

Conference for Food Protection – Committee Periodic Report

Template approved: 04/20/2016

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COMMITTEE NAME: Program Standards (PSC)

DATE OF REPORT: ☐ Initial fall progress report ☐ Spring progress report ☒ Second fall progress report

Date submitted: 8/4/2017

Date amended (if applicable): [Click here to enter a date.](#)

Date accepted by Executive Board: [Click here to enter a date.](#)

COMMITTEE ASSIGNMENT: ☐ Council I ☐ Council II ☐ Council III ☒ Executive Board

REPORT SUBMITTED BY: Angie Cyr, Chair; Amanda Douglas, Co-Vice Chair; Joyce Theard, Co-Vice Chair

COMMITTEE CHARGE(S):

Issue # 2016 II-009 – PSC 3 – Recommendations from Issue 2014-II-005

1. Identify areas where the Voluntary National Retail Food Regulatory Program Standards can be changed or improved to enhance enrollment and implementation; and
2. Work on a project to recognize levels of performance of Program Standards enrollees that will demonstrate the progress of enrollees in a meaningful way and acknowledging the enrollees for taking the necessary incremental steps toward meeting the Program Standards. As part of this project:
 - a. Provide a Cost/Benefit Analysis for recognizing partial achievement of the Retail Program Standards;
 - b. Identify different approaches that could be used to recognize partial achievement of the Retail Program Standards that would not require additional resources to perform or administer; and
 - c. Examine whether there is an additional burden placed on enrollees or FDA (in time, money, or added complexity of the Standards) associated with development of a system to ensure that jurisdictions are uniformly recognized for partial achievement of the Standards.
3. Serve as a sounding board for FDA with respect to ideas generated during collaboration with the other entities such as the National Association of County and City Health Officials (NACCHO), Partnership for Food Protection (PFP) and Association of Food and Drug Officials (AFDO).

Issue # 2016 II-015 – CFSRP 2 – Reassign Charges to the Program Standards Committee

Collaborate with the FDA Division of Human Resource Development, and the Partnership for Food Protection Training and Certification Workgroup (PFP TCWG) to:

1. Continue review of all initiatives: existing, new or under development; involving the training, evaluation and/or certification of food safety inspection officers. This collaborative working relationship will ensure the sharing of information so as not to create any unnecessary redundancies in the creation of work product or assignment of tasks/responsibilities.
2. Review the results of the partnership for food protection training and certification work group recommendations for the nationally recognized Retail Food Curriculum based on the Retail Food Job Task Analysis (JTA) to determine if changes are needed in the Standard 2 curriculum. Identify any gaps and recommendations for change and review the time frame for completion of Standard 2 Steps 1 through 4 for new hires or staff newly assigned to the regulatory retail food protection program.
3. Continue to assess if any changes will be needed in Standard 2-Trained Regulatory Staff based on the current standard for review referenced in (1) above to provide better alignment with Standard 4 of the VNRFRPS.
4. Report back their findings and recommendations to the 2018 Biennial Meeting of the Conference for Food Protection.

Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee

1. Identify available resources related to foodborne illness training.
2. Assess any newly developed foodborne illness training courses or programs.
3. Maintain the document titled *Crosswalk - Requirements For Foodborne Illness Training Programs Based on Standard 5* as a resource and content baseline for foodborne illness training.
4. Report back any findings and recommendations to each biennial meeting of the Conference for Food Protection.

Issue # 2016 II-020 Reevaluation of FDA VNRFRP Standard 8

Evaluate Standard 8 of the FDA Voluntary National Retail Food Regulatory Program Standards, as follows:

1. Review the "Description of Requirements" for "Staffing Level" to ensure they are accurate, reasonable, and attainable for jurisdictions of all sizes.
2. Report back their findings and recommendations to the 2018 Biennial Meeting of the Conference for Food Protection.

Committee Work Plan and Timeline: There have been no changes to the committee work plan. The work plan is attached.

COMMITTEE ACTIVITIES:

1. Progress on Overall Committee Activities:

- a. The first full committee call was held on August 22, 2016. The committee chair and co vice-chairs presented the recommendation that the charges be worked on at a subcommittee level to complete the charges by September 2017 or sooner. The committee members supported the recommendation. Four subcommittees were formed: (1) **Issue # 2016 II-009 – PSC 3 – Recommendations from Issue 2014-II-005** with co-leads Joyce Theard and Andre Pierce, (2) **Issue # 2016 II-015 – CFSRP 2 – Reassign Charges to the Program Standards Committee** with co-leads David Read and Rick Akin (Note: Jeff Belmont was originally co-chair but was unable to continue as co-chair. Rick Akin agreed to co-chair the subcommittee with David Read.) (3) **Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee** with co-leads Michael Roberson and James Mack, (4) **Issue # 2016 II-020 Reevaluation of FDA VNRFRP Standard 8** with co-leads Michael Schaffer and David Lawrence. Each committee member expressed their interest in serving on one or more of the subcommittees.
- b. Meetings are being held via conference call and members are using FoodSHIELD to post committee and subcommittee documents. There is an overall CFP Program Standards Committee workgroup and then individual teams for each of the subcommittees in FoodSHIELD. During the initial meeting, time was allocated to introduce new members to the historical perspective of the committee. A conference call with the subcommittee co-chairs was held on February 9, 2017 for an update on subcommittee activities. A full committee conference call was held on May 4, 2017.

2. Progress on **Issue #2016 II-009-PSC 3 – Recommendations from Issue 2014-II-005:**

The Committee has met nine times, 10/26/2016, 11/17/2016, 12/15/2016, 1/19/2017, 2/16/2017, 3/16/17, 4/20/17, 5/18/17 and 6/15/17. The committee discussed the charges and reviewed a Self-Assessment (SA) and Gap Analysis Audit Form to assist jurisdictions in monitoring and tracking their progress. It has been noted that the language across the program standards is not consistent and the subcommittee has agreed that additional work is needed in this area. The subcommittee has reviewed Standard 6 and recommended the SA tool for use with the Administrative Procedures.

a. Standard 1:

Subcommittee members expressed a desire to recognize a jurisdiction for efforts made to achieve Standard 1 when control of the regulations were outside their control. Partial credit was recommended as an option to allow jurisdictions to show progress but not to meet the Standard.

b. Standard 2:

Standard was reviewed and the members recommended incorporating references to the Clearinghouse in the standards wherever possible.

