



# 2018 Continuous Improvement of Retail Food Safety Assessment

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October 2018

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# Background & Methods

NACCHO conducted an assessment to understand how local, state, tribal, and territorial governmental public health agencies are using the U.S. Food and Drug Administration (FDA) Voluntary National Retail Food Regulatory Program Standards (Retail Program Standards) as a tool for fostering continuous improvement in their retail food regulatory programs.

The Retail Program Standards (RPS) provide a framework for effective and responsive regulation of food service and retail food establishments. The standards “reinforce proper sanitation (good retail practices) and operational and environmental prerequisite programs while encouraging . . . [a] focus on the factors that cause and contribute to foodborne illness.”<sup>1</sup>

The RPS are a key component of a comprehensive strategy to ensuring the safety and security of the food supply in communities nationwide.

The RPS consists of nine standards:

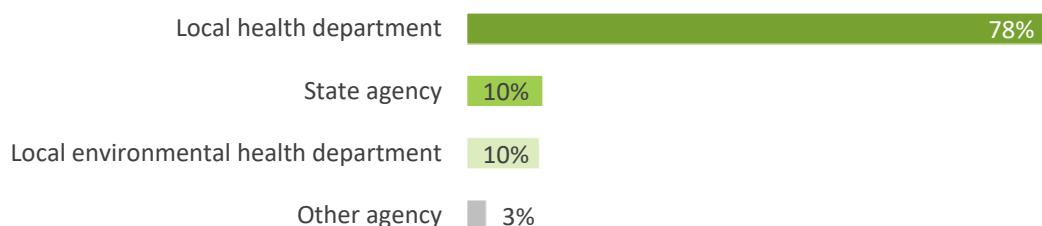
- Standard 1 – Regulatory Foundation
- Standard 2 – Trained Regulatory Staff
- Standard 3 – Inspection Program Based on Hazard Analysis and Critical Control Points (HACCP) Principles
- Standard 4 – Uniform Inspection Program
- Standard 5 – Foodborne Illness and Food Defense Preparedness and Response
- Standard 6 – Compliance and Enforcement
- Standard 7 – Industry and Community Relations
- Standard 8 – Program Support and Resources
- Standard 9 – Program Assessment

NACCHO distributed the Continuous Improvement of Retail Food Safety Assessment in June 2018 to a census of all 825 retail food regulatory programs enrolled in the RPS. Programs were identified by the FDA.

**A total of 425 retail food regulatory programs completed the assessment for a response rate of 52%.**

All data were self-reported; NACCHO did not independently verify the data provided by programs. Percentages were calculated using the number of programs receiving the survey question as the denominator and the number of respondents to the survey question as the numerator.

**Respondents represent retail food regulatory programs from different organizations across the United States**



n=425

<sup>1</sup>Food and Drug Administration. Voluntary National Retail Food Regulatory Program Standards webpage. Retrieved from <https://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/default.htm>



# Agency Experience with Retail Program Standards

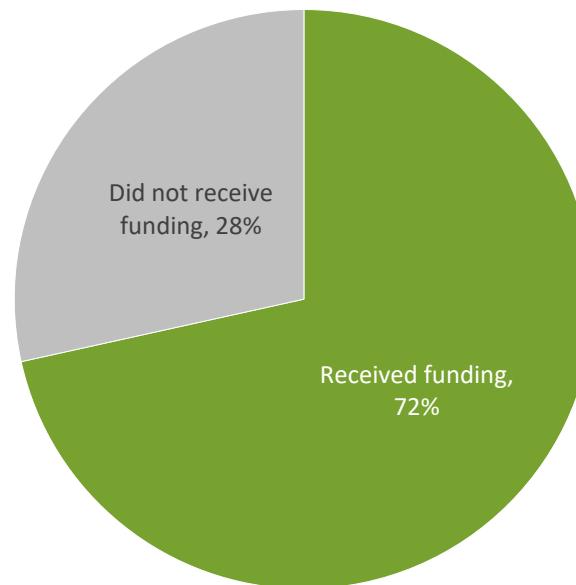
## The majority of retail food regulatory programs received funding to work on the Retail Program Standards

Nearly three-fourths of retail food regulatory programs received funding to work on the Retail Program Standards (RPS). Most often, agencies received funding from either the **Association of Food and Drug Officials (AFDO)** or **U.S. Food and Drug Administration (FDA)**.

Twenty-four percent of agencies reported receiving funding from NACCHO.

In addition, more than half of agencies not receiving funding indicated that **funding would have increased their RPS activity**. Nineteen percent of agencies did not think funding would have made an impact on their activities, while one-quarter were unsure.

