Conference for Food Protection
2010 Issue Form

Internal Number: 007
Issue: 2010 II-008

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

All information above the line is for conference use only.

Title:

Report - Certification of Food Safety Regulation Professionals Work Group

Issue you would like the Conference to consider:

The CFP Certification of Food Safety Regulation Professionals (CFSRP) Work Group seeks the Conference's acknowledgement of its Work Group Report.

Public Health Significance:

The Certification of Food Safety Regulation Professionals Work Group report submitted with this Issue as Attachment A provides a summary of the actions taken to address each of the following Conference charges:

- Review the 2006-2007 Assessment of Training Needs Pilot Project Report that resulted in the development of the current *CFP Field Training Manual* and Forms.

- Work Group review and deliberations will assess whether additional revisions/updates are needed to the *CFP Field Training Manual* and forms. (See Charge #1 in Work Group report)

- Determine if an evaluation tool that mirrors the CFP Field Training process should be developed.

- If such an evaluation tool is necessary, should it be incorporated into Standard #2 or left as a stand alone tool available from FDA's web site. For this initiative, the Work Group is charged to work in collaboration with FDA's Division of Human Resources Development. (See Charge #2 in Work Group report)
- o 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 standardization process. The Work Group will determine if the written criteria in Step 4 should be

revised for clarification and, if so, submit a recommendation to the 2010 Biennial Meeting. (See Charge #3 in Work Group report)

- Review the criteria for *Standard 2 - Trained Regulatory Staff, FDA Draft Voluntary National Retail Food Regulatory Program Standards* to ensure it reflects the most up-to-date approach for training and standardizing Food Safety Inspection Officers (FSIOs) newly hired or assigned to regulatory retail food protection programs.

- Re-examine Program Standard #2 time lines established for new hires to attain the specific milestones for pre-requisite curriculum, completion of field training, through standardization (Steps 1 - 4 in Standard #2). (See Charge #4 in Work Group report)
- Charge transferred in 2008 from Council 3 - Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 "Pre-Requisite Curriculum" and provide a recommendation to the 2010 Biennial Meeting. (See Charge #5 in Work Group report)
- Determine if there is a need to include the requirement of 25 joint field training inspections as a specific criterion within Step 2, Standard 2. (See Charge #6 in Work Group report)
- Assess the strengths/challenges associated with incorporating into Program Standard #2 curriculum requirements, courses related to Food Defense including National Incident Management Systems (NIMS) and Incident Command Systems (ICS) and provide a recommendation to the 2010 Biennial Meeting. (See Charge #7 in Work Group report)

In addition to this Issue requesting acknowledgement of the report, the CFP CFSRP Work Group has submitted 4 separate issues with recommended actions for the Conference to consider. A final issue with the recommendation for continuation of the CFP CFSRP Work Group and suggested 'charges' has also been submitted as a separate issue.

Recommended Solution: The Conference recommends...:

acknowledgement of the Conference for Food Protection, Certification of Food Safety Regulation Professionals - Work Group Report included as Attachment A with this Issue. The Conference further recommends that an expression of thanks be extended to all the CFSRP Work Group members who diligently dedicated their time over the past two years.

Submitter Information:

Name:	John Marcello, Co-Chair
Organization:	CFP Certification of Food Safety Regulation Professionals Work Group
Address:	51 W. 3rd Street, Suite E-265
City/State/Zip:	Tempe, AZ 85281
Telephone:	480 829-7396 ext. 35 Fax: 480 829-7677
E-mail:	john.marcello@fda.hhs.gov

Attachments:

- "Certification of Food Safety Regulation Professionals Work Group Report"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.

2010 Conference for Food Protection

Certification of Food Safety Regulation Professionals Work Group Report

Prepared and Submitted By the Work Group's Co-Chairs

John Marcello **Susan Kendrick**

BACKGROUND

The Conference for Food Protection (CFP) has progressed through multiple stages in the development of a nationally recognized process for training and standardizing regulatory Food Safety Inspection Officers (FSIO) responsible for institutional foodservice, restaurant, and retail food safety inspections. The 2008-2010 CFP Certification of Food Safety Regulations Professionals (CFSRP) Work Group deliberations focused on:

- Obtaining feedback from jurisdictions using the CFP Field Training Manual and forms on their experiences with training newly hired or staff newly assigned to the regulatory retail food protection programs. The feedback from these jurisdictions was used to assess the need to enhance or revise the process and/or forms.
- Reviewing specific criteria in Standard 2, Trained Regulatory Staff, *FDA Program Standard (2009)*, that may be in need of clarification or revision.
- Assessing the need to include an audit process and tool that mirrors the CFP Field Training process as part of the *FDA Program Standards*.

A list of the members of the CFP Certification of Food Safety Regulations Professionals Work Group is included as Addendum A.

SUMMARY OF THE CONFERENCE CHARGES

The following tables provide a list of the Conference charges to the 2008-2010 CFP CFSRP Work Group. Following these tables, a short summary of the actions taken by the Work Group to address each of these charges is provided.

1. **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 Manual* and Forms.**

2. **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.**

3. **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.**

4. **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.**

5. **Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 "Pre-Requisite Curriculum".**

6. **Re-examine the need to include the requirement of 25 joint field training inspections as a specific criteria within Step 2, Standard 2.**

7. **Assess 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).**

CFSRP WORK GROUP RESPONSE TO EACH CHARGE

RESPONSE – WORK GROUP CHARGE #1

1. **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 Manual* and Forms.**

Follow-up interviews were conducted with Twenty-two (22) of the Twenty-nine (29) state/local/tribal jurisdictions that participated in the 2007 Assessment of Training Needs (ATN) pilot project. The interview tool developed by the Work Group as well as a summary of the responses from jurisdictions is included as Addendum B.

Jurisdictions using the CFP Field Training process and forms have indicated an overwhelmingly favorable experience. **The CFP CFSRP Work Group is <u>not</u> submitting any recommendations to the 2010 Conference for revisions to the CFP Field Training Manual or forms.** However, five areas of focus have been identified that the future Work Group should continue to review and update if necessary:

- In collaboration with FDA's Division of Human Resource Development, continue to review and revise, as needed, the Standard 2 classroom curriculum.
- Obtain feedback from state/local/tribal jurisdictions on the Standard 2 time frame for new hires or staff newly assigned the regulatory retail food protection program to complete Steps 1 through 4.
- Assess opportunities for enhancing the electronic versions of the CFP Field Training Manual and forms to minimize paperwork.
- Determine if the CFP Field Training Manual and forms have completely addressed all recommendations received as part of the 2007 ATN pilot project.
- Evaluate whether a performance audit should be included as part of the FDA Program Standards or made available via another mechanism.

The follow-up interviews did indicate the need for the Conference to enhance efforts to promote awareness of the *CFP Field Training Manual* and forms. The CFP CFSRP Work Group is recommending to the Conference that a new 2010-2012 charge be addressed to evaluate and determine the best approaches to promoting awareness and implementation of this national training model including use of websites, list serves, newsletters, testimonials, presentations, and training workshops, etc.

The responses obtain from the follow-up interviews with the ATN pilot jurisdictions served as an important resource for addressing several Conference charges related to the criteria in Standard 2 – Trained Regulatory Staff, *FDA Program Standards (2009).*

RESPONSE – WORK GROUP CHARGE #2

> **2. 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**

Three points were identified as the primary steps needed to respond to the Work Group charge referenced above. These points are as follows:

- Is an audit tool needed?
- How would the audit tool be administered?
- Where would such an audit tool be housed (in Standard. 2, somewhere else in the Program Standards, or as a stand alone web document)?

Additional concerns were raised relative to the potential use of an FDA audit tool. Concerns included potential duplication between the FDA *Retail Food Level I Performance Audit* and its corresponding worksheet and the CFP *Field Training Manual* process; how the FDA *Audit* will fit with FDA *Standardization Procedures*; and, whether inclusion of an audit process into the CFP *Field Training Manual* would shift the focus from training assessment to performance competency and whether that would encompass disciplinary issues.

Results from the follow-up interviews with ATN pilot jurisdictions indicated support for the development of an audit tool that mirrored the CFP Field Training process. **The CFP CFSRP Work Group determined that there should be an audit tool available that mirrors the performance elements and competencies listed in the CFP Field Training Plan included as part of Appendix B-2, Standard 2, *FDA Program Standards (2009)*.**

Subsequent Work Group deliberations addressed the feasibility of how such an audit tool would be administered and where it should be housed (whether in Standard 2, somewhere else in the Program Standards, or as a stand alone web document). The Work Group reached consensus that the audit process, whether included as part of Standard 2 or provided as a stand alone process, should be fully compatible with the *CFP Field Training Manual*.

The Work Group focused their review on four existing documents that contained guidance for, or related to, conducting training audits:

- *FDA Program Standards (2009)*, particularly Standard 4 – Uniform Inspection Program;

- The performance elements and competencies contained in the *CFP Field Training Manual,* Appendix B-2, Standard 2 – Trained Regulatory Staff, *FDA Program Standards (2009)*;
- *FDA Procedures for Standardization (*also referenced in Standard 2 – Trained Regulatory Staff); and
- FDA *Retail Food Level I Performance Audit* draft documents.

While there are distinct similarities between several of the reviewed programs, including a focus on inspection performance, quality and uniformity, there were significant concerns expressed relative to the relationship of the FDA *Retail Food Level I Performance Audit* tool to *Program Standard 2* as originally proposed by FDA in Issue 2008 II-052. If the FDA *Performance Audit* component is incorporated into *Standard 2*, along with the CFP *Field Training Manual* and *Standardization Procedures*, there will be three different yet similar types of verification tools within a single *Program Standard*.