A representative from Southern Nevada Health District was referred to the subcommittee for feedback and has been requested to provide input at an upcoming meeting.

c. Standard 6:

The members reached a consensus to recommend consideration of a proposal to allow jurisdictions to assess the effectiveness of their compliance and enforcement program using an alternative sampling method that provides the same level of statistical confidence as the prescribed method. The proposal uses the same assessment methodology currently described in Standard 6.

The subcommittee recommended a standardized key that links to the FDA Code references, so jurisdictions may make comparisons of their Code risk factors and intervention strategies.

d. Standard 7:

Standard was reviewed and there were no recommended changes.

e. Other Consideration (s):

Members reached a consensus to explore the option to have the Program Standards Committee to work with plan review to create a separate standing committee or include plan review in an existing standard.

Progress on **Issue #2016 II-015 – CFSRP 2 – Reassign Charges to the Program Standards Committee:**

The co-chairs discussed new and existing training initiatives on 1/20/2017. In February 2017, the committee reached out to the Partnership for Food Protection to gather insight and outcomes from the 2016 Regulatory and Public Health Partner Training Summit that was held in September 2016. Subcommittee conference calls were held on 1/20/17, 3/30/17, and 5/22/17.

- a. Gathered and reviewed information from International Food Protection Training Institute (IFPTI), National Curriculum Standard (NCS), and Partnership for Food Protection. There has been a tremendous amount of work done and a great deal more to do in this regard. The training content is still in development, with 26 on-line courses anticipated to be available by fall of 2017. This is an open sourced project and IFPTI has a cooperative agreement with FDA. Work is continuing on developing competencies in other content areas of the Curriculum Framework. Once the competencies are completed in a content area, learning experiences (e.g. courses, job aids, OJT etc.) can be developed. It is a long-term project to complete the competencies and learning experiences for all content areas. After completion, methods on dissemination into the field will be addressed. Field trainers and assessors will be key to the training delivery process.

- b. Compiled a list of articles published on rationale and need for national curriculum standards for Food Safety Inspection Officers and shared with subcommittee members.
- c. Reviewed work completed from previous CFP workgroups on these subjects. Issue uses the term Job Task Analysis (JTA), this subcommittee recommends using Competency and Curriculum framework.
- d. During the 2016 CFP conference, an issue to revise Standard 4 – Uniform Inspection Program was submitted and approved. FDA has drafted the revised standard with no indication as of yet for the implementation date. In light of ongoing work on nationally recognized curriculum framework and upcoming revision implementation of Standard 4, it would be premature to suggest revisions to Standard 2 – Trained Regulatory Staff.

Progress on Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee:

The committee has met five times by conference call on 10/21/16, 12/5/16, 1/30/17, 2/27/17 and 6/8/17. Several resources related to foodborne illness training have been identified. In addition, several newly developed training materials have been identified. The committee has reviewed the training materials currently in the *Crosswalk – Required For Foodborne Illness Training Programs Based on Standard 5* (“Crosswalk”) document. The committee has discontinued reviewing the content of the training materials after clarification from the Executive Board. The references in the Crosswalk document have been updated.

Progress on Issue #2016 II-020-Reevaluation of FDA VNRFRP Standard 8:

The committee has met five times by conference call on 10/11/16, 10/28/16, 11/22/16, 1/10/17 and 4/17/17. Minutes from those meetings are attached to this report as supporting documents. Time was spent on the first conference call to review the supporting documents that were attached to the issue. Additional research was done with jurisdictions enrolled in the Program Standards that are identified as meeting Standard 8 following a self-assessment and/or verification audit. When asked, those jurisdictions that responded were not able to provide their supporting data or documentation.

The subcommittee distributed a survey to enrolled jurisdictions who have made progress with the Retail Program Standards except Standard 8. The intent is to help identify barriers (including those beyond the current FTE/Inspection ratio) that the subcommittee can consider when developing its recommendations.

The subcommittee is also studying “highly performing” regulatory food programs – those defined by the subcommittee as meeting Standards 3 and 4. The intent is to have an approach that is more “where we want to be” rather than “where we are” when it comes to recommendations.

The subcommittee has been gathering data from state and local food regulatory programs to support a possible recommendation to base Standard 8 “Staffing Level” on the regulatory program’s food establishment inventory risk categorization and average inspection time rather than FTE/inspection ratio.

3. Charges COMPLETED and the rationale for each specific recommendation:

- a. Charge 1 of Issue #2016 II-020-Reevaluation of FDA VNRFRP Standard 8 has been completed. Based on supporting documentation for Issue #2016 II-020 and additional follow-up with jurisdictions who are listed as meeting Standard 8, the subcommittee quickly reached consensus that the current “description of requirements” for “Staffing Level”, although accurately determined by the FDA, is neither reasonable nor attainable. It is the opinion of at least those subcommittee members who have been a part of the NACCHO Program Standards Mentorship program that the current Standard 8 “Staffing Level” criteria also lacks scalability to jurisdictions of various sizes and with varying levels of resources. The subcommittee is now working to devise a recommendation(s) and supporting data.
- b. Charge 1 and Charge 3 of Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee have been completed. New materials related to foodborne illness training have been identified. The references in the Crosswalk document have been updated.

4. Status of charges still PENDING and activities yet to be completed:

Issue #2016 II-009-PSC 3 – Recommendations from Issue 2014-II-005

- a. The charges for this issue are in progress. The committee recommends agencies use a Self-Assessment (SA) tool to assist with documenting partial completion. The SA tool can be presented at the 2018 CFP Biennial Meeting and posted on the CFP web site as a management tool.
- b. The FDA web site of the Listing of Jurisdictions Enrolled in the Voluntary National Retail Food Regulatory Program Standards (PS) is recommended for editing to help identify/recognize jurisdictions with partial achievement of a standard.
- c. The subcommittee co-chair met with a member of AFDO to discuss this issue and reported during our April meeting that AFDO did not feel there was a duplication of efforts between the two groups. It was stated we could probably get more momentum by sharing some of our work i.e., Standard 6 if we could work together.
- d. Standards remaining to be reviewed: Standards 3, 4, 5, and 9

Issue #2016 II-015 – CFSRP 2 – Reassign Charges to the Program Standards Committee

- a. The charges for this Issue are still all pending. Documents that the committee is reviewing are attached. They are the National Curriculum Standards (NCS) report and a list of publications that describe the process to develop the framework that is in the

NCS.

