

APPENDIX 1: SUMMARY OF CHANGES

This summary provides a synopsis of the changes made to the 2017 edition of the Voluntary National Retail Food Regulatory Program Standards (Retail Program Standards). The primary intent of this record is to capture the nature of the changes found in the 2017 edition of the Voluntary National Retail Food Regulatory Program Standards rather than to identify every word or editing change. This record should not be relied upon as an absolute comparison that identifies each and every change.

Changes Recommended by the Conference for Food Protection (CFP)

FDA works closely with stakeholders through the biennial Conference for Food Protection (CFP) to review proposed changes to the Voluntary National Retail Food Regulatory Program Standards. Changes may be proposed by FDA, or by stakeholder groups such as academia, industry, consumer groups, and regulatory officials. CFP provides an opportunity for stakeholders to provide comments about proposed changes.

The following changes reflect the recommendations from the Conference for Food Protection, 2016 biennial meeting.

Updates to Program Standards Definitions

What changed in the Definitions?

The definition for “Training Standard” was updated to include two additional elements related to training and standardization. The training standard definition now includes two new elements addressing completion of 20 contact hours of continuing education in food safety every 36 months after the initial training is completed as outlined in Standard 2, and maintenance of standardization every three years as outlined in Standard 2

How do these changes affect your jurisdiction?

Jurisdictions will now have to meet two additional as defined in the definition of “training standard”.

How will I be able to access these forms?

These forms are available on FDA’s website.

Updates to Standard 2- Trained Regulatory Staff

What changed in Standard 2?

Standard 2 applies to the essential elements of a training program for regulatory staff. Under Step 4: Food Safety Inspection Officer –Field Standardization, a re-emphasis was made regarding field standardization and re-standardization criteria allowing the flexibility to adhere to the regulations and ordinances germane to the jurisdiction along with a reference to using standardization procedures similar to the FDA procedures for Standardization of Retail Food Inspection Training Officers.

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How do these changes affect your jurisdiction?

Jurisdictions are encouraged to reference standardization procedures similar to those contained in the FDA Procedures for Standardization of a Retail Food Inspection Training Officer. This is intended to allow jurisdictions the flexibility to develop its own written protocol to ensure that personnel are trained and prepared to competently conduct inspections.

How will I be able to access and complete these forms?

These forms are available on FDA's website. Enrollees can print out the forms and complete them by hand. Alternatively, these forms can be completed electronically and saved.

Updates to Standard 4 – Uniform Inspection Program

What changed in Standard 4?

Standard 4 applies to the jurisdiction's internal policies and procedures established to ensure uniformity among regulatory staff in the interpretation of regulatory requirements, program policies and compliance/enforcement activities. The following changes reflect recommendations provided in the Uniform Inspection Program – Audit Pilot Project Report while also providing greater flexibility, improved program quality assessment and greater consistency between Program Standards 2 and 4. The changes include:

- More closely aligned Program Elements described in Program Standard No. 4 with the Performance Elements and Competencies contained in the Standard No. 2 - CFP Field Training Plan for new hires or staff newly assigned to the retail food protection program. This alignment process has resulted in 20 Program Elements.
- A re-ordered listing of the Program Elements in Program Standard No. 4 to reflect the organized flow of the inspection process.
- An increase the minimum number of required field assessments (joint inspections) to maintain consistency with the current statistical model upon which Standard 4 is based.

The Instructions and Worksheet for Conducting a Self-Assessment – Trained Regulatory Staff was updated to:

- Clarify that jurisdictions may assess additional performance elements as part of their field assessment process. However, for the purposes of achieving conformance with the Standard, only the performance elements specified in the Standard will be used to assess conformance with the Standard.
- Clarify that the assessment of the performance elements is not an all-or-nothing approach. (For instance, someone that misses one risk factor out of 10 risk factors during a field assessment may still achieve an acceptable level of performance/uniformity on a particular performance element)
- Clarify that enrolled jurisdictions may wish to create a field assessment tool that enables more specific comments and feedback for the individual food safety inspection officer.
- Clarify how establishments should be selected for the field assessment process.
- Provide more specific guidance about the file review process.
- Clarify who should conduct the field assessment and associated file review.

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How do these changes affect your jurisdiction?

With the change in number of Performance Elements to 20, the statistical model for Standard 4 has been updated. Previously in large jurisdictions (jurisdictions with 10 or more inspectors) the evaluation was based on direct oversight of two inspections per inspector, with respect to 10 Performance Elements. By updating the statistical model the evaluation must now be based on direct oversight of three inspections per inspector. In the same regard, the statistical model for jurisdictions with less than 10 inspectors has also been updated. A new calculation model has been included. Jurisdictions that have between four to nine inspectors will conduct three joint inspections for each inspector and for jurisdictions that have three or less inspectors it is recommended that extra oversight inspections be performed to produce a total of 12 inspections. The Program Self-Assessment and Verification Audit Form and Worksheets have been updated to reflect these changes.

How will I be able to access and complete these forms?

These forms are available on FDA's website. Enrollees can print out the forms and complete them by hand. Alternatively, these forms can be completed electronically and saved.

