program directors and to determine how we can use the resources of FDA to contact state and/or local food program personnel to determine if they are using either the ATN or the CFP Field Training Manual.	<b>12-23-08</b>
	b. Other potential sources of this information – NEHA, AFDO, CFP. John Marcello says agencies enrolled in the Program Standards are posted on the FDA website. He will send us the link to use.	
	c. Those jurisdictions that have implemented the model training program but did not participate in the pilot project will be contacted by telephone or e-mail to verify they have implemented the program and determine if they have any FSIOs who have completed the process to date.	<b>To be determined</b>
	d. Send survey instrument to those jurisdictions that did not participate in the pilot test of the Assessment of Training Needs (ATN - aka CFP Field Training Manual)	<b>To be determined</b>
	e. Surveyors will send an e-mail message with a copy of the follow-up survey tool to pilot project jurisdictions representatives.	<b>5-1-09</b>
	g. Telephone surveys will be completed.	<b>6-1-09</b>
	h. Follow up surveys will be submitted by the surveyors to Dave McSwane and Scott Gilliam.	<b>6-14-09</b>

**SUB-GROUP A  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
	i. Results of the telephone surveys will be compiled and analyzed and summary report prepared.	7-4-09
CONFERENCE CALL SCHEDULE		
Sub-Group A Conference Call	1-30-09	10:00 AM ET
Full CFP CFSRP Work Group Conference Call	2-18-09	2:00 PM ET
Sub-Group A Conference Call	TBD	

## CFP CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS

### SUB-GROUP B ACTION PLAN AND TIME LINE

#### CONFERENCE CHARGE

Determine if an evaluation tool that mirrors the CFP Field Training process should be developed, and if so, should it be incorporated into Standard #2 or left as a stand alone tool available for FDA's web site.

**Sub Group B Leaders:** Lee Cornman and Vicki Everly

**Sub Group B Members:** Jim Fear, Heidi Shaw, Paul Craig, Michael Roberson, Cindy Woodley, Mike Gentry, and Chris Gordon

#### Reference Documents to Assist Sub Group B

- CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers Guide to the Performance Audit Process - (Candidate & Auditor Guide, Retail Level I) for State, Local, and Tribal Food Safety Inspection Officers
- Retail Food Level I Performance Audit Criteria for State, Local, and Tribal Food Safety Inspection Officers
- Audit Failure Reference Guide - Retail Food Level I Performance Audit for State, Local, and Tribal Food Safety Inspection Officers
- Level I Food Safety Inspection Officer (State, Local, Tribal) Audit Results Summary Form
- Level I Food Safety Inspection Officer (State, Local, Tribal) Audit Worksheet
- Level I Food Safety Inspection Officer (State, Local, Tribal) Auditor Feedback Form
- FDA/DHRD Proposed Model to Address Standard 2 Criteria

### SUB-GROUP B ACTION PLAN AND TIME LINE

(revised 4-9-09)

#### December 2008

1. **December 15, 2008:** Forward link to FDA Standards and FDA Standardization Document to Work Group B members. [Jim Fear completed.]
2. **December 15, 2008:** Forward documents provided by Susan Kendrick on Oregon auditing. [Lee Cornman completed.]
3. **December 2008:** John Marcello will forward the Michigan audit tool to Lee / Vicki to forward to all Work Group B members.

#### January 2009

1. **January 15, 2009:** Request Work Group A to ask the survey jurisdictions during phone interviews if they have an audit process they would share or, if they do not, ask if they feel one would be beneficial. Lee / Vicki will request of David



McSwane and Scott Gilliam. Work Group A has a deadline of January 15, 2009 for receipt of additional questions. [Completed.]

2. **January 21, 2009:** Comparison of the FDA Performance Audit elements, CFP Field Training Manual, FDA Standardization Procedure to the elements of Standard 4, 1.b. All Work Group B members to participate. [Received response from Heidi Shaw and Chris Gordon.]
3. **January 21, 2009:** Forward existing & available audit processes and documents used by other jurisdictions to Lee / Vicki for disbursement to all members for review. All Work Group B members to participate. [None received as yet.]

