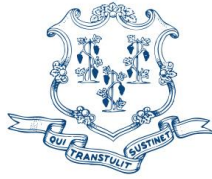


# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Environmental Health Section

EHS Circular Letter #2018-18

DATE: August 16, 2018

TO: Directors of Health  
Certified Food Inspectors  
Interested Parties

FROM: Tracey Weeks, MS, RS  
Food Protection Program Coordinator

RE: **Update on Food Inspector Certification Requirements to Enforce the FDA Food Code**

The purpose of this notice is to remind local health officials of the new requirements for food inspector certification that were previously described in EHS Circular Letter #2017-20 and to provide information on the changes that have been made since that letter was issued.

#### **Introduction**

Circular Letter 2017-20 initially described the new requirements for food inspector certification, however, the date for adoption of the regulations to implement the FDA Food Code has since been changed. Public Act 18-168 modified Connecticut General Statutes §19a-36h(a) as follows:

**“Not later than January 1, 2019**, the commissioner shall adopt and administer by reference the United States Food and Drug Administration's Food Code, as amended from time to time, for the purpose of regulating food establishments.” (Emphasis added)

This revised language provides additional time for local health officials to prepare for enforcing the FDA Food Code and for currently certified food inspectors (CFIs) to complete the online training requirements. This change also impacts the date for the revised certification process for new inspectors (CGS §19a-36j). In the revised process, local health departments (LHDs) will provide the training. The Food Protection Program (FPP) Standardization Officers will verify that the candidates possess the necessary knowledge to identify food code violations, mark and describe violations correctly utilizing the state inspection form, and explain the public health reasons why the violations must be corrected to the permit holder or person in charge. Since most of the training will occur at the local level, it is expected that the field standardization component conducted by the FPP will be completed in one day.

#### **Certification Procedure for Currently Certified Food Inspectors**

CFIs will need to have completed the 46 online training modules as detailed in Circular Letter 2017-20 and have attended one of the six classroom training courses provided by the FPP in



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December of 2017 and January, February, and March of 2018. Once the online training has been completed, the CFI must notify the FPP so the completion can be verified. A new certificate indicating the inspector is certified to conduct food establishment inspections utilizing the FDA Food Code will be issued with an expiration date in 3 years once the regulations to implement the new code have passed. Those who have **not** completed the required online and classroom training will no longer be certified after that time.

**Note:** The few CFIs who were not able to attend the classroom session will be notified by the FPP of a final training opportunity once plans have been finalized.

### Online Training Courses

There are 46 modules of FDA online training that must be completed. The attached list of course modules includes the estimated time to complete each in parentheses and instructions for accessing the courses. All but 5 of the courses are taken through Compliance Wire which can be tracked by the FPP. Because the Allergen, Communication, and 3 FEMA modules are not on Compliance Wire, certificates of completion must be provided to the FPP as instructed below.

In summary the process for completing the online training courses is:

1. Register for Compliance Wire.
2. Send an email to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) with "**Registered for Compliance Wire**" in the subject line so that you are included in the Connecticut system.
3. Once notified of registration approval by FDA, begin taking the courses through Compliance Wire.
4. Complete the 3 courses that are *not* on Compliance Wire - Food Allergens, Communication Skills for Regulators, and the 3 FEMA modules, - and send PDFs of the completion certificates to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov)
5. Notify the FPP when the Compliance Wire courses are completed by sending an email to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) with "**Online Courses Completed**" in the subject line.
6. The FPP will run a completion report and send an email to the inspector confirming that the online courses have been completed or, if courses are missing, notifying which courses have not yet been completed.

**Note:** Most of the modules require that a test be passed to receive credit for completion. If a test needs to be retaken, a request to reset the test should be emailed to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) . A response will be sent when the test has been reset.

### Certification Procedure for New Food Inspectors

When the FDA Food Code becomes effective, the process for training and certifying new inspectors will also change. CGA §19a-36j(a) states:

"On and after July 1, 2018, no person shall engage in the practice of a food inspector unless such person has obtained a certification from the commissioner in accordance with the provisions of this section. The commissioner shall develop a training and verification program for food inspector certification that shall be administered by the food inspection training officer at a local health department.