- b. Continue review of all initiatives: existing, new or under development; involving the training, evaluation and/or certification of food safety inspection officers. This collaborative working relationship will ensure the sharing of information so as not to create any unnecessary redundancies in the creation of work product or assignment of tasks/responsibilities.
- c. Review the results of the partnership for food protection training and certification work group recommendations for the nationally recognized Retail Food Curriculum based on the Retail Food Job Task Analysis (JTA) to determine if changes are needed in the Standard 2 curriculum. Identify any gaps and recommendations for change and review the time frame for completion of Standard 2 Steps 1 through 4 for new hires or staff newly assigned to the regulatory retail food protection program.
- d. Continue to assess if any changes will be needed in Standard 2 – Trained Regulatory Staff based on the current standard for review referenced in (b) above to provide better alignment with Standard 4 of the VNRFRPS.
- e. Report back their findings and recommendations to the 2018 Biennial Meeting of the Conference for Food Protection.

Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee

- a. The newly developed foodborne illness training materials that have been identified will need to be assessed by the subcommittee.

Issue #2016 II-020-Reevaluation of FDA VNRFRP Standard 8:

- a. Charge 2 is pending as the subcommittee is in the process of devising a recommendation(s) that will include supporting data to propose a revision to the Standard 8 “Staffing Level” FTE/Inspection Ratio criteria. The intent of the recommendation will not be to weaken the Standard but to provide more practical measures of performance of the enrollee against the Standard. Efforts to obtain the actual self-assessment documentation from the few enrolled jurisdictions listed on the FDA website as meeting Standard 8 (with or without a verification audit) have not been successful. The subcommittee felt that the self-assessment documentation for the FTE/Inspection Ratio requirement would help to identify in what ways conformance with the requirement was being achieved. The subcommittee is no longer seeking this information. Instead the focus has been to collect and analyze raw data from enrolled jurisdictions on average inspection times as it related to risk categorizations for food establishments in their inventory.
- b. The subcommittee has been able to gather 12 data sets of data from local and state health departments across the US with the prerequisite that they met 6 of the 9 Retail Program Standards – our definition of highly performing jurisdictions. With support from staff at the Harris County Public Health Department, this information has been organized into line graphs that depict, excluding a couple of outliers, the average inspection time spent for inspection for the most common food establishment risk categorization approaches (3 and 4 risk categories). **See Standard 8 - Average Inspection Time by Risk Categorization.** Additionally, there has been developed a model that incorporates the data to easily calculate the number of employees needed to meet our proposed criteria. **See Standard 8 – FTE to Inspection Ratio Calculator and Standard 8 – Productive Hours per Year for FTE.**
- c. In order to do regression modeling and other types of statistical analysis, the subcommittee would need at least 18 more data sets. However, we do not believe the outcome would change more than +/- 10% based on the information we currently have.
- d. Although not 100% complete in our modeling, we believe our approach to developing the model provides a better representation of the intent of the Standard 8 “Staffing Level” criteria. The model looks at inspection time spent by risk categorization and considers technological advancements in industry, efficiency improvements within local and state food regulatory programs, methods to conduct risk assessment categorization of food establishments (similar to FDA), and policies for establishing inspection frequency based on risk categorization (similar to FDA).

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD: ☐ No requested action at this time

- 1. The committee is asking the Executive Board’s permission to change the term “Job Task Analysis” to “Competency and Curriculum framework” in Charge 2 of Issue # 2016 II-015 – CFSRP 2 – Reassign Charges to the Program Standards Committee.
- 2. The committee is planning for the Retail Program Standards session at the 2018 Conference for Food Protection. The committee would like the Executive Board’s input on what should be included in the session that would be of interest all CFP constituencies.

ATTACHMENTS:

1. Content Documents:

- a. **Committee Member Roster:** ☐ See changes noted above under “requested action” ☒ No changes to previously approved roster
“Committee Members Template” (Excel) available at: www.foodprotect.org/work/ Committee roster to be submitted as a PDF attachment to this report.
- b. **Committee Generated Content Documents:** ☐ No draft content documents submitted at this time
 - 1. Standard 8 - Average Inspection Time by Risk Categorization
 - 2. Standard 8 – FTE to Inspection Ratio Calculator
 - 3. Standard 8 – Productive Hours per Year for FTE

2. Supporting Attachments (OPTIONAL): ☐ Not applicable

- a. Program Standards Committee Work Plan
- b. Standard 6 Proposal
- c. CFP Report on NCS background
- d. CFP Report Publications background
- e. Standard 8 Subcommittee Meeting Minutes from April 17, 2017.

Proposed Change

Voluntary National Retail Food Regulatory Program Standard 6

Scope of Proposed Change:

1. Allow jurisdictions to assess the effectiveness of their compliance and enforcement program using an alternative sampling method that provides the same level of statistical confidence as the prescribed method. The proposal uses the same assessment methodology currently described in Standard 6.

Reasoning for the Proposed Change:

1. The current sampling methodology is restrictive for jurisdictions that prefer to evaluate shorter self-assessment period time frames. The current methodology limits many jurisdictions:
 - a. The current method of determining the start point inspection may require jurisdictions to review inspections that were conducted prior to the current self-assessment period;
 - b. The current method of determining the start point inspection may not represent a jurisdiction's entire self-assessment period. For example, if only the third most recent routine inspections are reviewed, these may only represent a "moment in time" of the self-assessment period. If all routine inspections conducted during the self-assessment period are available for review, a more comprehensive representation of the jurisdiction's work is available for review;
 - c. The current method may inhibit a jurisdiction's ability to identify current potential gaps in compliance and enforcement activities. Without the ability to review more recent inspection reports, implemented intervention strategies may not be assessed during a self-assessment. On page AP-3 of the VNRFRPS 2015 Administrative Procedures, jurisdictions are encouraged to complete self-assessment updates to reflect the most current information on its program accomplishments. Limiting the Standard 6 review to the third most recent routine inspections decreases the ability for a jurisdiction to assess the most current information on its program accomplishments and creates disincentive to conducting self-assessment updates on Standard 6;
 - d. The current method of selecting the third most recent inspection and review of the establishment file up to the current date has not been consistently interpreted or implemented;
 - e. The current method may not allow a jurisdiction to assess all aspects of their compliance and enforcement program. For instance, if none of the randomly selected files measure all compliance and enforcement activities, a jurisdiction may not have an opportunity to assess their entire compliance and enforcement process;
 - f. The proposed change is more closely aligned with the Manufactured Food Regulatory Program Standards; and

- g. The current method requires jurisdictions that are enrolled in both the VNRFRPS and MFRPS to use different methods of assessing compliance and enforcement in each program area.