The instructions and worksheets provided in the *CFP Field Training Manual* constitute a training process, ***not*** a certification or audit process. The *CFP Field Training Manual* is designed specifically for the newly hired or newly transferred FSIO and completion of that process represents program competency to initiate independent inspections. A "performance audit" is ***not*** a training function. It is designed to evaluate whether or not a candidate can successfully and repeatedly apply their knowledge and skills to the inspection environment in a manner that conforms to program requirements. "Standardization" is designed and intended for evaluation of FSIOs with a longer tenure as a field inspector with more varied experience conducting independent inspections and who will serve as training officers for other program inspection staff.

In order to eliminate potential program redundancies, the CFP CFSRP Work Group is recommending a new 2010-2012 charge to collaborate with FDA on clarifying whether "Standardization" is more appropriately housed within "Standard 2" as a training function, or whether it should be reorganized somewhere else within the *Standards*. The CFP CFSRP would explore with FDA the feasibility of either combining the "Performance Audit" functions with that of "Standardization", or streamlining the duality of the processes to remove redundant or duplicative activities.

At this time, the program component with the greatest degree of compatibility for administration of the *FDA Retail Food Level I Performance Audit* is the *FDA Program Standards,* Standard 4 – Uniform Inspection Program. Use of the FDA "Performance Audit" as an application tool for the implementation of Standard 4 is relevant to the evaluation of a jurisdiction's ongoing "quality assurance program." Concurrently, the ten elements of competency derived from the *CFP Field Training Manual* and used for the "Performance Audit" criteria are well-suited to assess an FSIO's knowledge, skills and abilities as related to inspection procedures. If accepted by FDA, modifications to the existing draft documents

for the *FDA Retail Food Level I Performance A* will be needed to incorporate the recommendations provided by the CFP CFSRP Work Group.

The CFP CSRP Work Group is recommending that a new 2010-2012 charge include conducting a pilot project using the *FDA Retail Food Level I Performance Audit* with a limited and selected number of jurisdictions. The FDA "Performance Audit" will be piloted for use during the two joint inspections conducted as part of the quality assurance component of Standard 4 – Uniform Inspection Program. The proposed pilot project objectives and time line are included as Addendum C.

RESPONSE – WORK GROUP CHARGE #3

3. 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.

In 2006, the Conference unanimously approved a recommendation from the CFP CFSRP Work Group to revise the minimum number of inspections a FSIO must successfully complete as part of their Food Code standardization process. The minimum number of standardization inspections in Step 4, Standard 2, was reduced from 8 to 4 for FSIOs who would ***not*** be expected to serve as "Training Standards" responsible for standardizing other FSIOs. The standardization process must be similar to the "FDA Standardization Procedures" and address the five following performance areas:

1. Risk-based inspections focusing on the factors that contributed to foodborne illness;
2. Good Retail Practices;
3. Application of HACCP Principles;
4. Inspection equipment; and
5. Communication.

The FDA standardization procedures are based on a minimum of 8 inspections and include performance areas related to the development of HACCP flow charts, completion of a risk control plan, and verification of a HACCP Plan. FDA standardizations are conducted with regulatory retail food protection personnel who would be ***expected to serve*** as "Training Standards" responsible for standardizing other FSIOs.

Jurisdictions participating in the *FDA Program Standards* have indicated that the Standard 2 criteria does not clearly address the differences in the standardization process needed to be a "Training Standard" versus standardization of FSIOs who will ***not*** conduct standardizations with other FSIOs.

The CFP CFSRP Work Group has submitted an Issue recommending that the definitions of "Trainer" and "Training Standard" contained in the *FDA Program Standards (2009)* be revised to clearly identify the requirements for each of these roles. In addition, the Work Group recommends that Step 4, Standard 2, be revised to include a reference to the requirements for conducting field standardizations of FSIOs as presented in the Work Group's proposed "Training Standard" definition.

RESPONSE – WORK GROUP CHARGE #4

4. Re-examine the Standard 2 time line established for new hires to attain the specific milestones for pre-requisite curriculum, completion of field training, through standardization.

The Standard 2 – Trained Regulatory Staff criteria includes a time frame of 18 months for new hires or staff newly assigned to the regulatory retail food protection program to complete Steps 1-4.

> **Step 1** – Pre-requisite curriculum courses (prior to conducting independent inspections);
> **Step 2** – A minimum of 25 joint field training inspections with the jurisdiction's trainer and completion of a field training process similar to that presented in the *CFP Field Training Manual*;
> **Step 3** – A minimum of 25 independent inspections; and
> **Step 4** – A standardization process, based on a minimum of 4 inspections that is similar to the *FDA Standardization Procedures*.

The CFP CFSRP Work Group recommends that no change be made to the 18 month time frame. This consensus decision was based on internal Work Group deliberations and response from the follow-up interviews conducted with the ATN pilot project jurisdictions. The responses from the follow-up interviews were varied with 13 of the 22 respondents indicating that the 18 month time frame was appropriate.

RESPONSE – WORK GROUP CHARGE #5

5. Assess the feasibility of incorporating an Allergen Management Course as part of the Standard 2 "Pre-Requisite Curriculum".

At the 2008 Biennial Meeting, the Voting Assembly of Delegates unanimously approved the Council III recommendation contained in Issue 2008 III-007, *Food Allergy Information for state/local regulatory officials*:

The CFP CFSRP Work Group has submitted an Issue recommending that a letter be sent to the FDA 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/tribal regulators.

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

The responses from the ATN pilot project jurisdictions indicated overwhelming support for inclusion of an Allergen Management Course as part of the Standard 2 – Trained Regulatory Staff curriculum.

Appendix B-1, Standard 2, contains a listing of the training curriculum expected to be completed by new hires or staff newly assigned to the regulatory retail food protection program. To be included in this listing, the subject matter must be in the form of a course with learning objectives. FDA's Division of Human Resource Development has developed several of the core elements for an Allergen Management Course. FDA's Center for Food Safety and Applied Nutrition is currently working on an Allergen Management guidance document. This document will include specific recommendations for the retail food industry. FDA is planning on collaborating with the CFP Food Allergen Committee to obtain feedback on the information contained in the Allergen Management guidance document. Once the document is finalized, FDA will incorporate specific allergen management guidance for foodservice and retail food operations into the Allergen Management course.

The CFP CFSRP Work Group has submitted a 2010 Issue recommending that the FDA Allergen Management Course be incorporated as part of the Standard 2 post curriculum upon its completion and review by the CFP Food Allergen Committee.

RESPONSE – WORK GROUP CHARGE #6

6. Re-examine the need to include the requirement of 25 joint field training inspections as a specific criteria within Step 2, Standard 2.

Feedback from the jurisdictions that participated in the 2007 ATN pilot project, administered through the Conference, indicated a wide variation in opinion as to the appropriate number of joint field training inspections needed to prepare new FSIOs for conducting independent inspections of foodservice and retail food facility types. A summary of the jurisdiction responses to appropriate number of joint field inspections is contained on pages 48 and 49 of the 2007 Assessment

of Training Needs Pilot Project Report which is available from the Conference for Food Protection web site: www.foodprotect.org

Sixty-five percent (65%) of the jurisdictions participating in the pilot project indicated that 25 joint field training inspections was the appropriate minimum number to include in Standard 2. Of the 10 that responded with a "no", the number of joint field training inspections recommended ranged from 10 to 100, with an average of 75. From comments received from the pilot jurisdiction, the appropriate number of joint field training inspections is primarily based on an individual's skill, capability and affinity for learning new tasks or accomplishment of certain skills. These learning characteristics will vary from one individual to another.

A recurring comment from ATN pilot project jurisdictions was that the number of joint field inspections was not the performance measure they used to determine a trainee's readiness to conduct independent inspections. The ultimate performance measure is the trainee's ability to successfully demonstrate all the competencies listed on the CFP Field Training Plan contained in Appendix B-2, Standard 2.

Many jurisdictions indicated that having a minimum of 25 joint field training inspections provided the jurisdiction's trainer with expectations on time commitments/resources that should be devoted to the training process. It provides for a degree of quality assurance and expectation of the training process for both the candidate and trainer.

The CFP CFSRP Work Group is submitting an Issue recommending that the Conference retain the reference to the minimum of 25 joint field inspections in Step 2, Standard 2, but also include language that would allow a trainer to conduct a fewer number provided that the exception was supported by written documentation, such as completion of the CFP Field Training Plan included in Appendix B-2, Standard 2.

RESPONSE – WORK GROUP CHARGE #7

7. Assess the strengths/challenges associated with incorporating into the Standard 2 curriculum requirements, courses related to Food Defense including National Incident Management Systems (NIMS) and Incident Command Systems (ICS).

State/local/tribal regulatory retail food safety professionals are often the first responders to a food safety or food defense emergency. Frequently these incidents impact multiple jurisdictions and require an operational response and management to ensure maximum public health protection.

The Federal Emergency Management Agency (FEMA) offers a national model training curriculum for all public officials with emergency response and coordination responsibilities. FEMA's Emergency Management Institute provides many basic and advanced National Incident Management Systems and Incident Command Systems courses on-line for no cost. These courses which include final examinations and certificate of completions are available from the following web link: http://training.fema.gov/IS/NIMS.asp.

The CFP CFSRP Work Group has submitted an Issue recommending the inclusion of the following three FEMA courses as part of the "post curriculum" outlined on Appendix B-1, Standard 2.

IS-100.a, *Introduction to Incident Command System*, ICS-100
This course provides training and resources for personnel who require a basic understanding of the Incident Command System (ICS).

IS-200.a, *ICS for Single Resources and Initial Action Incidents*, ICS-200
This course provides training and resources for personnel who are likely to assume a supervisory position within the Incident Command System (ICS). The primary target audiences are response personnel at the supervisory level.

IS-700.a, *NIMS An Introduction*, ICS 700
This course provides training and resources for the National Incident Management System (NIMS). NIMS provide a consistent nationwide template to enable all government, private sector, and nongovernmental organizations to work together during domestic incidents.