(1) Each person seeking certification as a food inspector shall submit an application to the department on a form prescribed by the commissioner and present to the department satisfactory evidence that such person (A) is sponsored by the director of health in the jurisdiction in which the applicant is employed to conduct food inspections, (B) possesses a bachelor's degree or three years of experience in a regulatory food protection program, (C) has successfully completed a training and verification program, (D) has successfully completed the field standardization inspection prescribed by the commissioner, and (E) is not involved in the ownership or management of a food establishment located in the applicant's jurisdiction.

(2) Each director of health sponsoring an applicant for certification as a food inspector shall submit to the commissioner a form documenting the applicant's qualifications and successful completion of the requirements described in subdivision (1) of this subsection.

(3) Certifications issued under this section shall be subject to renewal once every three years. A food inspector applying for renewal of his or her certification shall demonstrate successful completion of twenty contact hours in food protection training, as approved by the commissioner, and reassessment by the food inspection training officer."

19a-36g(15) defines a food inspection training officer (FITO) as "a certified food inspector who has received training developed or approved by the commissioner and been authorized by the commissioner to train candidates for food inspector certification."

Candidates for food inspector certification will:

- Be employed to conduct food establishments inspections for the LHD that makes the request for their certification
- Complete the required FDA online training courses
- Receive training from a FITO
- Shadow the FITO or another certified food inspector during 25 food establishment inspections
- Act as the lead in a minimum of 25 inspections with oversight provided by the FITO
- Meet the required competencies (documented by the FITO)
- Complete field standardization with a FPP field standardization officer
- Receive food inspector certification from the commissioner upon satisfactory completion of all requirements

#### **Food Inspector Certification Renewal**

Once the FDA Food Code is in effect, 20 contact hours of approved training will be required for renewal of food inspector certification and an assessment by a FITO. Training must be approved in advance by the FPP to be eligible for contact hours. The FPP anticipates having training available as webinars in the near future to provide more options for inspectors.

#### **FITO Training**

To date, 9 CFIs have been trained as FITOs. The training was developed as part of the *Self-Assessment/Quality Assurance (SA/QA)* program, an FDA grant project to improve Connecticut's conformance with the FDA Retail Food Program Standards. FITO training, provided by Christine Applewhite and Samantha Fresilli; includes a one-day classroom session (to be done regionally), inspection form marking training, and a maximum of 6 joint field inspections with an FPP standardization officer. If the required competencies are met, a letter designating the CFI as a FITO will be issued. Details on FITO training and responsibilities are provided in the SA/QA manual that will be made available to local health officials once revisions (based on feedback from the pilot program) are completed. Directors of health should consider who among their certified food inspectors will serve as the FITO. An email regarding CFI staffing and FITOs will be sent to directors of health separately. FITO training will be prioritized based on the number of CFIs, the number of food establishments, and other criteria.

#### **Quality Assurance Program**

The QA process, also being revised, will be conducted by the FPP to evaluate the LHD's self-assessment program of the food establishment inspection program. The QA program will include a review of the LHD's food inspection program policies and procedures, inspection reports, self-assessment documentation conducted by the FITOs, and a final report prepared by the FPP.

### **Summary**

Changes to the food inspector certification process will occur when the FDA Food Code becomes effective. These changes include online course training requirements for both current CFIs and candidates for certification, training of FITOs who will be responsible for training candidates for certification and documenting their successful completion of the training, and an increase in the number of contact hours required for renewal of certification (from 16 to 20) in addition to a satisfactory assessment by the FITO.

To best prepare for the coming changes, the FPP advises the following:

- Notify the FPP of changes to contact information
- Begin or complete the required FDA online training courses and notify the FPP as described above
- Update LHD license application to conform to the requirements in Chapter 8 of the FDA Food Code
- Read the 2017 FDA Food Code
- Read the Instructions for Marking the Inspection Form: Guide 3-B in Annex 7 to the FDA Food Code
- Use the Annex as a reference, especially *Annex 3 - Public Health Reasons/Administrative Guidelines*

Questions related to the food inspector certification process should be directed to the FPP at 860-509-7297.

