Any discussion of best practices that are deemed critical to effective regulatory retail food protection programs is likely to include the employment of highly competent and professional staff that possesses good communication skills. In addition, there is consensus that the arena within which a competent regulatory food safety workforce can have the greatest positive impact on the nation’s retail food protection system is during inspection visits to industry operations. Thus, the training structure and process regulatory agencies provide for staff newly hired or assigned to the retail food protection program are vital for developing a solid foundation for meaningful intervention strategies that will lead to effective control of the factors that contribute to foodborne illness within this segment of the industry.

A survey conducted by the Conference for Food Protection (CFP) revealed that existing training and standardization programs for regulatory retail food inspection staff varied greatly from jurisdiction to jurisdiction throughout the country. What seems to be lacking is a nationally recognized training and standardization process for Food Safety Inspection Officers (FSIO) that can be used as a model to enhance the effectiveness of food safety inspections and increase uniformity among regulatory professionals in the assessment of food safety practices in the retail food industry. To fill this void, a work group within the Conference for Food Protection has created a multi-tiered approach for the training and standardization of FSIOs. This program consists of a combination of instruction and field training experience designed to prepare FSIOs to conduct quality inspections of retail food, restaurant, and institutional foodservice establishments.

The FDA Voluntary National Retail Food Regulatory Program Standards, www.foodprotect.org/doc/ProgramStandards2005v2.doc, provide the template used to develop a comprehensive training and standardization model for FSIOs. Program Standard #2 – Trained Regulatory Staff has been revised to include a five-step approach for determining whether a FSIO has the required knowledge, skills and abilities to perform specific competencies related to retail food and foodservice inspections. The five-step training and assessment process consists of the following components:

**STEP 1: PRE-INSPECTION CURRICULUM**

Prior to conducting any type of independent field inspections in retail food or foodservice establishments, a FSIO must complete 42 clock hours of the training in the following curriculum areas: 1) Prevailing statutes; regulations; ordinances; 2) Public Health Principles; 3) Food Microbiology; and 4) Communication Skills.
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I am pleased to tell you that your Board of Directors are making strides in increasing our membership. CEHA sponsored Chapter trainings and events and hard work by members are starting to show results. The 2006 Northern Update was hosted by the Redwood Chapter on October 12th and 13th, under the helm of Chapter President, Laura Barnthouse. Thank you Laura, for doing an outstanding job of putting together a program that included some of the most current and popular subjects in Environmental Health.

The preparations for the 2007 AES are also well under way and the conference is starting to take shape. AES Co-Chairs Lori Braunreither and George Nakamura are ensuring that all Committee Chairs are meeting their deadlines and watching over the smallest details. Remember to keep the dates of April 23 to April 27 open for the 2007 AES. It will be held at the Radisson Resort Hotel in Sacramento. Details and registration information will be coming soon. If you wish to volunteer to help at the AES, contact Lori at lbraunes@hsd.cc.county.us or George at gmlnaka@concast.net.

Our esteemed CEHA Committee Chairs are also very busy. By the time you receive this bulletin, we are hopeful that the legislative link on the CEHA website will be operational. Under the leadership of the Legislative Committee Chair Melinda Talent, the legislative link will allow you to track all of the current legislation that affects our profession. Melinda intends to update this site as legislative changes are made so that you have the most current information at all times. Diane Eastman, International Relations Chair, is continuing her book drive activities. As she did for the very successful “Books for Zimbabwe” textbook drive, she is now seeking donations of all your old Environmental Health textbook for a fledging Environmental Health program at the University of Zambia. Past recipients of the text books in Zimbabwe were very grateful for the donation. Please contact your Chapter representatives if you have any books you wish to donate.

Also, Past President Jill Pahl was appointed Director of Environmental Health for Placer County and Past President Alicia Enriquez was promoted to Manager in the Division of Environmental Health, Sacramento County Environmental Management Department. Please join me in wishing Jill and Alicia a well deserved congratulation on their new positions.

I, too, have been “walking the beat” to entice people to join CEHA. I have had the pleasure of talking and meeting with many Environmental Health Specialists. I have even talked to several former members. Whoo, former members! Now, why is that? If CEHA is so great, why are members not staying loyal and maintaining their membership? Why are members not encouraging others to join? I am very concerned. The greatest asset CEHA has is its membership. I am not talking about the membership fees people pay to be a part of this organization. I am talking about the people who care about legislation that affects the laws we use to do our jobs or affect our personal safety. It is about people who assist other nations in their quest to ensure health and safety. It is about the people who volunteer their personal time and energy to host the AES or Updates that provide you the needed skills and information to perform your duties. It is about the people who share their wisdom, knowledge and experience as speakers at CEHA events and trainings. It is about all of us working together to protect and promote our profession.

CEHA is your professional organization. It represents all Environmental Health Specialists in the State of California; a state that is recognized nationally as one of the leaders in Environmental Health. We should be proud of this distinction. Perhaps we have forgotten how this happened. You can read the history of CEHA on the CEHA website, but it does not tell you about the hard work and sacrifice the many individuals before me have put into CEHA. I only know that there are many CEHA members out there that are very passionate about this organization and have given too much of themselves to let it be thrown away.

I encourage you to use the following 10 reasons to be a CEHA member to encourage those who are not, or no longer, associated with this organization:

1. Network! Network! Expand your network of professional contacts.
2. Take an active role in commenting on legislation and meeting legislators and making a difference in environmental health through CEHA.
3. Hear top professionals share their knowledge based on real world experience.
4. Share your own expertise or unusual environmental health experiences at an Annual Educational Symposium or Update. Join the CEHA Speakers Bureau or write an article for the CEHA Bulletin.
5. Learn about employment opportunities and increase your opportunities for obtaining a job or promotion.
6. Maintain your professional registration or certification by earning contact hours or continuing education units at Symposiums and Updates.
7. Opportunities to take part in organizing or arranging educational seminars.
8. Attend educational conferences to gain knowledge of an environmental health program you don’t normally work in.
9. Apply to be CEHA’s delegate to the Lancaster Symposium in Lancaster, England.
10. Opportunities to travel and gather together a program that included some of the most current and popular subjects in Environmental Health.