2010-2012 Conference Charges for the Work Group

The Work Group issue titled*, Re-Create – Certification of Food Safety Regulation Professionals Work Group*, recommends that a new CFP CFSRP Work Group be re-created to address the following charges:

- Collaborate with the FDA Center for Food Safety and Applied Nutrition and the FDA Division of Human Resource Development to:
    - Review 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.

- Eliminate the potential redundancy of multiple verification tools (FDA *Retail Food Level I Performance Audit and* FDA *Procedures for Standardization and Certification of Retail Food Inspection / Training Officers*) utilized by FDA programs, work in collaboration with FDA's Center for Food Safety and Applied Nutrition, FDA's National Retail Food Team and the FDA's Division of Human Resource Development to:
    - Conduct a pilot project over the next year using the FDA *Retail Food Level I Performance Audit* with a limited and selected number of jurisdictions. The FDA *Performance Audit* will be piloted for use during the two joint inspections conducted as part of the quality assurance component of *Standard 4 – Uniform Inspection Program.* An outline of the pilot project objectives, protocol, and projected timeline is included as Attachment A with this Issue. The CFP CFSRP work group will submit a report to the 2012 Biennial Meeting that documents the result of the pilot project and any recommendations for the use of verification tools as part of the FDA Program Standards*;* and,
    - Conduct a joint assessment of FDA *Standardization Procedures* and FDA *Performance Audit* documents to determine if both verification tools are equally viable with distinct purposes and outcomes; and,
    - Explore the feasibility of merging these existing verification tool documents and provide a plan for consolidation of such; and,
    - Upon determination, assess the placement and administration of final verification tool(s) within the FDA *Program Standards* as appropriate, or separately as appropriate; and,

  With input and guidance from the CFSRP Work Group, FDA will determine if modifications to their draft FDA *Performance FDA Retail Food Level I Performance Audit* and/or *Standardization* documents are needed. Any

modifications that would include changes to the Program Standards will be submitted as Issues by the CFP CFSRP Work Group to the 2012 Biennial Meeting.

- Collaborate with FDA, other federal agencies, professional and industry associations to research what criteria is currently being used to assess the education and training qualifications of independent third party auditors that have been contracted to conduct institutional foodservice, restaurant, and retail food compliance inspections in lieu of a State/local/tribal regulatory retail food program. The re-created Work Group is to provide a report to the 2012 Biennial Meeting that:
    - Assesses the number of jurisdictions and geographic areas where retail food compliance Inspections are conducted by independent third party auditors in lieu of a regulatory compliance program;
    - Delineates the reasons jurisdictions have moved to a third party auditor inspection compliance program;
    - Summarizes criteria used to select third party auditors for inspection compliance oversight responsibilities including, but not limited to, education and training qualifications;
    - Assesses and determines appropriate training and standardization processes/protocols for third party auditors, and
    - Identifies any agencies/organizations/working groups currently addressing education and training standards for third party auditors conducting retail food compliance inspections.

  Based on the above research, the work group will provide a recommendation to the Conference as to what actions/initiatives, if any, need to be undertaken to provide a national structure for ensuring that third party auditors possess the necessary knowledge, skills, and abilities to conduct retail food program compliance inspections.

- Evaluate and determine the best approaches to promoting awareness and implementation of the national training model contained in the CFP Field Training Manual and forms, Appendix B-2, Standard 2. The work group will research the use of websites, list serves, newsletters, testimonials, presentations, and training workshops, etc.

- Report back to the 2012 Biennial Meeting its findings regarding the above charges.

The last charge related to third party auditors presented above has been included as a new charge based on an increase in the number of independent third party auditors that have been contracted to conduct regulatory oversight inspections of institutional foodservice, restaurant, and retail food store facility types. Some areas of the country are beginning to disband the local regulatory retail food protection agency and contract the work to nongovernmental organizations. Currently, a national standard upon which to evaluate the

education and qualifications of independent third party auditors does not exist. Legislation has been introduced at the federal level that contains language that would recognize third party audits as a legitimate use of resources to enhance food safety. Since these issues are still not solidified at the time of submittal of the Work Group report to the 2010 Biennial Meeting, a closer look over the next two year cycle is in order.

Summary of CFP CFSRP Work Group Issues Submitted to the 2010 Conference

(Work Group Issues are listed by titles. Conference assigned "Issue Numbers" were not available prior to submission.)

√ **Issue** Report – Certification of Food Safety Regulation Professionals Work Group **Attachment A** 2010 Conference for Food Protection Certification of Food Safety Regulation Professionals Work Group Report
√ **Issue** Emergency Management Course Additions to Appendix B-1, Standard 2
√ **Issue** Allergen Management Course Addition to Appendix B-1, Standard 2
√ **Issue** Clarifying Step 2, Standard 2 – Program Standards
√ **Issue** Clarifying Definitions for Step 4, Standard 2 – Program Standards
√ **Issue** Re-create – CFSRP Work Group **Attachment A** Performance Audit Tool Pilot Project Objectives and Time Line

CERTIFICATION OF FOOD SAFETY REGULATION PROFESSIONALS WORK GROUP

(Part of the Conference for Food Protection (CFP) Program Standards Committee)

Susan Kendrick, Co-Chair
Education Specialist
Oregon Department of Agriculture
Food Safety Division
635 Capitol Street NE
Salem, OR 97301-2532
(503) 533-0835
FAX: (503) 986-4729
skendric@oda.state.or.us

John Marcello, Co-Chair
Pacific Region Retail Food Specialist
U.S. Food & Drug Administration
FDA Phoenix Resident Post
51 W. 3rd Street, Suite 265
Tempe, AZ 85281
(480) 829-7396 ext. 35
FAX: (480) 829-7677
john.marcello@fda.hhs.gov

STATE REGULATORY

1. Lee M. Cornman
Florida Department of Agriculture and Consumer Services
Division of Food Safety
3125 Conner Boulevard (C-18)
Tallahassee, FL 32399-1650
(850) 245-5595
cornmal@doacs.state.fl.us

2. Ruth Hendy
State Standardization Officer, Food Establishments
PSQA Unit
Texas Department State Health Services Group
PO Box 149347
Austin, Texas 78714-9347
(512) 834-6753
ruth.hendy@dshs.state.tx.us

3. Mike Gentry
Program Coordinator
Food Safety and Sanitation
Alaska Department of Environmental Conservation
555 Cordova Street, 5th Floor
Anchorage, AK 99501
(907) 269-7596
mike.gentry@alaska.gov

4. Catherine Cummins
Virginia Department of Health
PO Box 1552
Radford, VA 22906-7912
(434) 906-1129
catherine.cummins@vdh.virginia.gov

5. David Read
Dairy and Food Inspection Division
Minnesota Department of Agriculture
625 Robert Street North
St. Paul, MN 55155-2538
(651)-201-6596
david.read@state.mn.us

6. A. Scott Gilliam
Indiana State Department of Health
2 N. Meridian Street, Room 5C
Indianapolis, IN 46204
(317) 233-7360
sgilliam@isdh.in.gov

7. Carolyn Bombet
Louisiana Department of Health and Hospitals
Office of Public Health
628 N. 4th Street, Box 10
Baton Rouge, LA 70802
(225) 342-7773
cbombet@dhh.la.gov

8. Rebecca Peterson
Food Industry Specialist
Michigan Department of Agriculture – Food & Dairy Division
Constitutional Hall
P.O. Box 30017
Lansing, MI 48909
(517) 241-0140
petersonr2@michigan.gov

LOCAL REGULATORY

9. Vicki Everly, REHS
Supervising Environmental Health Specialist
County of Santa Clara, Department of Environmental Health
Consumer Protection Division
1555 Berger Drive, Suite 300
San Jose, CA 95112-2716
(408) 918-3490
vicki.everly@deh.sccgov.org

10. DeBrena Hilton
Tulsa Health Department
5051 S. 129th Avenue
Tulsa, OK 74134
(918) 595-4302
dhilton@tulsa-health.org

FEDERAL AGENCIES

11. Jim Fear
Manager State Training
Office of Regulatory Affairs, DHRD
U.S. Food and Drug Administration
11919 Rockville Pike, HFC-60
Rockville, MD 20852
(301) 796-4513
james.fear@fda.hhs.gov

PROFESSIONAL ASSOCIATIONS

12. Heidi J. Shaw
National Environmental Health Association (NEHA)
720 S. Colorado Blvd., Ste. 1000-N
Denver, CO 80246
(303) 756-9090 ext. 339
hshaw@neha.org

ACADEMIA

13. David McSwane
Professor
School of Public & Environmental Affairs
Indiana University
801 W. Michigan Street
Indianapolis, IN 46202
(317) 274-2918
dmcswane@iupui.edu

INDUSTRY – FOODSERVICE (RESTAURANT)

14. Nancy Nesel
Yum! Brands, Inc
1900 Colonel Sanders Lane
Louisville, KY 40228
(502) 874-8493
nancy.nesel@yum.com

INDUSTRY – RETAIL FOOD STORE

15. Tom Dominick, R.S.
Vice President of Food Safety and Sanitation
Bashas', Inc.
P.O. Box 488
Chandler, AZ 85244
(602) 277-0523
tdominick@bashas.com

16. Stephanie Mohn
Food Safety Manager
Marsh Supermarkets
9511 Depot Street.
Yorktown, IN 47396
(317) 759-4121
smohn@marsh.net

17. Michael Roberson
Publix Super Markets, Inc.
P.O. Box 32024
Lakeland, FL 33802
(863) 688-1188, Ext. 32422
michael.roberson@publix.com

CONSUMER ORGANIZATIONS AND INDEPENDENTS

18. Nikki Eatchel
Prometric
1260 Energy Lane
St. Paul, MN 55108
(651) 603-3396
nikki.eatchel@prometric.com

19. Ron Grimes
NSF International
789 Dixboro Road
Ann Arbor, MI 48105
(734) 827-6863
rgrimes@nsf.org

20. Paul Craig
JohnsonDiversey, Inc.
8310 16th Street
Sturtevant, WI 53177
(713) 553-1328
paul.craig@johnsondiversey.com

21. Dr. Cynthia D. Woodley
Psychometrician
Vice President, Operations
Professional Testing Inc.
7680 Universal Blvd, Suite 300
Orlando, FL 32819
(407) 264-2993
cdwoodley@proftesting.com

