

Best Practices Manual for Administering Consistent, Uniform, and Safe Food, Pools, and Lodging Programs in Minnesota

*Section Two:
Trained Regulatory Staff*



Minnesota Department of Health
Environmental Health Division
Food, Pools, and Lodging Services Section

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Section Two: Trained Regulatory Staff

Introduction

Consistent, uniform, and safe retail food and beverage, lodging (i.e., hotel, motel, manufactured home parks (MHP), recreational camping areas (RCA), and youth camps) and public swimming pool programs require qualified, trained, and competent staff (i.e., administrators, managers, supervisors, inspection personnel, interns). Staff may be engaged in education, supervision, inspection, licensing, and enforcement duties for retail food and beverage, lodging, and public swimming pool programs in Minnesota. Administrators, directors, managers, and supervisors must actively support, participate and provide continuous oversight of staff training. This must include taking an active role in evaluating whether staff has the knowledge, skills and abilities (KSAs) necessary to conduct day to day activities. The success of your training program is dependent on you.

The Minnesota Department of Health (MDH) Delegation Agreement requires that inspections of regulated establishments be conducted by registered environmental health specialists/sanitarians (EHS/sanitarians). EHS/sanitarians are college graduates with training in environmental health, sanitary science, sanitary engineering, or other related environmental fields. They are public health professionals who protect public health from detrimental conditions in the environment through community education, investigation, consultation, review of construction plans, collection of samples and interpretation of laboratory data, enforcement actions, review and recommendation of policy, and/or regulation. They may administer environmental health programs for both public and private agencies and organizations; and may work in a variety of environmental health areas, including food protection and safety, water protection, air quality, noise, industrial and land pollution, sewage disposal, hazardous and toxic substances, solid waste management, emergency management, public health nuisance abatement, pest management and vector control, and institutional health.

Legal requirements and best practices in relation to hiring, training, registration, standardization, and documentation include:

- Meeting requirements of MDH Delegation Agreement and Minnesota statutes and rules.
- Training new and experienced staff.
- Upholding professional standards for staff (i.e., registration and standardization).
- Documenting staff education, training, and registration.

Training recommendations in this Best Practices Manual are based on United States Food and Drug Administration [Voluntary National Retail Food Regulatory Program Standards, Standard Number 2 – Trained Regulatory Staff](#) (FDA Program Standard 2), and have been expanded to

include references to all program areas covered under the MDH Delegation Agreement. Applicable training components will vary depending upon specific position responsibilities.

Delegation Agreement

Local boards of health and MDH may enter into agreements to delegate duties and responsibilities for licensing, inspecting, and regulating retail food and beverage establishments, lodging establishments, and public swimming pools. Delegated duties and responsibilities include providing and maintaining qualified, trained, and competent staff. Under the requirements of the MDH Delegation Agreement, inspections must be conducted by staff that meets the requirements in [Minnesota Rules, chapter 4695, section 2500 to section 2800](#). Figure 1 includes a summary of these requirements. A complete list of requirements can be found in Section 3.2, B., pages 6-8 of the [MDH Delegation Agreement](#).

Table 1. Summary of MDH Delegation Agreement staffing requirements

Description of Staff Qualifications	Conduct delegated inspections	Conduct inspections in excess of those required in Delegation Agreement	May be employed as the agency's only inspection staff	Must be supervised by EHS/sanitarian registered in Minnesota
▶ EHS/sanitarian registered in Minnesota.	YES	YES	YES	NO
▶ Meets educational requirements. ▶ Qualified to sit for exam within 2 years of hire.	YES	YES	NO	YES
▶ Enrolled in qualifying educational program. ▶ Not qualified to sit for exam within 2 years of hire.	NO	YES	NO	YES

Adequate program coverage with qualified, trained, and competent inspection personnel and other staff is critical to delivering consistent, uniform, and safe programs throughout the state of Minnesota. Duties and responsibilities of program managers, administrators, and staff include collaborating with state and local partners annually regarding staffing plans. Developing, reviewing, maintaining, and communicating staffing plans according to the MDH Delegation Agreement assures adequate program coverage in emergencies or when unexpected staff absences or changes occur. A complete list of requirements for documentation and notification of program staff plans and staff changes are addressed in [Section 3.2, B., \(5\)-\(7\), pages 7-8](#) of the MDH Delegation Agreement.