Our profession will be facing some serious challenges in the next few years to come. We need to work together to ensure that our registration is maintained and held to the highest degree. We can only do this if we all stay together and work through our differences. We need to encourage others to become CEHA members to strengthen our voice. And, we need to help those who wish to become registered. They are our future.

Be well. Be safe.

Darryl C.F. Wong
Using the FDA Office of Regulatory Affairs’ (ORA) online university web courses as a model, specific food safety web courses and learning objectives have been identified for each of the curriculum areas. The courses identified in Table 1 provide the basic food safety knowledge required to perform retail food and foodservice inspections. These courses can be accessed by food safety regulation professionals at no charge from the FDA ORA U web site at www.fda.gov/ora/training/. The on-site, on-demand accessibility of FDA ORA U distance education courses provides a flexible, time-efficient approach for FSIOs to fulfill the pre-inspection curriculum requirement.

Another option is recognized for fulfilling the pre-inspection curriculum requirement. If the coursework completed by the FSIO includes 80% of the learning objectives contained in the comparable FDA ORA U course(s) it is deemed equivalent. FSIOs submitting equivalent coursework to meet the curriculum requirement must also demonstrate a basic level of food safety knowledge by successfully passing one of the following examinations: 1) the National Environmental Health Association’s (NEHA) Certified Food Safety Professional (CFSP) examination; 2) a Registered Environmental Health Specialist (REHS) or Registered Sanitarian (RS) examination offered by NEHA or a State Registration Agency; 3) a state sponsored food safety examination that is based on the most current version of the FDA Food Code (and supplement) and is developed using psychometrically valid and reliable procedures; or 4) a food manager certification examination provided by an ANSI-CFP accredited certification organization. Within the context of the CFP training and assessment process, these written examinations are considered to be part of the training process and not for the purpose of standardization or certification. In addition, the CFP does not make any claim that these examinations are equivalent to each other. Rather the examinations are considered as training tools and have been incorporated as part of the process because each provides a viable tool for assessing whether a FSIO has attained a basic level of food safety knowledge.

**STEP 2: INITIAL FIELD TRAINING AND EXPERIENCE**

Training is most effective when it is delivered within the context or environment within which the individual would be expected to apply the knowledge and skills required of the job task. For FSIOs, the appropriate training environment is one that mirrors the actual experience of inspecting retail food, foodservice, and institutional feeding operations.

From the survey conducted by the CFP work group, having an experienced FSIO accompany a new hire during joint field inspections is the most common training method currently used by regulatory retail food protection programs. In the majority of cases, however, the regulatory jurisdiction did not implement a structured approach upon which to evaluate specific performance elements during the joint field training process. The determination as to when a new hire was ready to conduct independent inspections was for the most part left up to the discretion of the experienced FSIO who conducted the training.

As part of the developmental process, the CFP work group conducted a review of regulatory retail food training programs from around the country. From this research, 25 specific performance elements related to retail food and foodservice establishment inspections were identified and are presented in Table 2. These performance elements have been sorted among 6 inspection categories and serve as the foundation for an Assessment of Training Needs (ATN) for FSIOs. The primary purpose of the ATN is to establish a structured approach (national model) for field training of regulatory retail food program inspection staff that is part of a continuous improvement process.

Newly hired or assigned FSIOs are expected to complete a minimum of 25 joint field inspections with a jurisdiction’s trainer or designated staff member who has successfully completed all the training elements required in Program Standard #2. The 25 joint field inspections will include both “demonstration” (trainer-led) and “training” (trainer-led) inspections of a variety of retail food and foodservice establishment types available within the jurisdiction.

As part of the 25 joint field inspections, the jurisdiction’s trainer or designated staff person will conduct an Assessment of Training Needs (ATN) during a portion of the inspections led by the FSIO. The ATN is designed to assess a FSIO’s readiness to conduct independent inspections and provide valuable feedback to retail food program managers about the effectiveness of their jurisdiction’s food safety training process.

During the ATN, the trainer will observe how well the FSIO performs the inspection elements presented in Table 2. The jurisdiction does not have to perform an ATN for every joint field training inspection. However, the jurisdiction must conduct a sufficient number of assessments to determine that a candidate has the knowledge and skills needed to perform all elements of an inspection. The ATN should be viewed as part of the training process that is intended to both provide feedback to the candidate on specific strong and weak areas, and feedback to the regulatory program on potential gaps in their food program training and orientation process.

Though most of the 25 performance elements presented in Table 2 apply to every jurisdiction, there may be some instances where certain performance elements are not part of a FSIO’s job responsibilities. For example, FSIOs in some jurisdictions may not be responsible for collecting aseptic food or water samples. Therefore, the ATN process and forms can be customized to address the specific performance elements required of a jurisdiction’s FSIOs.