Consultants to CFP CFSRP Work Group (non-voting member)

22. Veronica Moore
U.S. Food and Drug Administration
Center for Food Safety and Applied Nutrition
5100 Paint Branch Parkway, Room 3B035
College Park, MD 20740
(301) 436-1409
veronica.moore@fda.hhs.gov

23. Chris Gordon
Virginia Department of Health
109 Governor's Street
Richmond, VA 23219
(804) 864-7417
christopher,gordon@vdh.virginia.gov

CONFERENCE FOR FOOD PROTECTION (CFP)

MODEL FIELD TRAINING MANUAL AND PROGRAM FOR REGULATORY RETAIL FOOD SAFETY INSPECTION OFFICERS (FSIO)

PILOT PROJECT JURISDICTION FOLLOW-UP FEEDBACK FORM

(Please refer to the "CFP Field Training Manual" when responding to the following questions)

Name of Jurisdiction_____

Person Interviewed _____

Field Training Process Used:

CFP Field Training Manual ☐ **4** **or** **Assessment of Training Needs** ☐ **16**

Combination of Field Training Manual and ATN 2

Comments on the Field Training Process:

- The municipal jurisdiction has not formally incorporated the use if the CFP Field Training Manual. All staff to date listed in Question #1 have been trained using the Assessment of Training Needs process and forms. The municipality's training officer has reviewed the CFP Field Training Manual and prefers its design and format. The municipality plans to use the CFP Field Training process for when new hires begin training in the future.
- The State Department of Agriculture has developed a Training Plan that covers performance elements and competencies related to both retail food and manufactured foods. They are enrolled in both the FDA Manufactured Food and Retail Food Regulatory Program Standards. They also incorporate a Field Training Worksheet used to provide the new hire feedback. The worksheet is completed after every 5 inspections. The Field Training Worksheet basically follows the same format as the one provided in the CFP Field Training Manual. The training plan, however, is more aligned with the Assessment of Training Needs format. The State Department of Agriculture has a one year probationary period for new hires to determine whether or not the candidate is appropriate for state service. The Training Plan (ATN) process is used as documentation that a hew hire has successfully completed all the performance elements and integrated into the agency's probationary assessment.
- The county health department continues to use the Assessment of Training Needs because the tool met their training program needs. They have only made minor additions to the original tool. While aware of the revised version (CFP Field Training Manual), the need to move from the ATN process and forms has not been viewed as a priority. The county health agency is looking at the CFP Field Training Manual to assess whether it might better fit their training needs.
- The ATN was used by the county health department up to the point of the CFP Field Training Manual being released. No new employees have been hired since the Field

Training Manual was released. All training materials have been updated to replace the ATN and use the Field Training Manual. The county health department has computerized their inspection program and is in the process of developing a software package to support their training process. This software program will incorporate the use of all the forms contained in the CFP Field Training Manual. The county's training officer indicated that once this project is complete, he would share the results with the CFP Work Group. Based on what is developed, CFP may consider looking into making such a software program available to other jurisdictions

- As one of the jurisdictions that participated in the ATN pilot project, city-county health department received a copy of the CFP Field Training Manual after it was approved at the 2008 Conference. The food program manager indicated the changes incorporated into the CFP Field Training Manual clarified with new hires that the framework was a training process not an evaluation process. The new forms provide useful tools in tracking how a new hire is progressing through the training process.
- The county health department continued use of the ATN tool instead of the CFP Field Training Manual appears to be the result of miscommunication within the agency. The training officer was aware that the Conference had revised the ATN process/forms and that the CFP Field Training document was available for use. He thought he had been using the updated version but came to realize during the interview that he had not as yet integrated the new CFP Field Training manual into County's training program.
- The county health department has not hired any new staff since the release of the CFP Field Training Manual. When the next new hire comes on board they will use the CFP Field Training Manual and forms rather than the ATN material. The county thought the CFP Field Training Manual and forms provided a solid, targeted, FSIO training framework

1. **How many FSIOS has the interviewee's Jurisdiction trained using the field training process identified above?** **162**

2. **Does the interviewee believe the FSIOs who have successfully completed the training program prescribed in the Model Field Training Manual or Assessment of Training Needs are properly prepared to conduct independent retail food and/or foodservice inspections at the conclusion of the training program?**

☐ **Yes** **19** ☐ **No** **2** **Maybe 1**

If the interviewee said no, ask them to elaborate on what area(s) the FSIO is not properly prepared in to enable them to conduct independent inspections.

Comments Related to "No" Responses

Because we have only been able to do 8 inspections at the most. Independent inspections were not reviewed, lack of follow through on part of supervisors and trainers due to time constraints, priorities not well communicated and staff turnover/absences.

- Training on process HACCP approach to conduct risk-based inspections is not clearly identified in the training curriculum. This course is currently a classroom FDA ORA-U offering, not an online course.
- Public health risk communication is not well addressed by the online communications course.
- Complaint investigation training, especially foodborne illness investigation, requires a specific approach.

Maybe
They do initial training on HACCP, FBI investigations, specialized processing, etc. before having the trainee do the ORAU courses. They also focus more on Risk Based Inspections during the training process.

3. Does the interviewee believe the Glossary of Terms in the Manual was sufficient to understand and implement the training process in your jurisdiction? IF THE JURISDICTION YOU ARE SURVEYING USED THE ASSESSMENT OF TRAINING NEEDS INSTEAD OF THE CFP MODEL FIELD TRAINING MANUAL, SKIP TO QUESTION 4

☐ **Yes 12** ☐ **No** **No Response 10**

If the interviewee said no, please specify what terms in the glossary he/she thought needed improvement or what terms they would like to see added to the glossary.

No additional terms were recommended

4. Did the jurisdiction's FSIOs experience any problems with the Pre-Requisite Curriculum portion of the Program?

☐ **Yes 5** ☐ **No 17**

If the respondent said yes, ask them to specify what problem(s) were encountered. Please specify if the problems were related to the FDA ORA U Web-based training or the equivalent coursework.

Comments Related to "Yes" Responses
- Shockwave was required and had to be downloaded by IT to all computers (employees are not permitted to download ANY software).
- Getting signed in and finding the correct classes was a little difficult.
- Since they do training of staff prior to the ORA U curriculum it would be hard to answer this question. The health department is hiring inspectors without Bachelor's degrees, much less environmental health degrees, so the trainees need additional training up front.

- Web-based training was helpful and covered basic principles of environmental health, but it was very time-consuming.
- ORA U courses were labor intensive because MFRPS courses were also added onto our curriculum. The criteria for completing these courses in the FDA specified time period did not correlate with our jurisdiction's "probationary" time period of one year. Our jurisdiction needs to complete the pre-training before the one year period, thus the liberal time frame FDA wants the courses completed puts our jurisdiction at a disadvantage because we must complete training (including standardization of each FSIO) within the first year of hire.
- A jurisdiction that has a set probationary period and must comply with basic course requirements during that probationary period may be a problem. I realize that having more time than the jurisdiction requires would in and of itself be a good thing. However, when there is nothing addressing this possibility an auditor (in our case a joint administrative procedures committee that works for the legislature) may have issues with what constitutes before you go out in the field and what you can do afterwards.
- Out of the four staff, only one has completed the FDA ORA U Web-based training. The rest have been given a deadline, July 2009 to complete all the training courses. The problem has not been the training material, but not making it a priority by the Environmental Health professional. Two of them have been in the field for at least 20 years, and they feel they have all the training they need; however, the problem has been addressed, and they should be finished with the online training by July.
- We did not have the 2 persons do all of the prerequisites before starting. We find it difficult to accomplish this, but so far we have had people with strong public health experience. A brand new person with no experience I think we would do it this way.
- We did not experience any problems using ORAU. Our new hires found the ORAU courses to be a review of concepts taught in their college courses.
- The communications course was not available (and I am still not finding it on ORAU) and this was confusing since it appears on the list of pre-requisite courses.
- Time wise it has been difficult to fit in all of the courses during our initial training period. We typically had inspectors ready to do independent inspections within 6 weeks of the hire date but sometimes it took 3-6 months for employees to complete the online courses due to the workload issue or computer/connection issues. Now the courses seem to be running smoothly compared to the past so the computer issues are no longer posing a problem. The workload issue is something we need to work on from a scheduling standpoint. Our trainees are often on travel status during training and it has been difficult to leave enough time during the training period for course completion.
- It would be a very helpful training tool to have the food code modules available or if they are now available I haven't been able to find them on ORAU.
- The number one problem that we have had is staff getting access to ORA-U once they are enrolled. That is an internal problem with our IT programs and we think we have it solved. The second problem is convincing new hires that they have to complete the coursework, because most of our newly hired staff has many years of experience in food safety. Again, this is an internal problem, and not a problem with the training itself.
- No problems were experienced related to the FDA ORA U web site, but using IE alternative web browsers (such as Mozilla Firefox) resulted in some functional problems. The problems where corrected by allowing pop-ups, and view this page in IE.

5. Does the interviewee believe the information provided in the Assessment of Training Needs or Section III of the Manual adequately describe the approach that is being recommended for identifying the training content, determining training needs, and tracking a FSIOs progress in demonstrating competencies specific to their job responsibilities?

☐ **Yes 22** ☐ **No 0**

If the interviewee said no, identify those portions of the Assessment of Training Needs or CFP Field Training Manual that need improvement in the space below. Ask the interviewee to provide specific recommendation(s) for improving the content of the section of the ATN or Field Training Manual in the space provided below.

