

**Conference for Food Protection
2016 Issue Form**

Issue: 2016 II-020

Council Recommendation: Accepted as Submitted _____ Accepted as Amended _____ No Action _____

Delegate Action: Accepted _____ Rejected _____

All information above the line is for conference use only.

Issue History:

This is a brand new Issue.

Title:

Reevaluation of FDA VNRFRP Standard 8

Issue you would like the Conference to consider:

The FDA *Voluntary National Retail Food Regulatory Program Standards* (VNRFRPS) provides an excellent framework for measure of conformity and serves as a benchmark for local health departments. It is our opinion that Standard 8 should be reevaluated to promote more feasible, sensible, and realistic criteria that can be obtained by health departments without reducing the overall objective of Standard 8.

Public Health Significance:

Standard 8 of the VNRFRPS creates an unattainable standard that prohibits local health departments (LHDs) from achieving this level of model operation.

Very few LHDs have met this Standard. Of this small number, many were one person jurisdictions that do not operate on the same capacity of the majority of LHDs. From the FDA VNRFRP website, of the 671 LHDs that are enrolled, only 27 have met Standard 8 thru self-assessment, 14 of those conducted their assessments over 5 years ago, and only 2 of the 27 were actually verified via an audit.

While the Standard surely should exist, the logic model doesn't seem sound when it is unattainable or impractical to efficient operations of LHDs. Standard 8 should be reevaluated, not to reduce the quality of the benchmark, but to review the criteria to be sure it is accurate and reasonable, as well as being an attainable standard of measure for LHDs to strive to attain.

Recommended Solution: The Conference recommends...:

that the CFP Program Standards Committee be charged to 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.

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