

# FPLS Evaluation Workgroup

APRIL 10, 2018

## Is the Workgroup meeting its goals according to the FPLS Program Evaluation Workgroup Charter?

### #2 Purpose

The EHCIB approved a proposal for a new FPLS program evaluation model. The key difference in the evaluation model is all programs will be evaluated on one standard at a time; evaluations will be conducted Standard-by-Standard vs. program-by-program. The EHCIB made the following recommendations for implementing the new model:

EHCIB Recommendation	Rationale	Workgroup Comments
Initiate a workgroup to develop metrics and tools to support the new FPLS program evaluation process.	This will allow the new FPLS program evaluation process to roll out efficiently and in partnership. The EHCIB will work with MDH EH staff to develop a charter and recruit members; the workgroup will begin work in early 2016.	<p>The workgroup has been working since 2016.</p> <p>The group is currently absent one MDH delegated metro member (position has been vacant since December 2016).</p> <p>There have been varying levels of participation from the workgroup Advisors.</p>
Use the existing Food and Drug Administration (FDA) Voluntary National Retail Food Regulatory Program Standards (Standards), MDH, and MDA Delegation Agreements, and incorporate Minnesota-specific (MDH or MDA) criteria where valuable.	The Standards serve as a strong foundation and using them will promote MDH-MDA alignment. In addition, the EHCIB would like to see MDH and MDA use consistent program elements and evaluation processes.	<p>Feedback from two pilots of Standards 2 and 8 is that the work involved to assess and meet the voluntary standards is too burdensome to be practical.</p> <p>The “required” elements from the pilots were lifted from the existing MDH evaluation tool. These elements were specific to requirements in state statute and the MDH delegation agreement. Pilot participants found these items to be reasonable to assess and verify.</p> <p>The workgroup has been working to define program elements through the two pilots. MDA has independently</p>

## FPLS EVALUATION WORKGROUP

EHCIB Recommendation	Rationale	Workgroup Comments
		<p>been developing proposed performance standard elements through their process to update their delegation agreements. The MDA performance standards are not finalized, but it is anticipated that they will be similar but not equal to what the workgroup has created.</p> <p>When the workgroup was convened, the original issue was with MDH evaluations and MDH delegated programs. There are concerns about trying to create something that can address both agencies – this may not be possible; at the very least it is slowing down the process.</p>
<p>Implement a new program rating method – “meets” or “does not meet.”</p>	<p>Since programs will be evaluated one Standard at a time, the EHCIB recommends a status of “meets” or “does not meet” be given to each program for each Standard.</p>	<p>This has been done for the first two pilots. Feedback from the second pilot is that terminology should be less severe. “Does not meet” is harsher than something like “needs more information.”</p> <p>“Not assessed” was added as an option for voluntary elements.</p>
<p>Identify minimum required criteria that must be met in order to have a delegated program.</p>	<p>These criteria will be consistent with requirements in the delegation agreement.</p>	<p>Statutory language “sufficient to replace services of the state” – at what point in time is the state’s performance being measured to know if delegated agency’s performance is sufficient. Where is the bar set?</p> <p>MDH and MDA need to be held accountable and held to the same standard to which they are holding their delegated agencies.</p> <p>Minimum criteria have been identified for MDH delegation agreement elements.</p> <p>MDH delegation agreement (currently signed) – these elements are agreed upon to be “required.”</p>

## FPLS EVALUATION WORKGROUP

EHCIB Recommendation	Rationale	Workgroup Comments
		MDA delegation agreements (still in discussion) – still ongoing conversations about what are the minimum elements.
Identify steps a delegated program must take in order to make improvements to standards that do not meet the minimum criteria.	These steps will promote a continuous improvement process while still ensuring public health is protected.	Continuous Improvement cycle has been developed; it hasn't been officially tested or implemented.  However, multiple opportunities for corrective action were incorporated into the pilot process.
Maintain focus on improving trust between evaluators and programs being evaluated.	Strengthening the bonds of trust between MDH/MDA and the local delegated programs is essential to successfully developing and implementing an improved evaluation process.	This is an ongoing process.

