

**Conference for Food Protection 2008-2010**  
**Executive Board Meeting Committee Update**  
**2008 Certification of Food Safety Regulation Professionals Work Group Report**

**Date of Committee Report:** March 4, 2009

**Submitted By:** John Marcello and Susan Kendrick

**Conference Charges to the CFP CFSRP Work Group:**

This work group will meet from 2008-2010 to deliberate charges from the 2008 meeting and prepare Issues for the 2010 Conference. A primary focus for the work group will be on the continued development of Program Standard #2 - Trained Regulatory Staff - FDA Voluntary National Retail Food Regulatory Program Standards.

- Continue to review the results of the 2006-2007 Assessment of Training Needs Pilot Project that resulted in the development of the current CFP Field Training Manual and Forms. Consideration will be given as to whether additional revisions/updates are needed to the CFP Field Training and Forms.
- Determine if an evaluation tool that mirrors the CFP Field Training process should be developed, and if so, should it be incorporated into Standard #2 or left as a stand alone tool available for FDA's web site. For this initiative, the Work Group is charged to work in collaboration with FDA's Division of Human Resources Development
- Re-examine Step 4 of the current Program Standard 2 language as it relates to "standardization". Current language has raised some confusion among jurisdictions enrolled in the Standards as to what constitutes an acceptable process.
- Re-examine the Program Standard #2 time lines established for new hires to attain the specific milestones for pre-requisite curriculum, completion of field training, through standardization.
- New charge from Council 3 – Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 "Pre-Requisite Curriculum".
- Re-examine the need to include the requirement of 25 joint field training inspections as a specific criteria within Step 2, Standard 2.
- Consider/Deliberate the strengths/challenges associated with incorporating into the Program Standard #2 curriculum requirements, courses related to Food Defense including National Incident Management Systems (NIMS) and Incident Command Systems (ICS).

**Work Group Membership:** Included with this Work Group Report as Attachment A

### **Progress Report/Committee Activities:**

The CFP Work Group has had 3 full work group conference calls and a face-to-face meeting since the submission of its last report. The face-to-face meeting was made possible through FDA funding for member travel. The Work Group would like the Council II Chairs to extend a note of appreciation to Gary German, Director, FDA Division of Human Resource Development. Through his funding almost the entire work group was in attendance.

The work group has divided itself into 3 smaller sub-groups so that it can execute actions on several charges simultaneously. Each sub-group has Co-Leaders responsible for overseeing that action items and time lines are achieved. The Work Group Chairs oversee the progress of the sub-groups to ensure that issues are addressed completely and within specified time frames.

During the December 11-12, 2008 face-to-face meeting in Rockville, MD, each of these sub-groups developed a short-term action plan and time line for addressing the charges that they have responsibility for. These Sub Group Action Plans and Times Lines are included with this report in Attachment B.

Sub-groups do the research needed to evaluate all perspectives of an issue. If specific language is required to address an item in Program Standard 2 or the CFP Field Training Manual, the sub-groups develop recommended language for review and comment by the entire CFP CFSRP Work Group. All recommendations to the Conference and actions items must be reviewed and voted on by the entire work group.

The Work Group has targeted August, 2009 for completing its deliberation of Conference charges. The time period between August and December 2009 will be used to prepare Conference Issues based on Work Group recommendations and prepare any supporting documents.

### **Requested Executive Board Action:**

The CFP CFSRP Work Group received a charge from Council III, Issue 2008 III 007 (included at the end of this section of the report), to incorporate food allergen resource information as part of the recommended curriculum in Standard #2. The issue references resource documents such as allergen checklists, labeling documents, and PowerPoint presentations. In order to be incorporated into Standard 2, however, the allergen management resources materials need to be incorporated into a course with learning objectives. At the present time FDA's Division of Human Resource Development, ORA U is in the process of developing an allergen management course that will be available on its web link.

The CFP CFSRP Work Group has agreed conceptually that an allergen management course should be included as part of the Standard #2 curriculum. Before moving ahead with a recommendation to the 2010 Conference, the work group recommends that the course content and objectives be reviewed by persons with a solid understanding of food allergens and the foodservice industry. The CFP CFSRP Work Group area of focus is specific to the training of regulatory retail food safety personnel not on allergen management.

