



Massachusetts Department of Public Health
Bureau of Environmental Health
305 South Street
Jamaica Plain, MA 02130-3597
(617) 983-6712 (617) 983-6770 - Fax

Food Protection Program Policies, Procedures and Guidelines

Issue: Local Health Food Inspector Training

No: RF 8-1

Minimum Knowledge Requirements for Food Inspectors

The purpose of this document is to provide local cities and towns in Massachusetts with staff hiring and training guidance to promote a trained regulatory workforce with the skills and knowledge necessary to conduct quality retail food inspections, complaint investigations and to effectively respond to food emergency events. Setting educations and/or experience pre-requisites for hiring can also reduce the time and costs associated with training and field standardization.

The role of environmental health professionals in food safety is protecting the public from food borne illness through prevention, intervention and rapid response, coordinating these retail food safety activities with industry, state, federal and other local stakeholders in the food safety system including:

- Promotion of active managerial control of food-borne illness risk factors through education
- Licensure, inspection and enforcement procedures to achieve compliance with retail food and food service regulatory requirements..
- Rapid response investigation of food-related incidents that involve illness, injury, unintentional or deliberate food contamination.

Section 105 CMR 590.010(G) Inspector Training in MA regulation 105 CMR 590.000 – Minimum Sanitation Standards for Food Establishments – Chapter X, requires anyone conducting regulatory retail food establishments in MA to be knowledgeable in foodborne disease prevention, application of the hazard analysis critical control point principles and the requirements of 105 CMR 590.000. In addition, they must be able to demonstrate food safety inspection knowledge by:

1. Being a registered sanitarian, certified health officer, or a certified professional – food safety (*previously certified food safety professional*)

OR

2. By passing a certified food protection management exam that is part of an accredited program recognized by the Department (*basic industry food safety course – with no food safety professional criterion*),

AND

3. Completing food safety inspection training recognized by the Department.

Training Recommendations

Standard No. 2 – Trained Regulatory Staff (in FDA’s Draft Voluntary National Retail Food Regulatory Program Standards) applies to the essential elements of a training program for food regulatory staff (Appendix A). The program standards are developed and recommended by the U.S. Food and Drug Administration with input from federal, state, and local regulatory officials, industry, trade associations, academia, and consumers. Standard No. 2 Trained Regulatory Staff, outlines a recommended curriculum and field standardization procedures to be completed within 18 months for new hires and continuing education and training requirements to continue to meet the standard.

Although the Department is not mandated to train local boards of health, the Department has been the primary resource for food safety and inspection trainings for local boards of health to date offering training topics related to the food code, FBI investigations, HACCP, food and water emergencies, temporary events, plan review. Other potential training resources include FDA, professional organizations such as the MHOA, MEHA and their national affiliates, private non-profit environmental health service organizations and academia. Classroom courses offered to MA local boards of health are publicized via the Local Public Health Institute and sponsoring agencies.

The Department promotes enrollment of inspector on-line training courses provided by FDA (FDA – ORA U Office of Regulatory Affairs University) as a cost effective method available to local, state and federal food inspectors at no cost that can be found at: <http://www.fda.gov/ora/training/orau/state/RFCurric.htm>. Below are awareness and performance level competencies for environmental health specialists whose roles and responsibilities include food safety within their jurisdiction.

Awareness Competencies

- Identify causes and prevention of foodborne illness
- Explain food safety inspection purpose and procedures
- Explain facility and plan review purpose and procedures
- Identify enforcement tools available to protect food supply
- Explain sample collection purpose and procedures

- Explain role of local board of health relative to food safety education/ consumer education/ awareness
- Identify performance based standard used to assess retail food program
- Explain food-borne illness Surveillance and investigation purpose and procedures
- Identify role of local board of health relative to food defense and bio-security
- Explain role and responsibility of local board of health in food emergency preparedness, assessment and response
- Explain purpose and procedures for validation and verification of HACCP And risk control plans for specialized processes
- Differentiate between risk factors and major interventions / good retail practices / standard operating procedures / HACCP Pre-requisites .