**Agencies Receiving Funding for Retail Program Standards**  
*Percentage of retail food regulatory programs*



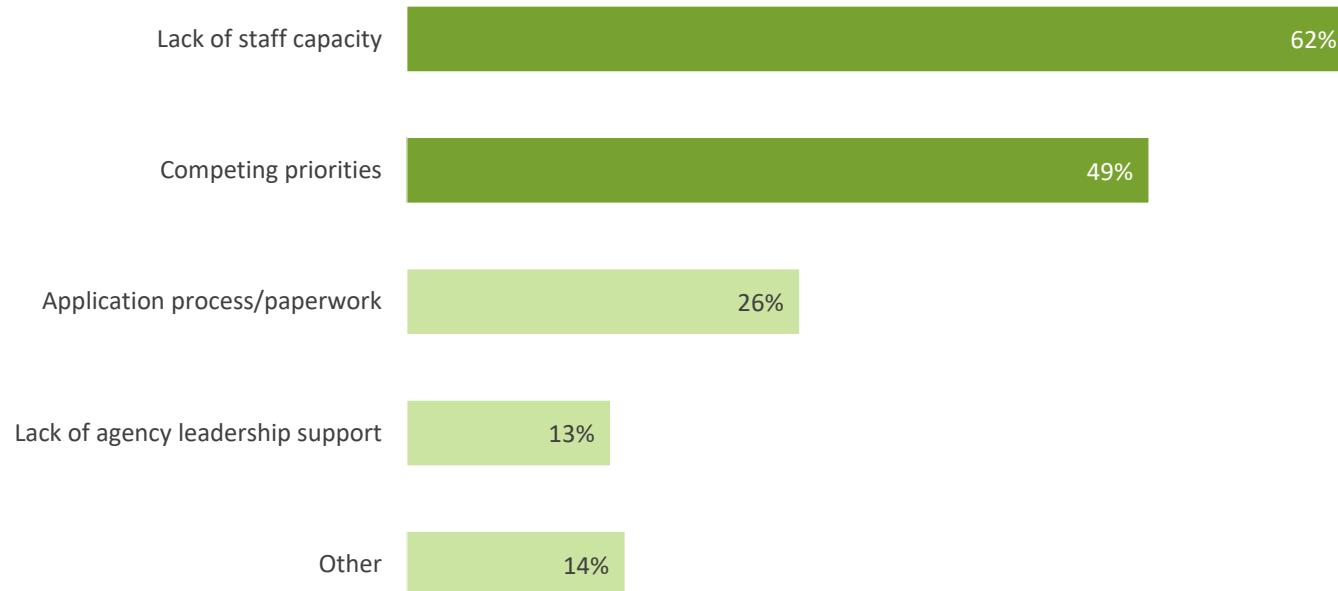
n=397

# Lack of staff capacity and competing priorities are barriers to applying for/receiving funding

Of the agencies not receiving funding to work on Retail Program Standards, **over 60% reported that a lack of staff capacity challenges their ability to obtain funding**. In addition, nearly half of these programs indicated competing priorities took precedence over working towards RPS funding. Other barriers reported include inability to accept funding, lack of awareness about funding opportunities, and already having sufficient resources.

## Barriers to Applying for or Receiving RPS Funding

*Percentage of retail food regulatory programs (of those not receiving funding)*



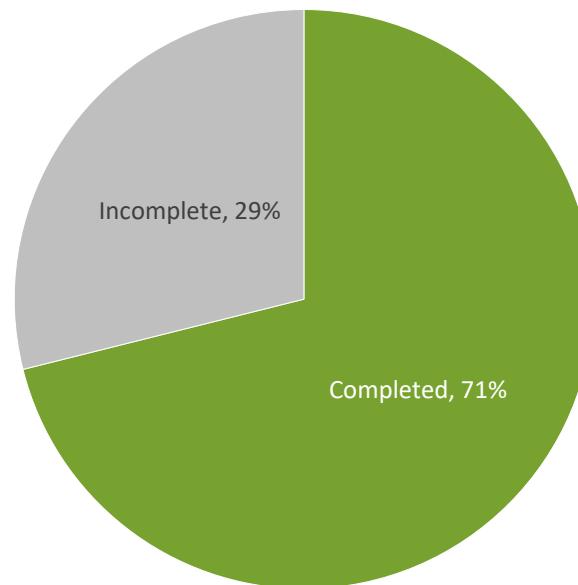
n=105

## The majority of retail food regulatory programs completed the Retail Program Standards self-assessment

Nearly three-fourths of retail food regulatory programs completed the RPS self-assessment of all nine standards. Of those reporting incomplete, **40% indicated having completed less than 25% of the self-assessment.** In addition, one quarter of these agencies had completed between 26% and 50%, while another quarter were 51 to 75% complete. Few agencies indicated they were more than 75% complete with the self-assessments.