Summary of Proposed Changes:

Standard 6: Instructions for Conducting a Self-Assessment

Step 1: No change

Step 2: Assess the Effectiveness of the Compliance and Enforcement Program

Each jurisdiction shall measure the effectiveness of their compliance and enforcement program by either reviewing each inspection when a foodborne illness risk factor or *Food Code* intervention was marked out of compliance or by using a statistical method to determine if the jurisdiction has satisfactorily resolved foodborne illness risk factor and *Food Code* Intervention violations. The jurisdiction shall establish written procedures that:

- Describe the compliance and enforcement review process;
- Include a review of routine inspections that have at least one foodborne illness risk factor or *Food Code* intervention violation marked OUT of compliance. The number inspections reviewed and method of selection must provide a statistical confidence level equal to or greater than the published Standard 6 statistical model; and
- Include supporting documentation and worksheets.

If a jurisdiction does not wish to establish independent written procedures, the jurisdiction may use the method set forth in Parts I-IV.

Part 1 – No change

Part 2 – Add language that allows jurisdictions to exclude lower risk facilities from the listing of all establishments. Adding language at the end of Paragraph 2 of Part II such as “The jurisdiction may exclude Food Establishments with a Low Risk Categorization from the listing of all establishments.”

Part 3 – No change

Part 4 – No change

Step 3: No change

Standard 6 Compliance and Enforcement:

Documentation:

Add the following documents to the list if quality records needed for this standard:

- If necessary, a copy of the jurisdiction's established written procedures used to measure the effectiveness of the compliance and enforcement program
- If necessary, statistical confidence level documentation from a statistician

Step 1: Enter Establishment Information

Low Risk

of Establishment

1000

Frequency/year

1

Average Time Spent (hours)

1

Moderate Risk

of Establishment

2000

Frequency/year

2

Average Time spent (hours)

2

High Risk

of Establishment

3000

Frequency/year

3

Average Time spent (hours)

3

Step 2: Food Safety Productive Hours

Holiday/Leaves

Holiday Leave: # of Days/Year

10

Vacation Leave: # of Days/Year

5

Sick Leave: # of Days/Year

5

Other Leave: # of Days/Year

0

Productivity Factoring

Admin Work Hours/Week

1

Travel Time to Inspection Hours/Day

1

Others Hours/Week

0

Break Time Hours/day

0.5

Training Time Hours/week

0

Personal Development Time

Continuing Education Time Hours/Week

0

Others Hours/Week

0

Food Safety Inspection Time

Other Types of Investigation (hotel, pool, etc.)

Yes

No

If Yes, Percent of Time Only for Food Inspections:

0%50%100%

Step 3: Calculate

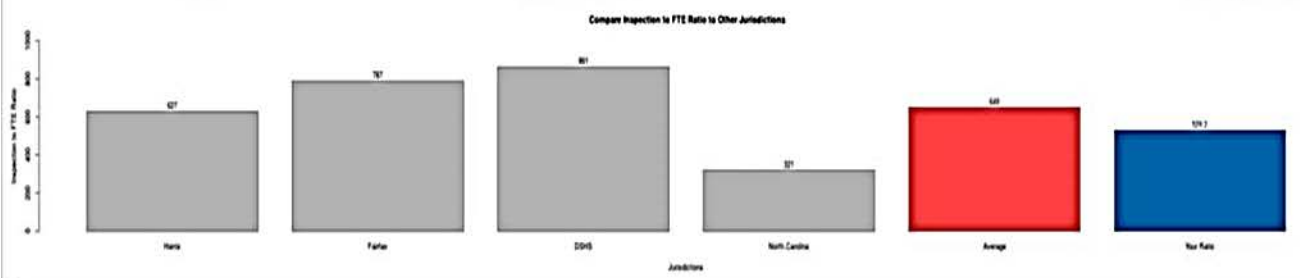
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Results:

FTE = 26

Inspection to FTE Ratio= 529

Actual Employees Needed= 53



E11

	A	B	C	D	E	F
1	Information For One Employee		Hours/Year	Hours/Day	Hours/Week	Total Hours
2	Overall Working Hours Per year					2080
3	Non-productive Hours Per Year					
4		Local Holiday Hours Per Year				0
5		Local Vacation Leave Hours Per Year				0
6		Local Sick Leave Hours Per Year				0
7		Local Family-Personal Leave Hours Per Year				0
8	Productivity Factoring Per Year					
9		Travel Time For Inspection				2080
10		Break Time				2080
11		Administrative Work (in-office work)				2080
12		Training Time				2080
13		Others				2080
14	Personal Development Time Per Year					
15		Continuing Education Hours				2080
16		Others				2080
17	Productive Hours Per Year					2080
18						
19	Non-Food Safety Hours Per Year					
20		Neighborhood Nuisance				
21		Pools				
22		Hotels				
23		Others				
24		Total				0