Training of New and Experienced Staff

Effective and ongoing training is a critical element in maintaining a program which meets requirements of the MDH Delegation Agreement. Regulatory staff, including new and experienced EHS/sanitarians as well as other designated personnel (i.e., interns, supervisors, managers, and administrators) must have the KSAs to adequately perform their required duties. Experienced staff is strongly encouraged to continually update their KSAs to keep up with changing science and technology. Ongoing training within and among agencies also promotes a comprehensive and coordinated statewide program for retail food and beverage, lodging, and public swimming pool programs.

Training Plan Components

The recommended best practices for training presented in this manual are divided into the following components:

- General Training—provides every employee with necessary information about agency organization, policies, and resources.
- Core Training—provides inspection staff with fundamental KSAs to adequately perform required duties.
- Specialized Training—provides inspection staff with advanced KSAs to adequately perform required duties in specialized areas.
- Field Training and Experience—provides on-site training at facilities similar to those where inspection staff would perform required duties.
- Documentation—provides a history of training certificates, field inspection logs, and other pertinent records.

Staff training is best accomplished through a variety of methods, including one-on-one and group training sessions with lead inspection staff or supervisors; classroom, online, or field training; and videoconferences (i.e., [Food Safety Partnership \(FSP\) of Minnesota](#)).

FDA Program Standard 2 states that 90% of the regulatory retail program inspection staff must have successfully completed the required training elements within 18 months of hire or assignment to the retail food protection program. In Minnesota we strive to meet this 18-

month training timetable for retail food and beverage, lodging, and public swimming pool programs.

General Training

General training for staff should include at a minimum:

- Human Resources.
- Agency overview.
- Personal safety.
- Computer and office equipment usage.
- Communication and basic report writing.

In addition, all staff should be introduced to the agency's enforcement and legal standard operating procedures, including:

- Principles and practices of education, inspection, and enforcement.
- Use of enforcement tools and legal remedies (e.g., citations, fines, license revocation, Notice of Violations, Administrative Penalty Orders).
- Proper use and purpose of inspection, licensure, and enforcement forms.

Core Training

All employees who conduct inspections of retail food and beverage establishments, lodging, and public swimming pools should satisfactorily complete core training that includes an overview of environmental health systems in Minnesota as well as elementary content and skill training. Satisfactory completion of this core training ensures a minimum level of competency which is fundamental to further training in specialized content.

Legal Authority

All Minnesota statutes and rules can be accessed at the [Minnesota State Legislature website](#). Table 2 lists some of the statutes and rules enforced by MDH and local delegated health agencies.

Table 2. Minnesota laws regarding retail food and beverage, lodging, and public swimming pools

Description	Statutes	Rules	Comment
Board and Lodging with Special Services	157.17	None	
Delegation Agreement	145A	None	

Description	Statutes	Rules	Comment
Disease Investigation & Control	144.05 Subd. 1 144.053	4605.7500	State epidemiologist and staff are authorized to collect private data. Investigation data are disseminated within MDH and local public health agencies on a need-to-know basis. Private data will be protected from discovery under Minnesota Statutes, chapter 144, section 658 .
Enforcement	144.99	None	
Food and Beverage	157	4626	Includes food manager certification.
Injunctive Relief	145.075		
Lodging	157 327.10 327.70	4625	Includes hotel, motel, manufactured home parks (MHP), recreational camping areas (RCA), and youth camps.
Manufactured Home Parks/Recreational Camping Areas	327.14	4630	See also Building Code (Minnesota Rules, chapter 1350) and Code of Federal Regulations, title 24, subtitle B, chapter XX, part 3280 . Storm shelter requirements are in Minnesota Rules, chapter 1370 .
Mass Gatherings	144.12 , Subd. 2	4626.1840 4626.1865	
Registration as EHS/Sanitarian	214.02 15.059 214.13	4695.2500 – 4695.3200	
Public Swimming Pools	157 144.1222	4717	