C: Suzanne Blancaflor, MS, MPH, Chief, Environmental Health Section

**Curriculum for Retail Food Safety Inspection Officers**  
For state, local & tribal regulators to register on-line for free access to web courses, go  
to: <http://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm120925.htm>

**Revised\*\***

**Curriculum (“Pre”) courses**

**PUBLIC HEALTH PRINCIPLES**

1. Public Health Principles (90) FDA36

**MICROBIOLOGY**

**Food Microbiological Control (series):**

1. Overview of Microbiology (60) MIC01
2. Gram-Negative Rods (60) MIC02
3. Gram-Positive Rods & Cocci (90) MIC03
4. Foodborne Viruses (60) MIC04
5. Foodborne Parasites (90) MIC05
6. Mid-Series Exam (30) MIC16
7. Controlling Growth Factors (90) MIC06
8. Control by Refrigeration & Freezing (60) MIC07
9. Control by Thermal Processing (90) MIC08
10. Control by Pasteurization (90) MIC09
11. Control by Retorting (90) MIC10
12. Technology-Based Food Processes (120) MIC11
13. Natural Toxins (90) MIC12
14. Aseptic Sampling (90) MIC13
15. Good Manufacturing Practices (90) MIC14
16. Cleaning & Sanitizing (90) MIC15

**PREVAILING STATUTES, REGULATIONS, ORDINANCES**

1. Basic Food Law for State Regulators (60) FDA35
2. Basics of Inspection: Beginning an Inspection (90) FDA38
3. Basics of Inspection: Issues & Observations (90) FDA39
4. An Introduction to Food Security Awareness (60) **FD251 is the exam. Start with FD251a -the PDF of the course. Follow the directions. When complete, go to FD251 to take the exam. (ORAU internet site)**
5. FDA Food Code (**Note: There are 11 modules for this course.**)

**COMMUNICATION SKILLS**

1. Communication Skills for Regulators (120)\*

Course can be accessed through

<http://www.accessdata.fda.gov/ORAU/CommRegulators/>

\*While this course is also available at the ifpti website as listed on a previous version of this notice, FDA advises using the site listed here as that is what is listed in the FDA Program Standards. The ifpti certificate is still acceptable.

**Curriculum (“Post”) courses**

**HACCP**

**Basics of HACCP (series):**

1. Overview of HACCP (60) FDA16
2. Prerequisite Programs & Preliminary Steps (60) FDA17
3. The Principles (60) FDA18

**ALLERGEN MANAGEMENT**

1. Food Allergens (60) FD252 (Course can be accessed through <http://class.ucanr.edu/>)

**EPIDEMIOLOGY**

**Foodborne Illness Investigations (series):**

1. Collecting Surveillance Data (90) FI01
2. Beginning the Investigation (90) FI02
3. Expanding the Investigation (90) FI03
4. Conducting a Food Hazard Review (90) FI04
5. Epidemiological Statistics (90) FI05
6. Final Report (30) FI06

**EMERGENCY MANAGEMENT**

**FEMA – Incident Command System and National Incident**

**Management System:** Course available from FEMA web link. –

<http://training.fema.gov/IS/NIMS.asp>

1. IS-100.a, Introduction to Incident Command System, (180) ICS-100 or IS-100 for FDA
2. IS-200.a, ICS for Single Resources and Initial Action Incidents, (180) ICS-200
3. IS-700.a, NIMS an Introduction, (180) ICS 700

**Note: newer versions may be listed as IS-100.c, IS-200.b, and IS-700.b**

**Note: Currently certified food inspectors must take all courses – ‘Pre’ and ‘Post’ before the regulations to implement the FDA code are passed, but before January 1, 2019.**

**All courses except those listed in red are accessible through Compliance Wire. A separate link is provided for each of the courses listed in red. See attached registration instructions.**

**\*\* Revisions include information on the Intro to Food Security Awareness FD251 (Exam) and to the preferred website for the Communications Skills for Regulators course. Updated 8/13/18: the date to complete courses and the note for newer versions of the 3 FEMA courses.**

# DIRECTIONS TO ACCESS THE ONLINE FDA REQUIRED COURSES

From Circular Letter # 2017-20: updated page 7/26/17 revised 10/15/17

Follow the directions below to access the free, online required training courses.