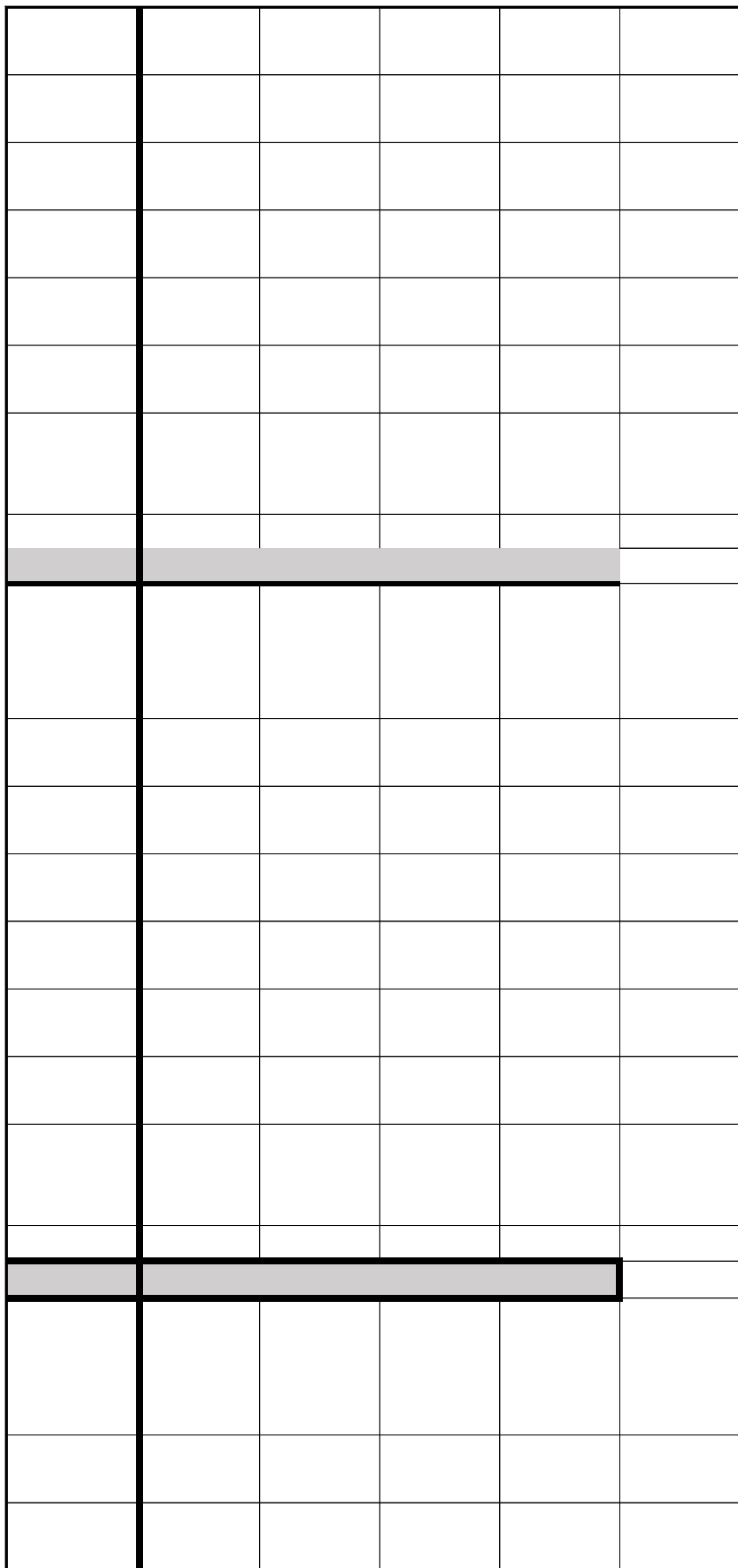
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Subcommittee meetings	Subcommittee Chair					26	17	15	19	16	16								
progress reports to PSC chair	Subcommittee Chair									X				X			X		
final report to PSC chair	Subcommittee Chair																	X	
Charge 1 specific tasks	Subcommittee Chair																		
Charge 2 specific tasks	Subcommittee Chair																		
Charge 3 specific tasks	Subcommittee Chair																		
Develop issues for 2018 CFP & submit to PSC chair	Subcommittee Chair																		
Issue 2016 II-015 CFSRP 2 Reassign Charges to the Program Standards																			
Develop subcommittee roster & submit to PSC chair	Subcommittee Chair				X														
Subcommittee meetings	Subcommittee Chair								20		30								
progress reports to PSC chair	Subcommittee Chair									X				X			X		
final report to PSC chair	Subcommittee Chair																	X	
Charge 1 specific tasks	Subcommittee Chair																		
Charge 2 specific tasks	Subcommittee Chair																		
Charge 3 specific tasks	Subcommittee Chair																		
Develop issues for 2018 CFP & submit to PSC chair	Subcommittee Chair																		
Issue 2016-018 IFITC 3 Reassign Charges to Program Standards Committee																			
Develop subcommittee roster & submit to PSC chair	Subcommittee Chair				X														
Subcommittee meetings	Subcommittee Chair					21		5		27	29								
progress reports to PSC chair	Subcommittee Chair									X				X			X		

[illegible]

Power Point presentation developed and provided to CFP Executive Director for posting on the CFP web-site	all/subcommittee chair																		
A/V needs for session submitted to CFP Executive Director	Subcommittee chair																		
Progress report to PSC chair	Subcommittee chair												X		X		X		

2018					
December	January	February	March	April	
	12				



			Presentati ons finalized and submitted to Executive Director	Session Tuesday 1- 3	

x		x	x	x	

National Curriculum Standard

The National Curriculum Standard (NCS) is a competency-based training curriculum framework for regulatory food protection professionals (FPPs) that supports a core component of the Integrated Food Safety System (IFSS): a competent workforce doing comparable work at the federal, state, and local (including tribal and territorial) levels. The NCS will provide FPPs with a comprehensive, national curriculum framework that is career-spanning, standardized, and standards- and competency-based thus allowing them to gain, maintain, or update the knowledge, skills, and abilities the profession requires.

Key to the development of the NCS has been the creation of the IFSS Curriculum Framework (hereafter the IFSS Framework). A curriculum “a set of learning experiences intentionally designed to help the participant achieve desired outcomes.” A curriculum framework (Kaml, 2013) provides a well-designed, thought-out, aligned, consistent, outcomes-based approach incorporating adult learning preferences and adherence to a national system standard by training providers. Such an outcomes-based approach requires an in-depth, scientifically conducted front-end analysis of training needs—specifically, the competencies (i.e., knowledge, skills, or abilities) required for the target audiences and the key performance indicators (KPIs) (i.e., proficiency measurements) to measure those competencies.

A curriculum framework is a schematic illustration of the relationship between, among, and progression through professional levels, core content (topic) areas, professional tracks (and program areas within those tracks), and spanning content areas (Kaml, 2013). Each content area contains competency statements and KPIs that can be used by an individual to assess his or her competency in that particular content area, and develop a personal learning plan based on his or her competency assessment. Figure 1 represents a high-level illustration of the elements in a curriculum framework based on the IFSS Framework being championed by IFPTI and FDA’s DHRD.