### #3 The Workgroup's Charge and Deliverables

***The Workgroup will work collaboratively to complete the following:***

Workgroup Charge and Deliverable	Not Done	In Process	Done	Workgroup Comments
Evaluate performance measure work conducted by EHCIB, existing criteria in the Standards, and the MDH and MDA Program evaluation processes			X*	FDA Standards, previous evaluation process tools, delegation agreements and other materials were researched and reviewed. Statewide performance measures were reported in 2017.  The strongest criticisms of MDH's previous evaluation process were related to: a lack of clearly defined expectations for how to meet a standard, inconsistencies between evaluators over time (7 year time

## FPLS EVALUATION WORKGROUP

Workgroup Charge and Deliverable	Not Done	In Process	Done	Workgroup Comments
				<p>span from start to finish), and a lack of a defined improvement process.</p> <p>*Is the EHCIB's intent for this to look at other measures?</p> <p>*The workgroup has only looked at food program performance.</p>
<p>Identify and develop criteria, metrics, tools and process that will be used for program self-assessment and evaluation of each Standard.</p>		X		<p><b>Done:</b></p> <p>Criteria, metrics, and tools have been developed and tested for Standards 2 and 8.</p> <p>2 pilots have been done (summer 2017 and winter 2017/18) for Standards 2 and 8.</p> <p>We learned between the two pilots that training is critical.</p> <p>There is a big difference between required/minimum and voluntary elements – both pilots have shown that voluntary elements are a workload burden.</p> <p>Pilot participants did not see additional value for protecting public health in the voluntary elements of Standards 2 and 8.</p> <p><b>Not Done:</b></p> <p>Nothing yet developed for Standards 1, 3, 4, 5, 6, 7, 9 or anything related to pools and lodging (including MHP, RCA, and Youth Camps).</p>
<p>Develop a draft implementation plan for evaluation of each Standard.</p>	X			<p>The implementation plan has not been developed.</p>
<p>Identify a process for programs that do not meet minimum criteria to improve their performance.</p>		X		<p><b>Done:</b></p> <p>2 Continuous Improvement Cycles have been developed (one for MDH, one for MDA).</p>

## FPLS EVALUATION WORKGROUP

Workgroup Charge and Deliverable	Not Done	In Process	Done	Workgroup Comments
				<p><b>Not Done:</b></p> <p>Continuous Improvement Cycle has not been tested according to what was previously presented to the EHCIB. In Pilot 2.0, we added an additional step / opportunity for clarifying requirements prior to getting results.</p> <p>There are two cycles (MDH and MDA) – the original charge was to have one process.</p>
Present recommended criteria, metrics, tools and implementation plan to the EHCIB for comment and approval.		X		<p><b>Done:</b></p> <p>Status reports have been given at each EHCIB meeting since the inception of the workgroup.</p> <p><b>Not Done:</b></p> <p>The final proposal has not been developed or presented to the EHCIB.</p>
Make recommendations on how to communicate and disseminate best practices to promote continuous improvement.		X		<p><b>Done:</b></p> <p>Using feedback from Pilot 1.0, improvements were made to training and communications plan for Pilot 2.0.</p> <p>Workgroup has discussed possibilities for implementing statewide clinics and info sessions as well as ongoing maintenance and support.</p> <p><b>Not Done:</b></p> <p>Final proposal not developed</p> <p>Can a “hybrid” process look more like an improvement process than an evaluation process?</p>
Make revisions to criteria, metrics, tools and implementation plan and		X		<p><b>Done:</b></p> <p>Revisions have been ongoing.</p>

## FPLS EVALUATION WORKGROUP

Workgroup Charge and Deliverable	Not Done	In Process	Done	Workgroup Comments
present for final approval to the EHCIB.				<p>Pilot 2.0 was specifically split between “required” and “voluntary” elements. Participants were not required to do the “voluntary” elements.</p> <p>Added “not assessed” as an option for voluntary elements.</p> <p><b>Not Done:</b></p> <p>Nothing yet developed for Standards 1, 3, 4, 5, 6, 7, 9 or anything related to pools and lodging (including MHP, RCA, and Youth Camps). Continuous Improvement Cycle has not been tested.</p> <p>Feedback from Pilot 2.0 – do we want to use a word other than “not meet” (“more information needed” was suggested).</p>

### *Considerations:*

Consideration	MDA	MDH	Workgroup Comments
The workgroup needs to consider that the final updated evaluation process may impact existing delegation agreement language.	<p>MDA is in the process of updating agreements with their Delegated Agents.</p> <p>Performance standards have been developed independently from the FPLS evaluation workgroup. They are not yet finalized.</p>	<p>MDH has no immediate plans to update Delegation Agreements.</p> <p>MDH Delegation Agreement language related to program evaluation (Part 4: Assessment of Board’s Performance) does not currently support the model proposed by the EHCIB.</p> <p><b>Evaluation frequency</b> is specified (no more than one per year, no less than one every five years).</p>	MDA and MDH have separate agreements with separate requirements.

## FPLS EVALUATION WORKGROUP

		<p><b>Performance statuses</b> fall into five categories, with specific actions for follow-up for each category.</p> <p><b>Improvement plans</b> are not aligned with the proposed continuous improvement cycle</p>	
--	--	---	--