Additional Comments

- I really like how the CFP Field Training Manual is set up in this section for allowing flexibility.
- When the municipality did the pilot program they made some modifications in the program, which they have continued to use. So for the municipality, ORA U only supports the training, but most of the training is done as "one-on-one" classroom based training.
- The training officer liked the organization of the section.
- On page 7, include the definition of JFT in the table if this has not already been added.

6. The CFP Training Plan and Log or the Assessment of Training Needs are divided into six (6) inspection training areas and 23 "performance elements". Does the interviewee believe these training areas and performance elements sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections of retail food and foodservice establishments?

☐ **Yes 18** ☐ **No 3** **In general 1**

If the interviewee said no, ask them to specify what improvements they believe should be made to the training areas or performance elements. This may include areas and elements they believe should be added or deleted.

Comments Related to "No" Responses

- Would like to see more focus on reviewing systems approach
  - Determining compliance with responsibilities of the person in charge (Food Code 2-103.??)
  - What are company policies→ example of policies for training employees on handwashing, how do they verify employees are following procedures? Handwashing policy, handwashing training, handwashing verification.
- The program should add:

  - State training
  - FBI training
  - HACCP
  - Food Code training
- The ATN Field Training worksheet lists multiple items addressing aseptic sampling. These items should be deleted from the worksheet and offered in an addendum as optional performance elements. The focus on aseptic sampling (food and water) is too great for our food program.
- Elements of standardization should be included as part of a performance element. Our jurisdiction recently added a pre-standardization performance area to our check sheet which includes all HACCP exercises that the FSIO is required to complete for standardization. We found that after completing the training, these exercises were not included as part of training and the FSIO was not ready for the final evaluation of standardization. We also designed a performance element for all the training courses that were required throughout training. Each course was listed under the performance area and the tracking was beneficial to the evaluators.
- At the beginning of the pilot, the county added some optional items, like review file for repeated violation items, verify compliance with 410 IAC 7-22, review of HIPPA law, document repeat violations from previous inspection, refer report for enforcement action, complete a Risk Control Plan, Flow Chart. I believe some were incorporated into the final
- ATN form and some are jurisdiction-specific. All are addressed.
- We added specific computer-based inspection training: demonstrates ability to open a new establishment/inspection file, how to properly document risk factors, discussion with operators/employees; demonstrates ability to close an establishment file if needed.
- The State Department of Agriculture has identified a potential gap in the performance elements competencies contained in the CFP Field Training Plan and Worksheets. By the time the FSIO is scheduled to be standardized, all the performance elements and competencies related to the standardization process should have been addressed in the agency's training program. The State agency discovered that as their new hires proceeded through the process they had not been exposed to the competencies needed to complete the following exercises that are included as part of the FDA Standardization process:
  - Development of a Risk Control Plan
  - Development of HACCP Flow Charts for each of the three process food flows
  - Verification of a HACCP Plan

  The State agency encourages the CFP Work Group to consider adding these areas as specific competencies in the existing field training plan/forms OR develop a specific performance element that address pre-standardization training that lists the above items as need competencies.
- The inspection training areas and performance elements sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections of retail foodservice establishments. One of the strengths of the Field Training Manual is the flexibility/customization that can be done and to meet the unique and specific needs of a program but providing a well defined structure for the basic knowledge and skills and FSIO needs.

- The county agency has included additional performance elements not included on the current CFP Field Training Worksheet based on their program needs. Additional performance elements include the FSIOs ability to use their computer based inspection system and training is provided to ensure a FSIO follows all the county's procedures for determining if an establishment is in compliance with their smoke free environment ordinance. In addition, they included as a performance element area a FSIO's ability to conduct a menu based review to determine food safety priorities during the inspection.

7. Has the interviewee experienced any problems when implementing the following steps that are integral to the field training process described in the Assessment of Training or Section IV of the Model Training Plan?

STEP 1 – Determine Performance Elements to be Included in Your Training Plan
STEP 2 – Determine Competencies for Each Selected Performance Element
STEP 3 – Determine Need for Additional Performance Elements and Competencies
STEP 4 – Determine Appropriate Training Method for Each Competency

☐ **Yes 2** ☐ **No 19** **No Response 1**

If the interviewee said yes, ask them to identify the step(s) that has/have caused a problem and describe the problem(s) they have encountered.

<u>Comments Related to "Yes" Responses</u>

- Our program has not been able to get organized on this process and has not been consistent in its use.
- The only real problem we have had has been that we have had to use multiple people to conduct the training and evaluations. I would prefer to have a single training officer do this, but this is not possible with our current structure.
- Not all of these elements have been incorporated in a formal manner into our training plan.

8. Based on your experience using the CFP Field Training Manual or the Assessment of Training Needs process, do you believe the 18 month timeline provided in the FDA Voluntary National Retail Food Regulatory Program Standard No. 2 - Trained Regulatory Staff for completing steps 1 through 4 in the training process is the proper amount of time?

☐ **Yes 13** ☐ **No 9**

If you said no, how many months do you believe are appropriate for completing steps 1 through 4 in the training process? _____

STEP 1 – Completion of curriculum courses designated as "Pre" in Appendix B-1 prior to conducting any independent routine inspections

↓

STEP 2 – Completion of a minimum of 25 joint field training inspections,

AND

successful completion of the jurisdiction's FSIO Field Training similar to the process outlined in Appendix B-2.

↓

STEP 3 – Completion of a minimum of 25 independent inspections

AND

remaining course curriculum (designated as "post" courses) outlined in Appendix B-1.

STEP 4 - Completion of a standardization process similar to the FDA standardization procedures.

- 36 months – Inadequate staffing to do both training and standardization. We have been unable to standardize any employees as of yet.
- 18-24 months
- 6 months - ORAU courses were labor intensive because MFRPS courses were also added onto our curriculum. The criteria for completing these courses in the FDA specified time period did not correlate with our jurisdiction's "probationary" time period of one year. Our jurisdiction needs to complete the pre-training before the one year period, thus the liberal timeframe FDA wants the course completed puts our jurisdiction at a disadvantage because we must complete training (including standardization of each FSIO) within the first year of hire.
- A jurisdiction that has a set probationary period and must comply with basic course requirements during that probationary period may be a problem. I realize that having more time than the jurisdiction requires would in and of itself be a good thing. However, when there is nothing addressing this possibility an auditor (in our case a joint administrative procedures committee that works for the legislature) may have issues with what constitutes before you go out in the field and what you can do afterwards.
- 24 months
- 24 months
- This is a difficult question to answer. Completing 25 join inspections, 25 independent inspections and then completing a standardization process doesn't seem feasible in an 18 month time frame. However, when we used the ATN process, we completed fewer than 25 joint inspections before proceeding to independent inspections. In such a case (less than 25 joint inspections) the 18 month time frame seems more realistic. We have not yet initiated step four due to limited resources.

- 24-36 months – We have not been able to standardize people due to economic and time resources. We hired 8 people all at once and this has been a drain on the system but we have performed follow-up field inspections with these individuals to ensure they are on track.
- 36 months.
- 24 months.
- The municipality does not have a large staff. Staff assigned to the food program is, for the most part, "specialized" concentrating the bulk of their work time to the food program. The training officer indicated that they have not experience a problem with the 18 month time frame for completing Standard 2 Steps 1 through 4. They standardize staff using the FDA process of 8 inspections including the exercises. They have had a problem with staff completing the post curriculum course in a timely manner. The training officer attributed this problem to the agency's lack of quality assurance oversight to ensure completion of the post curriculum courses. Staff has been concentrating on completing their required number of inspections and not viewing the completion of the coursework as an integral part of their work plan responsibilities.
- The State agency must complete all their training and standardizations within the first 12 months due to the probationary assessment that must be conducted of all their new hires. The shorten time frame places significant stress on their agency's ability to fit in all the required training, especially since they are also enrolled in the Manufactured Food Regulatory Program Standards that contain additional coursework requirements.
- Though the county marked YES to this question indicating that an 18 month time frame was appropriate for a new hire to complete Steps 1 through 4, it is important to note that they do not include (Standardization – Step 4) as part of the training process. The county's training program consists of Steps 1 through 3. The training officer did indicate, however, that she is familiar with the FDA Standardization process and if it were included as part of the training program she still thinks the 18 month time frame is appropriate for all 4 Steps described in Standard 2.
- 25 joint field training inspections provide a good baseline for new hires. Some require less, some more. The Standard needs to maintain a minimum number of joint inspections otherwise time pressure related to having new hires contribute productively too the program will compromise the training process. In addition trainers have work load pressures as well and may not allocate the appropriate amount of time (number of inspections) to really ensure that the new hire is effectively trained and proficient in all performance element areas.
- The food program manager indicated that the 18 month Standard 2 time frame was appropriate for completion of Steps 1 through 3 but more time is needed for new hires to complete Standardization (Step 4). The county's staff is~~are~~, for the most part, Specialists not Generalists. Even with that said, the training officer encourages the Work Group to extend the time frame for completion of Steps 1 – 4 to 24 months. Staff needs some time in the field to assimilate the basic training prior to standardization. Generally the standardization process begins around 15-18 months into the new hire employment. Additional training, especially in risk based inspections, is needed to fully prepare the candidate for standardization.

9. The Assessment of Training Needs or Sections V and VI of the CFP Field Training Plan describe steps to follow when preparing for and conducting joint field training inspections. Has the interviewee experienced any problems when implementing these steps as part of their program?

☐ **Yes 5** ☐ **No 16** **No Response 1**

If the interviewee said yes, please have them identify which step(s) posed a problem for your jurisdiction and what they have done or what they believe should be done to correct this problem(s).