Figure 1. Curriculum Framework Example

Leadership	Core Content			Spanning Content Area
Technical Specialist	Professional Track (and Program Areas)	Professional Track (and Program Areas)	Professional Track (and Program Areas)	
	Core Content			
Advanced	Professional Track (and Program Areas)	Professional Track (and Program Areas)	Professional Track (and Program Areas)	
	Core Content			
Entry	Professional Track (and Program Areas)	Professional Track (and Program Areas)	Professional Track (and Program Areas)	
	Spanning Content Area			
	Core Content			

Professional levels represent various career stages within a profession, and are depicted in Figure 1 via color-coded horizontal rows. The IFSS Framework contains four professional levels: Entry Level (depicted by the brown row), Advanced Level (depicted by the white row), Technical Specialist Level (depicted by the gray row), and Leadership Level (depicted by the orange row).

Core content areas are the essential topics in which an individual, at each professional level, should attain competency. Each content area contains a set of competencies and KPIs that serve as the basis for the development of training and other learning experiences.

Professional tracks are specific areas of specialization within the profession. For example, within the IFSS Framework, there are three professional tracks: Unprocessed Food, Manufactured Food, and Retail Food (represented in blue, pink, and green in Figure 1). As an FPP advances within his or her profession (i.e. going from an Entry Level employee to an Advanced Level employee), he or she can continue to specialize in a particular professional track.

Spanning content areas are topics that are applicable either to multiple professional levels (depicted in yellow vertically on the framework) or professional tracks (depicted in yellow horizontally).

The National Curriculum Standard (NCS)

The vision for the NCS began in 2008 with the FDA 50-State Meeting and the creation of the Partnership for Food Protection (PFP). The PFP has representative membership across the country from federal, state and local regulatory agencies, and was created to advance the IFSS mission. The PFP established a number of workgroups to implement the IFSS. The PFP Training and Certification Workgroup was charged to develop a competency-based National Curriculum Standard (NCS) for the 30,000 to 50,000 regulatory FPPs in more than 2,500 federal, state, and local jurisdictions across the U.S.

In 2009, IFPTI began collaborating with a representative group of state and local FPPs and university academicians to design a competency-based, career-spanning professional development curriculum that encompasses and organizes existing professional development into efficient, effective, standards (Partnership for Food Protection (PFP) Training and Certification Workgroup Final Report, 2010). As part of a Cooperative Agreement with FDA's Division of Human Resource Development in 2011, IFPTI became the architect in meeting the PFP Workgroup's charge of creating a national training standard. The "blueprint" for this national standard is the IFPTI competency-based curriculum framework development process. (For more information go to the FDA PFP website: <https://www.fda.gov/ForFederalStateandLocalOfficials/ProgramsInitiatives/PartnershipforFoodProtectionPFP/default.htm>)

IFPTI has overseen the development of competency-based curriculum frameworks for a variety of U.S. regulatory FPPs, including those working in the animal food, manufactured food, and retail food sectors, along with laboratory professionals. During the creation of these frameworks, IFPTI has facilitated dozens of working groups comprising food protection (which encompasses food safety and defense) subject matter experts (SMEs) from federal, state, and local regulatory agencies, academic institutions, and food protection organizations such as the AFDO, the Association of American Feed Control Officials (AAFCO), APHL, and NEHA.

IFSS Framework

IFPTI began facilitating the development of the IFSS Framework (sometimes referred to as the "Main Framework") in 2011. FDA DHRD assembled a working group of thirty SMEs representing federal, state, and local regulatory jurisdictions, and by utilizing the IFPTI curriculum development process, the group built out an initial framework featuring four professional levels (Entry, Advanced, Technical Specialist, and Leadership), more than one hundred content areas, three professional tracks (Unprocessed, Manufactured, and Retail), and specialized program areas within those professional tracks (e.g., Dairy Processing, Shellfish Plant, Produce). IFPTI has facilitated more than ten meetings with the IFSS Framework SME Working Group since 2011. Most of these meetings have spanned a period of 3.5 to 4 days, and most have been held at DHRD headquarters in Rockville, MD. Figure 2 included in the Appendix represents the IFSS Framework in its current form.

As of now, the IFSS Framework Working Group has fully built out the twenty-five core content areas at the Entry Level (the bottom row of the framework, in brown). These core content areas are often referred to as the General Education content areas, or "Gen Eds." Gen Ed content areas include topics such as Allergens, Biological Hazards, Jurisdiction, Public Health Principles, and Sampling. "Fully built out" means that the IFSS Framework SME Working Group has identified all of the competencies needed by an Entry Level FPP, and these competencies were used by the IFPTI Instructional Systems Design (ISD) Team to create course design documents (CDDs) for online courses scheduled to be launched later this year.

The Gen Ed course CDDs created by the IFPTI ISD team outlined the learning objectives for each online course along with the content to be covered. IFPTI handed these CDDs off to ISD teams from five Cooperative Agreement recipients (Auburn University, the University of California at Davis, IFPTI, NEHA, and the University of Tennessee), along with CFIA, who are creating the online courses in collaboration with more than 185 subject matter experts. The Association of Food and Drug Officials (AFDO) has a group of SMEs currently reviewing and refining the Gen Ed courses for FDA that are expected to be on line later this year.

Retail Food Framework

In 2015, IFPTI began leading the creation of the Retail Food Framework with a group of fifteen federal, state, and local FPPs specializing in the regulation of retail food establishments. The Retail Framework comprises four professional levels: Entry, Advanced, Technical Specialist, and Leadership. The Retail Framework Working Group has met a total of four times, with each meeting spanning four days and being facilitated by IFPTI. Figure 3 included in the Appendix represents the Retail Food Framework in its current form.

At the time of this proposal, the Retail Food Framework Working Group has identified six content areas at the Entry Level, including Active Managerial Control, Introduction to Special Processes, Non-Traditional Food Outlets, Oral Culture Learning, Regulatory Foundations for Retail Food Safety, and Risk-Based Inspection, and has identified all of the competencies needed by an Entry Level FPP associated with these content areas. The working group has initially identified content areas at the Advanced Level (Plan Review and Special Processes), and Technical Specialist Level (FDA Retail Program Standards). At subsequent meetings, the working group will begin to further develop the framework, including competencies and KPIs, depending on Cooperative Agreement support.