## 1. COMPLIANCE WIRE REGISTRATION

Most of the required online courses are on Compliance Wire. In order to successfully register for Compliance Wire it is important that you follow these steps:

1. Go to <http://www.compliancewire.com/secure/custom/FDAORAUselfReg.asp> to complete and submit the registration form for Compliance Wire.
2. Immediately after submitting your registration request to Compliance Wire, send an email notification to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) with "Registered for FDA Online Courses" in the Subject line. This is an important step for two reasons:
  1. It will speed up the approval process of your registration.
  2. It will allow the FPP to verify your course completion status and eliminate the need for faxing the numerous pages of completion certificates.

Once you receive an email stating your registration has been approved you can begin taking courses. To find the courses you need, login to your account, click on the 'Catalog' tab, type in a key word, and search. E.g. to find the Food Code course, type 'code' and search. Your results will include the 11 modules of the Food Code course. If you have trouble accessing any of the courses send a message to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) with 'can't access courses' in the subject line. Do not forward completion certificates as the FPP can view completion reports online.

**NOTE: If you forgot your password, do not create a new account! Instead, click on "Forgot my password."**

## 2. COMMUNICATION SKILLS FOR REGULATORS

To register for "Communication Skills for Regulators" go to <http://www.accessdata.fda.gov/ORAU/CommRegulators/>

This course should launch immediately. Save the certificate at the end of the lesson email it directly to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) as the FPP does not have access to view completion reports for this site at this time.

**Revised!**

## 3. FOOD ALLERGENS

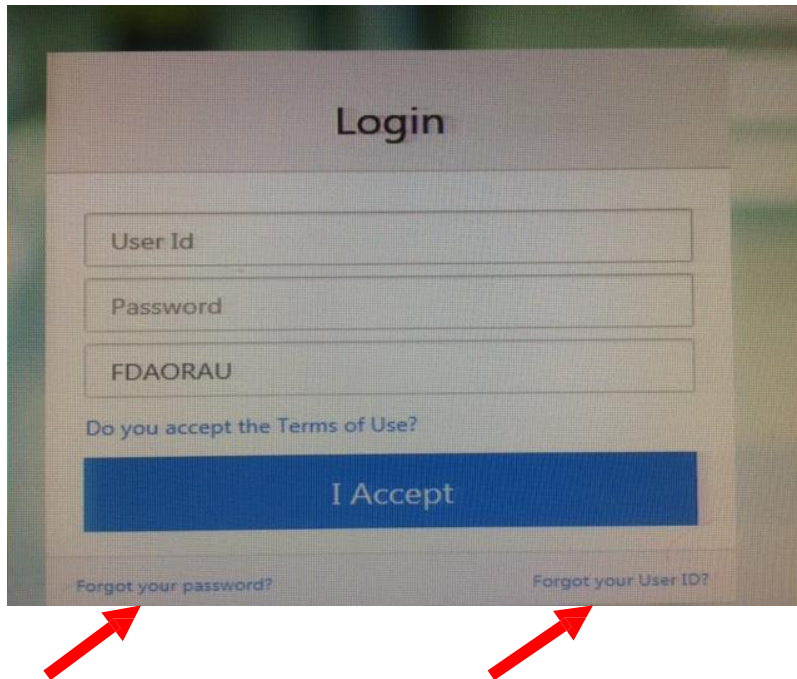
To access the Food Allergens course FD252, go to <http://class.ucanr.edu/>. You will need to email the certificate of completion to Tracey Weeks at [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov).

## 4. FEMA – INCIDENT COMMAND SYSTEM AND NATIONAL INCIDENT MANAGEMENT SYSTEM

For these courses go to the FEMA web link at <http://training.fema.gov/IS/NIMS.asp>. Certificates of completion will need to be emailed to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov).