Description	Statutes	Rules	Comment
Variances	14	4625.2355 4626.1690 - 4626.1715 4630.1801 4630.4750 4717.3975	No variance can be granted to a statute. Specific requirements for variance requests are contained in the parts listed in the previous column.
Youth Camps	144.71 144.72 144.73 144.74 157	4630	

Other related Minnesota Statutes and Rules:

- Food Donation - Liability of food donors (Minnesota Statutes, chapter [604A, section 10](#)).
- Individual Sewage Treatment Systems (Minnesota Rules, chapter [7080](#)).
- Liquor and Wine (Minnesota Statutes, chapter [340A, section 315](#)).
- Minnesota Clean Indoor Air Act (Minnesota Rules, chapter [4665, section 9090](#)).
- Plumbing Code (Minnesota Rules, chapter [4715](#), Minnesota Rules, chapter [4716](#)).
- Well Code (Minnesota Rules, chapter [4725](#)).
- Fire Code (Minnesota Rules, chapter [7511](#)).
- Minnesota Department of Agriculture (MDA) Consolidated Food License Law (Minnesota Statutes, chapter [28A](#)).

Online Curriculum

Much of the recommended training in core content and skill areas can be accomplished through the FDA Office of Regulatory Affairs' Online University (ORAU). There are 31 [ORAU Level 1 online retail food courses](#) designed to help satisfy the six topic areas of training specified in FDA Program Standard 2 for the new hire. These courses are also good as a refresher for experienced staff. These topic areas include:

- Prevailing Statutes, Regulations, Ordinances (3 courses).
- Public Health Principles (1 course).
- Communication Skills (2 courses).
- Microbiology (16 courses).
- Epidemiology (6 courses).
- Hazard Analysis and Critical Control Point (HACCP) Principles (3 courses).

The student must first sign up and receive a password to take the ORAU courses. Please be aware that access to the courses may take several weeks, so plan accordingly. If a response is not received within 14 days, it is recommended to contact ORAU regarding password status. The time required to complete each online course varies with the individual. Typically, most courses can be completed within 60 to 90 minutes. The total estimated time for completion of the 31 Level 1 ORAU courses is 26 hours.

Contact hours or continuing education units (CEUs) issued from ORAU for the 31 core training courses are not acceptable for continuing education credits for renewal of Minnesota EHS/sanitarian registration.

In addition to the topic area training listed above, basic emergency management training is recommended for all retail food and beverage, lodging, and public swimming pool regulatory staff. The [Federal Emergency Management Agency \(FEMA\)](#) provides online training in emergency management and incident response through the National Incident Response System (NIMS). [NIMS](#) represents a core set of doctrine, concepts, principles, terminology, and organizational processes that enables effective, efficient, and collaborative incident management. Recommended online courses include—at a minimum—Incident Command System (ICS) 100 and 200.

Classroom Training

MDH has developed and provides Food Safety Classroom Training sessions on a regular basis to inspection and management staff from MDH and local delegated health agencies. This training is provided to advance KSAs, encourage standard procedures, and promote uniformity amongst inspection staff. Topics covered include:

- FDA and Minnesota food codes; statutes, rules and regulations (17 hours).
- Proper field equipment use (e.g., thermocouples, light meters and pH meters) (2 hours).
- Effective communication and report writing (4 hours).
- Risk-based inspections (11 hours).