### **May 2009**

1. **May 15, 2009:** Lee / Vicki will create compilation of Work Group B comparisons (see January #2).
2. **May 20, 2009:** Forward the audit comparison to all Work Group B members for review. Lee / Vicki will complete.

### **June 2009**

1. **June 3, 2009:** Review and provide comment or recommended changes on audit comparison document back to Lee / Vicki. All Work Group B members to participate and forward comments.
2. **June 17, 2009:** Work Group B conference call to discuss the audit comparison document and reach consensus. All Work Group B members to participate.
3. **June 24, 2009:** Receive comments and complete draft document. Edit and finalize draft audit comparison based on Work Group B input. Lee / Vicki to complete.

### **July 2009**

1. **July 8, 2009:** Forward draft audit comparison back to Work Group B. Lee / Vicki to complete.
2. **July 12, 2009:** Work Group B conference call to develop proposal to FDA on the use of the comparison as a tool for implementation of Standard 4. All Work Group B members participate.
3. **July 29, 2009:** Forward draft FDA proposal with draft comparison document to full CFSRP Work Group for review and comment. Lee / Vicki to forward.

### **August 2009**

1. **August 4, 2009:** Deadline to receive comments back from full CFSRP Work Group on draft FDA proposal with draft comparison document. All CFSRP Work Group members will participate. Lee / Vicki will receive the comments and revise draft documents accordingly.
2. **August 18, 2009:** Forward final FDA proposal and comparison document to FDA for review and use. Lee / Vicki to complete.

## CFP CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS

### SUB-GROUP C ACTION PLAN AND TIME LINE

#### CONFERENCE CHARGE

- Re-examine Step 4 of the current Program Standard 2 language as it relates to “standardization”. Current language has raised some confusion among jurisdictions enrolled in the Standards as to what constitutes an acceptable process.
- Re-examine the Program Standard #2 time lines established for new hires to attain the specific milestones for pre-requisite curriculum, completion of field training, through standardization.
- New charge from Council 3 – Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 “Pre-Requisite Curriculum”.
- Re-examine the need to include the requirement of 25 joint field training inspections as a specific criteria within Step 2, Standard 2.
- Consider/Deliberate the merits of incorporating into the Program Standard #2 curriculum requirements, courses related to Food Defense including National Incident Management Systems (NIMS) and Incident Command Systems (ICS).

**Sub Group C Leaders:** Ruth Hendy and David Read

**Sub Group C Members:** Jim Fear, DeBrena Hilton, Catherine Cummins, Ron Grimes, and Carolyn Bombet

#### Reference Documents to Assist Sub Group C

- Standard 2: Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards (criteria without the appendices, as approved at the 2008 Conference for Food Protection).
- The Learning Objectives from the FDA ORA U Allergen Management Course currently under development
- DRAFT Outline FDA ORA U Allergen Management Course

**SUB-GROUP C  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
1. Incorporating Allergen Management Course as part of Standard 2.	Agree to addition of course with placement recommendation as a “Post” course. Consensus was that all staff, as well as industry, need this training.	<b>1-15-09</b>
	Recommendations from sub-group regarding course: a. Additional retail information, specifically pertaining to labeling and examples of retail settings where labeling would be required. b. Basic information to help FSIO gain confidence and awareness of allergen issues for operations that prepare food.	
	Sub-Group recommendation to be submitted to CFP CFSRP Work Group Co-Chairs	
2. Re-examine Program Standard #2 to incorporate requirement of incident command training into curriculum.	Recommendation that ICS 100 & 200 be added to the Pre-Requisite course list. Courses must be NIMS compliant. Recommendation to be submitted to CFP CFSRP Work Group Co-Chairs.	<b>1-15-09</b>
	Research availability of appropriate Emergency Response courses that might be suitable for inclusion in the Pre-Requisite curriculum. Deadline for completion of research.	<b>6-5-09</b>
3. Re-examine Step 4 as it relates to standardization.	Re-write Step 4 language that a minimum of 4 inspections can be used for FSIO staff with field inspection duties. Standardization Officer level standardizations must meet the FDA protocol. Draft re-write will be created by Ron and David	<b>9-1-09</b>
4. Re-examine timelines for new hires to attain specific milestones for completion of independent inspections within 18 months.	Recommendation is that the Step 3 time-lines remain the same unless some compelling information is provided to the workgroup to justify a change. Oral Recommendation submitted at 12-11-08 Work Group meeting. Written motion to be submitted to work group Co-Chairs for member vote.	<b>9-1-09</b>

