

## 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: 3/22/2017

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:** See attached committee work plan.

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 will be held after the April Executive Board meeting.

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

The Committee has met six times, 10/26/2016, 11/17/2016, 12/15/2016, 1/19/2017, 2/16/2017 and 3/16/17. 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.

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. A subcommittee conference call was held on 3/30/17.

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

The committee has met four times by conference call on 10/21/16, 12/5/16, 1/30/17 and 2/27/17. Several resources related to foodborne illness training have been identified. In addition, several newly developed materials have been identified. The committee has also been reviewing the training materials currently in the *Crosswalk – Required For Foodborne Illness Training Programs Based on Standard 5* document. Clarification on this charge is being requested from the Executive Board.

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 3/28/17. 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. The current 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.

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

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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. Standardize the key that is used with Standard 6 by the Iowa Department of Inspections and Appeals for jurisdictions that use the FDA Model Inspection Report along with the Model Report Marking Instructions. Develop a model key based on the Food Code and inspection report for core violations.
- d. A group of subcommittee members are meeting to further expand recommendations for Standard 6 and are looking into the impact of these recommendations on the current statistical model.
- e. Request a member of the AFDO-CFP workgroup attend one of the future meetings and provide feedback on the harmonization of the RPS and the Manufactured Program Standards.

### 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.

### 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.
- b. The document titled Crosswalk – Required For Foodborne Illness Training Programs Based on Standard 5 will need to be updated.

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

- a. Charge 2 is pending as the subcommittee is now working diligently to devise a recommendation(s) and supporting data to propose another option to the Standard 8 FTE/Inspection Ration criteria.

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

1. Approve updated committee roster. The following committee members were removed from the roster: Liz Corchado Torres and Debbie Watts. Contact information for Tom Arbizu, Angie Cyr and Scott Gilliam were updated. Stephen Hughes, FDA consultant, was replaced by Mary Cartagena.
2. Clarify the charges of **Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee**. Does the Executive Board expect the committee to update the document titled Crosswalk – Required For Foodborne Illness Training Programs Based on Standard 5 with the training materials that have been newly identified by the subcommittee? The charges are not clear on this.
3. Clarify charge # 3 of **Issue #2016 II-018 – IFITC 3 – Reassign Charges to Program Standards Committee**. The committee has been reviewing the actual materials referenced in the Crosswalk for the accuracy of their content. This seems to be beyond the scope of the charge. Does the Executive Board want them to continue this work and submit issues recommending that the providers of the training make the identified changes to their materials?

### 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/](http://www.foodprotect.org/work/) Committee roster to be submitted as a PDF attachment to this report.
- b. **Committee Generated Content Documents (OPTIONAL):**  No draft content documents submitted at this time

#### 2. Supporting Attachments (OPTIONAL): Not applicable

- a. Program Standards Committee Work Plan
- b. Updated Committee roster
- c. Iowa Department of Inspections and Appeals key for use with Standard 6
- d. National Curriculum Standard (NCS) report
- e. Publication list that describe the process to develop the framework that is in the NCS report