The [National Swimming Pool Foundation \(NSPF\)](#) and the [National Recreation and Park Association \(NRPA\)](#) have both developed classroom training for swimming pool inspection staff, operators, service professionals, builders, and academia. Attendance at one or both courses (i.e., NSPF's Certified Pool Operator Training (CPO), NRPA's Aquatic Facility Operator (AFO)) is recommended for staff whose duties include inspection of public swimming pools. Topics covered include:

- Pool and spa chemistry.
- Facility and employee management.
- Pool safety.
- Facility and equipment maintenance.

- Record keeping and reporting.
- Risk management and reduction.

Individualized Training

One-on-one training with supervisors or experienced EHS/sanitarians from the same or another agency completes the recommendations for core training components. Topics to be covered include, but are not limited to:

- Good Retail Practices (GRPs) for retail food and beverage establishments, lodging, and public swimming pools.
- Outbreak fundamentals, including state and agency [protocols](#) for foodborne and waterborne outbreak investigations.
- Retail food and beverage and lodging plan review and construction inspection. (All public swimming pool plan review and construction inspections are conducted by MDH.)
- Minnesota food manager certification program.
- Report writing using computerized inspection programs.
- Licensing procedures.
- Regulating temporary food establishments (i.e. mobile food units, seasonal permanent food stands, and seasonal temporary food stands), food carts, and special event food stands.

[Minnesota Environmental Health Association \(MEHA\)](#) maintains a library of documents and past conference presentations that provide individualized training for staff.

Specialized Training

Retail food and beverage, lodging, and public swimming pool programs regulate a wide variety of establishments. Business models of regulated establishments may encompass many complex food processes, as well as lodging, and diverse public swimming pools. In order to provide adequate regulation of all establishments, including identifying and controlling risks associated with emerging trends, it is important that each agency provide specialized training for all staff that performs duties requiring specialized KSAs. Dependent upon assigned responsibilities staff should augment their initial training by satisfactorily completing specialty subject area training. Examples of specialized training include:

- Facility plan review.
- Application of retail HACCP.
- Emergency response.
- Epidemiology and foodborne illness investigations.
- Trackback investigations.

Temporary establishments (e.g., special event camping areas, special event food stands, and mobile food units).

Managers, administrators and supervisors should identify staff needs and arrange for appropriate training opportunities. On-the-job training with experienced staff, classroom-style training from FDA or other agencies, and online training are all acceptable formats.

Field Training and Experience

Within 12 months of employment or assignment to the retail food and beverage, lodging, and public swimming pool program, all staff that conducts inspections of retail food and beverage, lodging, and public swimming pool establishments should satisfactorily complete initial field training. Initial field training should be comprised of joint training inspections with experienced staff, including:

- Twenty-five (25) joint field inspections of retail food and beverage facilities, to include five (5) low risk facilities, eight (8) medium risk facilities, and twelve (12) high risk facilities.
- Twenty-five (25) independent inspections led by the new staff and reviewed by the standardized trainer (either on-site or paperwork review).
- Five (5) joint inspections of lodging facilities (as applicable).
- Ten (10) joint inspections of swimming pool facilities, including four (4) inspections led by the new staff, and comprising various pool types (i.e., pool, spa, wading pool).
- Six (6) joint inspections of manufactured home parks (as applicable).
- Joint inspections of youth camps and recreational camping areas (as applicable).

If possible, field training for newly hired staff should occur with multiple EHS/sanitarians, from the employing or from neighboring agencies. This will provide the trainee with exposure to a variety of inspection and communication styles.

Verification of Knowledge, Skills, and Abilities (KSAs)

Conference for Food Protection Field Training Manual

The [Conference for Food Protection \(CFP\)](#) has developed a [field training manual](#), which focuses on two components of the multi-tiered approach contained in FDA Standard 2—the prerequisite coursework and the field training model for preparing newly hired EHS/sanitarians or individuals newly assigned to the regulatory retail food protection program to conduct independent food safety inspections. The instructions and worksheets provided in the field training manual constitute a training process, not a certification or audit process.