**Agencies Completing the Retail Program Standards Self-Assessment**

*Percentage of retail food regulatory programs*



n=391



# Progress on Retail Program Standards

## More than half of agencies reported meeting criteria across the first three Retail Program Standards

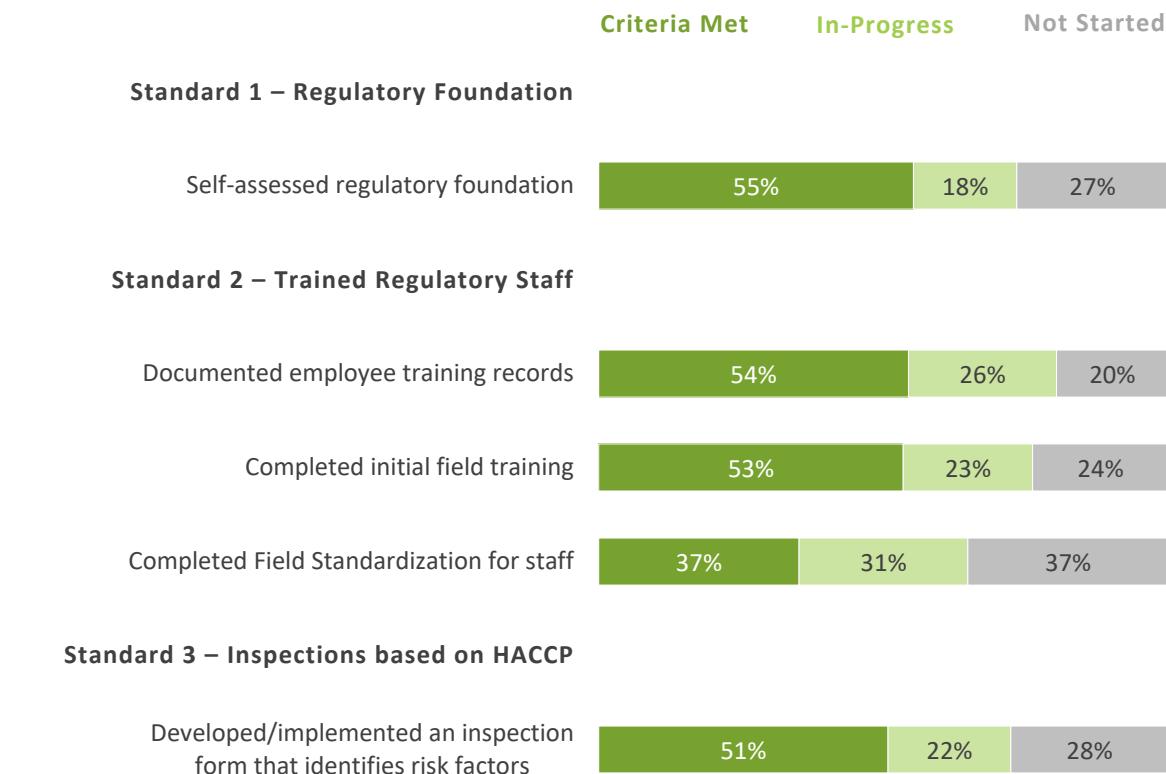
Retail food regulatory programs work to fully meet all RPS criteria. Over half of agencies reported completing an assessment of their program's regulatory foundation. Of these agencies, 34% indicated their jurisdiction had **adopted the most recent version of the FDA Food Code**.

In addition, many agencies documented employee training records (54%) and completed an initial field training (53%). Fewer agencies completed Field Standardization for all their staff (37%). Approximately one-third of agencies indicated progress was made towards meeting that criterion.

Over half of food safety programs also reported having developed or implemented an inspection form that identifies foodborne illness risk factors and includes risk categories based on Hazard Analysis Critical Control Point (HACCP) principles.

### Progress Meeting Criteria within Retail Program Standards

Percentage of retail food regulatory programs



n=374–380

# Agencies face challenges to fully meeting Retail Program Standard One & Food Code Adoption

Retail Program Standard 1 encourages the adoption of the most recent FDA Food Code to promote a science-based regulatory foundation and support uniformity of the industry.

Respondents described the barriers and challenges faced by agencies related to adopting the most recent version of the FDA Food Code. A thematic analysis found that barriers and challenges were in five key areas.

 **State-level issues.** One of the most commonly reported challenges was that local agencies follow their state agency's lead in adopting the Food Code. Specifically, some state health and agriculture departments adopted an older version of the code, while some developed a Food Code separate from FDA.



**Lack of capacity.** Another commonly cited barrier was the lack of capacity. Many respondents indicated their agencies did not have sufficient funding, staffing, and/or time to adopt the most recent Food Code. In addition, one agency reported improved data capacity was needed prior to adopting the code.



**Stakeholder engagement.**

Some agencies indicated challenges in engaging stakeholders in the process of adopting the Food Code. For example, respondents cited a lack of support in the community and difficulty with bringing partners together.



**Timing.**

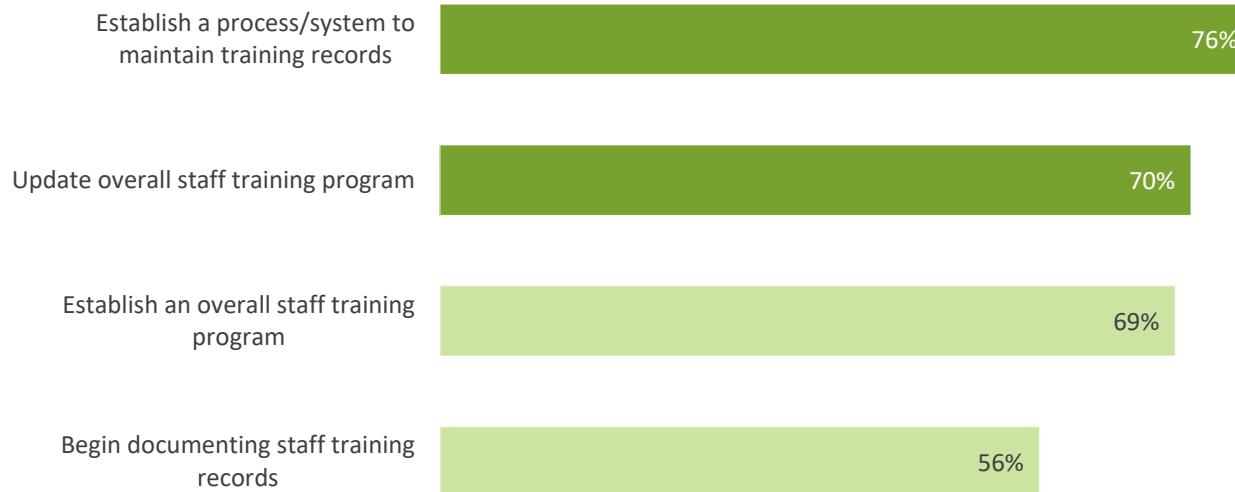
Respondents indicated timing was a barrier. Specifically, some agency processes require a review of local ordinances in specific intervals, such as every three years. In these instances, agencies are not yet due to adopt the most recent version of the Food Code. In other cases, agencies recently adopted an older version of the Food Code, reporting the most recent version does not have enough revisions to warrant its adoption.