**SUB-GROUP C  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
5. Re-examine requirement of 25 joint field inspections.	<p>Recommendation to change wording to remove the 25 joint inspection mandate and replace with wording that reflects a concept that recognizes that the number of inspections necessary is dictated by their level of ability and training. Wording shall include statements that the process will follow the CFP <i>Field Training Manual</i> protocol, and forms and worksheets provided. The decision for the number of joint inspections would be made by the jurisdiction following a documented training process.</p> <p>Draft re-write will be created by DeBrena, Catherine and Carolyn.</p>	<b>9-1-09</b>
<b>CONFERENCE CALL SCHEDULE</b>		
<b>Full CFP CFSRP Work Group Conference Call</b>	<b>2-18-09</b>	<b>2:00 PM ET</b>
<b>Sub-Group C Conference Call</b>	<b>TBD</b>	

**CONFERENCE FOR FOOD PROTECTION (CFP)  
MODEL FIELD TRAINING MANUAL AND PROGRAM FOR  
REGULATORY RETAIL FOOD SAFETY INSPECTION OFFICERS (FSIO)  
PILOT PROJECT JURISDICTION FOLLOW-UP FEEDBACK FORM**

*(Please refer to the “CFP Field Training Manual” when responding to the following questions)*

**Name of Jurisdiction** \_\_\_\_\_

**Person Interviewed** \_\_\_\_\_

**Field Training Process Used**

CFP Field Training Manual  or Assessment of Training Needs

**1. How many FSIOs has the interviewee’s Jurisdiction trained using the field training process identified above?**

\_\_\_\_\_

**2. Does the interviewee believe the FSIOs who have successfully completed the training program prescribed in the Model Field Training Manual or Assessment of Training Needs are properly prepared to conduct independent retail food and/or foodservice inspections at the conclusion of the training program?**

Yes

No

**If the interviewee said no, ask them to elaborate on what area(s) the FSIO is not properly prepared in to enable them to conduct independent inspections.**

**3. Does the interviewee believe the Glossary of Terms in the Manual was sufficient to understand and implement the training process in your jurisdiction? IF THE JURISDICTION YOU ARE SURVEYING USED THE ASSESSMENT OF TRAINING NEEDS INSTEAD OF THE CFP MODEL FIELD TRAINING MANUAL, SKIP TO QUESTION 4**

Yes

No

**If the interviewee said no, please specify what terms in the glossary he/she thought needed improvement or what terms they would like to see added to the glossary.**

**4. Did the jurisdiction's FSIOs experience any problems with the Pre-Requisite Curriculum portion of the Program?**

Yes

No

**If the respondent said yes, ask them to specify what problem(s) were encountered. Please specify if the problems were related to the FDA ORA U Web-based training or the equivalent coursework.**

**5. Does the interviewee believe the information provided in the Assessment of Training Needs or Section III of the Manual adequately describe the approach that is being recommended for identifying the training content, determining training needs, and tracking a FSIOs progress in demonstrating competencies specific to their job responsibilities?**

Yes

No

**If the interviewee said no, identify those portions of the Assessment of Training Needs or CFP Field Training Manual that need improvement in the space below. Ask the interviewee to provide specific recommendation(s) for improving the content of the section of the ATN or Field Training Manual in the space provided below.**

**6. The CFP Training Plan and Log or the Assessment of Training Needs are divided into six (6) inspection training areas and 23 “performance elements”. Does the interviewee believe these training areas and performance elements sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections of retail food and foodservice establishments?**

Yes

No

**If the interviewee said no, ask them to specify what improvements they believe should be made to the training areas or performance elements. This may include areas and elements they believe should be added or deleted.**

**7. Has the interviewee experienced any problems when implementing the following steps that are integral to the field training process described in the Assessment of Training or Section IV of the Model Training Plan?**

- STEP 1 – Determine Performance Elements to be Included in Your Training Plan
- STEP 2 – Determine Competencies for Each Selected Performance Element
- STEP 3 – Determine Need for Additional Performance Elements and Competencies
- STEP 4 – Determine Appropriate Training Method for Each Competency

