

# COLLABORATION OF STATE AND LOCAL HEALTH DEPARTMENTS IN ADOPTING THE FDA 2005 MODEL FOOD CODE 2007-2008

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## PROBLEM STATEMENT

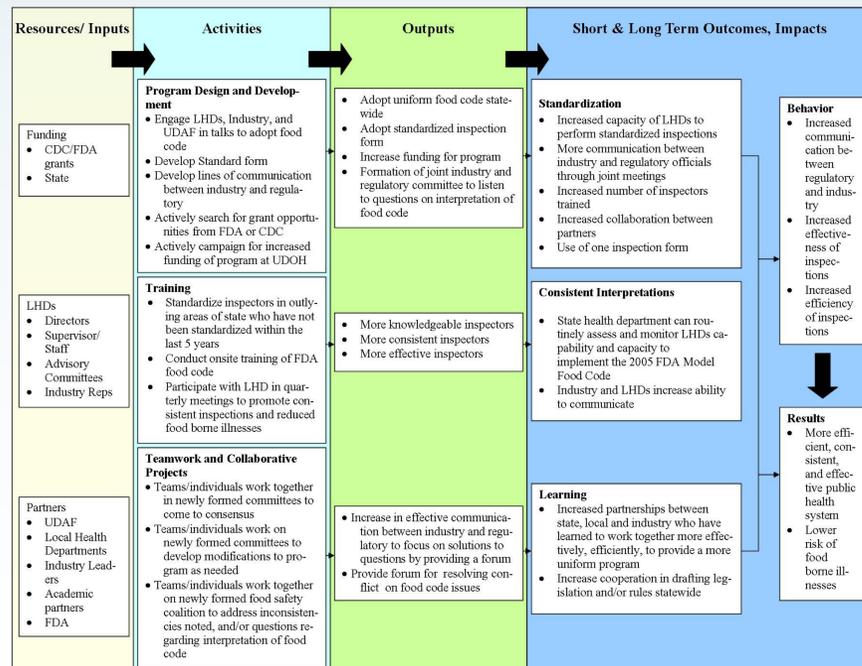
The State of Utah had not updated the food rule since adopting the 1999 FDA Model food code in 2000. Since that time budget cuts have occurred which shut down the program for 6 months, and has altered the available staff. In the interim, some local health departments (LHDs) have updated their regulations to reflect the latest updates proposed by FDA, while others have not. This has created a non-standardized food code across the state. To update the state rule and standardize regulation statewide, systems had to be redefined, relationships reestablished, and efforts to rebuild the program implemented. This project has worked to address solutions to the questions of "Why did the loss of two FTE's in the Environmental Sanitation Program affect the public health relationship between the LHDs and the State Department of Health, and why did this incident cause the loss of standardized food regulations in the state."

## PROJECT GOALS & OBJECTIVES

- Outcome Objective:** Adopt a uniform code statewide, and assure that all stakeholders use the adopted 2005 FDA Food code and consistently interpret and enforce it.
- Impact Objective:** By June 2008, adopt the FDA 2005 food code to give stakeholders one guideline for accepted food safety practice.
- Process Objective 1:** By January 2008, develop plan to adequately train and standardize stakeholders.
- Process Objective 2:** By June 2008, 50% of the local health departments will be using the same inspections sheet.
- Process Objective 3:** By June 2008, convene a committee consisting of both industry and regulatory representatives to give guidance regarding questions on interpretation of the food code.
- Process Objective 4:** By June 2008, train six local health department inspectors as statewide standardization offers in the FDA format.

## LOGIC MODEL

Draft UDOH Standardization Logic Model r.05/31/07  
Goal: Improve the standardization of inspections statewide through the adoption of standardized form and communication with local health and industry leaders



## BEHAVIOR OVER TIME

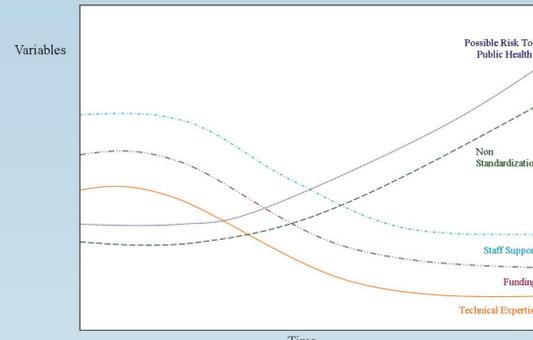


Figure 1. Behavior Over Time

## NATIONAL GOALS SUPPORTED



**Focus Area 10 Goal:**  
Reduce Food borne Illnesses  
**Objective 10-6:**

Improve food employee behaviors and food preparation practices that directly relate to food borne illnesses in retail food establishments... To help control the risk factors, the Food Code provides key public health interventions: use of time-temperature control, prevention of hand contact with foods as a vehicle of contamination, employee health, demonstration of knowledge by the manager, and a consumer advisory to inform consumers of their risk when eating raw or undercooked animal foods. Proper application and implementation of these interventions are crucial to combat food borne disease.