## Retail Program Standard Two criteria supported agencies in improving staff training

Of agencies meeting at least one criteria within Standard 2, **87% indicated the completed criteria helped their retail food regulatory program**. The most common way Standard 2 helped programs was by helping to establish a process/system to maintain training records as a part of the overall staff training program (76%). Agencies also reported that Standard 2 helped them to update overall staff training program (70%), establish an overall staff training program (69%), and begin documenting staff training records (56%).

### Ways Standard 2 Helped Agency Retail Food Regulatory Programs

*Percentage of retail food regulatory programs (of those meeting at least one Standard 2 criteria)*



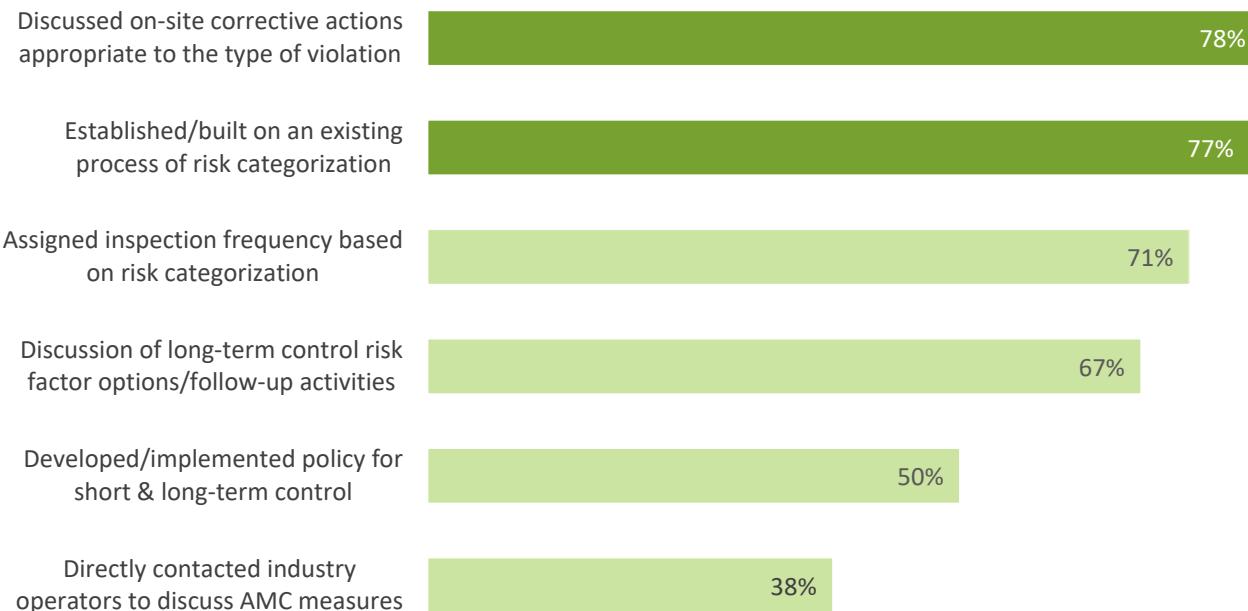
n=205

# Retail Program Standard Three helped agencies target inspections based on risk categorization

Fifty-one percent of retail food regulatory programs met the Standard 3 criterion by having an inspection form identifying foodborne illness risk factors. Meeting this criterion encouraged agencies to discuss during inspections on-site corrective actions as appropriate to the type of violation (78%) and develop a process of risk categorization (77%). Agencies also reported that Standard 3 helped them to assign inspection frequency (71%), discuss options for long-term control of risk factors (67%), and develop a policy for control of risk factors (50%). Fewer programs made direct contact with industry operators to discuss use of Active Managerial Control (AMC) measures to control risk (38%).

## Ways Standard 3 Helped Programs Target Inspections Based on Risk Categorization

*Percentage of retail food regulatory programs (of those meeting Standard 3 criterion)*