The ATN process also takes into account that some performance elements deemed

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**TABLE 1. Curriculum for retail food safety inspection officers pre-requisite curriculum courses**

<table>
<thead>
<tr>
<th>Prevailing Statutes</th>
<th>Microbiology</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Food Law For State Regulators FDA35</td>
<td>Overview of Microbiology MIC01</td>
</tr>
<tr>
<td>Basics of Inspection: - Beginning an Inspection FDA38 - Issues &amp; Observations FDA39</td>
<td>Gram-Negative Rods MIC02</td>
</tr>
<tr>
<td>An Introduction to Food Security Awareness FDA251</td>
<td>Gram-Positive Rods &amp; Cocci MIC03</td>
</tr>
<tr>
<td>2005 Food Code - Specific state/local laws and regulations to be addressed by each jurisdiction</td>
<td>Foodborne Viruses MIC04</td>
</tr>
<tr>
<td></td>
<td>Foodborne Parasites MIC05</td>
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</table>

<table>
<thead>
<tr>
<th>Public Health Principles</th>
<th>Communication Skills</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Health Principles FDA36</td>
<td>Communication Skills for Regulators</td>
</tr>
</tbody>
</table>
**Table 2. Summary of FSIO performance elements for the six inspection training areas**

<table>
<thead>
<tr>
<th>I. Pre-Inspection - (3 Performance Elements)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Successfully completes the pre-requisite training courses specified in Program Standard #2.</td>
<td></td>
</tr>
<tr>
<td>• Has the required equipment and forms to conduct the inspection.</td>
<td></td>
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<tr>
<td>• Reviews the establishment file for the previous inspection report and, if applicable, documents or complaints on file.</td>
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</table>

<table>
<thead>
<tr>
<th>II. Inspection Observations &amp; Performance – (7 Performance Elements)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>• Provides identification as a regulatory official to the person in charge, confirming agency authority for the inspection, and states the purpose of the visit.</td>
<td></td>
</tr>
<tr>
<td>• Has knowledge of the jurisdiction’s laws, rules, and regulations required for conducting retail foodservice inspections.</td>
<td></td>
</tr>
<tr>
<td>• Uses a risk-based inspection methodology to assess regulations related to employee practices and management procedures essential to the safe storage, preparation and service of food.</td>
<td></td>
</tr>
<tr>
<td>• Obtains immediate corrective action for out of compliance employee practices and management procedures essential to the safe storage, preparation and service of food.</td>
<td></td>
</tr>
<tr>
<td>• Correctly assesses the compliance status of other regulations (Good Retail Practices) that are included in the jurisdiction’s prevailing statutes, regulations and/or ordinances.</td>
<td></td>
</tr>
<tr>
<td>• Verifies correction of out of compliance observations identified during the previous inspection.</td>
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</tr>
<tr>
<td>• Correctly uses inspection equipment during the joint inspection.</td>
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</tbody>
</table>

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<thead>
<tr>
<th>III. Sample Collection and Evidence Development – (3 Performance Elements)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>• Photographs taken to support the regulatory findings or conditions observed.</td>
<td></td>
</tr>
<tr>
<td>• Uses an aseptic food sample collection method consistent with criteria established by the laboratory serving the jurisdiction.</td>
<td></td>
</tr>
<tr>
<td>• Uses an aseptic water sample collection method consistent with criteria established by the laboratory serving the jurisdiction.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>IV. Oral Communication – (6 Performance Elements)</th>
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<tbody>
<tr>
<td>• Asks questions and engages in dialogue with the person in charge/employees to obtain information relevant to the inspection.</td>
<td></td>
</tr>
<tr>
<td>• Provides the person in charge/employees with accurate answers to inspection-related questions or admits not knowing the answer.</td>
<td></td>
</tr>
<tr>
<td>• Uses available means (e.g., interpreter, drawings, demonstrations, diagrams) to overcome language or communication barriers.</td>
<td></td>
</tr>
<tr>
<td>• Follows the jurisdiction’s policy with regard to disclosure of confidential information.</td>
<td></td>
</tr>
<tr>
<td>• Uses effective communication and conflict resolution techniques to overcome inspection barriers.</td>
<td></td>
</tr>
<tr>
<td>• Conducts the exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>V. Written Communication – (3 Performance Elements)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Completes the inspection form per the jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reasons; applicable code references; compliance dates).</td>
<td></td>
</tr>
<tr>
<td>• Includes with the inspection report any compliance or regulatory documents (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices) identified or cross-referenced in written statements.</td>
<td></td>
</tr>
<tr>
<td>• Presents the inspection report, and when necessary cross referenced documents, to the person in charge.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>VI. Professionalism – (3 Performance Elements)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>• Maintains a professional appearance consistent with the jurisdiction’s policy (e.g., clean clothing, hair restraint).</td>
<td></td>
</tr>
<tr>
<td>• Demonstrates the same proper sanitary practices as expected from a foodservice employee.</td>
<td></td>
</tr>
<tr>
<td>• Only reports substantiated findings as violations.</td>
<td></td>
</tr>
</tbody>
</table>

important to a FSIO’s inspection responsibilities may be difficult to observe as part of the joint field training process. Some examples of performance elements that may be difficult to observe a FSIO performing in the field include collecting aseptic food or water samples, implementing effective conflict resolution techniques, or having to address issues related to confidential information during an inspection. For these types of activities it may be necessary to use laboratory, classroom, and/or in-office exercises to assess performance elements that are difficult to observe in the field.

A detailed explanation of the Assessment for Training Needs process and forms is provided in the CFP Guide for Conducting an Assessment of Training Needs for Retail Food Safety Inspection Officers. The guide and forms can be downloaded from the CFP’s web site at www.foodprotect.org/other_documents.html.

The Assessment of Training Needs process will be pilot tested by 32 state, local, and tribal regulatory retail food protection programs from July 2006 through July 2007. The purpose of the pilot project is to assess the appropriateness and clarity of the performance elements included in the ATN and to solicit feedback from regulatory jurisdictions concerning logistical problems experienced when conducting the training process. Based on the results of the pilot project, the CFP work group will determine if changes need to be made to the ATN process or forms. A report of the results of the pilot project will be created and recommended changes to the process and forms will be submitted, if necessary, as issues for consideration by the Conference for Food Protection at its next regularly scheduled meeting in the spring of 2008.