Food Foundations Framework

Work on the Retail Food Framework and the Manufactured Food Framework was put on hold to allow SMEs from each of those workgroups to meet to identify common curriculum content areas in a new framework called Food Foundations. The Food Foundations workgroup will review the Retail Food Framework and the Manufactured Food Framework to develop competencies applicable to both the Retail and Manufactured Food program areas, tailored to regulators who have demonstrated the Gen Ed competencies and who are planning on advancing into either the Retail Food or Manufactured Food Professional Track.

The Food Foundations Work Group met July 25-29, 2016, August 16-19, 2016, October 18-21, 2016, and December 13-16, 2016, and will meet again March 21-24, 2017. During these meetings, the Work Group built out competencies related to nine (9) Content Areas identified in the Food Foundations Framework. Figure 4 included in the Appendix represents the Food Foundations Framework in its current form. When work is completed on the Food Foundations Framework development will resume on the Retail Food Framework.

Interactive National Curriculum Standard

IFPTI has built an online system (the Interactive National Curriculum Standard, or INCS) for U.S. government (federal, state, and local) regulatory FPPs for animal and human food. The INCS features an interactive website that allows the user to identify competency statements within each content area of the IFSS Framework, Animal Food Framework, Manufactured Food Framework, and Retail Food Framework. The system also includes a course catalog that aligns learning experiences (courses, training, etc.) to specific content areas and links out to the service provider of those learning experiences. **The INCS, which can be found at <http://incs.ifpti.org>, will comprise a key element in the current project.** There are descriptions of both the Competency Framework and the Curriculum Framework and their interrelationship.

A unique feature of the online system is an assessment instrument that allows individuals to assess themselves against a set of identified competencies, and allows supervisors to assess their staff against that set of competencies. The assessment feature also allows the user to create a gap report for use in competency coaching and the development of personal or group learning plans.

National Assessment and Training Strategy

A next phase of this project projected to start later in 2017 is to prepare regulatory food protection agencies to deliver much of the training in the IFSS Curriculum Framework in the field through field based trainers/assessors. The National Assessment and Training Strategy (NATS) will incorporate field-based training, assessment, mentoring, and coaching into a portfolio of learning experiences delivered to government food protection professionals by government food protection agency in-the-field trainers/assessors. A SME Workgroup will develop the competencies and key performance indicators for in-the-field trainers and assessors.

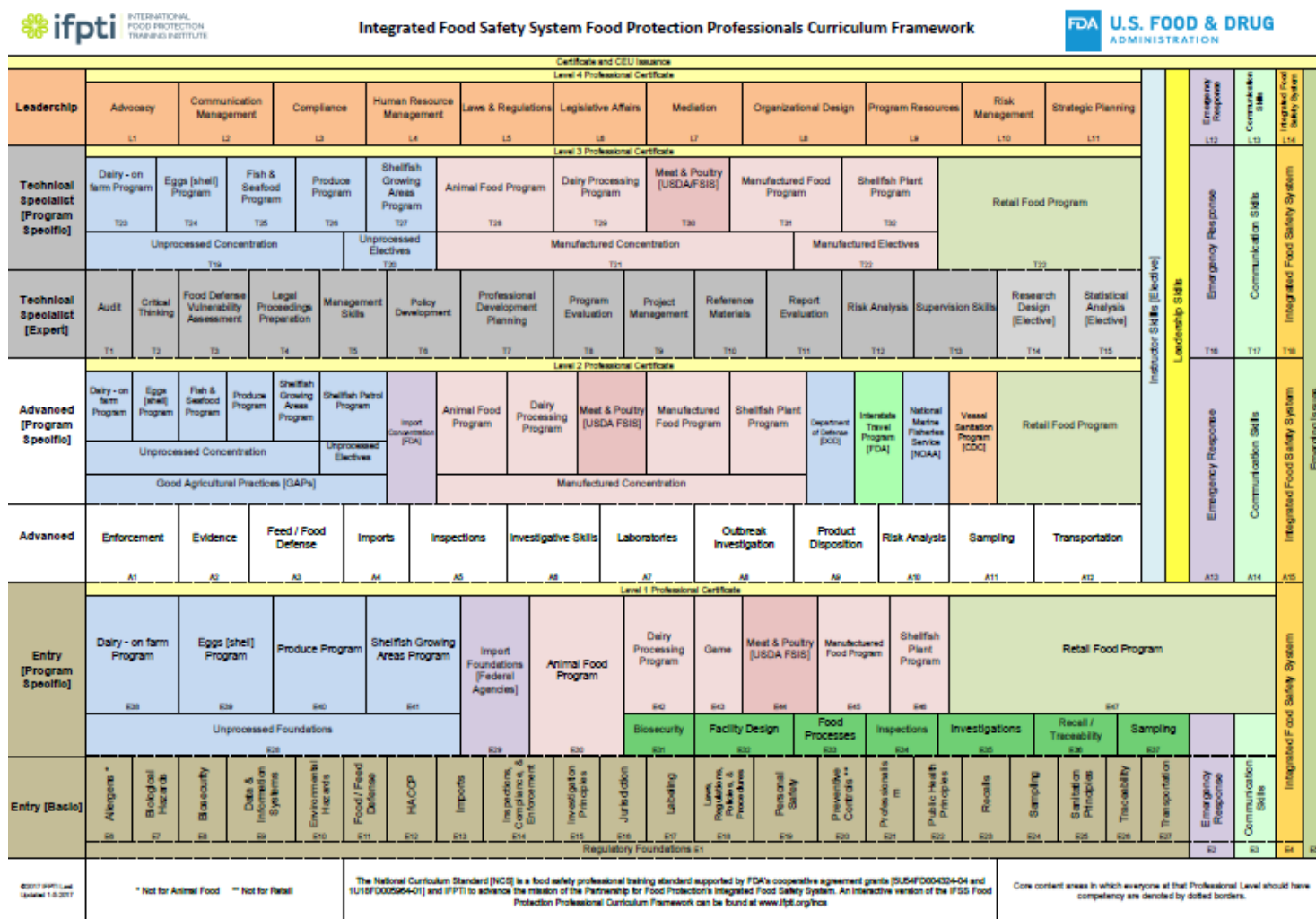
NATS focuses on assessing employees' competency against the National Curriculum Standard (NCS) competencies, provide learning experiences to help obtain the desired competencies, and then reassessment by a trained field-based assessor in everyday work conditions. The intent of this strategy is to increase access to learning experiences (training) via trained, field-based, agency-level instructors, who are also trained assessors. These instructors/assessors can provide intra or interagency assessment of other instructors' learners. The main approach of this strategy is to use field-based experiences to guide employees' learning, however, the learning plan can lever all methods of learning experiences, such as online, self-paced, mentored, and classroom-based courses.