- It is a lot of paperwork to maintain. We would like to print all of the forms that will be filled out for the full process for each candidate (FSIO) into a comb binder. The FSIO will be responsible for making sure that the binder forms are filled out and maintained. A copy of this will be kept at the central office after completion.
- Initially (first 2-3 inspectors) we discovered that having more than one trainer was problematic. Once all joint inspections were done by the same standardizing officer the process has been much less confusing to the trainee._
- We created our own form based on the CFP Field Training Plan, condensed the format and limited the amount of times the form was required to be used. Evaluators fill out a joint inspection form only once, after they have completed at least 5 inspections in the session with that evaluator.
- On the first one we had to adopt it to the wholesale inspection, but it worked well.
- Our jurisdiction does not require new inspectors to become Registered Sanitarians or to have experience in food safety. We feel that 25 inspections were not enough for them to be trained and to start doing solo inspections. On average, it took around 40-45 inspections for them to obtain the information and to feel comfortable doing the inspections on their own.
- These areas have not been implemented into the State's Agriculture training program.
- Although we have not been able to hire inspectors with processing or retail inspection experience, we found that we needed a classroom review session after the inspectors had been in the field because of the complexities of navigating the policies and procedures, laws and regulations, processing of paperwork and navigation of the computerized inspection program. We incorporated this classroom training into a modified version of the face-to-face Applications Course.

10. Do you believe the 25 joint inspections that are required in the CFP Field Training Manual or the Assessment of Training Needs process are too many, too few or just the right number?

__4____ Too many; ___2___ Too few; __15____ Just right number;
__1____ None of these options

If you said too many or too few, how many joint inspections would you recommend that a FSIO be required to complete as part of the training process? _____

- 8
- 8-10
- 10 inspections, consistent with the standardization process, FDA
- 40-45
- New inspectors learn at different levels and have had different experience prior to hire. Staff that had some food regulatory experience prior to hire were ready to move into independent inspections before completing the 25 joint inspections. The trainer is in a better position to determine readiness to move into independent inspections rather than requiring a person ready to conduct independent inspections to continue to conduct joint inspections until 25 are completed.
- In our use of the ATN process, there was no predetermined number of joint inspections. The process was continued until a consistent, acceptable level of competency in all areas of the ATN had been demonstrated.
- During the interview, Dawn indicated that the Standard should not reference a specific number of joint inspections that needed to be completed. She said that the Standard should be reworded to reflect that a sufficient number of joint inspections should be conducted until such time as the Trainer determines that the Trainee can successfully perform all the competencies listed on the CFP Field Training Worksheet.
- We have made adjustments up or down depending on the trainee's level of experience coming in to the job.
- 50 or more should be required because it takes more than 25 inspections to see all types of facilities in a jurisdiction and also to allow enough time for an inspector to feel comfortable doing these inspections solo.
- The training officer echoes the comments submitted by many of the jurisdictions I have interviewed that 25 joint inspections was the right minimum number. There is an understanding conceptually that the reasoning behind removing a minimum number and focusing on the use of the Training Plan as the determiner as to how many joint inspections are needed. The number of inspections should be based on how many it takes to ensure that a new hire can perform all the competencies. The municipality could live with either approach but if they had to make a choice they support retaining the minimum number of 25 joint inspections. A specified number of inspections provide a degree of quality assurance and expectation to the training process for both the candidate and trainer.
- The State agency does many more joint field training inspections that the minimum 25 contained in the Standard 2 criteria. They recommend that the CFP Work Group retain the reference to a minimum of 25 joint field training inspections.
- Conceptually the county would not have an issue with removing a reference to a specified number of joint field training inspections in the Standard 2 criteria and simply stating that the new hire would have to successful demonstration the performance elements in the CFP Field Training Manual before conducting independent inspections. The training officer did indicate, however, that having a minimum baseline number of 25 would assist jurisdictions with expectations on time commitments/resources that should be devoted to

the training process. For the county 25 joint field training inspections was considered a minimum number and for most new hires many more joint inspections are conducted.

- Our experience is 25 joint inspections is the right number. We have had individuals who were ready prior to completing all 25, but it provides the opportunity for additional observations of the FSIO, as well as opportunities for the FSIO to observe special circumstances that may not be observed in a setting with fewer joint inspections.
- The training officer echoed the same concerns for not having a minimum number of joint field training inspections stipulated in Standard 2. He stated that this is a quality assurance issue. If a minimum number of inspections are not stipulated, pressure exists to get new hires into the field to conduct inspections. While the training officer agreed that conceptually it really isn't the number of joint training inspections that is the ultimate measurement rather it is the FSIO's ability to demonstrate the performance elements and competencies, he stated that the county would retain a minimum of 25 joint field training inspections as a requirement in their own program should this criteria be removed from the Standard.
- A new hire to the food program will generally be able to assimilate the technical aspects of food inspections (knowing the code; observing violations; filling out reports, etc.) within the current 18 month period of time. Thirty-six (36) months, however, are necessary for the new hire to become proficient in the inter-communication skills that are key to behavior changes related to active managerial control of foodborne illness risk factors. If the goal of the Standard and standardization is simply to assess Food Code application and knowledge then the 18 month time frame is appropriate. If, however, the goal of Standard 2 is to train FSIOs to facilitate behavior changes within the inspection framework, then inter-communication skills are an essential piece and require experience in the field to acquire. The Standardization process should begin sometime the beginning of a candidates third year, therefore, I would recommend that the Standard provide a 36 month period of time from hire to successful completion of standardization.
- Echoing the comments received from other jurisdictions I have interviewed, the county's training officer who thought that a minimum of 25 joint field training inspections was the appropriate number to include in the Standards. Conceptually the training officer understands the rationale for the Work Group's consideration of possibly removing any reference to a specific number of inspections and focusing on conducting a sufficient number to ensure the new hire can perform all the competencies contained in the agencies training plan. Keeping a minimum number within the Standard, however, provides a quality assurance check for an agency's training program. The training officer recommends that the CFP Work Group retain the reference to a minimum of 25 joint field training inspections.

11. Does the information presented in the Assessment of Training Needs or Section VII of the Model Training Plan provide the information the interviewee needs for their jurisdiction to develop an effective system to track a FSIO's training progress and accomplishments?

☐ **Yes 21** ☐ **No 1**

If the interviewee said no, ask them to identify the step(s) that has caused a problem and describe the problem(s) they have encountered.

- The logs are helpful, especially in the CFP Manual
- Using only the field training worksheet
- The ATN Field Training worksheet and separate documentation of successful completion do not provide an effective system to track an individual FSIO's training needs and observed improvements as the FSIO progresses through training. A single document merging these two ATN components with entry of notes/comments is recommended.

12. Do you have an audit process or tool that you use as part of your training program to assure that a FSIO is properly trained before he/she is released into the field to conduct independent inspections?

☐ **Yes 14** ☐ **No 8**

If you said no, do you think it would be beneficial to have an audit process or tool to use to assure that FSIOs are properly trained before they are allowed to conduct independent inspections?

- This tool – We don't have an audit process separate from this.
- I say yes, but the tool is very informal
- The municipality standardizes their trainees to assure they are ready. (The training officer is FDA standardized)
- The training officer is not only the "trainer" but the "auditor" for the training.
- Yes, and it is in the developing stages. We hope we would have completed standard 2 of the FDA by the end of this fiscal year, including a verification tool.
- The audit process the food program manager used involved the review of all written reports; 3-4 joint field inspections with each staff and impromptu staff meetings to discuss new things.
- Yes. However, the training manual could serve in this capacity, but one more finely tuned as an audit tool would be beneficial. We need some way to monitor ongoing effective of field work by existing FSIO's.
- No
- We have used the documents to conduct an evaluation, but only conduct a formal evaluation one time; we currently do not have the staff to do more frequent evaluations.
- During the interview, the training officer indicated that the county does not have a separate and distinct audit process for new hires. Currently they use the CFP Field Training Process and forms for both training and a final assessment by the Trainer. But it is done as one process. There is not a distinct "evaluation" component to their program. The training officer did indicate, however, that an audit tool should be added and based off the field training manual. In addition, such an evaluation process would be better positioned as a component of Standard 4 – Uniform Inspection Program than Standard 2 because it is a quality assurance issue rather than a training issue.

- We have a 6 month probationary period and it would be nice to have some sort of document that could be filled out by a supervisor to verify that the candidate is performing their job correctly. If used prior to the end of the probationary period, this document would likely help determine whether to keep a candidate or terminate them so this might be beyond the scope of an audit form.
- The Training officer indicated a preference for having an audit tool incorporated as part of Standard 2 not Standard 4. The audit tool would be a value added part of the training process that ensured the FSIO is ready to conduct independent inspections. The training officer's preference was to have the audit process conducted before releasing the FSIO for independent inspections.
- We do not have a formal audit process. We have used the completion of the ATN/Joint Field Training Worksheet to determine whether the FSIO is ready to be released for independent inspections. After completion of the joint field inspections a supervisor observes the FSIO in the field and gives the final release. If an FSIO is not ready then the joint field training exercises would be extended. Yes, an audit process or tool would be beneficial.
- I feel that the ATN process assures that all necessary technical matters are discussed before an FSIO is approved to conduct independent inspections. No training process can be 100% complete and the ATN provides a reasonable foundation for a field inspector. Many questions will still come up during subsequent field work and our standardized training officer is always available for consultation.
- If an audit tool is included as part of the process, it should be included as part of Standard 4 quality assurance rather than Standard 2. Currently Standard 4 requires that 2 inspections be conducted with each Food Safety Inspection Officer to assess the QA elements contained in Standard 4. While this Standard specifies the number of QA inspections and broad based criteria, it does not provide a protocol for a consistent assessment of the candidate during the 2 QA inspections. An audit tool would provide a consistent approach to assessing whether a candidate in the field is performing to expectations and what gaps might exist in the jurisdiction's training program.
- If not included in Standard 4, an audit tool might be considered as an intermediate step between the end of the field training process and standardization.
- Yes, having some ability to assure that a FSIO is properly trained before being released into the field to conduct independent inspections would be beneficial. Current format used includes discussion with trainee and trainer(s) to assess competency and comfort level for establishments in each risk level prior to conducting independent inspections in the corresponding risk levels.
- The training officer included in the survey response that they have an audit tool but it is an informal process. The municipality uses the Assessment of Training Needs first and foremost as a method for structuring their training and ensuring exposure to all the performance elements and competencies. The ATN worksheets are used more as an assessment tool. The municipality's training officer questioned the need for an audit tool – not sure what value it brought to the program. After some discussion they indicated they would have to wait to review what the audit tool looked like and where it was positioned in the Standard. They indicated that they had not worked much with Standard 4 so they were not in a position to comments as to whether the audit tool would be more appropriate positioned as part of Standard 2 or 4.