**STEP 3 – INDEPENDENT INSPECTIONS AND COMPLETION OF ALL CURRICULUM ELEMENTS**

Once FSIOs have successfully completed the pre-inspection curriculum and the Assessment of Training Needs they will be ready to conduct independent inspections of retail food and foodservice establishments. The independent inspections provide the FSIO valuable experience and an opportunity to gain a broader understanding of the retail food and foodservice environment and how the provisions in their regulatory Food Code apply to these operations. These independent inspections serve as preparatory work toward standardization.

During this phase of the training process, the FSIO will be expected to conduct a minimum of 25 independent inspections of retail food establishments that fall within risk categories 3 and 4 as described in Annex 5, Table 1 of the 2005 FDA Food Code – http://www.cfsan.fda.gov/~acrobatt/fc05-a5.pdf. For small jurisdictions that don’t have any food establishments that meet the criteria for risk categories 3 and 4, the FSIO should complete independent inspections in establishments that represent the highest risk categories within their assigned geographic region or training area. Normally a FSIO will conduct
more than the minimum 25 independent inspections prior to standardization, and to the extent possible, the inspections should be conducted in establishments that conduct a variety of food preparation activities and procedures requiring active managerial control of multiple contributing factors to foodborne illness.

In addition to conducting the independent inspections, the FSIO must complete the remaining coursework in the following 3 curriculum areas: 1) Food Microbiology (these are advance courses not included in Step 1); 2) Epidemiology; and 3) Hazard Analysis Critical Control Point (HACCP). As with the pre-inspection curriculum, this coursework can be completed using the FDA ORA U process or through coursework deemed equivalent to the learning objectives covered in the comparable FDA web based curriculum. Table 3 outlines the FDA ORA U courses for these 3 curriculum areas.

All courses for each of the curriculum areas described in Steps 1 and 3 in addition to the 25 independent inspections must be completed within 18 months of hire or assignment to the regulatory retail food program in order for the FSIO to be eligible for field standardization.

**STEP 4 – FIELD STANDARDIZATION OF FOOD SAFETY INSPECTION OFFICERS**

The fourth step in the training process involves having the FSIO complete a minimum of 4 joint inspections with a “training standard” using a process similar to the ‘FDA Standardization Procedures.’ The “standardization” process must be completed by the FSIO within 18 months of hire or assignment to the retail food protection program. The standardization process is designed to determine the FSIO’s ability to apply the knowledge and skills obtained from the training curriculum and address the following performance areas:

1) Risk-Based Inspections;
2) Good Retail Practices;
3) Application of HACCP;
4) Use of Inspection Equipment; and
5) Communication.

The goal of standardization is to assess not only the FSIO’s technical knowledge but also his or her ability to assess and prioritize the potential food safety hazards within the operation in a way that ensures the time and resources spent within a facility offer maximum public health protection for the industry and the consuming public.

In the program developed by the Conference for Food Protection, FSIOs are required to be re-standardized every 3 years by performing at least four joint inspections with a training standard.

**STEP 5 – CONTINUING EDUCATION AND TRAINING**

A FSIO must accumulate 20 contact hours of continuing education in food safety every 36 months after the initial training and standardization is completed (Steps 1 – 4). A FSIO qualifies for one contact hour of continuing education for each clock hour of participation in activities that are related specifically to food safety or food inspection work. Some examples of activities that would qualify for continuing education credit include:

1) Attendance at FDA regional seminars; technical conferences; professional symposiums and college courses;
2) Distance learning programs about food safety topics;
3) Presentations on food safety topics at professional conferences;
4) Providing classroom and/or field training to newly hired FSIOs;
5) Publishing an original article in a peer-reviewed professional or trade association journal/periodical; and
6) Reading technical publications related to food safety.

**TABLE 3. Additional coursework to pre-requisite curriculum for retail Food Safety Inspection Officers**

<table>
<thead>
<tr>
<th>Microbiology</th>
<th>Epidemiology</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control by Reporting (MIC10)</td>
<td>Collecting Surveillance Date (F101)</td>
</tr>
<tr>
<td>Technology-Based Food Processes (MIC11)</td>
<td>Beginning the Investigation (F102)</td>
</tr>
<tr>
<td>Natural Toxins (MIC12)</td>
<td>Expanding the Investigation (F103)</td>
</tr>
<tr>
<td>HACCP</td>
<td>Conducting a Food Hazard Review (F104)</td>
</tr>
<tr>
<td>Overview of HACCP (FDA16)</td>
<td>Epidemiological Studies (F105)</td>
</tr>
<tr>
<td>Prerequisite Programs &amp; Preliminary Steps (FDA17)</td>
<td>Final Report (F106)</td>
</tr>
<tr>
<td>The Principles (FDA18)</td>
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</tbody>
</table>

**Summary**

The Conference for Food Protection believes the training and standardization process described in this paper provides a solid training foundation for any retail food protection program. By following the 5 steps in the process, a jurisdiction can assure that its FSIOs have an opportunity to develop the knowledge, skills, and abilities required to conduct effective inspections of retail food and foodservice establishments.

The Assessment of Training Needs (ATN) employed during Step 2 is a very important part of the training process. It will help retail food protection programs determine when FSIO are ready to conduct independent retail food and foodservice inspections. The ATN is also designed to provide valuable feedback to retail food protection program managers about the effectiveness of their jurisdiction’s food safety training process.

Over the next year, the Conference for Food Protection will be conducting a pilot project to evaluate the Assessment of Training Needs process and forms. The project will also solicit feedback from regulatory jurisdictions concerning any logistical problems they experienced during the training process. A jurisdiction does not need to be enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards to use the ATN process or to participate in the pilot study. You may contact either David McSwane (dmcswayne@iupui.edu) or John Marcello (john.marcello@fda.hhs.gov) if you would like more information about the training and assessment process or if your retail food safety program would like volunteer to participate in CFP Assessment of Training Needs pilot project.