The overarching objective of the project is to develop a **competency and curriculum framework** for in-the-field trainers/assessors in government food safety agencies. Competencies are the knowledge, skills, and abilities necessary for successful job performance. A *competency framework* is a model that broadly defines the blueprint for excellent performance *within a particular profession* at various points of one's career. The framework helps identify high-level competencies (desired outcomes or behavior), enumerates metrics by which competency can be measured, spells out observable and measureable characteristics, and provides evaluation criteria.

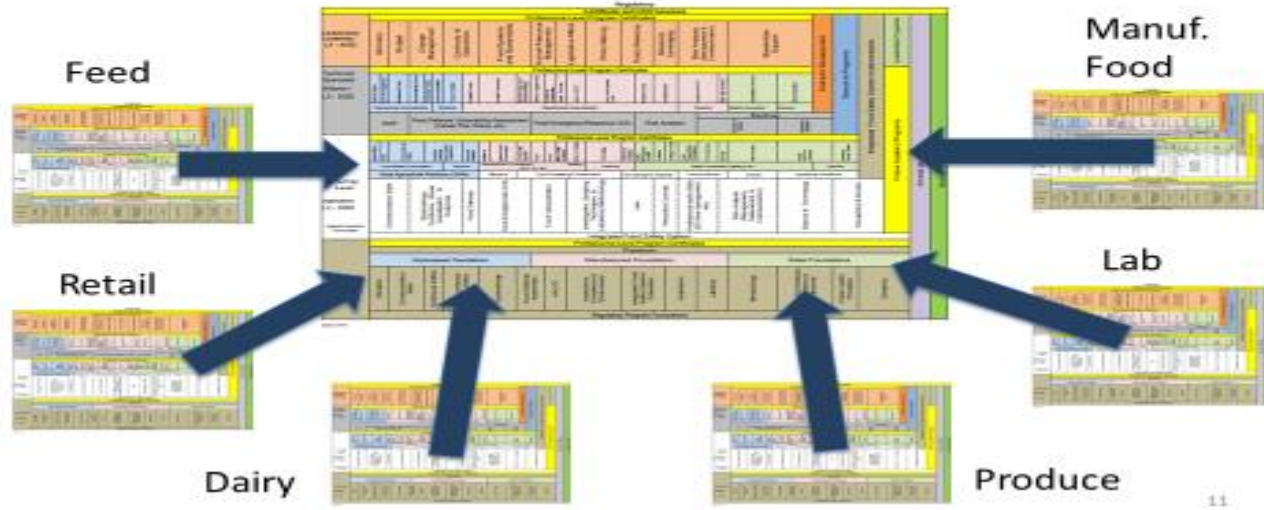
The competency framework will serve as the foundation for the in-the-field trainer/assessor **curriculum framework**, a color-coded visual schematic that represents the roadmap for content area learning experiences (training, courses, etc.) that will enable in-the-field trainers/assessors to match the blueprint for excellence spelled out by the competency framework.

Appendix

Figure 2. IFSS Framework



Current Curriculum Development Main Framework



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Curriculum Framework

- A platform/system to catalog/organize learning events
- Similar to a library
- Learning events are like the books with each categorized and in sections (content areas)



Figure 3. Retail Food Framework





		Retail Curriculum Framework				
Leadership	See Food Protection Professionals Curriculum Framework					
Technical Specialist	Report of Completion					
	FDA Retail Program Standards					
	TS1					
Advanced	Report of Completion					
	Plan Review			Special Processes		
	A1			A2		
Entry	Report of Completion					
	Active Managerial Control	Introduction to Special Processes	Non-Traditional Food Outlets	Oral Culture Learning	Regulatory Foundations for Retail Food Safety	Risk-Based Inspection
	E1	E2	E3	E4	E5	E6

Figure 4 Food Foundations Framework

 Food Foundations 									
Entry	Report of Completion								
	Biosecurity	Communication Skills	Emergency Response	Facility Design	Food Processes	Inspections	Investigations	Recall / Traceability	Sampling
	FF1	FF2	FF3	FF4	FF5	FF6	FF7	FF8	FF9

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IFPTI Last
Updated:
12-19-16

The National Curriculum Standard (NCS) is a food safety professional training standard supported by FDA's cooperative agreement grants (5U54FD004324-04 and 1U18FD005964-01) and IFPTI to advance the mission of the Partnership for Food Protection's Integrated Food Safety System. An interactive version of the IFSS Food Protection Professional Curriculum Framework can be found at www.ifps.org/incs

- **Publication** - *Training in an Integrated Food Safety System: Focus on Food Protection Officials*, Kaml et al.: Food Safety Magazine, April/May issue, 2011
- **Publication** - *The Development of a Standards-Based National Curriculum Framework for Regulatory Food Safety Training in the United States*, Kaml et al.: Journal of Environmental Health Vol. 76, No. 2, 2013
- **Publication** - *Developing a Global Curriculum for Regulators*, Preston et al.: Discussion Paper, Institute of Medicine, Washington, DC, 2013
- **Publication** - *Developing a Competency Framework for U.S. State Food and Feed Testing Laboratory Personnel*, Kaml et al.: Journal of AOAC International Vol. 97, No. 3, 2014
- **Publication** - The textbook *Regulatory Foundations for the Food Protection Professional* was published through the international publishing company, Springer. *Regulatory Foundations for the Food Protection Professional* is a comprehensive guide for the entry-level food protection professional (FPP) working in either the public or private sector. The book also serves as a foundation for students in academic programs preparing for a career in food protection. The book is based on the entry level content areas of the national curriculum framework. IFPTI edited the volume while volunteers from FDA, state, and local agencies authored the chapters (no grant funds were used as this was an in-kind contribution).
- **Publication** - *Building a National Competency-Based Learning System for Food Officials*, Kaml et al.: Food Safety Magazine, August/September issue, 2016