

**Conference for Food Protection  
2016 Issue Form**

**Issue: 2016 II-009**

**Council Recommendation:** Accepted as Submitted \_\_\_\_\_ Accepted as Amended \_\_\_\_\_ No Action \_\_\_\_\_

**Delegate Action:** Accepted \_\_\_\_\_ Rejected \_\_\_\_\_

*All information above the line is for conference use only.*

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**Issue History:**

This is a brand new Issue.

**Title:**

PSC 3 - Recommendations from Issue 2014 II-005

**Issue you would like the Conference to consider:**

The Program Standards Committee has completed charge 3 of Issue 2014 II-005 to conduct an evaluation of the current verification audit requirement of the Voluntary National Retail Food Regulatory Program Standards (Retail Program Standards). The Committee has proposed recommendations to be sent to the FDA.

**Public Health Significance:**

The Program Standards Committee is a standing committee reporting to the CFP Executive Board. The Committee provides ongoing input to the FDA on issues that arise with the Retail Program Standards. The Committee serves the Conference by indirectly assisting Retail Program Standards enrollees in making progress towards meeting the Standards. Issue 2014 II-005 included the charge to *Review the current verification audit requirement and: (a) Identify strengths of the current verification audit requirement; (b) Identify weaknesses of the current verification audit requirement, with emphasis on any barriers that may result from the current requirement; and (c) Determine whether there are potential changes to the requirement, or the administration of the requirement, that could maintain the credibility of the Retail Program Standards while reducing barriers to achievement that may result from the current verification audit requirement.* To address the charge, a subcommittee developed and distributed a survey questionnaire (*see Verification Audit Survey Tool*) to the jurisdictions currently enrolled in the Retail Program Standards to gather information about verification audits.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to the FDA requesting that they:

1. Work on removing the barriers identified related to conducting a Voluntary National Retail Food Regulatory Program Standard verification audit by: (1) providing auditor training; (2) creating a mentorship program for auditors; (3) including information on

the online Listing of Enrolled Jurisdictions document indicating which enrollees are willing to serve as verification auditors for other enrollees; and (4) continuing to work to simplify the forms and procedures for the Retail Program Standards in an effort to reduce the amount of time required to complete the required documentation;

2. Expand funding opportunities to help support and sustain the Retail Program Standards-related activities of enrollees; and
3. Better publicize and promote the work that is being done by the FDA Clearinghouse Workgroup as an important resource for Retail Program Standards enrollees.

The Conference also recommends the continuation of charges 1, 2 and 4 from Issue 2014 II-005 to the 2016 - 2018 Program Standards Committee. Those charges are:

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).

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