The field training manual was developed to assist jurisdictions that do not have the available staff resources and funding necessary to develop a comprehensive training process, and the information and resources can be integrated into existing regulatory retail food protection programs. The model presented in the field training manual consists of a training plan,

procedures, trainer's worksheets, and training records/logs that may be used by any regulatory retail food protection program. Jurisdictions do not have to be enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards to use—and benefit from—this training structure.

Registration and Professional Standards for EHS/Sanitarians

Sanitarian registration signifies a level of expertise and competency based on education and experience that is nationally recognized within the environmental health profession.

Minnesota's registration process is defined in Minnesota Rules, chapter 4695. Registration as EHS/sanitarian is a process that certifies the applicant has been found by the commissioner of health to meet the qualifications specified in Minnesota Rules, chapter 4695, section 2500 to section 3200 to protect environmental health. The professional standards for EHS/sanitarians are outlined here, including prerequisite education and work experience requirements, exam preparation, the application and examination process, and continuing education requirements for renewal of EHS/sanitarian registration every two years. Further information on this topic is available at the [Environmental Health Specialist/Sanitarian website](#).

The Environmental Health Specialists/Sanitarians Advisory Council (council) was established in 1979 to:

- Advise the commissioner regarding environmental health specialist/sanitarian registration standards.
- Advise the commissioner on enforcement of the environmental health specialist/sanitarian rules.
- Provide for the dissemination of information regarding environmental health specialist/sanitarian registration standards.
- Review applications and recommend applicants for registration or registration renewal.

Prerequisite Education and Work Experience

To be eligible to sit for the registration exam, an applicant must have a baccalaureate or post-baccalaureate degree in public health, sanitary science, or other related environmental health field which includes at least 30 semester or 45 quarter-hour credits in the physical or biological sciences. The council has developed the [Environmental Health Specialist/Sanitarian Science Course List](#) which is intended to serve as a core list to assure candidates and employers that these courses will be accepted as meeting the requirements of Minnesota Rules, chapter 4695, section 2700, subpart 1A. An official transcript must be mailed directly to MDH in order to verify coursework.

In addition to the required educational background, an applicant must provide evidence of at least one year of employment supervised by a qualified individual, such as a sanitarian, licensed health professional, or an engineer or other professional with a graduate degree in one of the

physical or biological sciences, or other person whom the commissioner of health deems has equivalent environmental health background.

Exam Preparation

Exam preparation resources, including mentoring, study groups, textbooks, online reference materials, and sample questions are available to individuals preparing for the registration exam. [National Environmental Health Association \(NEHA\)](#), MEHA, and MDH each provide materials and guidance. Candidates for registration in Minnesota are encouraged to take advantage of one or more of these preparation aids.

Application and Examination

After the appropriate education and work experience have been accomplished, the prospective EHS/sanitarian must apply to take the REHS/RS registration examination. The [Sanitarian Registration Exam Application](#) and [Application to Re-apply for Sanitarian Registration Examination](#) forms are available online.

The applicant must complete a registered examination approved by the commissioner of health and obtain a passing score of sixty eight (68) percent or better. MDH and the council administer the sanitarian registration exam. Currently, the NEHA Registered Environmental Health Specialist/Registered Sanitarian Examination is the official, approved exam. Other options to take this exam (i.e., online through a designated computer provider) may be available, provided such method(s) meet MDH criteria and council approval.

Examination dates are established annually, and candidates are notified at least 30 days prior to the examination (examination dates usually occur in April and October).

After passing the examination administered by MDH, the candidate will be registered as EHS/sanitarian in Minnesota. Information regarding national registration is available at the NEHA website.

Registration Renewal

The EHS/sanitarian registration is valid for two years. For registration renewal, submit evidence of successful completion of 24 contact hours of acceptable continuing education during each two-year renewal period. Figure 1 on the following provides the criteria for continuing education.

Activities related to one or more of the environmental program areas contained in Minnesota Rules, chapter [4695, section 2600](#), subpart 7 are acceptable.

Environmental program areas include but are not limited to:

- Food, beverage, and lodging sanitation.
- Housing.
- Refuse disposal.