n=177

## At least one-third of agencies reported meeting criteria within Retail Program Standards Five and Six

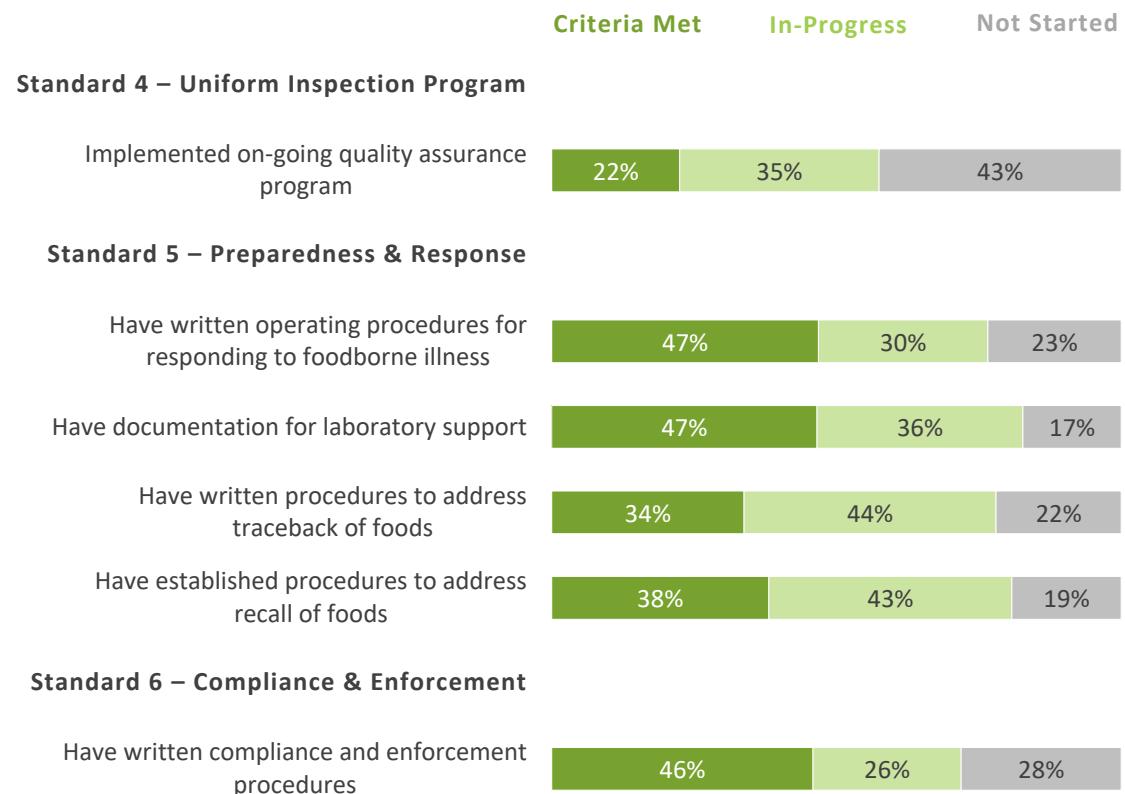
Retail food regulatory programs work to fully meet all RPS criteria. Twenty-two percent of agencies reported implementing on-going quality assurance program that evaluates inspection uniformity to ensure inspection quality.

In addition, some agencies indicated having written procedures and documentation to respond to and/or conduct investigations of foodborne illness and food related injury.

Almost half of retail food regulatory programs also reported having written compliance and enforcement procedures. Forty-four percent of these agencies indicated **the use of Standard 6 changed how they document compliance and enforcement action**. Thirty-two percent reported their documentation process did not change, and 24% did not know.

### Progress Meeting Criteria within Retail Program Standards

Percentage of retail food regulatory programs



n=365–380

## More than half of agencies reported fully meeting criteria within Retail Program Standard Seven

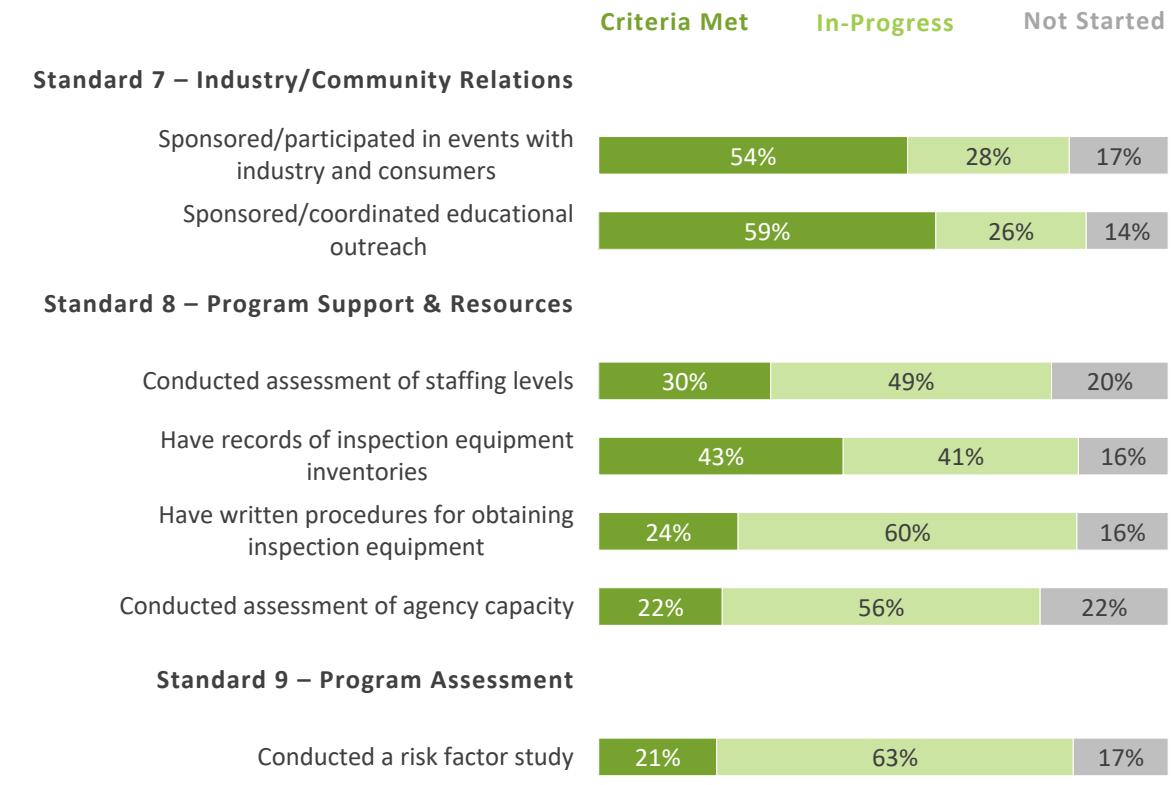
Retail food regulatory programs work to fully meet all RPS criteria. More than half of agencies reported sponsoring or actively participating in meetings, forums, and/or events with industry and consumer interaction. **Sixty-six percent of these agencies conducted these activities before enrolling in RPS.**