The CFP CFSRP Work Group is recommending that the Executive Board charge the CFP Allergen Committee with the responsibility for reviewing the FDA allergen management course prior to its inclusion in the Standard #2 curriculum. The CFP Allergen Committee should work in collaboration with FDA DHRD to review the course. In order for an Issue to be submitted to the 2010 Conference recommending inclusion of the Allergen Management Course as part of the Standard 2 curriculum, all review work associated with the course development will need to be completed no later than **December 1, 2009.**

**ISSUE:** 2008 III 007

**TITLE:** Food Allergy Information for State/Local Regulatory Officials

**ACTION:** Accepted as Amended

**RECOMMENDED SOLUTION**

The Conference recommends the Food Allergen Committee be reestablished and that a letter be sent to the FDA recommending that food allergen resource information be included as part of the recommended curriculum in the FDA Voluntary National Retail Food Regulatory Program Standards, Standard #2, Trained Regulatory Staff and that a compendium of educational materials be made available to state/local regulators. Examples of educational materials currently available are attached to this Issue:

- Sample Allergen Checklist for Food Suppliers and Manufacturer's;
- MN Allergen Labeling Document;
- MN Allergen Awareness PowerPoint Presentation

The Conference further recommends that the Food Allergen Committee work with the FDA to develop an appropriate educational component regarding food allergen awareness.

## **CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS WORK GROUP**

*(Part of the Conference for Food Protection (CFP)  
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ATTACHMENT A

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**CFP CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS**

**SUB-GROUP A  
ACTION PLAN AND TIME LINE**

**CONFERENCE CHARGE**

Continue to review the results of the 2006-2007 Assessment of Training Needs Pilot Project that resulted in the development of the current CFP Field Training Manual and Forms. Consideration will be given as to whether additional revisions/updates are needed to the CFP Field Training and Forms.

**Sub Group A Leaders:** David McSwane and Scott Gilliam

**Sub Group A Members:** Tom Dominick; Dot Horber; Garey Walker, Stephanie Mohn, Nancy Nesel, and Rebecca Petersen

**Reference Documents to Assist Sub Group A**

- Assessment of Training Needs Pilot Project Report
- CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers

<b>Sub-Group Activity</b>	<b>Specific Action Items</b>	<b>Completion Date</b>
1. Review of the Assessment of Training Needs Pilot Project Report approved at the 2008 Conference and look for information that may require changes in the Manual and/or the training process. <ul style="list-style-type: none"> <li>a. Brainstorm the type of information the work group might want to learn from jurisdictions that participated in the pilot project and who may be continuing to use the CFP Field Training Manual and Forms.</li> </ul>	The draft follow-up survey tool will be sent to all members of the CFP work group	<b>12-15-08</b>
	The members of the work group and sub-group A will send comments and recommendations for revisions to the follow-up survey tool to Dave McSwane and Scott Gilliam	<b>1-15-09</b>
2. Dave McSwane and Scott Gilliam will revise a survey tool to collect information from jurisdictions that participated in the pilot test of the ATN/CFP Field Training Manual.	a. Identify areas where additional information may be needed and develop questions that can be incorporated into the telephone surveys	<b>2a thru 2f to be completed by 1-23-09</b>
	b. Determine if jurisdictions have trained additional Food Safety Inspection Officers since the end of the pilot project and to solicit information about their experiences.	
	c. Sub-group B wants us to add an item in the survey about evaluation.	
	d. Are the 25 joint inspections too much, too little or just right?	
	e. Should an allergen course be added to the post-inspection curriculum?	
	f. Should food defense courses be added as a pre-inspection requirement?	

**SUB-GROUP A  
ACTION PLAN AND TIME LINE**

<b>Sub-Group Activity</b>	<b>Specific Action Items</b>	<b>Completion Date</b>
<p>3. Identify and survey jurisdictions that did not participate in the pilot study but who are currently using the ATN/Field Training Manual</p>	<p>a. John Marcello will work with the Regional Retail Food Specialists and will contact Richard Barnes to obtain an e-mail listserv for the state food program directors and to determine how we can use the resources of FDA to contact state and/or local food program personnel to determine if they are using either the ATN or the CFP Field Training Manual.</p>	<p align="center"><b>12-23-08</b></p>
	<p>b. Other potential sources of this information – NEHA, AFDO, CFP. John Marcello says agencies enrolled in the Program Standards are posted on the FDA website. He will send us the link to use.</p>	
	<p>c. Those jurisdictions that have implemented the model training program but did not participate in the pilot project will be contacted by telephone or e-mail to verify they have implemented the program and determine if they have any FSIOs who have completed the process to date.</p>	<p align="center"><b>2-15-09</b></p>
	<p>d. Send survey instrument to those jurisdictions that did not participate in the pilot test of the Assessment of Training Needs (ATN - aka CFP Field Training Manual)</p>	<p align="center"><b>2-28-09</b></p>
	<p>e. Follow-up telephone surveys will be conducted with those jurisdictions that participated in the pilot project. The work group will solicit volunteers from the larger work group to help with these telephone interviews. The interviewees should be familiar with the Field Training Manual, process, and the pilot project.</p>	<p align="center"><b>4-15-09</b></p>
	<p>f. Results of the telephone surveys will be compiled and analyzed and summary report prepared.</p>	<p align="center"><b>6-1-09</b></p>
<b>CONFERENCE CALL SCHEDULE</b>		
<b>Sub-Group A Conference Call</b>	<b>1-30-09 10:00 AM ET</b>	
<b>Full CFP CFSRP Work Group Conference Call</b>	<b>2-18-09 2:00 PM ET</b>	
<b>Sub-Group A Conference Call</b>	<b>4-28-09 11:00 AM ET</b>	

