

# Conference for Food Protection – Committee FINAL Report

Template approved: 08/14/2013

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**COMMITTEE NAME:** Food Protection Manager Certification Committee (FPMCC)

**COUNCIL or EXECUTIVE BOARD ASSIGNMENT:** Executive Board

**DATE OF REPORT:** January 15, 2016

**SUBMITTED BY:** Jeff Hawley, Chair

**COMMITTEE CHARGE(s):**

**Issue: 2014 II-012**

1. 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.
2. Evaluate the results of the exam security evaluation process and Standards revisions approved by the 2012 CFP Biennial Meeting to ensure that they are resulting in substantial improvement of exam security.
3. Report back to the Executive Board and the 2016 Biennial Meeting of the Conference for Food Protection.

**Issue: 2014 II-015**

The Food Protection Manager Certification Committee (FPMCC) determine the process and requirements for potential acceptance of the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17024-2012 for food protection manager certification as an additional option to and without impact on the existing CFP Standards for Accreditation of Food Protection Manger Certification Programs and report back its findings at the 2016 Biennial Meeting.

**Constitutional Charge: Article XV, Section 6**

The Food Protection Manager Certification Committee shall report to the Board. The Food Protection Manager Certification Committee shall work with the accreditation organization for food protection manager certification programs to:

- Subsection 1.** Establish and refine policies and standards to which certifiers must conform in order for them to be accredited;
- Subsection 2.** Provide Conference input into the development of accreditation standards for certifying organizations specific to food protection manager certification programs;
- Subsection 3.** Develop strategies for enhancing equivalence among food protection manager certificates issued by certifiers; and
- Subsection 4.** Promote universal acceptance of certificates issued by accredited certifiers.

**COMMITTEE ACTIVITIES AND RECOMMENDATIONS:**

**1. Progress on Overall Committee Activities:**

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A. The Food Protection Manager Certification Committee (FPMCC) had face-to-face meetings October 15-16, 2014 in Kansas City, KS; April 1-2, 2015 in Milwaukee, WI; and October 21-22, 2015 in Dallas, TX. In addition, the Committee plans to meet April 15, 2016, prior to the 2016 biennial meeting. The Committee and workgroups had additional conference calls throughout the 2-year period.

B. The FPMCC formed 6 workgroups to address charges from the 2014 biennial meeting and conduct business of the Committee. These are the workgroups and their chairs:

1. Standards – Kate Piche (Certification Provider)
2. Standards Comparison – Christine Hollenbeck (Regulatory)
3. Bylaws – Sharon Wood (Retail Industry)
4. Logistics – Geoff Luebke (Food Service Industry)
5. Communications – George Roughan (Training Provider)
6. Security Evaluation – Bryan Chapman (Training Provider)

**C. Progress on Issue #: 2014 II-012(1): 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.**

The FPMCC Standards Workgroup is chaired by Kate Piche. This workgroup recommended editorial revisions to the CFP Standards. This included punctuation, italics, capitalization, and other non-substantive changes (See Content Attachment 1).

The Standards Workgroup was asked by Chair, Jeff Hawley and the Committee to review the Standards, and identify sections that can be less prescriptive, and determine the security impact (positive, negative, or unknown) for each. The workgroup considered a lengthy list of items that could be considered as too specific, prescriptive, or otherwise lacking utility for effectiveness of the CFP Standards. The workgroup has developed a list of such items, and will continue this work during the next biennium.

**D. Progress on Issue #: 2014 II-012(2): Evaluate the results of the exam security evaluation process and Standards revisions approved by the 2012 CFP Biennial Meeting to ensure that they are resulting in substantial improvement of exam security.**

To evaluate the data and determine if the new security standards are effective, Dr. Donald Ford (ANSI) compared security data provided by certification providers before the new standards were in place, and data after the new security standards were implemented following the 2012 biennial meeting. Security data from July 1, 2009-June 30, 2010 was compared to data from July 1, 2013-June 30, 2014 (See Supporting Attachment 1). This is a summary of Dr. Ford's findings:

Goal 1: Enforce Proctor/Administrator Disciplinary Actions.