Furthermore, more than half indicated they sponsored or coordinated educational outreach directed at industry, consumer groups, media, and/or elected officials. **Seventy-three percent of these agencies conducted these activities before enrolling in RPS.**

Few agencies met criteria related to assessing programmatic support, resources, and impact. One-fifth of programs conducted a risk factor study.

### Progress Meeting Criteria within Retail Program Standards

Percentage of retail food regulatory programs



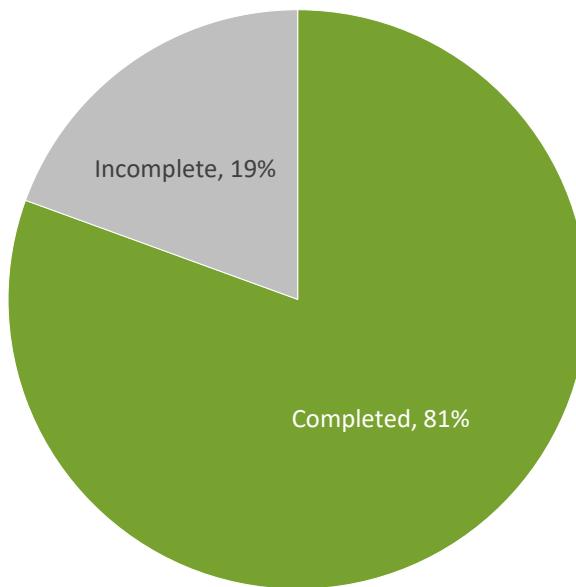
n=368–380

## Most retail food regulatory programs have analyzed risk factor study data when available

Of the retail food regulatory programs conducting a risk factor study, 81% indicated they analyzed the data from the study. Another 11% of agencies are in the process of analyzing the data, and 8% have not yet started the analysis. **Sixty-two percent of the agencies that have completed analysis have developed a targeted intervention strategy based on the findings from the risk factor study**, while 29% are in the process of developing a strategy.

### Agencies Analyzing Data from Risk Factor Study

*Percentage of retail food regulatory programs (of those meeting Standard 9 criterion)*



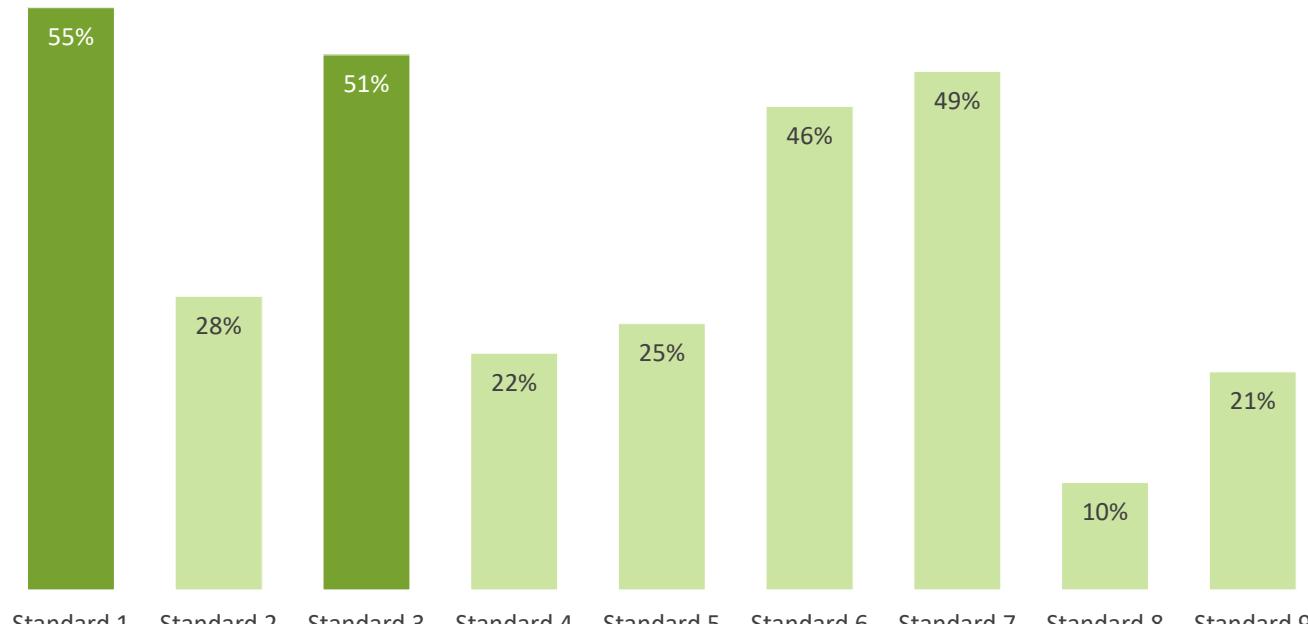
n=72

# More than half of agencies reported completing Retail Program Standards One and Three

Many agencies reported meeting all criteria within Standards 1, 3, 6, and 7. Respectively, these standards relate to developing a regulatory foundation, ensuring inspections include risk categorization, implementing compliance and enforcement procedures, and building relationships with the industry and consumers. In contrast, less than one-third of agencies have met all criteria related to training regulatory staff (28%), implementing quality assurance (22%), developing preparedness and response procedures (25%), and conducting a risk factor study (21%). Ten percent of retail food regulatory programs have met all criteria to assess program support and resources.