Dr. McSwane is a Professor in the School of Public and Environmental Affairs at Indiana University Purdue University - Indianapolis.

David is a Registered Environmental Health Specialist, a Certified Food Safety Professional, and a Diplomate of the American Academy of Sanitarians. He conducts food safety training programs throughout the United States and serves as a public health consultant to numerous organizations within the retail food industry.

John Marcello is one of six FDA Regional Food Specialists assigned to the 9 state Pacific Region. Regional Food Specialists provide technical assistance to regulatory and industry food safety professionals; train and standardize regulatory personnel, and provide consultation on, and evaluation of, state food programs.

John’s background incorporates both a regulatory and industry perspective on food safety issues.
Excellence in Environmental Health

The California Conference of Directors of Environmental Health (CCDEH) presents an annual Excellence in Environmental Health Award to acknowledge outstanding programs that are innovative, creative, and effective in providing quality environmental health services. It is intended that the award give statewide and local recognition to environmental health agency accomplishments and thereby enhance the visibility and public image of the profession.

Nominations for this award are solicited from CCDEH membership. Each nominated jurisdiction presents their program and innovations during CCDEH’s annual conference with the winner(s) receiving the award during the Thursday night awards banquet. Each year the Directors get to hear about fantastic and creative programs that other jurisdictions are doing. This year there were nominees from five jurisdictions. The nominees included the following:

Orange County’s Fresh is Best! – a program created specifically to preserve and protect many of the traditional foods in the Orange County Vietnamese community. The program Fresh is Best! is designed to 1) offer consumers the freshest foods possible and 2) ensure that the food is safe for consumption.

Riverside County presented their Recruitment and Retention Program, which by pushing their recruitment efforts further than ever before has allowed the department to hire the most qualified trainees and to help retain many of their staff.

Sacramento County was nominated for their Public Food Safety Information Fact Sheets. The Sacramento County Environmental Management Department and the University of Sacramento established an ongoing partnership in 2004 to reduce food borne illnesses within Sacramento County and to provide residents with food safety information that can be used in the home environment.

The entry from Santa Clara County highlighted their work in enacting a local Body Art Ordinance. With a concern about the possible spread of Bloodborne Pathogen diseases caused by improper body art applications, Santa Clara staff worked with the public and the body art industry to help pass the ordinance.

The final presentation was Tulare County’s Water Project, a multi-dimensional approach evaluating trends and problem solving issues around drinking water contamination.

The winner of the 2006 Excellence in Environmental Health Award was Riverside County Environmental Health for their Recruitment and Retention Program.

These new programs, and all of the other programs in the various jurisdictions, would not exist without the innovation, creativity, and enthusiasm of the wonderfully talented and dedicated environmental health staff throughout California.

I applaud each of you who bring this passion to your environmental health careers each and every day.

On behalf of all of the Directors and the public, I thank you.

Mission Chapter’s Plan to Attract Students to Environmental Health

Is anyone else out there experiencing problems with recruitment and/or retention of new employees? Rumor has it that student enrollment is not up where it used to be, and qualified graduates would rather do other things. The Past Presidents’ Council of NEHA noted that this trend is nation wide.

About a year ago, Mission Chapter embarked on a new plan to attract students into the field of environmental health. We approached community colleges in our tri-county area that have programs in biological sciences to determine interest in complimentary educational institution memberships in NEHA and CEHA, courtesy of Mission Chapter.

Two colleges responded favorably, so we are providing Santa Barbara City College, and Moorpark College with a membership in CEHA and in NEHA in hopes that the receipt of the publications on a regular basis will spark some interest in the students into exploring the field.

The basic philosophy is that homegrown students from the area, attending a local community college, would be more likely to want to return to home territory after gaining a degree in Environmental Health, or a Basic Science that will enable them educationally to qualify to become an REHS.

While it is not possible to gauge in such a short time how well or whether this program has succeeded, there may be other chapters that would like to try this as well. You can also offer to speak to classes in biology and chemistry to stir up some interest.

Community colleges that send students on for bachelors’ degrees at universities could well become the next best place to recruit new members of our profession.
Meeting the Regulatory Challenge of a Culturally-diverse Food Industry

By Olivia Andrade de Sanchez, Environmental Health Supervisor, Albuquerque Environmental Health Department, Consumer Health Protection Division

INTRODUCTION

As an Environmental Health Specialist working directly with operators and now as a Supervisor overseeing others, I have learned that effective communication between the inspector and the operator is essential. Effective communication facilitates the operator’s understanding of food safety standards so that they can meet compliance requirements and ultimately prevent food borne illness. As we have all found as well, the tools that we have at our disposal for information sharing and early detection of potential food borne outbreaks have advanced tremendously. But, it becomes frustrating to both the operator and the inspector when language barriers inhibit communication and full application of available tools and technologies. Inspectors become frustrated about the numerous times they must identify and document the same violations with little or no improvement. Operators receiving the notices of violation find themselves in a cycle of increasing enforcement action. Even when the operator understands the enforcement action, they may not know how to permanently correct the behavior that led to the action. Inspectors often wonder if it’s a lack of understanding on the part of the operator or, if it’s simply the lack of cooperation. More often that not, I have found it is a lack of understanding coupled with a cultural or ethnically based miscommunication.

This article provides a compliance improvement plan developed to improve communication and to address food safety standards compliance when challenged by conflicting cultural food preparation practices at sushi bars. The project was designed to “determine if science could meet cultural diversity” . The intent was also to determine if this ethnic group was willing to embrace food safety practices when the science behind the regulation is explained to them.