Yes

No

**If the interviewee said yes, ask them to identify the step(s) that has/have caused a problem and describe the problem(s) they have encountered.**

**8. Based on your experience using the CFP Field Training Manual or the Assessment of Training Needs process, do you believe the 18 month timeline provided in the FDA Voluntary National Retail Food Regulatory Program Standard No. 2 - Trained Regulatory Staff for completing steps 1 through 4 in the training process is the proper amount of time?**

Yes

No

**If you said no, how many months do you believe are appropriate for completing steps 1 through 4 in the training process? \_\_\_\_\_**

**STEP 1** – Completion of curriculum courses designated as “Pre” in Appendix B-1 prior to conducting any independent routine inspections

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**STEP 2** – Completion of a minimum of 25 joint field training inspections,  
AND  
successful completion of the jurisdiction’s FSIO Field Training similar to the process outlined in Appendix B-2.

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**STEP 3** – Completion of a minimum of 25 independent inspections  
AND  
remaining course curriculum (designated as “post” courses) outlined in Appendix B-1.

↓

**STEP 4** - Completion of a standardization process similar to the FDA standardization procedures.



**9. The Assessment of Training Needs or Sections V and VI of the CFP Field Training Plan describe steps to follow when preparing for and conducting joint field training inspections. Has the interviewee experienced any problems when implementing these steps as part of their program?**

- Yes                       No

**If the interviewee said yes, please have them identify which step(s) posed a problem for your jurisdiction and what they have done or what they believe should be done to correct this problem(s).**

**10. Do you believe the 25 joint inspections that are required in the CFP Field Training Manual or the Assessment of Training Needs process are too many, too few or just the right number?**

\_\_\_\_\_ Too many; \_\_\_\_\_ Too few; \_\_\_\_\_ Just right number

**If you said too many or too few, how many joint inspections would you recommend that a FSIO be required to complete as part of the training process? \_\_\_\_\_**

**11. Does the information presented in the Assessment of Training Needs or Section VII of the Model Training Plan provide the information the interviewee needs for their jurisdiction to develop an effective system to track a FSIO's training progress and accomplishments?**

- Yes                       No

**If the interviewee said no, ask them to identify the step(s) that has caused a problem and describe the problem(s) they have encountered.**

**12. Do you have an audit process or tool that you use as part of your training program to assure that a FSIO is properly trained before he/she is released into the field to conduct independent inspections?**

Yes

No

**If you said no, do you think it would be beneficial to have an audit process or tool to use to assure that FSIOs are properly trained before they are allowed to conduct independent inspections?**

**13. The Assessment of Training Needs or Section VIII of the Model Training Plan describes additional food safety related courses and a modified standardization process that an FSIO should complete after she/he has started to conduct independent inspections. Have these requirements presented any problems for your jurisdiction or the FSIOs who are participating in the program?**

Yes

No

**If the interviewee said yes, please identify what problems they have encountered.**

**14. It has been suggested that a course on allergens be added to the training curriculum in the CFP Training Manual. Would you recommend that this course be added as part of the pre-inspection curriculum or the post-inspection curriculum, or does it matter?**

\_\_\_\_\_ **Pre-inspection**

\_\_\_\_\_ **Post-inspection**

\_\_\_\_\_ **Doesn't matter**

**15. It has been suggested that one or more courses on Food Defense [National Incident Management System (NIMS) or Incident Command System (ICS)] be added to the training curriculum in the CFP Training Manual. Would you recommend that this course be added as part of the pre-inspection curriculum or the post-inspection curriculum, or does it matter?**

\_\_\_\_\_ **Pre-inspection**

\_\_\_\_\_ **Post-inspection**

\_\_\_\_\_ **Doesn't matter**

**16. Is there is any relevant information the interviewee would like to share about the Assessment of Training Needs or CFP Field Training Process that has not been addressed in the first 10 items of this survey? If so, please provide this information in the space below.**

**17. Do you know of any other jurisdictions in your state that are currently using the CFP Field Training Manual or the Assessment of Training Needs Process? If so, please provide the name of the agency and a contact person.**