**CFP CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS**

**SUB-GROUP B  
ACTION PLAN AND TIME LINE**

**CONFERENCE CHARGE**

Determine if an evaluation tool that mirrors the CFP Field Training process should be developed, and if so, should it be incorporated into Standard #2 or left as a stand alone tool available for FDA’s web site.

**Sub Group B Leaders:** Lee Cornman and Vicki Everly

**Sub Group B Members:** Jim Fear, Heidi Shaw, Paul Craig, Michael Roberson, Cindy Woodley, Mike Gentry, and Chris Gordon

**Reference Documents to Assist Sub Group B**

- CFP Field Training Manual for Regulatory Retail Food Safety Inspection Officers Guide to the Performance Audit Process - (Candidate & Auditor Guide, Retail Level I) for State, Local, and Tribal Food Safety Inspection Officers
- Retail Food Level I Performance Audit Criteria for State, Local, and Tribal Food Safety Inspection Officers
- Audit Failure Reference Guide - Retail Food Level I Performance Audit for State, Local, and Tribal Food Safety Inspection Officers
- Level I Food Safety Inspection Officer (State, Local, Tribal) Audit Results Summary Form
- Level I Food Safety Inspection Officer (State, Local, Tribal) Audit Worksheet
- Level I Food Safety Inspection Officer (State, Local, Tribal) Auditor Feedback Form
- FDA/DHRD Proposed Model to Address Standard 2 Criteria

**SUB-GROUP B  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
<b>DECEMBER 2008 ACTIONS</b>	Forward link to FDA Standards and FDA Standardization Document to Work Group B members	Jim Fear completed
	Forward documents provided by Susan Kendrick on Oregon auditing.	Lee Cornman completed
	John Marcello will forward the Michigan audit tool to Lee / Vicki to forward to all Work Group B members	John Marcello completed

**SUB-GROUP B  
ACTION PLAN AND TIME LINE**

<b>Sub-Group Activity</b>	<b>Specific Action Items</b>	<b>Completion Date</b>
<b>JANUARY 2009 ACTION ITEMS</b>	Request Work Group A to ask the survey jurisdictions during phone interviews if they have an audit process they would share or, if they do not, ask if they feel one would be beneficial. Lee / Vicki will request of David McSwane and Scott Gilliam. Work Group A has a deadline of January 15, 2009 for receipt of additional questions.	<b>1-15-09</b>
	Comparison of the FDA Performance Audit elements, CFP Field Training Manual, FDA Standardization Procedure to the elements of Standard 4, 1.b. All Work Group B members to participate.	<b>1-21-09</b>
	Forward existing & available audit processes and documents used by other jurisdictions to Lee / Vicki for disbursement to all members for review. All Work Group B members to participate.	<b>1-21-09</b>
<b>FEBRUARY 2009 ACTION ITEMS</b>	Full Work Group Conference Call	<b>2-18-09 2:00 PM ET</b>
	Lee / Vicki will create compilation of Work Group B comparisons (see January #2)	<b>2-27-09</b>
<b>MARCH 2009 ACTION ITEMS</b>	Forward the audit comparison to all Work Group B members for review. Lee / Vicki will complete.	<b>3-2-09</b>
	Review and provide comment or recommended changes on audit comparison document to Lee / Vicki. All Work Group B members to participate and forward comments	<b>3-20-09</b>
	Work Group B conference call to discuss the audit comparison document and reach consensus. All Work Group B members to participate	<b>3-25-09</b>
<b>APRIL 2009 ACTION ITEMS</b>	Receive comments and complete draft document. Edit and finalize draft audit comparison based on Work Group B input. Lee / Vicki to complete	<b>4-30-09</b>

