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FOOD PROGRAM TRAINING

Assessing the Risk Based Inspection Skills of a Previously Trained / Experienced Inspector

OVERVIEW

This guidance documents the recommended assessment process for Local Health Department's (LHD) newly hired or newly assigned but previously trained food safety inspectors. Many of the components for this training program are derived from the Conference for Food Protection (CFP) and FDA models. This assessment process can be broken down into the following 4 steps:

1. Assessing the completion of technical / curriculum training
2. Field assessment, consisting of joint inspections with the standardized trainer
3. Independent inspections under the review of the standardized trainer
4. Evaluation inspections conducted with the standardized trainer

All four steps must be addressed within 12 months of the inspector's assignment to the food service program. Employees that are not fully assigned to the food program or part time employees have 18 months to complete training.

A component never clearly defined is if (or how) these training requirements could be **adjusted** for a newly assigned inspector who has been doing **risk based inspections on a routine basis** in Michigan.

EXPLANATION OF MULTI TIERED TRAINING APPROACH

The CFP defines a trainee as "...an individual newly hired or newly assigned to the regulatory retail food protection program. These individuals (**regardless of their previous inspection experience**) are in the process of learning and successfully demonstrating the competencies identified in the jurisdiction's training plan as essential for conducting effective food safety inspections."

Every evaluator comes into this assessment with different training backgrounds and different levels of experiences in the food safety program.

As part of the accreditation process, the MPR indicator guide (MPRs 12 and 13) states that: "A training assessment is recommended for a sanitarian, new to a department, who has become qualified and experienced while working in another LHD. The assessment should consist of a document review of the inspector's credentials as well as a field skill review. A training plan should be developed based on the review."

With the new multi-tiered approach for training inspectors that CFP and FDA have developed, a process is now available to define and use for a training assessment. Use of this assessment process and the accompanying forms clearly defines when competency has been achieved and the trainee is ready to begin the next level of assessment. This process would meet the training requirements of MPRs 12 and 13.

Use of the forms and logs found in this guidance document is optional; but they will assist in meeting the accreditation requirements for training of staff.

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TECHNICAL TRAINING REQUIREMENTS

Completion of a-c within 12 months of hire or assignment to the program meets accreditation MPR 12 requirements. (Employees that are not fully assigned to the food program or part time employees have 18 months to complete training.)

To be completed before beginning independent inspections:

- a. ORA U courses, including ORA U. Food Code Training: All pre-requisite ORA U courses can be completed via web-based training. Employees of regulatory agencies can obtain free access to these course offerings; access passwords can be obtained online. **(For free access to these courses, you must use your government e-mail address.)** The time needed to complete the prerequisite courses will vary from one trainee to another. FDA ORA U has estimated the total time needed to complete the prerequisite coursework to be 42 hours. (instructions below)
(See Appendix 1 at the end of this section for instructions to access ORA U training.)
- b. MDARD Plan Review Module found at: http://www.michigan.gov/mda/0,1607,7-125-50772_50775_51204---,00.html
(Have your trainer contact their MDARD Consultant to obtain the test and answer sheet)

To be completed within 12 months of assignment to the program:

- c. MDARD Food Law Training (1 day training offered by MDARD every January)
(A memo will be sent out each fall regarding the January MDARD Food Law Training.)

Recommended:

- d. Manager Certification Class

ASSESSMENT OF TECHNICAL TRAINING

The standardized trainer should evaluate and document the pre-requisite coursework preparing individuals newly assigned to the food program before allowing them to conduct independent food safety inspections.

TECHNICAL TRAINING 1 – If the trainee has not previously completed this required coursework or does not have clear documentation from their previous employer of this training, the trainee would be required to meet and document the “Technical Training Requirements” listed above.

OR

TECHNICAL TRAINING 2 – Equivalent Coursework and Recognized Examination

A standardized trainer or food program manager can allow credit for coursework that a trainee has completed from sources other than FDA ORA U. A course is deemed equivalent if it can be demonstrated to cover at least 80 percent of the learning objectives of the comparable ORA U course **and documentation of successful completion is provided.** The learning objectives for each of the ORA U courses are available from the FDA web site link listed under Option 1 above.

Completion of the MDARD training modules prior to 2010 would meet the ORA U requirements

If the trainee was previously trained under the FDA Food Code and Michigan Law of 2000 prior to 2013, a copy of a certificate of completion of the Food Code / Food Law Training completed after 2000 would be acceptable.

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A copy of the final test score of the MDARD Plan Review Training Module would meet requirement 'b'.

