STANDARD 2 – TRAINED REGULATORY STAFF

Table of Contents

REQUIREMENT SUMMARY 2
DESCRIPTION OF REQUIREMENT 2
Step 1: Pre-Inspection Curriculum 3
Step 2: Initial Field Training and Experience 4
Step 3: Independent Inspections and Completion of ALL Curriculum Elements 6
Step 4: Food Safety Inspection Officer – Field Standardization 7
Step 5: Continuing Education and Training 8
OUTCOME 9
DOCUMENTATION 10

STANDARD 2 – TRAINED REGULATORY STAFF

This Standard applies to the essential elements of a training program for regulatory staff.

Requirement Summary

The regulatory retail food program inspection staff (Food Safety Inspection Officers - FSIO) shall have the knowledge, skills, and ability to adequately perform their required duties. The following is a schematic of a 5-step training and standardization process to achieve the required level of competency.

STEP 1
Completion of curriculum courses designated as "Pre" in Appendix B-1 prior to conducting any independent ROUTINE INSPECTIONS.

STEP 2
Completion of the following:

- A minimum of 25 joint field training inspections (or a sufficient number of joint inspections determined by the TRAINER and verified through written documentation that the FSIO has demonstrated all performance elements and competencies to conduct independent inspections of retail food establishments); and
- Successful completion of the jurisdiction's FSIO Field Training Plan similar to the process outlined in *Appendix B-2: Conference for Food Protection (CFP) Field Training Manual*.

STEP 3
Completion of the following:

- A minimum of 25 independent inspections; and
- Remaining course curriculum (designated as "post" courses) outlined in *Appendix B-1: Curriculum for Retail Food Safety Inspection Officers*.

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

STEP 5
Completion of 20 contact hours of food safety related continuing education every 36 months after initial training is completed for those conducting standardization of others, and minimum of 30 contact hours every 60 months for those not responsible for standardizing others after initial training is completed.

Description of Requirement

Ninety percent (90 %) of the regulatory retail food program inspection staff (Food Safety Inspection Officers - FSIO) shall have successfully completed the required elements of the 5-step training and standardization process:

- Steps 1 through 4 within 24 months of hire or assignment to the retail food regulatory program.
- Step 5 every 36 months/60 months after the initial 24 months of training.

Step 1: Pre-Inspection Curriculum

Prior to conducting any type of independent field inspections in retail food establishments, the FSIO must satisfactorily complete training in pre-requisite courses designated with a "Pre" in Appendix B-1, for the following curriculum areas:

1. Prevailing statutes, regulations, ordinances (specific laws and regulations to be addressed by each jurisdiction);
2. Public Health Principles;
3. Food Microbiology; and
4. Communication Skills.

There are two options for demonstrating successful completion of the pre-inspection curriculum.

OPTION 1: Completion of the pre-inspection curriculum may be demonstrated by successful completion of the following:

- FDA ORA LearnED pre-requisite courses identified as "Pre" in Appendix B-1; and
- Training on the jurisdiction's prevailing statutes, regulations, and/or ordinances.

NOTE: *The estimated contact time for completion of the FDA ORA LearnED pre-requisite ("Pre") courses is 39 hours.*

OPTION 2: Completion of the pre-inspection curriculum may be demonstrated by successful completion of the following:

- Successful completion of courses deemed by the regulatory jurisdiction's food program supervisor or training officer to be equivalent to the FDA ORA LearnED pre- requisite (Pre") courses; and
- Training on the jurisdiction's prevailing statutes, regulations, and/or ordinances; and
- Successful passing of one of the four written examination options (described later in this Standard) for determining if a FSIO has a basic level of food safety knowledge.

A course is deemed equivalent if it can be demonstrated that it covers at least 80% of the learning objectives of the comparable FDA ORA LearnED course AND verification of successful completion is provided. The learning objectives for each of the listed FDA ORA LearnED courses are available in the platform at https://fdaoted.csodfed.com/login/render.aspx?id=defaultclp.

