

POLICY NUMBER: 222.05
DIVISION: Environmental Public Health
POLICY TITLE: Food Safety Program; FDA Standard #2 Trained Staff
AGENCY: Lincoln-Lancaster County Health Department
AUTHORITY: Board of Health
DRAFTED: 09-18-06
APPROVED: 10-10-06
REVISED: 12-18-15
APPROVED:

POLICY STATEMENT:

The Lincoln-Lancaster County Board of Health (BOH) has adopted ~~Healthy People 2010, Health Objectives for the Year 2010 for Lincoln & Lancaster County as it Ends Objectives. The the~~ Safe Food Health Objective ~~for the Year 2010 is to "Reduce to reduce~~ the incidence of foodborne illness and assure the public is provided safe wholesome food." ~~In order to achieve this objective, it~~ shall be the policy of the BOH that the Food and Drug Administration (FDA) ~~Recommended-Voluntary~~ National Retail Food Regulatory Program Standards (FDA Standards) will be used to evaluate the overall quality of the LLCHD Food Safety Program. The BOH's goal is for the LLCHD Food Safety Program to ~~meet-maintain compliance with~~ the FDA Standard # 2.

FDA Standard #2 Trained Staff provides specific guidance on what is required to achieve compliance. This policy is adopted by the BOH in order that the Food Safety Program will achieve compliance with FDA Standard # 2. Compliance with FDA Standard #2 will assure that LLCHD Food Safety Program staff have the education, knowledge, skills and abilities to: conduct uniform inspections; provide high quality services to the regulated food industry; and reduce the risk to the public's health from food borne illness.

PROCEDURES:

- I. Education and certification requirements. As required by the Nebraska Pure Food Act, all staff assigned to conduct inspections in the Food Safety Program must hold either a Registered Environmental Health Specialists (REHS) or a Registered Environmental Health Specialists-in-training license issued by the State of Nebraska. To qualify as an REHS-in-training, a person must hold a Bachelor's Degree that includes an Algebra course or higher level math, and 30 semester/45 quarter hours in basic sciences. To qualify to hold the REHS license, a person must have two or more years of experience working in environmental health. Thus, only persons with such educational backgrounds shall be hired as Environmental Health Specialists in the Food Safety Program.
- II. The Food Safety Program Supervisor shall provide an orientation to each new Environmental Health Specialist (EHS) (hereafter referred to the EHS Trainee). The EHS Trainee shall be provided adequate resources (equipment and work related materials) needed to perform assigned duties.

- III. The EHS Trainee shall be trained to establish a solid base knowledge on: expected conduct in the field, food safety principles, food codes, documentation requirements, equipment usage, and inspection techniques.
 - A. The EHS Trainee shall study the Lincoln Food Code and the Nebraska Food Code and review all food safety program policies and procedures.
 - B. Prior to being allowed to conduct any independent inspections, the EHS Trainee will be required to accompany an REHS who has been standardized in food inspections (hereafter referred to as the REHS Trainer) on a minimum of 25 joint inspections. The REHS Trainer shall conduct the inspection and document violations in accord with Policy 222.30 - Routine Food Establishment Inspection. The REHS Trainer will explain the inspection process and the application of the Food Code. The EHS Trainee shall observe the inspection process and ask questions for clarification. Inspections should be of various types of food establishments. A joint inspection log (Exhibit 1) of these inspections must be maintained by the EHS Trainee and turned in to the Food Team Training and Standardization Coordinator (FTTSC) upon completion.
 - C. At the recommendation of the REHS Trainer, upon successful completion of at least 25 joint inspections, the EHS Trainee will complete at least 25 observed “independent” inspections. The observer must be an REHS Trainer. The REHS Trainer shall provide guidance and assure that the inspections are completed accurately and professionally. The EHS Trainee shall record all such inspections in the joint inspection log (Exhibit 1). Upon completion of all 25 joint and 25 observed inspections, provide a copy of these logs to the FTTSC.
 - D. A new employee with significant food safety inspection experience may be exempt from III. B and C. The EHS Trainee shall instead complete a combination of 25 inspections of REHS Trainer led inspections and EHS Trainee led inspections.
- IV. Within 12 months of assignment to the Food Safety Program, the FTTSC shall standardize the EHS Trainee in accord with Policy 222.01 - Food Safety Program Quality Improvement and Standardization.
- V. The FTTSC shall re-standardize each EHS Trainee annually.
- VI. Within ~~18~~six months of assignment to the Food Safety Program, the EHS Trainee shall complete a training curriculum that includes prevailing statutes, regulations, ordinances; public health principles; communication skills; microbiology; epidemiology; and Hazard Analysis of Critical Control Point methods. Completion of specific FDA Office of Regulatory Authority University (ORA-U) web-based interactive computer courses (Exhibit 2) will meet this requirement.