The percentage of test administrators/proctors who committed violations decreased from 2009-10 to 2013-14 from 5.72% to 4.4%. The most probable reason for

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reduction in violations was that all test administrators/proctors were retrained by the certification providers. Violations included:

- a. Failure to return exams/answer sheets on time
- b. Failure to return all materials, or to sign/seal return envelopes
- c. Failure to use a traceable shipping carrier
- d. Failure to follow proctor guidelines, including not being present the entire time or allowing test-takers to self-proctor
- e. Suspected/confirmed cheating or colluding with test takers

## Goal 2: Reduce Exam Packaging and Shipping Irregularities (lost exams/answer sheets).

There was an increase in reported lost materials from 2009 to 2013: 0.01% to 0.02%. Percentage of lost exams/answer sheets has remained steady at 0.02% over the last 2 years.

*Note: We may have reached a theoretical limit in preventing lost exams/answer sheets. Current safeguards are effective in the majority of cases, but zero losses appear to be unattainable under the current system of testing.*

## Goal 3: Reduce Test Site Irregularities.

Test Administration problems show a big increase: less than 0.5% to 3.19%, while test site problems remain small at 0.01%. The increase in test administration irregularities was probably due to better detection and reporting rather than an actual increase in incidents. Greater focus on test administration and test site irregularities is helping to uncover previously unreported problems.

### Most Frequent Reasons for Test Site Irregularities in 2014

- a. Candidate demographic changes (wrong name or other personal information at registration)
- b. Exam was given in a restaurant during service or otherwise interrupted by outside noise
- c. Examinees were allowed to sit too close together
- d. Technical issue with online testing site hardware

### Most Frequent Reasons for Test Administration Irregularities

- a. Failure to follow shipping policies for returning materials on time
- b. Failure to properly return all materials via traceable carrier
- c. Failure to follow policies and procedures for proctoring – partially unproctored or self-proctored exams
- d. Cheating or collusion: candidates were allowed to talk in a foreign language during the exam, proctor colluded in cheating, candidates shared notes during exam

## Goal 4: Reduce Cheating and Test Administration Irregularities.

Confirmed/suspected cases of cheating went from 10 in 2009-10, to 16 in 2012-13, to 13 in 2013-14. Better detection, reporting and enforcement resulted in more confirmed cases initially. Percentage of test administration violations decreased from 0.24% in 2009-10 to 0.14% in 2013-14. This decrease is a result of better detection and enforcement.

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## Most Frequent Corrective Actions Taken To Combat Cheating

- a. Use multiple versions of the exam at each administration
- b. Revoke proctor privileges for collusion
- c. Enforce spacing and other environmental guidelines
- d. Use biometrics to verify examinee identity
- e. Require examinees to retest when cheating is suspected
- f. Adopt better exam forensic analysis methods
- g. Increase exam session audits

## Goal 5: Improve Test Quality Assurance (QA)

2009-10: Only 1 of 3 providers had a QA system installed, and it was incomplete.

2012-13: All 4 providers had QA system in place, but still implementing some features.

2013-14: QA system fully functional for all providers.

QA elements include:

- a. Document control
- b. Internal audit
- c. Management review
- d. Exam security plan
- e. External audit/certification

**E. Progress on Security Improvements.** After implementing the security measures from the Standards adopted in 2012, security of the test administration process has improved, and the number of breaches has dramatically decreased. Much progress has been made, but there is still room for improvement. More can be done to standardize test administration and minimum standards for test sites. Recommendations for best practices by certification providers have been implemented, and have led to measurable improvements in test administration security. Certification providers will continue with their efforts to make improvements in the following areas:

- 1) Proctors/Administrators:
  - a) Increase screening, selection and training standards
  - b) Continue to vigorously apply disciplinary actions against offenders
- 2) Shipping Irregularities:
  - a) Use traceable carriers only, especially those with high reputation for security and reliability
  - b) Continue to enforce rules for shipping
- 3) Test Sites/Administration:
  - a) Standardize test site requirements across all providers
  - b) Share best practices for administration
- 4) Test Cheating:
  - a) Share best practices for data forensics and cheating detection
  - b) Encourage test-takers to report cheating (whistleblower hotline)
- 5) QA System:

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- a) Fully implement all features for all providers
- b) Use it as preventive mechanism and early warning system

**F. Issue #: 2014 II-015: The Food Protection Manager Certification Committee (FPMCC) determine the process and requirements for potential acceptance of the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17024-2012 for food protection manager certification as an additional option to and without impact on the existing CFP Standards for Accreditation of Food Protection Manger Certification Programs and report back its findings at the 2016 Biennial Meeting.**

The Standards Comparison Workgroup did a line by line comparison of the CFP Standards and ISO 17024 to determine areas of “equivalencies”, and also identified items that would need further review to determine equivalency of the two standards (See Supporting Attachment 2). There was much discussion concerning unintended consequences, such as operational impacts and additional costs of implementation that must be considered in the comparison of CFP Standards and ISO 17024.