> ***NOTE:*** *While certificates issued by course sponsors are the ideal proof of attendance, other official documentation can serve as satisfactory verification of attendance. The key to a document's acceptability is that someone with responsibility, such as a TRAINER/food PROGRAM MANAGER who has first-hand knowledge of employee attendance at the session, keeps the records according to an established protocol. An established protocol can include such items as:*
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> - *Logs/records that are completed based on sign-in sheets; or*
> - *Information validated from the certificate at the time-of-issuance; or*
> - *A college transcript with a passing grade or other indication of successful completion of the course; or*
> - *Automated attendance records, such as those currently kept by some professional associations and state agencies, or*
> - *Other accurate verification of actual attendance.*

Regulatory retail food inspection staff submitting documentation of courses equivalent to the FDA ORA LearnED courses – OPTION 2 – must also demonstrate a basic level of food safety knowledge by successfully passing one examination from the four written examination categories specified herein.

1. The Certified Food Safety Professional examination offered by the National Environmental Health Association; or

2. A state sponsored food safety examination that is based on the current version of the FDA Food Code (and supplement) and is developed using methods that are psychometrically valid and reliable; or

3. A food manager certification examination provided by an ANSI/CFP accredited certification organization; or

4. A Registered Environmental Health Specialist or Registered Sanitarian examination offered by the National Environmental Health Association or a State Registration Board.

NOTE: *Written examinations are part of a training process, not a standardization/certification process. The examinations listed are not to be considered equivalent to each other. They are to be considered as training tools and have been incorporated as part of the Standard because each instrument will provide a method of assessing whether a FSIO has attained a basic level of food safety knowledge. Any jurisdiction has the option and latitude to mandate a particular examination based on the laws and rules of that jurisdiction.*

Step 2: Initial Field Training and Experience

The regulatory staff conducting inspections of retail food establishments must conduct a minimum of 25 joint field inspections with a TRAINER who has successfully completed all training elements (Steps 1 – 3) of this Standard. The 25 joint field inspections are to be comprised of both "demonstration" (TRAINER led) and "training" (trainee led) inspections and include a variety of retail food establishment types available within the jurisdiction.

If the TRAINER determines that the FSIO has successfully demonstrated the required performance elements and competencies, a lower minimum number of joint field training inspections can be established for that FSIO provided there is written documentation, such as the completion of the CFP Field Training Plan in Appendix B-2, to support the exception.

NOTE: *The CFP Field Training Manual is available for the Conference for Food Protection web site: http://www.foodprotect.org/ and is located under the icon titled "Conference Developed Guides and Documents."*

Demonstration inspections are those in which the jurisdiction's TRAINER takes the lead and the CANDIDATE observes the inspection process. Training inspections are those in which the CANDIDATE takes the lead, and their inspection performance is assessed and critiqued by the TRAINER. The jurisdiction's TRAINER is

responsible for determining the appropriate combination of demonstration and training inspections based on the CANDIDATE's food safety knowledge and performance during the joint field inspections.

The joint field inspections must be conducted using a field training process and forms similar to ones presented in the *CFP Field Training Manual* included as Appendix B-2. The *CFP Field Training Manual* consists of a training plan and log, trainer's worksheets, and procedures that may be incorporated into any jurisdiction's retail food training program. It is a national model upon which jurisdictions can design basic field training and provides a method for FSIOs to demonstrate competencies needed to conduct independent inspections of retail food, restaurant, and institutional foodservice establishments.

Jurisdictions are not required to use the forms or worksheets provided in the *CFP Field Training Manual*. Equivalent forms or training processes can be developed. To meet the intent of the Standard, documentation must be maintained that confirms FSIOs are trained on, and have demonstrated, the performance element competencies needed to conduct independent inspections of retail food and/or foodservice establishments.