NOTE: Although not a requirement in Michigan, it is recommended by CFP (and required to meet Standard 2 if you are enrolled in the National Standards Program) that a trainee submitting documentation of equivalent coursework should also demonstrate a basic level of food safety knowledge by successfully passing a written examination from one of the following four (4) categories:

1. The Certified Food Safety Professional (CFSP) examination offered by the National Environmental Health Association (NEHA).
2. A state sponsored food safety examination that is based on the current version of the FDA Food Code (and supplement) and developed using methods that are psychometrically valid and reliable.
3. A food manager certification examination provided by an ANSI/CFP accredited certification organization.
4. A Registered Environmental Health Specialist (REHS) or Registered Sanitarian (RS) examination offered by NEHA or a State Registration Board.

TECHNICAL TRAINING COMPLETION LOG: The standardized trainer should evaluate and document the pre-requisite coursework preparing individuals newly assigned to the LHD program before the trainee may conduct independent food safety inspections.

Date Compliance Achieved	Standardized Trainer	Technical Training Requirements	
		To be completed before or during the 25 joint evaluation period AND prior to conducting independent evaluations.	
		Completion of Required ORA U Pre- Requisite Courses, including ORA U Food Code Courses	Attach all certificates of course completion
		MDARD Plan Review Module http://www.michigan.gov/mda/0,1607,7-125-50772_50775_51204---,00.html	Attach copy of scored exam. (request exam scoring sheet from your MDARD Consultant)
To be completed within 12 months of assignment to the program			
		MDARD Food Law Class (1 day training offered by MDARD every January)	Attach copy of certificate
Recommended			
		Manager Certification Course (Recommended but not required)	Attach copy of certificate

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Assessing the Risk Based Inspection Skills of a Previously Trained / Experienced Inspector:

If training an inspector new to the food program who has become qualified and experienced:

- While working in another LHD in Michigan
- Was trained previously at the current LHD

The standardized trainer would have the option to **develop and use this assessment of training needs process for the joint training requirements**. The assessment would determine the type and scope of training necessary. The number of inspections necessary for this assessment is one that provides adequate opportunity for all competencies to be demonstrated and documented.

Most of the competencies, such as those related to conducting risk based inspections, should be continually demonstrated throughout the course of the field training process (Example: evaluation of the cooling processes would be demonstrated multiple times during the assessment process).

Almost all of the competencies listed, however, should be demonstrated by the trainee at least several times. (Example: During the entire assessment process, the trainee might only have one or two opportunities to address documentation of 'processing operating under a variance' issued by the jurisdiction.)

The standardized trainer should observe the trainee successfully demonstrate a consistent pattern of behavior for **each** competency. As defined by CFP, a '**consistent pattern of behavior**' means:

- The trainee can explain the purpose/objective of the job task and the steps necessary to carry it out effectively.
- The demonstration of a clear understanding of a given competency.
- A collective set of trainer observations which predominately indicate that the trainee can successfully demonstrate the competency correctly and repeatedly.

The standardized trainer should conduct these assessment exercises as they would any joint training exercise. Use of the "Field Evaluation Worksheet" (Addendum A); the "MDARD/FDA Standardization Evaluation Report" (Addendum C); and the completion of the "Joint Field Training Assessment for a Previously Trained / Experienced Evaluator - Establishment Log" will assist in determining competency of the trainee.

An evaluator who has been well trained and who has recently been conducting risk based inspections might demonstrate competency rather quickly. If the standardized trainer observes good risk based inspection technique early in the evaluation process, use of these three worksheets would document when the trainee has clearly demonstrated competency; and the trainee could then proceed to independent inspections.

For a trainee who has not recently worked in the food program or who has not recently been doing risk based inspections, the assessment might show that the trainee would need to complete the entire training process, and the standardized trainer would then refer to the "Training Plan for Newly Hired or Newly Assigned Food Evaluators."

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During these joint inspections, a minimum of 3 Field Evaluation Worksheets (see addendum A and B) and 3 MDARD/FDA Standardization Evaluation Reports (see addendum C and D) must be completed. To demonstrate competency:

- A trainee should achieve at least 80% competency in all 4 categories of at least 3 of the Field Evaluation Worksheets; and
- A trainee should achieve at least 90% competency on at least 3 of the MDARD/FDA Standardization Evaluation Report forms

The standardized trainer is required to document the assessment process. Only after the trainee has proven, **through the assessment process**, that he/she has achieved competency, may the trainee begin the 25 independent evaluations under the review of the standardized trainer.