BACKGROUND: Food Industry Cultural Diversity

As a consumer, you may have experienced an increase in menu choices with ethnically-based names in which interpreting their meaning becomes an adventure. As a regulator, inspector or, quality assurance auditor, when you review the preparation of ethnically-based dishes, you may have noticed an increase of imported ingredients. Finding out if they come from an approved source is both challenging and of major importance. As you read the package, you may find imported food items with labeling translated into English. If you are knowledgeable in the language of origin, you may discover that the English version does not match the language of origin. Listings of ingredients or the safe food handling instructions on the package in both languages frequently are not identical.

During an inspection, you may observe food preparation practices with which you are not accustomed. The methods used may appear to be inconsistent with accepted food safety practices. Is this a perception or a fact? Do we as regulators, take the time to find out if each of these methods are truly inconsistent with food safety standards? If a comparison of violations is conducted between one establishment and another, within the same ethnic group, you will be able to identify a pattern of infractions that lead to increased enforcement action. If you compare inspection results within a period of time at the same facility, you will also notice a similar infraction pattern. The operator and the regulator become frustrated because the issues are not resolved.

Compliance Improvement Plan (CIP)

The Compliance Improvement Plan (CIP) developed by the Consumer Health Division of the Albuquerque Environmental Health Department, is aimed at opening communication and to improving food safety practices through the mutual understanding of what is expected. The plan is divided into four areas: A) Identification of the Regulatory Challenges; B) Identification and enrollment of partners for the development of the plan; C) Research and Methodology and; D) Monitor, Verify and Sustain the CIP.

A) Identify Regulatory Challenges:
The first step in identifying regulatory challenges is to select representative food establishments within the designated ethnic group. The second step is to identify the kinds of violations and their incidence by type of food process within the culturally-based food group. As you compile this data, from one facility to another, you will notice repetitive food preparation hazards that lead to infraction patterns. To break the pattern of these infractions, you must engage the operator to help you understand why certain steps are necessary in the preparation of a culturally-based dish. Through this engagement with the operator and by understanding the culturally-based food preparation procedure, you are also enlisting the operator’s involvement in finding solutions to the infractions.

B) Identify and Enroll Partners:
The second area of the plan is to identify potential partners and enroll them in the CIP. Potential partners can be drawn from four sources: (1) Ethnic groups (owners, ethnic group associations, or translators); (2) Food Industry Representatives (distributors, consultants, trainers or associations); (3) Regulators (Federal, state and local); (4) Other sources such as research associations, food laboratories, equipment manufacturers or credentialing agencies like NSF.

C) Research and Methodology:
The third area of the plan is to gather preliminary information by listening to the operator’s concerns. Identify culturally and ethnically-based food preparation procedures that lead to unsafe food safety practices. Inquire as to why the step is important. Is it tradition, habit or a cultural need? As you gain knowledge as to why certain practices are used, compare them to the violations established by food safety standards. Determine if there is flexibility in the food safety standard that can meet the culturally-based food preparation practice.

As you complete your preliminary research, and identify and enroll partners find a neutral location to meet. By meeting at a neutral place, operators are not distracted and you are able to transform yourself...
from the regulator/enforcer to the facilitator. Be respectful of their culture and time. Time is money and long meetings impact on their livelihood. A meeting without content or one that is too long may discourage partners and result in failure to show up for the next meeting.

Based on the identified “Regulatory Challenges” of repetitive violations, work with the group to establish objectives and outcome. When the group knows what is expected, the expectations become the driving force to ensure progress in the development of the plan. Establish meeting frequency and the topic of each meeting. Topics can range from informing the group about the regulatory boundaries you have to work within, to explaining the science behind the regulation. Next, you need to identify the food flow. Once the food-flow is established, identify where the hazards exist in the ethnically-based food preparation practice.

As you review this process with the operator, find out why the food safety practice is not followed. Identify the microbial risks involved, and continue to use the science behind the regulation to explain how the food safety standard can prevent foodborne illness. Explore with the operators and partners what changes can be made to their ethnically-based food preparation practices to ensure food safety. Seek consensus. Ask if they are willing to give the proposed changes a try. Always request feedback. Were the proposed changes put into practice? If yes, were they noticed by their loyal customers?

If the changes are accepted without the loss of customers, you are on the road to finding long term solutions to repetitive infractions. By the conclusion of the research and methodology portion of the CIP, you should have completed the summary of the known violations, the generic culturally-based food flow, and modified culturally-based food preparation practices. Have samples been collected of the ethnic dishes prepared using preparation practices. Have samples been collected of the ethnic dishes prepared using preparation practices. 

C) Research and Methodology:
Each regulatory challenge was addressed individually. Research on incidence of violations was completed and presented to the group with comparative studies on different regulation language. In regards to sushi rice, considered as an acidified product, samples were taken and tested for pH by our New Mexico State Scientific Diagnostic Laboratory. Two samples of sushi rice were taken at each sushi bar. One sample was taken after 30 minutes of preparation and, the second taken after two hours. We found that the pH on 96% of the samples was below 4.5 at 75°F. The pH results of the samples of acidified water taken, was equal to the pH of tap water, between 8.6 and 8.2. (See Tables PG. 12).

Such results opened the possibility of allowing the operators to keep sushi rice at room temperature. We could not allow the use of dipping water in lieu of hand washing. Operators would have to wash hands often to prevent cross-contamination and use utensils instead of scooping the rice with their bare hands. The guideline standard developed was to allow sushi rice to remain at room temperature if it met a 4.1 of pH or below during equilibrium and not to exceed a pH of 4.5 after two hours. All sushi rice is to be discarded after 3 hours. Structurally speaking, it was agreed that sushi bars would be required to maintain: dedicated hand washing sinks for their sushi masters to use; three-compartment sinks; reach-in refrigerators and display cases or sections thereof; dedicated cutting boards and utensils; and calibrated bi-stem thermometers and pH meters.

In regards to measuring devices required, a local supplier and the manufacturer of pH meters provided information on the different types available and training on their use. For microbial concerns, a microbiologist provided a presentation on common concerns and their origin. The local seafood supplier identified which species of fish require deep freezing to ensure parasite destruction.