> ***NOTE:*** *The CFP Field Training Manual is designed as a training approach providing a structure for continuous feedback between the FSIO and TRAINER on specific knowledge, skills, and abilities that are important elements of effective retail food, restaurant, and institutional foodservice inspections.*
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> - *The CFP Field Training Manual is NOT intended to be used for certification or licensure purposes.*
> - *The CFP Field Training Manual is NOT intended to be used by regulatory jurisdictions for administrative purposes such as job classifications, promotions, or disciplinary actions.*

FSIOs must successfully complete a joint field training process, similar to that presented in the *CFP Field Training Manual*, prior to conducting independent inspections and re-inspections of retail food establishments in risk categories 2, 3, and 4 as presented in Appendix B-3 (taken from Annex 5, Table 1 of the current version of the *FDA Food Code*). The jurisdiction's TRAINER/food PROGRAM MANAGER can determine if the FSIO is ready to conduct independent inspections of risk category 1 establishments (as defined in Appendix B-3) at any time during the training process.

> ***NOTE:*** *The criterion for conducting a minimum of 25 joint field training inspections is intended for new employees or employees new to the food safety program. In order to accommodate an experienced FSIO, the supervisor/training officer can in lieu of the 25 joint field inspections:*
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> - *Include a signed statement or affidavit in the employee's training file explaining the background or experience that justifies a waiver of this requirement; and*
> - *The supervisor/training officer must observe experienced FSIOs conduct inspections to determine any areas in need of improvement. An individual corrective action plan should be developed outlining how any training deficiencies will be corrected and the date when correction will be achieved.*

Step 3: Independent Inspections and Completion of ALL Curriculum Elements

Within 24 months of hire or assignment to the regulatory retail food program, Food Safety Inspection Officers must complete a minimum of 25 independent inspections of retail food, restaurant, and/or institutional foodservice establishments.

- If the jurisdiction's establishment inventory contains a sufficient number of facilities, the FSIO must complete 25 independent inspections of food establishments in risk categories 3 and 4 as described in Appendix B-3.
- For those jurisdictions that have a limited number of establishments which would meet the risk category 3 and/or 4 criteria, the FSIO must complete 25 independent inspections in food establishments that are representative of the highest risk categories within their assigned geographic region or training area.

In addition, all coursework identified in Appendix B-1, for the following eight curricula areas, must be completed within this 24-month time frame.

1. Prevailing statutes, regulations, ordinances (some of the courses for this element are part of the pre- requisite curriculum outlined in Step 1);
2. Public health principles (some courses for this element are part of the pre-requisite curriculum outlined in Step 1);
3. Food microbiology (some of the courses for this element are part of the pre-requisite curriculum outlined in Step 1);
4. Epidemiology;
5. Hazard Analysis Critical Control Points (HACCP);
6. Allergen Management
7. Emergency Management

All courses for each of the curriculum areas must be successfully completed within 24 months of hire or assignment to the regulatory retail food program in order for FSIOs to be eligible for the Field Standardization Assessment.

> ***NOTE:*** *The estimated contact time for completion of the FDA ORA LearnED "post" courses is 31 hours. The term "post" refers to those courses in Appendix B-1 that were not included as part of the pre-requisite coursework. This includes all the courses in Appendix B-1 that do not have the designation "Pre" associated with them. All courses in Appendix B-1 must be successfully completed prior to conducting field standardizations.*

As with the pre-requisite inspection courses, the coursework pertaining to the above six curriculum areas can be successfully achieved by completing the FDA ORA LearnED courses listed under each curriculum area OR by completing courses, deemed by the regulatory jurisdiction's food program supervisor or training officer to be equivalent to the comparable FDA ORA LearnED courses.

A course is deemed equivalent if it can be demonstrated that it covers at least 80% of the learning objectives of the comparable FDA ORA LearnED course AND verification of successful completion can be provided. The learning objectives for each of the listed FDA ORA LearnED courses are available in the platform at https://fdaoted.csodfed.com/login/render.aspx?id=defaultclp.