Updates to Standard 7: Industry and Community Relations

What changed in Standard 7?

Standard 7 applies to the Industry and Community Relations outreach activities used by a retail food regulatory program to solicit a broad spectrum of input about a retail food regulatory program's previous, current and future activities. In order to assess conformance with industry and consumer interaction for Standard 7, enrolled jurisdictions may now include additional forms of two way communications such as food safety task force meetings, advisory boards, advisory committees, customer surveys, web based meetings or forums or other mechanisms. The educational outreach component of Standard 7 now allows the usage of oral culture learner materials that increase the awareness of the foodborne illness risk factors and control methods to prevent foodborne illness.

How do these changes affect your jurisdiction?

When conducting a self-assessment of Standard 7, enrolled jurisdictions now have additional options available.

How will I be able to access and complete these forms?

These forms are available on FDA's website. Enrollees can print out the forms and complete them by hand. Alternatively, these forms can be completed electronically and saved.

Updates to the Standard 9: Program Assessment

What changed in Standard 9?

The Standard 9 criteria for an enrolled jurisdiction's risk factor study now include facility categories rather than facility types as stated in previous editions. The four categories have replaced the nine facility types. The four facility categories are:

1. Health Care,
2. Schools (K-12)
3. Restaurants
4. Retail Food Stores.

How do these changes affect your jurisdiction?

The changes to the content of the Standard 9 allow enrolled jurisdictions to select categories of facility types for their risk factor study. The data collection and analysis may occur at various times over the 60- month period, as long as all facility categories under regulation are included in the 60- month cycle. Subsequent studies and reports will indicate if there has been a net change in the occurrence of the risk factors.

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Other Changes made by FDA

FDA made a number of changes to the Voluntary National Retail Food Regulatory Program Standards. These changes are described below.

Standard 1: Regulatory Foundation

What changed in Standard 1?

Standard 1 applies to the regulatory foundation of a retail food regulatory program. In order to assess conformance with Standard 1, enrolled jurisdictions must compare their regulatory foundation with the provisions in the FDA Food Code. In order to facilitate this process, worksheets are provided to guide the self-assessment process and the verification audit process. These worksheets facilitate the comparison of the jurisdiction's regulatory foundation with risk factor and public health intervention provisions, good retail practice provisions, and compliance and enforcement provisions contained within the FDA Food Code.

Standard 1: Self-Assessment Worksheet for Part I was updated to reflect a recent change in the Food code. The change is as follows:

- Added Section 2-401.13 Bandages, Finger Cots, or Stall products on Wrists, Hands or Fingers

This provision was incorporated into the Food Code through a recommendation from the Conference for Food Protection, 2016 biennial meeting.

In addition, the Standard 1 Program Self-Assessment and Verification Audit Form contained a typographical error that referenced completion dates for both the Self-assessment and audit as it relates to Standard 2. The error has been fixed to reflect completion dates of the Self-Assessment and Audit for Standard 1.

How do these changes affect your jurisdiction?

When conducting a self-assessment of Standard 1, jurisdictions must compare their regulatory foundation to the current edition of the Food Code, or the two most recent previous editions. These changes impact the provisions assessed during the self-assessment process when using the current edition of the Food Code.

How will I be able to access and complete these forms?

These forms are available on FDA's website. Enrollees can print out the forms and complete them by hand. Alternatively, these forms can be completed electronically and saved.

Standard 3: Inspection Program Based on HACCP Principles Program Self-Assessment and Verification Audit Form

What changed in Standard 3?

Section 4 of the Standard 3 Program Self-Assessment and Verification Audit Form contained a typographical error that should have read "Written and Implemented Corrective Action Plan" as opposed to "Written and Implement Corrective Action Plan"

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How do these changes affect your jurisdiction?

The changes to the program Self-Assessment and Verification Audit Form will not affect a jurisdiction's ability to accurately report program Self-Assessment and Verification Audit information.

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Standard 5: Foodborne Illness and Food Defense Preparedness and Response

What changed in Standard 5?

Within the data Review and Analysis section of Standard 5, Regulatory Programs are encouraged to participate in the CDC National Voluntary Information System, previously known as (NEAVIS). The name of the system has now changed to the National Environmental Assessment Reporting System (NEARS). The web link has been updated to reflect the name change and accompanying pathway accessing the page.

How do these changes affect your jurisdiction?

The change incorporated into the Standard was to include a note regarding the NEARS program. Including this note does not change the process of conducting a self-assessment or verification audit for this Standard.

How will I be able to access and complete these forms?

These forms are available on FDA's website. Enrollees can print out the forms and complete them by hand. Alternatively, these forms can be completed electronically and saved.

“The 2017 Voluntary Retail National Program Standards workbook primarily reflects an incorporation of the recently approved changes that resulted from the 2016 Conference for Food Protection held in Boise, ID and changes forwarded by the Food and Drug Administration's CFSAN, Retail Food Policy Team. In addition to these recommendations and changes from FDA, the workbook also contains editorial corrections throughout to correct for spelling, grammar and date errors from previous editions.”