- Water supply sanitation.
- Rodent, insect, and vermin control.
- Accident prevention.
- Swimming pool and public bathing facility sanitation.
- Radiation safety.
- Air and water quality, noise pollution, and institutional and industrial hygiene.

Figure 1. Criteria for continuing education

Minnesota Rules 4695.2800 Renewal Registration

Subp. 3. Criteria for continuing education. *A continued education activity must meet the following criteria in order for credit to be given:*

A) It must have a specific, written objective(s) which describe expected outcomes for the participant.

B) It must be presented by knowledgeable person(s) who have reviewed the development in the subject being covered in the program within the last two years. His/her qualifications must be documented by one of the following: specialized training in the subject matter; experience in teaching the subject matter; experience in working in the subject areas.

C) It must last at least one contact hour.

D) It must have stated in written form what mechanism was utilized to demonstrate whether or not learning did occur. The mechanism may include, but is not limited to, a successfully completed written test or a performance component.

E) It must utilize a mechanism to validate participation. This may include, but is not limited to, earned credits and/or verification of attendance. Program sponsors shall maintain attendance sheets for three years.

The council reviews renewal applications to determine if the completed training or activities comprise acceptable contact hours. Contact MDH to inquire about the process for obtaining prior approval of contact hours for an educational event.

Reciprocity

Persons who have attained EHS/sanitarian registration or licensure outside of Minnesota may be entitled to registration in Minnesota if they can provide evidence of meeting all of the registration requirements. See [Environmental Health Specialist/Sanitarian Reciprocity](#) for more information.

Standardization of Registered EHS/Sanitarians

The purpose of the standardization procedure is to promote uniformity, consistency, and quality inspections of retail food inspections among federal, state, local and tribal agencies in accordance with FDA Program Standard 2. In Minnesota, standardization of EHS/sanitarians is performed by MDH sanitarians that are currently certified as FDA Standardized Food Safety Inspection Officers.

The [*FDA Procedures for Standardization of Retail Food Inspection Officers*](#) is the foundation for standardization used by MDH throughout Minnesota. The FDA standardization manual defines standardization as the process whereby a candidate demonstrates the KSAs to satisfy requirements for a standardized food safety officer candidate. Candidates who successfully achieve standardization are expected to use the procedure to train or standardize other inspectors within their regulatory agency.

The standardization procedure is not intended to provide core or specialized training to individual candidates but rather is intended to confirm a high level of knowledge, understanding and application of food safety principles. The application of the standardization procedure will ensure that the candidate recognizes foodborne illness risk factors, public health interventions, and good retail practices. This includes the ability to accurately cite the provisions of Minnesota Rules, chapter 4626, and applying a HACCP-based inspectional approach.

Documentation of Staff Education, Training, Registration, and Standardization

Complete and up-to-date documentation of employee education and work experience, initial and ongoing training, registration, standardization, and continuing education are a logical and necessary extension of a sound regulatory staff training program. Documentation maintained by the employer and employee will provide accurate and timely information during periods of internal and external review, or when staff change jobs (either within or between agencies). Each manager should develop and implement a documentation system that fits the needs of the agency.

Managers or supervisors should ensure that records of education, training, registration, and standardization for all staff include:

- Employee name, job title, and date of employment.
- Training description (e.g., course title, continuing education topic, training format).
- Date, length, and location (e.g., online, classroom, field or individual) of training.