Step 4: Food Safety Inspection Officer – Field Standardization

Within 24 months of employment or assignment to the retail food program, staff conducting inspections of retail food establishments must satisfactorily complete four joint inspections with a TRAINING STANDARD using a process similar to the "FDA Standardization Procedures." The jurisdiction's TRAINING STANDARD must have met all the requirements for conducting field standardizations as presented in the definition section of these Standards. The standardization procedures shall determine the inspector's ability to apply the knowledge and skills obtained from the training curriculum, and address the five following performance areas:

1. RISK-BASED INSPECTIONS focusing on the factors that contribute to foodborne illness;
2. Good Retail Practices;
3. Application of HACCP;
4. Inspection equipment; and
5. Communication.

Continuing standardization (re-standardization) shall be maintained by performing four joint inspections with the TRAINING STANDARD every three years. FSIOs that do not standardize others shall complete re-standardization at least every five years.

NOTE: *The field standardization and continuing standardization (re-standardization) criteria described in Step 4 is intended to provide a jurisdiction the flexibility to use their own regulation or ordinance. In addition, the reference to using standardization procedures similar to the FDA Procedures for Standardization of Retail Food Inspection Training Officers, is intended to allow the jurisdiction the option to develop its own written protocol to ensure that personnel are trained and prepared to competently conduct inspections. Any written standardization protocol must include the five performance areas outlined above in Step 4.*

It is highly beneficial to use the FDA Food Code, standardization forms and procedures even when a jurisdiction has adopted modifications to the Food Code. Usually, regulatory differences can be noted and discussed during the exercises, thereby enhancing the knowledge, and understanding of the CANDIDATE. The scoring and assessment tools presented in the FDA standardization procedures can be used without modification regardless of the Food Code enforced in a jurisdiction. The scoring and assessment tools are, however, specifically tied to the standardization inspection form and other assessment forms that are a part of the FDA Procedures for Standardization.

FDA's standardization procedures are based on a minimum of 8 inspections. However, to meet Standard 2, a minimum of 4 STANDARDIZATION INSPECTIONS must be conducted.

Jurisdictions that modify the limits of the standardization process by reducing the minimum number of inspections from 8 to 4 are cautioned that a redesign of the scoring assessment of the CANDIDATE's performance on the field inspections is required. This sometimes proves to be a very difficult task. A jurisdiction must consider both the food safety expertise of its staff, as well as the availability of personnel versed in statistical analysis before it decides to modify the minimum number of STANDARDIZATION INSPECTIONS. The jurisdiction's standardization procedures need to reflect a credible process and the scoring assessment should facilitate consistent evaluation of all CANDIDATES.

The five performance areas target the behavioral elements of an inspection. The behavioral elements of an inspection are defined as the manner, approach and focus which targets the most important public health RISK FACTORS and communicates vital information about the inspection in a way that can be received, understood, and acted upon by retail food management. The goal of standardization is to assess not only technical knowledge but also an inspector's ability to apply his or her knowledge in a way that ensures the time and resources spent within a facility offer maximum benefit to both the regulatory agency and the consuming public. Any customized standardization procedure must continue to meet these stated targets and goals.

Should a jurisdiction fall short of having 90% of its retail food program inspection staff successfully complete the Program Standard 2 criteria within the 24- month time frame, a written protocol must be established to provide a remedy so that the Standard can be met. This protocol would include a corrective action plan outlining how the situation will be corrected and the date when the correction will be achieved.

Step 5: Continuing Education and Training

A FSIO responsible for standardizing others must accumulate 20 contact hours of continuing education in food safety every 36 months after the initial training (24 months) is completed. All other FSIOs must accumulate 30 contact hours every 60 months after the initial training (24 months) is completed. Within the scope of this standard, the goal of continuing education and training is to enhance the FSIO's knowledge, skills, and ability to perform retail food and foodservice inspections. The objective is to build upon the FSIO's knowledge base. Repeated coursework should be avoided unless justification is provided to, and approved by, the food PROGRAM MANAGER and/or training officer.