- A. The FTTSC shall assist the EHS Trainee in registering for the ORA-U training and provide a course list.
 - B. The EHS Trainee shall provide ORA-U course completion records to the FTTSC.
- VII. Food team members shall be responsible for maintaining a training record (Exhibit 3) of all training attended, including ORA-U courses. In addition, documentation of licenses (e.g. REHS) and certifications (e.g. Certified ~~Food Safety Specialist~~Professional – Food Safety) held shall be provided and maintained in the record. Each food team member shall be responsible for keeping their training record current. The FTTSC is responsible for reviewing the training records and verifying compliance with LLCHD requirements. The Food Team Supervisor shall review the training record as part of the annual performance evaluation.
- VIII. After 24 months of experience in the Environmental Public Health Division, the EHS Trainee is eligible to take the National REHS exam. Upon successful completion of the exam, the EHS Trainee shall submit an application to the State of Nebraska to become a licensed REHS. Copies of REHS documentation shall be submitted to the Personnel Clerk. The Personnel Clerk shall submit paperwork to the Personnel Department to reclassify the employee to an Environmental Health Specialist II.
- IX. The REHS is responsible for maintaining his/her REHS license in good standing. Failure to do so may result in suspension or termination.
- X. It is recommended each REHS in the Food Safety Program become a Certified ~~Food Safety~~Professional-Food Safety by passing the ~~CFSP-CP-FS~~ exam through the National Environmental Health Association. ~~The CFSP shall be a requirement for all Senior Environmental Health Specialists in the LLCHD Food Safety Program. However, holding a CFSP does not assure promotion to the Senior EHS level.~~ The REHS is responsible for maintaining his/her ~~CFSP-CP-FS~~ in good standing. Failure of a Senior EHS to maintain a ~~CFSP-CP-FS~~ may result in demotion to an EHS II.

Joint Inspection Log

EHS Trainee: _____ Hire Date: _____

 Initial
 Independent

	ESTABLISHMENT	DATE	REHS Trainer
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Food Safety Program - ORA-U Courses

In order to meet Standard 2 - Trained Regulatory Staff, of the FDA's Recommended National Retail Food Regulatory Program Standards please work on completing the following online ORA-U courses:

- 1) Statutes, Regulations, Ordinances
 - Basic Food Law for State Regulators (60 minutes)
 - Basics of Inspections: Beginning an Inspection (90 minutes)
 - Basics of Inspections: Issues and Observations (90 minutes)
 - Courtroom Testimony (60 minutes)
 - Destruction and Reconditioning (60 minutes)
 - Evidence and Proof (60 minutes)
 - Food and Drug Law: FDA Jurisdiction (60 minutes)
 - Food and Drug Law: Prohibited Actions (60 minutes)
 - Food and Drug Law: Criminal Acts Violations (45 minutes)
 - Food and Drug Law: Judicial Actions (60 minutes)
 - Food and Drug Law: Imports and Exports (60 minutes)
 - Food Labeling
 - Food Microbiology Control 11: Good Manufacturing Practices (90 minutes)
- 2) Public Health Principles
 - Public Health Principles (90 minutes)
- 3) Communication skills
 - Under Development-- Communication Skills for Regulators
- 4) Microbiology
 - Food Microbiology Control 1: Overview of Microbiology (60 minutes)
 - Food Microbiology Control 2A: Gram-Negative Rods (60 minutes)
 - Food Microbiology Control 2B: Gram-Positive Rods and Cocci (90 minutes)
 - Food Microbiology Control 3: Foodborne Viruses (90 minutes)
 - Food Microbiology Control 4: Foodborne Parasites (90 minutes)
 - Food Microbiology Control Mid-series Exam (30 minutes)
 - Food Microbiology Control 5: Controlling Growth Factors (90 minutes)
 - Food Microbiology Control 6: Control by Refrigeration and Freezing (60 minutes)
 - Food Microbiology Control 7A: Control by Thermal Processing (90 minutes)
 - Food Microbiology Control 7B: Control by Pasteurization (90 minutes)
 - Food Microbiology Control 8: Technology-based Food Processes (120 minutes)
 - Food Microbiology Control 9: Natural Toxins (90 minutes)
 - Food Microbiology Control 10: Aseptic Sampling (90 minutes)
 - Food Microbiology Control 11: Good Manufacturing Practices (90 minutes)
 - Food Microbiology Control 12: Cleaning and Sanitizing (90 minutes)
- 5) Epidemiology
 - Foodborne Illness Investigations 1: Collecting Surveillance Data (90 minutes)
 - Foodborne Illness Investigations 2: Beginning an Investigation (90 minutes)
 - Foodborne Illness Investigations 3: Expanding the Investigation (90 minutes)
 - Foodborne Illness Investigations 4: Conducting a Food Hazard Review (90 minutes)
 - Foodborne Illness Investigations 5: Epidemiological Statistics (90 minutes)
 - Foodborne Illness Investigations 6: Final Report (30 minutes)
- 6) HACCP
 - Basics of HACCP: Overview of HACCP (60 minutes)
 - Basics of HACCP: Prerequisite Programs and Preliminary Steps (60 minutes)
 - Basics of HACCP: The Principles (60 minutes)

Food Team Registration and Training Records for January 1 to December 31, 20_____

Name _____

Nebraska REHS # _____

In-Training

New, date received ____/____/_____

Current

Renewed, date ____/____/_____

CFSP # _____

New, date received ____/____/_____

Current

Renewed, date ____/____/_____

Standardization date: ____/____/_____ By: _____

Log of Training / CEU:

Date	Event/Training and Sponsor	Location	CEU
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Total CEUs for the year			

A copy of this form shall be provided to the Standardization Coordinator at the end of the year.

Reviewed / Verified Compliance by FTTSC _____ Date ____/____/_____