After much discussion consensus could not be reached, and the Committee made the decision to request a continuation of Charge #: 2014 II-015 to the next biennium. The Committee also realized that additional expertise in standards review and evaluation was necessary to help create a foundation for understanding and comparing CFP Standards and ISO 17024. Dr. Vijay Krishna (ANSI) offered to conduct a workshop on standards writing methodology and verifiability at the first meeting of the FPMCC in the 2016-18 biennium.

The FPMCC reports it has conducted an extensive but incomplete study comparing current CFP Manager Certification Standards and ISO 17024, and therefore recommends that Charge 2014 II-015 be continued for the 2016-18 biennium to permit completion of the comparison with the input of standards development expertise from ANSI, as such expertise will better enable the FPMCC to both resolve the comparison and provide support in ongoing improvement of the CFP Manager Certification Standards while completing work on Charge 2014 II-015.

## Acknowledgements

The FPMCC would like to thank Big Y World Class Market, Florida Restaurant and Lodging Association, National Registry of Food Safety Professionals, National Restaurant Association, Performance Food Group, State Food Safety, and Wisconsin Restaurant Association for their sponsorship of our meetings.

The Chair would also like to recognize and thank Vice-Chair Christine Hollenbeck, and workgroup chairs Kate Piche, Sharon Wood, George Roughan, Christine Hollenbeck, Bryan Chapman and Geoff Luebemann. They have been very diligent in fulfilling their responsibilities, and have enabled the committee to complete our assigned charges successfully.

And lastly, the Chair would like to recognize and thank the 2014-2016 FPMCC members, and the organizations/agencies they represent, which allowed them to participate on the Committee.

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Without the commitment and support of individuals and their organizations/agencies we would not have been able to complete our assigned charges.

## 2. Recommendations for consideration by Council:

- A. Thank the members of the 2014-2016 Food Protection Manager Certification Committee (FPMCC) for their hard work, and acknowledgement of this report.
- B. Approve revisions to the Standards for Accreditation of Food Protection Manager Certification Programs (see Content Attachment 1)
- C. That the following charges assigned to the Food Protection Manager Certification Committee (FPMCC) be continued for the 2016-18 biennium:
  - a. Issue 2014 II-012: working with the CFP Executive Board and the American National Standards Institute (ANSI)-CFP Accreditation Committee (ACAC) to maintain the Standard for Accreditation of Food Protection Manager Certification Programs in an up-to-date format; including, but not limited to, recommending language for items that could be made less prescriptive without a negative effect on security.
  - b. Charge 2014 II-015: to permit completion of the comparison of ISO/IEC 17024-2012 to CFP Standards for Accreditation of Food Protection Manger Certification Programs, with the input of standards development expertise from American National Standards Institute (ANSI). ANSI expertise will better enable the FPMCC to both resolve the comparison, and provide support in ongoing improvement of the CFP Manager Certification Standards, while completing work on Charge 2014 II-015.
  - c. Report back findings and recommendations to the 2018 biennial meeting of the Conference for Food Protection.

## CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

### The FPMCC is submitting the following two Issues:

1. Report: Food Protection Manager Certification Committee (FPMCC)
2. FPMCC Issue 2: Standards for Accreditation of Food Protection Manager Certification Programs - Revisions

## Content Attachments:

1. Standards for Accreditation of Food Protection Manager Certification Programs (draft May 2015)

## Supporting Attachments:

*(Note: supporting attachments may not represent the views of the Conference for Food Protection)*

1. Security Evaluation Workgroup Baseline & Summative Self-Report Findings 2013-14

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## 2. CFP-ISO Standards Comparison Equivalency Report

### **COMMITTEE MEMBER ROSTER (attached):**

CFP FPMCC Roster 2014-2016