**Application of the CIP to an Ethnic Food-Industry Group: Sushi Bars**

A) Regulatory Challenges Identified:
Approved source; lack of documentation to ensure that the seafood was properly treated to ensure parasite destruction; improper hot and cold food holding; improper sanitizing procedures; bare-hand contact with ready-to-eat foods; lack of consumer advisory notices; and potential for cross-contamination. The operators’ concerns are the necessity to keep sushi (acidified) rice at room temperature and the practice of rinsing fingers in acidified water in lieu of hand washing.

The objectives, defined with the operator in mind, are to determine if sushi rice is acidified enough to meet the food safety criteria of non-potentially hazardous food by pH. Can the practice of dipping fingers in acidified water meet a safety standard to allow bare-hand contact with ready-to-eat foods?

B) Identify partners:
Sushi bar operators, identify leaders among the group, seek support from local restaurant association and trainers. Secure a neutral meeting place. Invite partners among field measuring equipment distributors. The New Mexico Scientific Diagnostic Laboratory became a key partner to have food samples tested.

Identify microbial concerns associated with the consumption of raw seafood.

C) Research and Methodology:
Each regulatory challenge was addressed individually. Research on incidence of violations was completed and presented to the group with comparative studies on different regulation language. In regards to sushi rice, considered as an acidified product, samples were taken and tested for pH by our New Mexico State Scientific Diagnostic Laboratory. Two samples of sushi rice were taken at each sushi bar. One sample was taken after 30 minutes of preparation and, the second taken after two hours. We found that the pH on 96% of the samples was below 4.5 at 75°F. The pH results of the samples of acidified water taken, was equal to the pH of tap water, between 8.6 and 8.2. (See Tables PG. 12).

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In regards to measuring devices required, a local supplier and the manufacturer of pH meters provided information on the different types available and training on their use. For microbial concerns, a microbiologist provided a presentation on common concerns and their origin. The local seafood supplier identified which species of fish require deep freezing to ensure parasite destruction.
D) Monitor, Verify and Sustain Plan:
At this stage of the project, a guideline on food safety practices for sushi bars was developed. This guideline incorporates research and literature developed by other organizations such as the Association of Food and Drug Officials, Food and Drug 2001 Food Code and from the Food Marketing Institute on Sushi Bar operations.

The final document was then distributed to all participants. They are all following the guidelines and are providing feedback for future revisions. One change that resulted immediately from this feedback is the creation of a daily check list for the operator to use. The Daily Check List and Temperature / pH Log is a tool to document cold food storage temperatures, equipment conditions and pH measurements by batch of sushi rice prepared. Monitoring and verification of the plan is done by the regulators with recommendations given to the operator at each facility.

### ACIDIFIED WATER TEST RESULTS

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### SUSHI RICE TEST RESULTS

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### References:

- Food and Drug Administration’s 2001 Food Code.

**Olivia Andrade de Sanchez has a B.S. in Chemistry and Food Technology. She has been employed by the City of Albuquerque in the Environmental Health Department, Consumer Health Protection Division for 16 years, where she is currently an Environmental Health Supervisor. She is also an FDA Food Program Inspection/Training Officer. For the last 10 years she has developed and conducted bilingual training for food operators.**

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A

t the 2006 AES I was casually talking to Diane Eastman about always wanting to apply as the delegate to the Lancaster Symposium. Every year I thought about applying but never could figure out the logistics of combining it with a vacation. Diane told me that she was going to give a lecture at the Symposium in memory of Eric Foskett, and as a fan I thought this would be the right time to apply. Since I am nearing the end of my career I thought maybe I should apply…so I did. That night I went home and filled out the application and thought this would be the right time to apply. Since I had no new clothes, how would I get ready? So… I was ready. We went to a very nice restaurant and had dinner, it was very British and we enjoyed ourselves. After dinner I said I would like to walk around the village and perhaps get a drink at a local pub. Barrie Whitehead and Tony Morris liked the idea and we went to a local pub for a quick beer. We walked back to the University where we sat and chatted and called Adam Rocke to say “Hi” from across the pond. It was fun and then I went to sleep, little did I know others were up till 5 AM having a good time.

When I awoke on Thursday, I remembered, no luggage but it should be coming in the morning and since the Symposium didn’t start till noon I had my new top I purchased from the day before. I got dressed and went to breakfast, found Barrie Whitehead and we went to town to the market that the town had on Thursday mornings, I had learned about it from Cathy Goldsberry, a friend from work, who has family in the area. It was fun looking at the local items for sale. When we returned to the University, I went to get my luggage, but… no luggage. I called the airport and after several tries I was told it was on the way. It was now noon so I went to the opening lunch and exhibits, same old clothes. The educational sections were starting so I went to the first few sessions that were very interesting.

The theme of the symposium was Health and Safety, which included a multitude of ideas. The primary focus was on the work place environment, from dangers encountered in the field to inconsistencies in enforcement. Since I work in Food much of this was new to me and I found that we are faced with issues regarding our safety that our apparently common throughout our profession. The other issues presented were “Noise at Work” and “Risk Assessments”. Andrew Walsh, a previous delegate to our AES, gave a presentation on new issues involving smoking. I tried to participate in some of the discussions and spoke with several of the presenters after their presentations. I had read an article on the way to England about a blind boy who got around by using echoes to determine where he was, I shared the article with the person presenting on sound who was interested in the use of echoes. It seemed timely.

At the end of the day, still no luggage. That evening was a dinner and a wine and cheese party. I wore; you guessed it, the same clothes. It was quite the issue. After dinner was a trivia game, my team did well, we didn’t win but since some the questions were about the United States, I was able to provide the answers. A great example of this was “What does it mean in the United States when someone says they need your John Hancock”. To me it was easy but it was foreign to the British. It was quite fun. Finally, at about 10 PM my luggage arrived.