- The State agency using the ATN as a framework for creating their training plan. Though not the intention of the CFP Work Group, the state agency not only uses this training plan to assess the progress of a candidate through the training process but the information also is used to assess a new hire through the probationary period.
- Though YES is marked on the questionnaire, the county does not implement a formal audit/evaluation process for inspectors in the field. The YES is marked as a reference that the ATN is used by training staff as an assessment tool as well as a training tool. The training officer indicated that the direction the county would like to take is to have staff supervisors conduct and audit/assessment of trained staff once they have been cleared to conduct independent inspections using a tool that mirrors the ATN, if not the ATN field training worksheet itself. Given that the county would prefer the supervisor's conduct the audit/evaluation, should the CFP Work Group develop an audit process and forms, the training officer indicated that the audit/evaluation process should be included as a component of Standard 4 rather than Standard 2.
- The food program manager would find an audit tool a value-added addition to the training process. If such a tool is added it should be incorporated as part of the QA process in Standard 4 rather than the training process in Standard 2. The training officer noted that the CFP Work Group had revised the original ATN to remove any reference to it being an evaluation/audit process. This was done to position the entire structure as a training process. If an audit tool is developed and incorporated into Standard 2 isn't the CFP Work Group reverting back to incorporating elements of an evaluation?

13. The Assessment of Training Needs or Section VIII of the Model Training Plan describes additional food safety related courses and a modified standardization process that an FSIO should complete after she/he has started to conduct independent inspections. Have these requirements presented any problems for your jurisdiction or the FSIOs who are participating in the program?

☐ **Yes 5** ☐ **No 17** **Yes and No 1**

If the interviewee said yes, please identify what problems they have encountered.

- It hasn't been a problem to standardize staff, but we have not been able to do the additional course work. Once staff are "cut loose" to do field work it's harder to find time to keep them in the office doing online training.
- Standardization has not yet been completed. Because of workload and limited resources, State DOH has been unable to schedule standardization exercised with the County. This is still a priority and hopefully will be accomplished in 2009.
- This related to jurisdictions such as ours that have to meet both the retail and manufacturers program standards at the same time which can relate to a burdensome task when both programs require their own separate agenda and must be met within the same time frame.
- We do not use the modified standardization process. Therefore, we cannot truly evaluate how effective using this modified structure would be.

- "Application of the Basics of Inspection/Investigation Course FD170" through ORA-U . I checked the AFDO website and Indiana had no trainer available. I did not pursue obtaining the CD. It was implied that a "Train-the-Trainer" status was required to teach the course. I was unable to locate this course on ORA-U at the end of the pilot.
- Attendance at state environmental health sponsored training should always be encouraged and funding is a problem.
- Other meeting such as the State's Food Safety and Defense Task Force, Symposium and other professional meetings are included in this.
- We have not completed the standardization process due to our perception of limited value with the current process. A primary concern is that doing eight standardization inspections is probably not always necessary, and is very time consuming. The standardization process should be complete when the requirements of standardization can be met through performance criteria rather than requiring that 8 standardization inspections be conducted.
- FDA's standardization process does provide a good framework that we would like to build upon in order to better meet our standardization needs. However, we have lacked the resources to pursue this as quickly as we would like to. Below is some feedback from my standardization experience in 2005. While completing the standardization process some areas for improvement were identified. Below is a list of examples where the standardization marking instructions created limitations in adequately documenting food safety risk factors:
    1. During one inspection the operator revealed that his salesman delivered food products to the restaurant by car. This was a concern identified by discussion. Following the standardization inspection report marking instructions, item 4.0D (receiving) was marked IN even though concerns were identified via discussion.
    2. Two operators were able to discuss appropriate quick cooling methods. Discussion revealed that cooling had not been verified to meet food code requirements. Because no cooling was taking place at the time of inspection, item 5.3A was marked NO even though the operator hadn't developed a system to monitor cooling (PIC responsibility 2-103.11 G)
    3. One operator described cooling of roasted meats. One step in the process was described as leaving the roast out on the counter at room temp until it was 120 °F. The operator could not relay how long the roast was on the counter or how long it then took to cool to 70 °F and then to 41 °F. Following the standardization inspection report marking instructions, item 5.3A (cooling) was marked NO (no cooling occurring during inspection) even though discussion revealed questionable cooling practices. Operator was marked IN for item 1.0A (demonstration of knowledge) because there were many good food safety systems in place.
    4. The standardization inspection report and CFP instructions do not address how to assess handwashing after restroom use. Handwashing in the restroom will rarely if ever be able to be assessed by sanitarian observation. However, discussion with operators can reveal how well the handwashing policy is followed by employees and how the operator monitors for appropriate employee behavior.

5. There were multiple instances where NO was marked, but discussion could have been an effective means of risk factor identification. For example:
   * Discussion with operators can reveal what temperature each type of meat usually reaches when temps are taken or what the goal temp is for each product.
   * Having the operator describe reheating and cooling processes and how these are monitored can help to identify potential problems even if the processes aren't occurring during the inspection.

- Discussion can cover more topics (high risk processes and behaviors) while observation will be limited to what is happening at inspection time. Discussion helps to identify gaps in monitoring or knowledge. This creates a teaching moment.
- Whenever possible, observation should be used to confirm what the operator says.
- The value of discussion to supplement observations in risk identification needs to be emphasized. This is especially important in identifying factors that contribute to foodborne illness. The State's experience in outbreak investigations and what we know about norovirus has shown that employee health, employee behaviors and food handling practices are risk identification and risk reduction focus areas. These risks are often difficult to see. Failure to recognize the importance of discussion and building an inspection process that doesn't promote and capitalize on sanitarian ability to use a variety of methods in risk identification is a missed opportunity. Now is the time to thoroughly evaluate the standardization process and make adjustments that take what the FDA has provided and make it even better. This type of continuous improvement approach will maximize what the standardization process and the CFP form can do to support reduction and prevention of foodborne illness.
- The current marking instructions for the Standardization Inspection Report and the Conference of Food Protection Form require making broad judgments about operator compliance in demonstration of knowledge and employee health. This is challenging, because management of these areas in multi-faceted.
- Our field work has been so far behind due to budget and the limits this has placed upon us being fully staffed that so far we have not had any candidates complete all of the post requisite courses. For the same reasons, we have also not standardized any of our new employees, however, we have had trainers work with the new employees twice per month for their first 6 months in the field and once per month for the next 6 months so that we can ensure we are following up and keeping the new employees on track. However, this follow up training includes time in manufacturing as well as retail inspections.

14. It has been suggested that a course on allergens be added to the training curriculum in the CFP Training Manual. Would you recommend that this course be added as part of the pre-inspection curriculum or the post-inspection curriculum, or does it matter?

___8____ Pre-inspection __11____ Post-inspection __3___ Doesn't matter

Comments:

- The training officer agrees that an allergen course should be part of the Standard 2 curriculum and is best positioned as a pre-requisite course.
- The municipality's training staff did view the allergen management course as a "value added" component to the Standard 2 curriculum. They did not, however, view it as an essential course for determining whether a new hire would be ready to conduct an independent inspection. Viewed the allergen course as an enhancement of existing food safety knowledge and better positioned within the post curriculum segment of Standard 2.
- The state agency views the allergen management course as a "value added" part for Standard 2 and has developed an allergen management course for the training of their new hires. They support incorporation of the allergen management course into Standard 2 as a pre-requisite course.
- Allergen management course does provide value added to the training process but the food program manager does not considered an essential element to conducting basic inspection work. Though it is an emerging issue, the existing pre-requisite courses provide the needed information to get staff ready for independent inspections. Much like HACCP is positioned as a post curriculum course, the allergen management course will provide useful information but directed at a very specific process/procedure or set of circumstances.

15. It has been suggested that one or more courses on Food Defense [National Incident Management System (NIMS) or Incident Command System (I CS)] be added to the training curriculum in the CFP Training Manual. Would you recommend that this course be added as part of the pre-inspection curriculum or the post-inspection curriculum, or does it matter?

__1_____ Pre-inspection ___18___ Post-inspection ___3___ Doesn't matter

Comments:

- The training officer agrees that an NIMS/ICS course should be part of the Standard 2 curriculum and is best positioned as a post curriculum course.
- The county has already included NIMS and ICS training into their new hire program. The training officer was not sure whether they course material provided was consistent with the EPA course offered on line.
- I am still studying this question. Many of the smaller jurisdictions do not use an incident command system, so the courses might not be useful. On the other hand, fire departments across the country use the ICS and many of the state jurisdictions are now using ICS on outbreaks, so just the understanding of the concept would be helpful.
- The municipality's training staff also viewed the NIMS and ICS courses as "value-added" pieces of the Standard 2 curriculum as long as they remained basic for new hires. They specifically mentioned that the scope of the courses should mirror the 100, 200, and 700 series course available on line. They definitely thought that these courses should be part of the Standard 2 post curriculum.
- The state agency views NIMS and ICS training as "value added" course to the Standard 2 curriculum. FL Ag already delivers NIMS and ICS training for its new hires. They support incorporation of these courses into Standard 2 as part of the post curriculum.