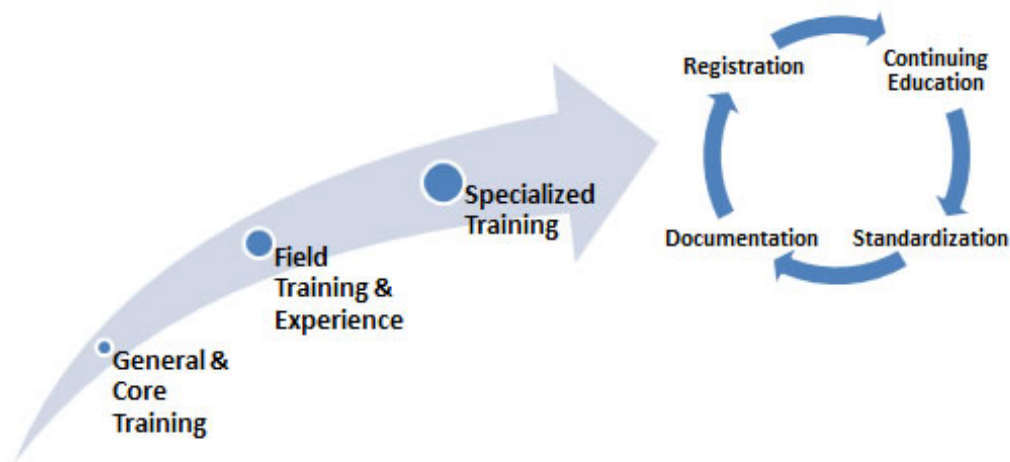
Each individual employee should maintain personal education, training, registration, and standardization records including:

- Certificates earned upon completion of ORAU courses.

- Automated attendance records, such as those currently kept by some professional associations or provided after successful completion of on-line courses.
- Documentation of field inspection reports for required joint and independent inspections.
- Certificates or other documentation of successful completion of a field training process.
- Minnesota EHS/sanitarian registration or proof of qualifications for registration.
- Certificates, inspection reports, and letters obtained from MDH upon successful completion of standardization.
- Other accurate verification of actual attendance, such as contact hour certificates or records for continuing education.

Summary

Adequately trained regulatory staff provides the foundation for a sound retail food and beverage, lodging, and public swimming pool program. Administrators, directors, managers, supervisors and staff must develop, refine, and sustain training practices that enable programs to meet the requirements of Minnesota statutes and rules, and the MDH Delegation Agreement. If an employee does not meet these benchmarks, consult your agency’s personnel policies. The following diagram illustrates a framework for the training components described in this section to help regulatory staff achieve required KSAs to perform job assignments.



- **General and Core Training:**
Staff gains basic environmental health KSAs needed to prepare for initial field training and experience.

Using the tools provided in this manual, administrators, directors, managers, and supervisors must ensure that appropriate training protocols have been developed and are being utilized by staff. Administrators, directors, managers, and supervisors must

take an active role in evaluating whether staff has the needed KSAs necessary for field training.

- **Field Training and Experience:**

Staff learns and demonstrates skills needed to conduct inspections of retail food and beverage, lodging (i.e., hotel, motel, manufactured home parks (MHP), recreational camping areas (RCA), and youth camps) and public swimming pools.

Administrators, directors, managers, and supervisors ensure staff is competent to conduct independent inspections. This can be accomplished by utilizing the tools in the CFP Training Manual, reviewing education records, and analyzing inspection reports for completeness and accuracy.

- **Specialized Training:**

Staff takes advantage of additional training opportunities to advance specialized KSAs.

Administrators, directors, managers, and supervisors must identify the training needs for staff in response to business practices at regulated establishments. For instance, if the regulated establishments are engaging in specialized processes such as reduced oxygen packaging or smoking meats, managers must ensure that appropriate funding and time is provided for staff to participate in training opportunities.

- **Registration, Continuing Education, Standardization, and Documentation:**

Staff upholds professional standards (i.e., registration, continuing education and standardization) needed to conduct risk-based inspections and communicate food safety principles.

Administrators, directors, managers, and supervisors maintain proper documentation to ensure that needed education, training, registration, and standardization are completed. Action is taken to ensure that the necessary training and documentation are completed by staff.

In order to maintain consistent, uniform, and safe retail food and beverage, lodging, and public swimming pool programs, all regulatory staff must be qualified, trained, and competent. Following the best practices outlined in this section is one way of achieving program goals for trained regulatory staff.