On Friday, I got dressed in new clean clothes, amazing…but as I mentioned above it was the hottest days ever in England and I had brought with me suit type clothing, it was not comfortable, but at least I was clean. After the day’s sessions was the President’s reception and then dinner. At the dinner was a multitude of presentations. I brought for them, from CEHA, a book about California, a flag of California, and Sees chocolates that were opened and shared at the dinner. I thanked them profusely for their hospitality and generosity; they would not even let me buy my own drinks. I also did a presentation about the grading program in Los Angeles County, who was generous to give me the time off. I presented magnets with “A”s and other materials about what is happening in Los Angeles County. They were very receptive and later and the next day told me how much they like my presentation. In addition, a delegate was there from Zambia and he also gave a presentation that was also well received.

On Saturday, there was a short morning session and closing remarks. Andrea Smith had arranged for me, and Hilton, the delegate from Zambia to go on a “Beatles” tour of Liverpool with Annette Swarbrick. She took us to the Beatles Museum and showed us all the “local spots”, such as Penny Lane and Strawberry Fields. It was the so exciting. Additionally, she took us to the racetrack and the soccer fields. At the end of the day she took us to the train station to go back to Manchester where Andrea picked me up and took me to her house to spend the night. We ate traditional Fish and Chips for dinner and watched a movie. The next morning she took me to the airport where I got on my flight back to home. I told the airlines about my luggage dilemma and they upgraded me to Business Class so the flight back was special.

I will always remember this incredible experience. I could not have asked for better hospitality and professionalism than I received. I was treated like a queen and learned a lot about the commitment the British have to Environmental Health that parallels our commitment. Anyone who has the opportunity to go as a delegate should take it. I am immensely appreciative of the faith CEHA had in me to be selected and I hope I represented us well.

Rochelle Abramovitz
The last day for the Governor to sign or veto bills was October 14, 2006. If you have any questions please call me at 805/654-2811, or e-mail at melinda.talent@ventura.org.

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HAZARDOUS MATERIALS AND WASTE

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California Environmental Health Association

CEHA 2007 AES ENDLESS OPPORTUNITIES

56th Annual Educational Symposium
April 23-27, 2007
Radisson Hotel, Sacramento

Folks came west for the endless opportunities available in California—the Gold Rush being one opportunity. The Gold Rush theme will be incorporated throughout the conference. Learn about the history of California and Sacramento while learning about Environmental Health and the history of our exhibiting companies. To get into the spirit of the week, start planning now to dress in gold rush or historic costume for the evening banquet.
Gary Erbeck, Winner of the 2006 Beverlee A. Myers Award for Excellence in Public Health

Each year the California Department of Health Services honors an individual who has exhibited outstanding leadership and accomplishments in public health. This year, Gary Erbeck, the Director of San Diego County’s Department of Environmental Health received the Beverlee A. Myers Award for Excellence in Public Health.

Mr. Erbeck’s passionate dedication and leadership have provided a model of excellence in the field of environmental health, and have been instrumental in improving the lives of Californians and impacting the public’s health on every level. As an active participant in many international, national, state and local environmental health committees, his environmental vision has lead to significant accomplishments. Through his leadership, many programs have been implemented, including pilot programs for CalEPA under the Environmental Protection Indicators for California (EPIC); protecting school children from foodborne illnesses; leading the development of a new California Retail Food Code; partnering with DEH’s regulated community to establish stakeholder groups to improve communication, and partnering with local schools to promote environmental health.

Mr. Erbeck has not only shown leadership and a strong commitment to public health, but he is a strong supporter of CEHA. As an active member of CEHA he has presented at the Annual Educational Symposia, and has encouraged DEH employees to participate in CEHA educational activities on the local and state levels.

CEHA extends hearty congratulations to Mr. Erbeck for his outstanding work in public and environmental health.

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“Books for Zambia”

CEHA has another opportunity to make a difference in countries less fortunate. Zambia is setting up a program in environmental health at the university and they are looking for any old textbooks that we can donate.

CEHA had a very successful “Books for Zimbabwe” drive a few years back and collected many textbooks that were sent to Zimbabwe for their fledgling Environmental Health Program at their new university there. They were very grateful for the donation.

We can do it again! If you have science and/or Environmental Health textbooks that you are no longer using, please consider donating them to the new “Books for Zambia” drive. They will be much appreciated. One that went over very well last time, and is increasingly difficult to come by, was “Sanitarian's Handbook” by Friedman.

They could also use any small laboratory or field equipment that is in good working order.

Please contact your Chapter officers and ask them to take any books and equipment to the next CEHA Board meeting. If this doesn’t work, please contact Diane Eastman via email deastman@west.net to see what arrangements could be made.

Our official delegate this year to the Lancaster Symposium was Rochelle Abramovitz. She will be sharing her impressions in another article.

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CEHA CALENDAR OF EVENTS

January 20, 2007;
Board of Directors Meeting - Long Beach

April 7, 2007
World Health Day http://www.who.int/en

April 24-27, 2007
56th AES, Radisson Hotel and Spa, Sacramento, CA

April 24, 2007
Board of Directors Meeting – Sacramento 1:00 - 5:00 pm

April 28, 2007
New Board of Directors Meeting,
Sacramento 9:30 am to 4:00 pm

June 18 – 21, 2007
NEHA’s 71st Annual Educational Conference, at the
Tropicana Hotel ($119 room rate), Atlantic City,
New Jersey

Please Note: CEHA has a new mailing address. The new address is:
110 South Fairfax Avenue, #A11-175
Los Angeles, California, 90036
The new phone, fax and email are:
(323) 634-7698 Phone
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support@ceha.org
Please visit the CEHA website at www.ceha.org

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