## Agencies Completing All Criteria in Each Retail Program Standard

*Percentage of retail food regulatory programs*



n=372–384

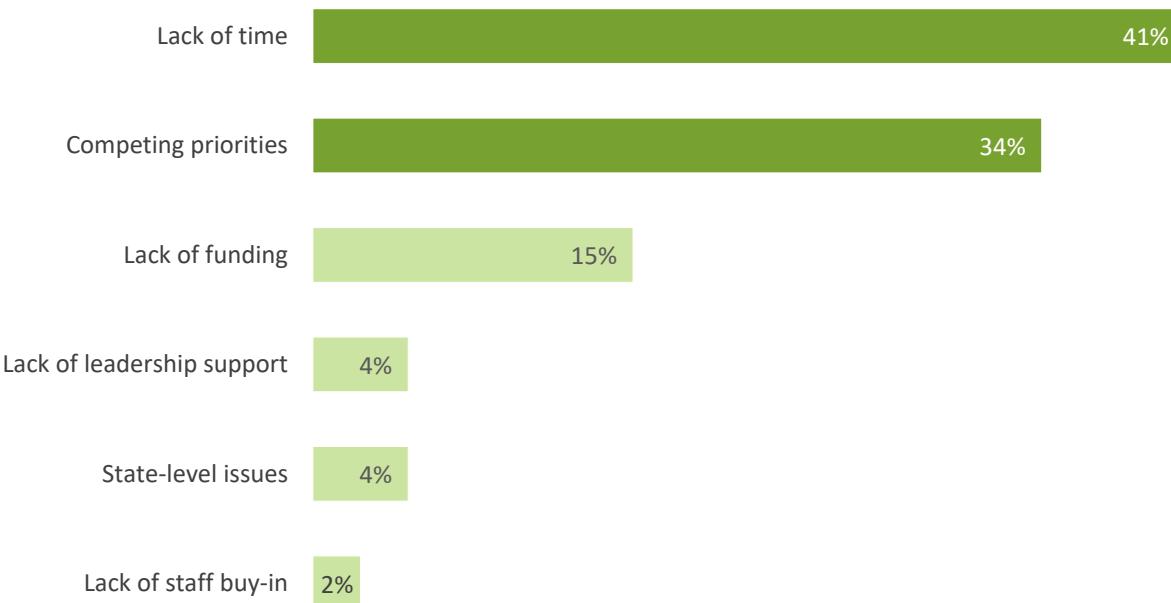
## Barriers to meeting RPS criteria included a lack of time and competing priorities

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Of agencies that reported unmet Program Standards criteria, 41% indicated a lack of time was a barrier to working towards completing criteria. In addition, one-third of programs cited competing priorities as a challenge to meeting criteria. Other barriers retail food regulatory programs experienced included insufficient funding (15%), a lack of leadership support (4%), state-level issues (4%), and a lack of agency staff buy-in (2%).

### Barriers to Meeting Retail Program Standards Criteria

*Percentage of retail food regulatory programs (of those indicating at least one unmet criterion)*



n=314



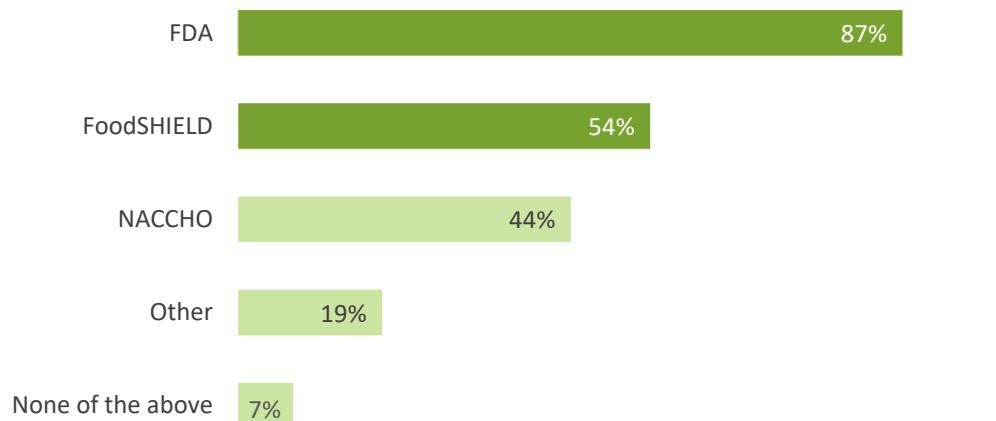
# Resources on Working with Retail Program Standards

# The majority of retail food regulatory programs visited FDA's website for RPS resources

When agencies need forms, tools, or best practices related to the Retail Program Standards, most visited the FDA's website for resources. In addition, more than half of agencies visited FoodSHIELD's website. Forty-four percent of agencies visited NACCHO's website for RPS resources. Other websites included those run by other state and local agencies, Conference for Food Protection (CFP), Association of Food and Drug Officials (AFDO), U.S. Department of Agriculture (USDA), National Environmental Health Association (NEHA), and International Association for Food Protection (IAFP).