Training on any changes in the regulatory agency's prevailing statutes, laws and/or ordinances must be included as part of the continuing education (CE) hours within six months of the regulatory change. Documentation of the regulatory change date and date of training must be included as part of the individual's training record.

The CANDIDATE qualifies for one contact hour of continuing education for each clock hour of participation in any of the following nine activities that are related specifically to food safety or food inspectional work:

1. Attendance at FDA Regional seminars / technical conferences;
2. Professional symposiums / college courses;
3. Food-related training provided by government agencies (e.g., USDA, State, local);
4. Food safety related conferences and workshops; and
5. Distance learning opportunities that pertain to food safety, such as:
   - Web based or online training courses (e.g., additional food safety courses offered though FDA ORA LearnED, industry associations, universities); and
   - Satellite Broadcasts.
6. Foodborne Illness training referenced in the Crosswalk Requirements for Foodborne Illness Training Programs – Standard 5.

A maximum of ten (10) contact hours may be accrued from the following activities:

1. Delivering presentations at professional conferences;
2. Providing classroom and/or field training to newly hired FSIOs, or being a course instructor in food safety; or
3. Publishing an original article in a peer-reviewed professional or trade association journal/periodical.

Contact hours for a specified presentation, course, or training activity will be recognized only one time within a three-year continuing education period.

NOTE: *Time needed to prepare an original presentation, course, or article may be included as part of the continuing education hours. If the FSIO delivers a presentation or course that has been previously prepared, only the actual time of the presentation may be considered for continuing education credit.*

A maximum of four (4) contact hours may be accrued for:

1. Reading technical publications related to food safety.

Documentation must accompany each activity submitted for continuing education credit. Examples of acceptable documentation include:

- certificates of completion indicating the course date(s) and number of hours attended or CE credits granted;
- transcripts from a college or university;
- a letter from the administrator of the continuing education program attended;
- a copy of the peer-reviewed article or presentation made at a professional conference; or
- documentation to verify technical publications related to food safety have been read including completion of self-assessed quizzes that accompany journal articles, written summaries of key points/findings presented in technical publications, and/or written book reports.

NOTE*: The key to a document's acceptability is that someone with responsibility, such as a training officer or supervisor, who has first-hand knowledge of employee's continuing education activities, maintains the training records according to an established protocol similar to that presented in Step 1 for assessing equivalent courses.*

Outcome

The desired outcome of this Standard is a trained regulatory staff with the skills and knowledge necessary to conduct quality inspections.

Documentation

The QUALITY RECORDS needed for this standard include:

1. Certificates or proof of attendance from the successful completion of all the course elements identified in the Program Standard curriculum (Steps 1 and 3);
2. Documentation of field inspection reports for twenty-five each joint and independent inspections (Steps 2 and 3);
3. Certificates or other documentation of successful completion of a field training process similar to that presented in Appendix B-2. ***NOTE:*** *The CFP Field Training Manual is available for the Conference for Food Protection web site: http://www.foodprotect.org/ and is located under the icon titled "Conference Developed Guides and Documents."*
4. Certificates or other records showing proof of satisfactory standardization (Step 4);
5. Contact hour certificates or other records for continuing education (Step 5);
6. Signed documentation from the regulatory jurisdiction's food program supervisor or training officer that food inspection personnel attended and successful completed the training and education steps outlined in this Standard.
7. Date of hire records or assignment to the retail food program; and
8. Summary record of employees' compliance with the Standard.

The *Standard 2: Program Self-Assessment and Verification Audit Form* is designed to document the findings from the SELF-ASSESSMENT and the VERIFICATION AUDIT process for Standard 2.