**SUB-GROUP B  
ACTION PLAN AND TIME LINE**

<b>Sub-Group Activity</b>	<b>Specific Action Items</b>	<b>Completion Date</b>
<b>MAY 2009 ACTION ITEMS</b>	Forward draft audit comparison back to Work Group B. Lee / Vicki to complete	<b>5-8-09</b>
	Work Group B conference call to develop proposal to FDA on the use of the comparison as a tool for implementation of Standard 4. All Work Group B members participate.	<b>5-15-09</b>
	Forward draft FDA proposal with draft comparison document to full CFSRP Work Group for review and comment. Lee / Vicki to forward.	<b>5-29-09</b>
<b>JUNE 2009 ACTION ITEMS</b>	Deadline to receive comments back from full CFSRP Work Group on draft FDA proposal with draft comparison document. All CFSRP Work Group members will participate. Lee / Vicki will receive the comments and revise draft documents accordingly.	<b>6-15-09</b>
	Forward final FDA proposal and comparison document to FDA for review and use. Lee / Vicki to complete.	<b>6-30-08</b>
<b>CONFERENCE CALL SCHEDULE</b>		
<b>Full CFP CFSRP Work Group Conference Call</b>	<b>2-18-09</b>	<b>2:00 PM ET</b>
<b>Sub-Group B Conference Call</b>	<b>3-25-09</b>	
<b>Sub-Group B Conference Call</b>	<b>5-15-09</b>	

**CFP CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS**

**SUB-GROUP C  
ACTION PLAN AND TIME LINE**

**CONFERENCE CHARGE**

- Re-examine Step 4 of the current Program Standard 2 language as it relates to “standardization”. Current language has raised some confusion among jurisdictions enrolled in the Standards as to what constitutes an acceptable process.
- Re-examine the Program Standard #2 time lines established for new hires to attain the specific milestones for pre-requisite curriculum, completion of field training, through standardization.
- New charge from Council 3 – Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 “Pre-Requisite Curriculum”.
- Re-examine the need to include the requirement of 25 joint field training inspections as a specific criteria within Step 2, Standard 2.
- Consider/Deliberate the merits of incorporating into the Program Standard #2 curriculum requirements, courses related to Food Defense including National Incident Management Systems (NIMS) and Incident Command Systems (ICS).

**Sub Group C Leaders:** Ruth Hendy and David Read

**Sub Group C Members:** Jim Fear, DeBrena Hilton, Catherine Cummins, Ron Grimes, and Carolyn Bombet

**Reference Documents to Assist Sub Group C**

- Standard 2: Trained Regulatory Staff, FDA Voluntary National Retail Food Regulatory Program Standards (criteria without the appendices, as approved at the 2008 Conference for Food Protection).
- The Learning Objectives from the FDA ORA U Allergen Management Course currently under development
- DRAFT Outline FDA ORA U Allergen Management Course

**SUB-GROUP C  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
1. Incorporating Allergen Management Course as part of Standard 2.	Agree to addition of course with placement recommendation as a “Post” course. Consensus was that all staff, as well as industry, need this training.	<b>1-15-09</b>
	Recommendations from sub-group regarding course: a. Additional retail information, specifically pertaining to labeling and examples of retail settings where labeling would be required. b. Basic information to help FSIO gain confidence and awareness of allergen issues for operations that prepare food.	
	Sub-Group recommendation to be submitted to CFP CFSRP Work Group Co-Chairs	
2. Re-examine Program Standard #2 to incorporate requirement of incident command training into curriculum.	Recommendation that ICS 100 & 200 be added to the Pre-Requisite course list. Courses must be NIMS compliant. Recommendation to be submitted to CFP CFSRP Work Group Co-Chairs.	<b>1-15-09</b>
	Research availability of appropriate Emergency Response courses that might be suitable for inclusion in the Pre-Requisite curriculum. Deadline for completion of research.	<b>6-5-09</b>
3. Re-examine Step 4 as it relates to standardization.	Re-write Step 4 language that a minimum of 4 inspections can be used for FSIO staff with field inspection duties. Standardization Officer level standardizations must meet the FDA protocol. Draft re-write will be created by Ron and David	<b>6-5-09</b>
4. Re-examine timelines for new hires to attain specific milestones for completion of independent inspections within 18 months.	Recommendation is that the Step 3 timelines remain the same unless some compelling information is provided to the workgroup to justify a change. Oral Recommendation submitted at 12-11-08 Work Group meeting. Written motion to be submitted to work group Co-Chairs for member vote.	<b>1-31-09</b>

**SUB-GROUP C  
ACTION PLAN AND TIME LINE**

Sub-Group Activity	Specific Action Items	Completion Date
5. Re-examine requirement of 25 joint field inspections.	<p>Recommendation to change wording to remove the 25 joint inspection mandate and replace with wording that reflects a concept that recognizes that the number of inspections necessary is dictated by their level of ability and training. Wording shall include statements that the process will follow the CFP <i>Field Training Manual</i> protocol, and forms and worksheets provided. The decision for the number of joint inspections would be made by the jurisdiction following a documented training process.</p> <p>Draft re-write will be created by DeBrena, Catherine and Carolyn.</p>	<b>6-5-09</b>
<b>CONFERENCE CALL SCHEDULE</b>		
<b>Full CFP CFSRP Work Group Conference Call</b>	<b>2-18-09</b>	<b>2:00 PM ET</b>