### National Strategy to Revitalize Environmental Public Health Services

- Build Capacity:** Rebuild the Environmental Services Program at the State Level
- Foster Leadership:** By rebuilding the program, reestablish the state in a leadership position for the LHDs
- Create Strategic Partnerships:** Rebuild the relationships between the LHDs and industry, which were affected by budget cuts

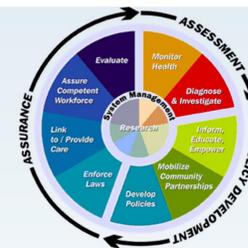
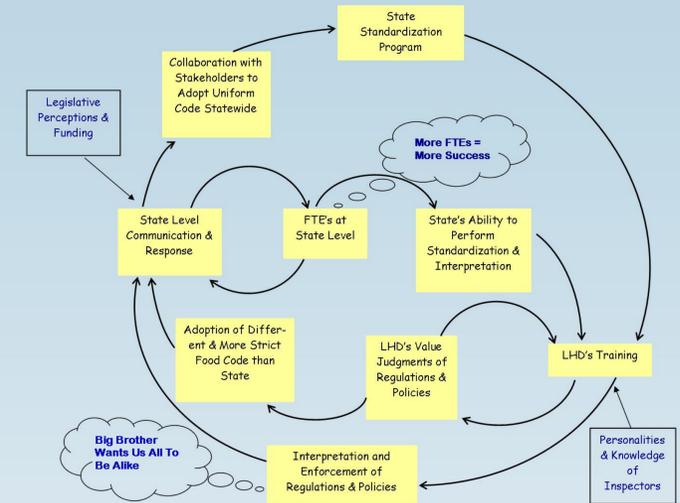


Figure 3: Reprinted from CDC's "National Strategy to Revitalize Environmental Public Health Services, 10 Essential Environmental Health Services"

## METHODOLOGY

- Quarterly Meetings with Environmental Health Directors**  
Collaborate with directors from the LHDs regarding adoption of the 2005 FDA food code as the state rule for enforcement in Utah. Get input on the direction desired for the inspection program. Propose uniform state inspection form to the directors, and form consensus. Develop a schedule of standardization activities for the next year to ensure standardization of inspectors to the new rule.
- Food code meetings with Utah Department of Agriculture and Food, Industry and LHDs**  
Collaborate with industry representatives, other state agencies, LHDs to gain consensus on the adoption of the food code. Form a consensus on how to address interpretation inconsistencies statewide.
- Meetings held with the Utah Environmental Services Workgroup Committee, and Presentation of Committee Findings to Health Officers and Executive Director of State Health Department**  
Collaborate with state and local representatives on defining the role and relationship of the state and LHDs in Utah. Develop a joint plan to rebuild the Environmental Services Program in Utah to fulfill the needs of the LHDs, and provide state leadership. Seek new ways of providing funding for the program, including actively seeking grant opportunities and/or developing new fees to provide a funding base increase. Present the committee findings to the Health Officers and Executive Director of State Health for approvals.
- Meetings with the Utah Food Safety Coalition**  
Collaborate with industry and regulatory representatives to promote food safety. Seek funding from FDA to hold meeting to promote and educate attendees on food safety. Write a grant to obtain the necessary funding.

## ACCIDENTAL ADVERSARIES



## RESULTS/CONCLUSIONS

Through the tedious and patience building task of meeting with the leaders of the local health departments and industry, a consensus has been reached. Both the local health department directors and industry have agreed that Utah should adopt the FDA 2005 Food code chapters 1 through 7 by reference without any modifications. In the beginning, the LHDs desired some modifications to the FDA food code, but industry and the LHDs were not in agreement in regards to this. A consensus to adopt the 2005 FDA food code by reference was reached as this food code had been approved at the Conference for Food Protection by both industry and regulatory representatives. The proposed code will need to go through administrative review at the Utah Department of Health, and go out to public comment before the rule will go into effect.

A proposed draft of the inspection form to be used statewide has been developed, and was given to the local health departments for input. This form is still under consideration, and a final approval has not yet been obtained. The most rural health departments have no objection, but the most populated health departments desire more time to consider the proposal. Standardization exercise dates will be finalized in January 2008 for the coming year.

The Environmental Services Workgroup has concluded their task of defining the roles of the local health departments and the state. And the task of proposing how to rebuild the Environmental Services Program has been completed. This was proposed for approval at a meeting in November 2007 to the Health Officers and Executive Director of the State Health Department. The committee's findings were approved.

A grant has been written and will be sent to FDA to obtain funding to promote food safety in Utah at a meeting which will be held in 2008. Food Safety representatives from both industry and regulatory will be invited to attend.