- Both the allergen management and ICS courses are viewed as value-added training by the county. The training officer supports their incorporation into the Standard 2 criteria. The county is already looking into incorporating the web based NIMS and ICS courses in their training of new hires.
- The food program manager questioned whether NIMS and ICS are an appropriate addition to a "Retail Food Safety" curriculum. The manager recognized the value of training in these areas but think these courses should be part of an agencies overall training program for new employees rather than part of the Standard 2 curriculum. It was pointed out that NIMS and ICS are not food specific but can be related to any type of emergency management situations.

16. Is there is any relevant information the interviewee would like to share about the Assessment of Training Needs or CFP Field Training Process that has not been addressed in the first 10 items of this survey? If so, please provide this information in the space below.

Comments:

- It would be great if a bound "field book" could be printed to provide to each FSIO when starting the training process. It would include all of the forms that need to be completed during the process. The trainee could provide the workbook to the trainer during each inspection. At the end there would be a complete record of training available AND/OR Develop an electronic database for recording all of the training information into.
- They are both great tools for ensuring all aspects of our food inspection program are covered. It is so easy to miss something if you are simply conducting joint inspections and not purposely looking for specific skill/knowledge areas.
- I also really like the abbreviated field training worksheet. The only thing I would change/modify would be along the lines of "signing off" on an aspect of it once it has sufficiently been shown to be mastered…ex: Professionalism.
- The ability to sign off that a new hire has performed a specific task is incorporated into the CFP Field Training Plan. Once the trainer determines that a new hire can perform a specific competency, the trainer does not need to continue to assess an area that the new hire can perform, rather they can concentrate on new areas or competencies the new hire is having difficulty with.
- I would like to hear how other jurisdictions are proceeding with this training program as well as communication from FDA on a more regular basis. Thank you for your support.
- The interviewee felt that this training is great.
- I believe the process is sound, but when there is not one dedicated trainer for all new trainees it presents problems for consistency within a program. Even amongst FDA standardized individuals there are still differences of interpretation of findings. I am not sure if this can ever be overcome.
- Our current plan resembles the CFP Training manual, but it not exactly the same and some of the forms used are different, but equivalent. Additionally, it should be noted that the state agency has responsibilities for retail food and manufactured food and our plan combines training requirements from both retail and manufactured Program Standard 2. We began development of this training plan in 2006 and continue to make

modifications to the plan with each new group of trainees. For an organization such as ours that has both programs, it is impractical to separate the two training plans; while generally, staff start with one or the other track (retail OR manufacturing), there is obviously overlap between the two and depending on staff and trainer resources, there may be cross training between the two at any one time (especially on field training). Because we are conducting the retail and manufactured foods training either consecutively or concurrently, this impacts our time for completion – especially to achieve Step 4 (standardization); not achieved within 18 months.

CFP Certification of Food Safety Regulation Professionals Work Group

Proposed Performance Audit Pilot Project Objectives and Time Line

Objectives of Pilot Project

1. Evaluate the FDA *Retail Food Level I Performance Audit* (Audit) documents [i.e., Guide to the Performance Audit Process for State, Local & Tribal Food Safety Inspection Officers (hereafter FSIO), Retail Food Level I Performance Audit Criteria for FSIO, Audit Failure Reference Guide, Level I FSIO Audit Results Summary Form, Level I FSIO Audit Worksheet, Level I FSIO Auditor Feedback Form]
    - Review the performance elements and criteria for omissions, additions, and items not applicable.
    - Determine the strengths and weaknesses of the documents.
    - Verify ease of use of the documents, including instructions and format. Are jurisdictions able to utilize documents independently without direct supervision or oversight?
    - Determine length of time required to use the documents and complete the Audit process.

2. Assess the use of the Audit process
    - Verify that the Audit process is appropriate to assess the FSIO's knowledge, skills and ability when applying the competencies required during a field inspection.
    - Verify the appropriate placement of the Audit process application tool; as a stand-alone document or within the Voluntary National Retail Food Regulatory Program Standards as part of the training process (Standard 2 – Trained Regulatory Staff) or as part of the ongoing quality assurance program (Program Standard 4 – Uniform Inspection Program).

3. Gather and analyze data from the pilot study and prepare a Pilot Project Report for the Conference for Food Protection Certification of Food Safety Regulation Professionals Work Group (Work Group) at the 2012 biennial meeting of the Conference for Food Protection (Conference).

Pilot Project Timeline

March 2010	Begin development of Pilot Project packages / Fact Sheet (web-based, paper, etc.)
April 2010	Solicitation of interested jurisdictions during the 2010 biennial meeting of the Conference
May 2010	Selection of jurisdictions for Pilot Project (Minimum of 8 jurisdictions desired)
June 2010	Send out Pilot Project packages to selected jurisdictions and notify jurisdictions not selected
July 2010	Conference call with selected jurisdictions (Overview of Pilot Project objectives, goals, methodology, data collection, etc.)
January 2011	Interim data collection from jurisdictions (Data may be received through CFP website)
February 2011	Interim conference call with jurisdictions (Review of data received to date, overview of progress, solicitation of questions, reminder of deadlines, etc.)
July 2011	Completion of field component of Pilot Project and collection of completed data reports from jurisdictions
August 2011	Convene conference call focus group of jurisdiction representatives to review Pilot Project outcomes
Sept / Oct 2011	CFP Work Group review, analysis, summary and development of Pilot Project results into Conference report and issue.
December 2011	Submit final Work Group report and any Issues for consideration at the 2012 biennial meeting of the Conference.

Methodology

Selection of jurisdictional participants: Criteria for participation in the Audit Pilot Project is as follows:

- Jurisdictions MUST be enrolled in Program Standards to participate.
- Jurisdictions must agree to follow the training criteria specified in Program Standard 2, Steps 1 – 3 (includes use of a field training process and documentation similar to that contained in the CFP Field Training Manual and forms, Appendix B-2) with newly hired FSIOs while a participant in the Pilot Project.
- Jurisdictions must have a sufficient number of FSIOs that have successfully completed Standard 2, Steps 1-3 .
- Jurisdictions must make a commitment to meet the Pilot Project timelines, reporting protocols. and participate in conference calls.
- Jurisdictions must agree to publication of their participation in Pilot Project Report
  (note: individual responses will remain confidential).
- Any jurisdictions not selected will be notified.

Distribution of Pilot Project Package: All selected jurisdictions will receive an Electronic Pilot Project Package containing the following materials:

- Copy of newly revised Standard 2 – Trained Regulatory Staff(as approved by the 2010 biennial meeting of the Conference) and Standard #4 – Uniform Inspection Program
- Copy of the FDA Retail Food Level I Performance Audit process documents including instructions.
- Copy of the *CFP Field Training Manual*.
- Performance Audit Pilot Project protocol and timeline.
- Contact information for Performance Audit Pilot Project Director.

Launch of Pilot Project: Pilot Project will be initiated with a conference call of all participating jurisdictions. The purpose of the conference call will be to provide an overview of the Pilot Project objectives, goals, timeline, methodology, participant expectations, data collection, and other reporting criteria.

Interim Progress Review of Pilot Project: Participating jurisdictions will submit reporting documents completed to date to Pilot Project Director. Data will be analyzed and summarized to identify any potential challenges, omissions, or errors that would hinder completion of the project. Additionally, a conference call will be conducted with participating jurisdictions for additional verbal feedback and clarification.

Data Collection and Reporting: The design of the Data Collection and Reporting Instrument will incorporate the following:

- A questionnaire designed to solicit information.
- Demographical information

- Focus Group(s) designed to solicit additional anecdotal information and recommendations.

Roles and Responsibilities

The following roles and responsibilities are integral to this Pilot Project:

Role	Responsibility
Conference for Food Protection Certification of Food Safety Regulation Professionals Work Group	Staff all Pilot Project Activities, review the Pilot Project outcomes and make further recommendations to the Conference.
Pilot Project Subgroup	Prepare Pilot Project Package, prepare Fact Sheet, solicit jurisdictional participation, select participants, distribute Pilot Project Package, receive Pilot Project data from the Pilot Project Director, tabulate and analyze data, summarize the results of the Pilot Project and prepare the Pilot Project Report (including recommendations) for presentation to the 2012 biennial meeting of the Conference.
Pilot Project Director	Serve as the central point of contact for the Pilot Project, collect data and forward to the Pilot Project Subgroup, coordinate focus group meetings, and present Pilot Project findings to the Conference.
Jurisdictional Participants	Carry out the activities of the Pilot Project including following the criteria specified in *Retail Food Level I Performance Audit* documents. Jurisdictions must be active participants in the FDA Program Standards and will have met the requirements of Standard 2, Steps 1 – 3, relative to use of the *CFP Field Training Manual*; must also be able to assess the feasibility of using the Audit documents with newly hired or existing FSIOs relative to applicability to Standard 4; completing the data reporting instruments; participating in focus group calls; agreeing to publication of Pilot Project participation; and providing feedback to the Pilot Project Subgroup.
Conference for Food Protection	Provide assistance as requested by the Work Group to disseminate and collect information.
FDA	Will collaborate with the Pilot Project Subgroup in the design and format of the Pilot Project, analysis of data, and subsequent recommendations for use and placement of the Audit documents and/or process.

Analysis of Data

The Pilot Project Subgroup will analyze the data by tabulating and summarizing all responses to the questionnaire and the focus group meetings. Based on the results of the Pilot Project, the Work Group will determine necessary or recommended changes that need to be made to the training/Audit documents and/or process.

Preparation of Pilot Project Report

A report of the results of the Pilot Project will be created. The report will include a summary of the results of the data tabulation (including participant list, demographics, and questionnaire results), a list of recommended changes to the Audit documents and a list of recommended changes to the Voluntary National Retail Food Regulatory Program Standards (Standard #2 and/or Standard #4). This report will be submitted to the 2012 biennial meeting of the Conference for Food Protection.

Additionally, Pilot Project results and recommendations will be developed in collaboration with FDA's Division of Human Resource Development to assist in the development of a performance assessment specific to the responsibilities of state, local and tribal retail food safety inspection officers.