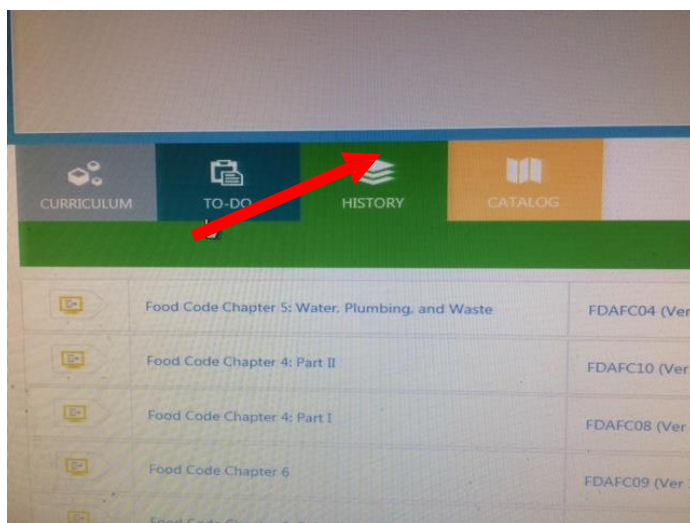
## *Frequently Asked Questions: Required Online Training Courses*

1. *If I forgot my USER Name and/or Password should I create a new account?*



No. If you have forgotten your USER ID or PASSWORD for Compliance Wire – click on the appropriate link and your USER ID or PASSWORD will be sent to the email address that you used to register. You should not create a new account as your previously completed courses are linked to your original account.

2. *How do I find out which courses I completed?*



Access your Compliance Wire Account and click on the History tab – all of your completed Compliance Wire courses should be listed there.

**Addendum to Circular Letter # 2017-20**  
***Frequently Asked Questions: Required Online Training Courses***

3. *I took the FEMA courses years ago. Do I have to take them again?*

As long as the course was the same as the one listed on the required course list and you have the certificate, it will be accepted.

4. *I didn't pass the Microbiology mid-series exam (MICRO 06). Can I take it again?*

Yes! Send an email stating that you need to retake the Mid-series Exam (MICRO 06) to [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov) and it will be assigned to you and a link placed in your TO-DO and CURRICULUM tabs. It is a good idea to take the courses in order as the Mid-series exam covers topics included in MICRO modules 01-05.

5. *I sent an email as directed in Circular Letter # 2017-20 stating that I could not access a Compliance Wire course, but the email came back as undeliverable. What do I do?*

An error was made in the email address: **the correct address** is [tracey.weeks@ct.gov](mailto:tracey.weeks@ct.gov)

6. *I tried to send the certificates for the FEMA courses as directed in Circular Letter #2017-20 but the email came back as undeliverable. What do I do?*

See the answer to FAQ #5 above.

7. *I don't have time to take the courses. Can I take them after January 1, 2019?*

Yes, but those who haven't completed the required online courses and attended the FPP classroom training that were offered in the fall of 2017 will **not be certified on and after January 1, 2019** and will not be legally able to inspect food establishments in Connecticut.

8. *Will I be FDA certified once I complete the online and fall classroom training?*

No. FDA does not certify inspectors. The Commissioner of the Connecticut Department of Public Health (DPH) has the authority to certify food inspectors in Connecticut. Section 5 of Public Act 17-93 includes language that describes the requirements for food inspectors. The DPH Food Protection Program has developed the training program for **currently certified food inspectors** (described in Circular Letter 2017-20) based on the FDA Retail Food Program Standards so that they can be certified by the Commissioner of DPH to enforce the FDA Food Code which will be effective on or after January 1, 2019.

9. *I already took the Communication Skills for Regulators course on the ifpti website as was listed in the previous version of the training requirements announcement. Do I have to take it again at <http://www.accessdata.fda.gov/ORAU/CommRegulators/>?*

No. If you took the ifpti version, it's ok. They are essentially, if not exactly, the same course. We changed it because we were advised that the web link for the ORAU version of the course is what is listed in the current version of the FDA Retail Food Program Standards.

10. *I didn't pass the Midseries Micro exam, MIC16, (or any of the other exams). What should I do?*

Send an email requesting that the exam(s) be reset to **tracey.weeks@ct.gov**. You will receive an email -usually in 1-2 days - stating that the exam was reset.

11. *I'm getting error messages when I try to log on to Compliance Wire. What should I do?*

Try using another browser - Internet Explorer is preferred. Try another computer. If you still experience problems contact the Compliance Wire help desk but if no response, send email to **tracey.weeks@ct.gov**.