Performance Competencies

- Promotes increased active managerial control of food-borne illness risk factors through education, science-based risk assessments, effective risk communication and performance-based standards for retail food programs.
- Conducts plan and operational reviews of new, remodeled and modified food operations.
- Conducts food safety risk and vulnerability assessments to identify contamination, both unintentional and intentional, and appropriate preventive and corrective measures.
- Conducts risk-based food inspections, sampling and surveillance to verify compliance with laws and regulations.
 - *FDA Voluntary National Retail Food Regulatory Program Standards Dec 2007 - Standard No. 2 Trained Regulatory Staff - Attachment B outlines awareness competencies.*
- Rapidly responds to imminent health hazard violations and conditions, when detected, to control and prevent foodborne illness/injury and the distribution of adulterated and/or misbranded food.
 - *MDPH Foodborne Illness Investigation and Control Reference Manual*
 - *Conducting Foodborne Illness Investigations MDPH FPP 2008*
 - *Preparing for and Responding to Food Emergencies MDPH FPP 2008*

Hiring Recommendations

While there is no state statute establishing a minimum education and/or experience standard for hiring local board of health food inspectors, the Department strongly recommends that communities recruit the most qualified candidates. Jurisdictions with a limited number of food establishments should consider contracting with qualified inspectors in the region and partnering with academic institutions who have graduate training programs. The Department does not support the use of volunteers without professional credentials.

The Conference for Food Protection recommends a minimum education for all new food inspectors of at least a bachelor's degree with 30 semester hours or 45 quarter hours in the basic sciences including courses in biology, microbiology, chemistry, physics, agricultural science, or other physical sciences, as well as environmental health science, sanitary engineering, or environmental engineering. The Department recommends that communities without any minimum competency standards for food inspectors consider phasing in minimum education and/or applicable regulatory experience for new inspectors as well as provide economic incentives for continuing education and professional environmental health credentialing.

Professional environmental health credentialing is another criterion by which communities can identify environmental health professionals with minimum competencies necessary to conduct quality inspections.

- **Registered Sanitarian (RS or REHS/RS)**

Registered Sanitarians or Registered Environmental Health Specialists administer environmental and health programs for both public and private agencies and organizations in food protection and safety, water protection, air quality, noise, industrial and land pollution, sewage disposal, hazardous and toxic substances, solid waste management and institutional health.

- **Certified Professional – Food Safety (CP-FS)** *formally Certified Food Safety Professional (CFSP)*

The CFSP is now the CP-FS. The Certified Professional - Food Safety is still especially for food safety professionals and is designed for individuals within the public and private sectors whose primary responsibility is the protection and safety of food. The exam for this credential integrates food microbiology, HACCP principles and regulatory requirements into questions that test problem solving skills and knowledge.

- **Certified Health Officer (CHO)**

Certified Health Officers (CHOs) are generally the administrative officers of a health department or board of health. Several are presently serving as administrators to the State Department of Public Health or State Department of Environmental Protection. The Health Officer evaluates the community's health issues and develops programs to address the community's needs and the prevention and control of health and/or environmental problems. The health officer must be knowledgeable of state, federal and local sanitary codes and regulations including other public regulations addressing the public health and the environment, as well as those issues referencing communicable disease control, Title

V septic system design and approval, housing, food service, public swimming pools and beaches, hazardous waste control and environmental pollutants, massage and tanning establishments, animal and rabies control and other public health issues that are governed by regulations. CHOs may perform field inspections, respond to complaints, follow up on consumer requests, and deal with issues associated with public health and environmental regulations that affect the community and the Commonwealth.

Resources

MA Department of Public Health, 2000, MA Regulation 105 CMR 590.000 - *Minimum Sanitation Standards for Food Establishments – Chapter X*.

U.S Food and Drug Administration, Jan 2007, *Draft Voluntary National Retail Food Regulatory Program Standards*

U.S Food and Drug Administration, Jan 2008, *Conference for Food Protection Field Training Manual – Regulatory Retail Food Safety Inspection Officers*.

MA Department of Public Health, 1997, *Foodborne Illness Investigation and Control Reference Manual*