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JOINT FIELD TRAINING - ESTABLISHMENT LOG

	Date	Establishment Name	Risk Category	Trainer Led Inspections	Trainee Led Inspections	Field Training Worksheet Completed - comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
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11						
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**Joint Field Training Assessment for a Previously Trained / Experienced Evaluator:
Establishment Log**

	Inspection Date	Establishment Name	FEWs (Must receive at least an 80% compliance in each category on at least 3 of the inspections)	MDARD/FDA Standardization Evaluation Report (Must receive at least a 90% compliance on at least 3 of the inspections)	Review of Written Inspection Report	Standardized Trainer Assessment
1						
2						
3						
4						
5						
6						
7						
8						
9						
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12						
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INDEPENDENT INSPECTIONS ASSESSED BY THE STANDARDIZED TRAINER:

After competency has been demonstrated by the trainee, the trainee will complete a minimum of 25 independent inspections. These inspections should be reviewed by the standardized trainer and feedback should be provided to the trainee at reasonable intervals to assist the trainee in improving the inspection process. The standardized trainer has the option to observe some or all of the inspections.

Use of the "Evaluation of the Independent Field Inspection Log" will document the training process and provide a record of when the trainee meets the competencies required. (Use of this form is optional.)

When the trainee has demonstrated competency in doing these independent evaluations, the standardized trainer and the trainee may schedule the joint evaluation inspections.

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Assessment of the Independent Field Inspection Log

	Inspection Date	Establishment Name	Assessment By Standardized Trainer	Feedback Provided To Trainee	Trainer Evaluation Date / Initials
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
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ASSESSMENT OF FIELD INSPECTION TRAINING:

After the 25 independent inspections have been evaluated, **the standardized trainer and trainee should conduct five joint evaluation inspections**, which will determine if the trainee is approved to conduct food establishment evaluations. These evaluations should be conducted using the MDARD/FDA Standardization Procedures.

A minimum of two Field Evaluation Worksheets (Addendum A) and two MDARD/FDA Standardization Evaluation Reports (Addendum C) should be completed.

To demonstrate competency:

- **A trainee should achieve at least 80 percent competency in each of the four categories on at least two of the FEWs completed.**
- **A trainee should achieve at least 90 percent competency on at least two of the MDARD/FDA Standardization Evaluation Reports completed.**

When the trainee demonstrates competency through these evaluations, he/ she has completed the training process.

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Field Training Evaluation Log

	Evaluation Date	Establishment Name	FEW Score (80% in each of the 4 categories required on at least 2 inspections)	MDARD/FDA Standardization Evaluation Report (90% on at least 2 inspections required)	Review of Written Evaluation Report	Standardized Trainer Assessment	Date Approved
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							

TRAINEE HAS COMPLETED THE TRAINING PROCESS, AND HAS DEMONSTRATED THE COMPETENCIES OF A FOOD SAFETY INSPECTION OFFICER.

Standardized trainer: _____ Date: _____

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Appendix 1

To Access FDA ORA U. Pre-Requisite Training:

1. Click on <http://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm119016.htm>
2. About half way down the page you will see

Get Started

1. Select a curriculum from below and print a copy for later use
 - Retail Food
 - Milk
 - Shellfish
 - Manufactured Foods
 - Feed Control
2. If you have not already done so, register at www.eduneering.com/oratraining
3. Once your registration has been approved, log in at ComplianceWire
<https://www.compliancewire.com/Secure/logon-cwire.asp> (remember to bookmark the site)

3. Click on “Retail Food” for a list of the pre-requisite courses. Print a copy for referral.
4. If you have not already registered for ORA U courses, click <http://www.compliancewire.com/secure/custom/FDAORAUSelfReg.asp>
5. After you have registered, click on: <https://www.compliancewire.com/CW3/Standard/Authentication/LogIn>
6. Click on “Catalog.” Using the course list printed in step # 3, type each course number in the SEARCH box. The course should appear, and just click the logo on the left to launch the course.

To Access FDA ORA U. Required Food Code Training:

<http://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm119016.htm>

If you have not already registered for ORA U courses, click <http://www.compliancewire.com/secure/custom/FDAORAUSelfReg.asp>

After you have registered, click on <https://www.compliancewire.com/CW3/Standard/Authentication/LogIn>

Click on “Catalog” and type “Food Code Training” in the SEARCH box.

Scroll down and you will locate:

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	Food Code Chapter 1: Purpose and Definitions	FDAFC02	General	
	Food Code Chapter 2: Supervision	FDAFC07	General	
	Food Code Chapter 3: Part I	FDAFC03	General	
	Food Code Chapter 3: Part II	FDAFC05	General	
	Food Code Chapter 3: Part III	FDAFC06	General	
	Food Code Chapter 4: Part I	FDAFC08	General	
	Food Code Chapter 4: Part II	FDAFC10	General	
	Food Code Chapter 5: Water, Plumbing, and Waste	FDAFC04	General	
	Food Code Chapter 6	FDAFC09	General	
	Food Code Chapter 7: Poisonous and Toxic Materials	FDAFC01	General	
	Food Code Chapter 8: Enforcement and Annex 1	FDAFC11	General	

Just click on the icon on the left to launch each course.