## Websites Agencies Visit for Forms, Tools, or Best Practices Related to RPS

*Percentage of retail food regulatory programs*



n=383



# Impact of Retail Program Standards

# Most agencies reported the RPS provides a framework for continuous improvement efforts

Most retail food regulatory programs agreed the Retail Program Standards provides a framework to identify performance improvement opportunities. In addition, more than half of programs reported working on Standard 2 criteria helped their agency document and make progress on staff training. Forty-four percent of agencies indicated the standards helped them progress on relationship building with the industry and community; 43% reported they developed an inspection program; 40% identified gaps between current and optimal levels of performance; 38% improved response to foodborne illness outbreaks, recalls, or emergency events; 29% developed a compliance and enforcement program, and 15% progressed on conducting a risk factor study and using results to develop an intervention strategy.

## Ways Retail Program Standards Impacted Agencies

*Percentage of retail food regulatory programs*



n=386–395

# Agencies used the Retail Program Standards as a tool for fostering continuous improvement

Respondents described the impacts of the RPS on their retail food regulatory programs' continuous improvement efforts. A thematic analysis resulted in eight key impact areas.



## Provided a framework for improvement.

Respondents commonly indicated that the RPS was a guide to help their agencies conduct self-assessments, identify gaps, prioritize activities, and create improvement plans for their retail food programs. One agency stated that the RPS gave them the "right questions" to ask about their program. In addition, another reported the RPS provided a timeframe to complete standardization of staff and enforcement actions.



## Documented policies and procedures.

The RPS also helped agencies improve documentation of their work and develop clear policies and procedures. Some agencies stated that having written policies and procedures provided staff with consistent expectations and increased accountability.



## Improved uniformity and staff training.

Several agencies indicated that the RPS helped them to implement or improve uniform inspection programs and staff training programs. In addition, one agency stated that the RPS helped newly hired staff receive training, as well as enabled better documentation of the trainings received.



## Justified funding.

Agencies also indicated that the RPS helped set standards of resource allocation for their programs and improved capacity to apply for RPS-related funding opportunities. The funding allowed agencies to attend more trainings and conferences, purchase inspection equipment and software, and work on related projects.



## Hired additional staff.

Some agencies indicated that the RPS provided a basis for hiring additional staff for their program. Specifically, agencies were able to justify adding positions based on the RPS' suggested level of inspection staff.



## Improved industry and community relations.

Some agencies stated that working on the RPS improved their industry and community outreach efforts. For instance, one agency's work on enhancing their inspection processes opened the door for industry to provide input, thereby improving their interaction with agency partners.



## Conducted risk factor study and developed targeted interventions.

Some agencies indicated they would not have conducted a risk factor study without enrolling in the RPS. Through conducting a risk factor study, agencies were able to create targeted intervention strategies to address the occurrence of risk factors identified.



## Increased organizational support.

Some agencies cited that enrolling in the RPS garnered more support from executive level management to work on RPS-related activities.



## Conclusions and Recommendations

# Conclusions and Recommendations

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The information collected as part of this baseline assessment represents a significant contribution by retail food regulatory programs about how jurisdictions enrolled in the Retail Program Standards (RPS) and used the standards to advance the vision of an integrated food safety system. This effort provides valuable data on how the Retail Program Standards are fostering continuous improvement in local, state, territorial, and tribal agencies. These findings will characterize progress made on the standards and inform retail food safety activities and priorities for the future.

Findings from the 2018 Continuous Improvement of Retail Food Safety illustrate the strengths, gaps, and opportunities in bolstering food safety capacity, informing the following recommendations and national priority areas.

## Retail Programs Standards Funding

**Although most agencies received funding to work on the RPS, 56% of those that did not indicated funding would have increased their RPS activity.**

Agencies reported insufficient staff capacity was a barrier to obtaining funding. Future research should explore whether funding dedicated to staff positions would positively impact compliance to the RPS.

## Progress Meeting Program Standards

**Overall, agencies face challenges in fully meeting all criteria within the nine Retail Program Standards.**

Retail food regulatory programs experienced diverse challenges to meeting RPS criteria. More information is needed to determine the major and consistent barriers. For example, national organizations should aim to better understand if there are parameters within RPS grants that act as barriers restricting progress within a particular standard.

## Retail Program Standards Resources

**Retail food regulatory programs engage with several national organizations and partners to access RPS resources.**

Retail food regulatory programs visited websites hosted by the FDA, FoodSHIELD, NACCHO, CFP, and others. These national organizations should collaborate to ensure forms, tools, and best practices align across websites. In addition, there is an opportunity to support local, state, territorial, and tribal agencies working on the RPS by working together to provide technical assistance and disseminate information.

## Impact of the Retail Program Standards

**The RPS provides a framework for agencies to identify performance improvement opportunities.**

Agencies enrolled in the RPS noted several positive impacts of the standards on their retail food regulatory programs. National organizations should continue to support the RPS and further bolster agency capacity to ensure the safety and security of the food supply in communities nationwide.



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The mission of the National Association of County and City Health Officials (NACCHO) is to improve the health of communities by strengthening and advocating for local health departments.

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