

An Evaluation of Existing Retail Program Standards Networks

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In 2021, the National Association of County and City Health Officials (NACCHO) and the Conference for Food Protection (CFP) collaborated to identify state and local retail food regulatory programs participating in state- and region-wide networks. These networks focused on working together to increase conformance with the [Voluntary National Retail Food Regulatory Program Standards](#) (hereafter Retail Program Standards). The goal of this project was to explore how participation in a network has helped jurisdictions achieve conformance with the Retail Program Standards and highlight promising practices that can be shared with others across the United States. Feedback from the focus groups indicated that network participation advanced jurisdictional conformance with the Retail Program Standards and promoted participation within other local jurisdictions who were not previously enrolled in the standards.

For the purposes of this project, a network is defined as three or more jurisdictions that regularly convene (virtually and/or in-person) to discuss, share, and work together to increase understanding of, and conformance with, the Retail Program Standards. A network can be administered by local jurisdictions, states, or the U.S. Food and Drug Administration (FDA) Retail Food Specialists. Network participation

was not limited in scope - any jurisdiction regardless of size, geographic area, or entity could participate. CFP, NACCHO, the Association of Food and Drug Officials (AFDO), and the National Environmental Health Association (NEHA) assisted in identifying networks. To ensure consistent evaluation of network effectiveness across focus groups, only networks consisting of more than six local health departments were included in the study sample. Success of the focus groups required active participation from local health department (LHD) representatives. The three networks represented in this report were those who had capacity to participate in focus groups while maintaining COVID-19 response and other routine food safety activities.

“Feedback [from the focus groups] indicated that [Retail Program Standards] network participation assisted enrollees in advancing conformance with the Retail Program Standards and promoted enrollment within other local jurisdictions.”

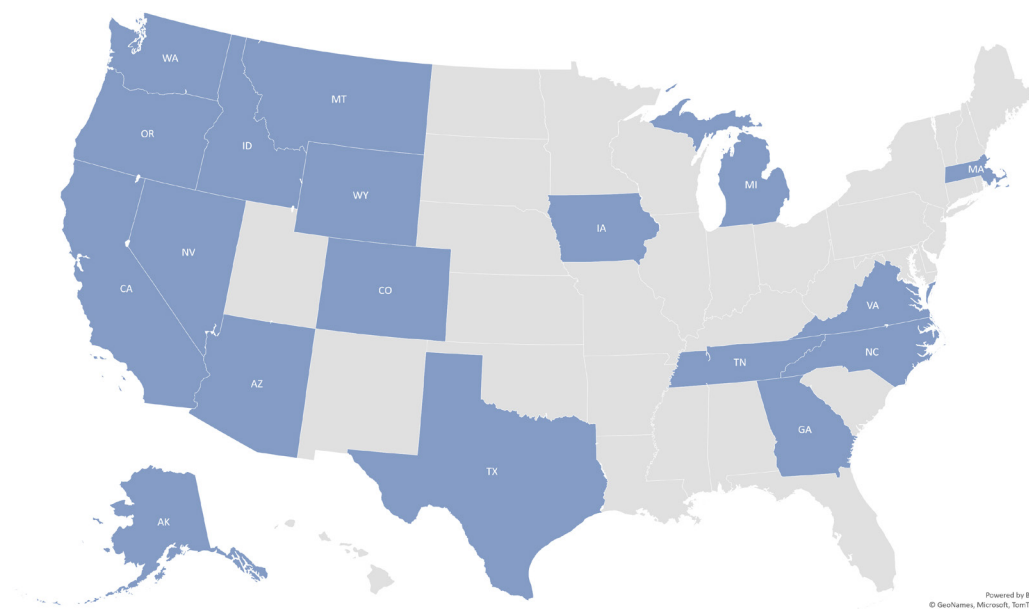


Figure: Map of the United States of America showing states with SLTTs participating in active Retail Program Standards Networks. Image credit: NACCHO.

Methodology

Due to resource limitations and limited availability of network members at the time the study was conducted, only three of the 13 networks identified participated in the study. The NACCHO Research and Evaluation (R&E) team held individual focus groups with Iowa, North Carolina, and Pacific Northwest Retail Program Standards Networks. The focus group sessions ranged from 60 to 90 minutes and were facilitated by NACCHO's Research & Evaluation (R&E) staff with another NACCHO employee taking notes.

The R&E team also disseminated a follow-up survey to network leaders who did not participate in the focus groups, namely the leaders of the Northwest Regional and North Carolina networks. The survey asked about the logistics regarding setting up and maintaining networks that network members may not have been able to answer as accurately as the network leaders. Due to the small sample size of this exploratory study, both the generalizability and replicability of study findings are limited. However, all three focus groups held very favorable opinions on the benefit of their networks in achieving conformance with the Retail Program Standards.

Facilitators of Retail Program Standards Networks

- ♦ **A determined and competent network leader that convened LHDs across the state and regions.** Networks that had a consistent person championing and coordinating the network formed closer relationships between members and had more familiarity with the work and resources of their peers. The network leaders were viewed as experts on food safety and the Retail Program Standards and were able to interpret the standards and communicate about the process for achieving conformance in a way that reduced barriers for LHDs.
- ♦ **Support through federal grant opportunities and peer-sharing initiatives to improve adoption and conformance with the Retail Program Standards.** When available, grant funds awarded to LHDs allowed network members to attend trainings and conferences focused on the

Retail Program Standards, including the FDA Self-Assessment and Verification Audit Workshop. Some network members also participated in [NACCHO's Retail Program Standards Mentorship Program](#) that paired mentee LHDs working on the Retail Program Standards with mentor LHDs who had already achieved conformance. These opportunities provided a space for peer exchange of successful strategies and lessons learned that were taken back to networks, which amplified the spread of information, especially among jurisdictions that did not have the staff capacity or funds to attend trainings. For example, network members provided real examples to follow when conducting the program self-assessment and determining an appropriate action plan and timeline for conforming with the Retail Program Standards. With this improved understanding of the standards, network participants were empowered to encourage neighboring jurisdictions to enroll in the Retail Program Standards and participate in the network. Furthermore, an FDA Retail Food Specialist created a FoodSHIELD account for participants to share resources. This approach could serve as a model for other FDA Retail Food Specialists to support networks within their regions, resulting in greater conformance with the Retail Program Standards and improved food safety.

- ♦ **Shared attitudes and intrinsic motivation to use the Retail Program Standards to improve food safety in their jurisdiction, region, and state.** Two of the three network members freely adopted the Retail Program Standards. In the third network, the state mandated conformance with some of the standards, but the network promoted the adoption of all nine standards as part of their shared values to improve food safety. Some network members noted that having the Retail Program Standards was helpful as a guide for improving their food safety practices, and network members drew inspiration from their peers who had already achieved conformance with several standards. Participants also mentioned that they were encouraged to get involved in networks by their direct supervisors, colleagues who were involved in Retail Program Standards, or other networks. External pressures also helped to build network momentum and a sense of shared values.

Benefits of Participation in the Network

Achievement of Standards

- ♦ **LHDs achieved conformance with the standards more efficiently and built upon other standards by connecting with one another and sharing resources.** Members used their networks to share strategies and templates for achieving conformance with the standards. By sharing resources, LHDs saved time and approached standards in a consistent way across their networks. LHDs with newer food safety program staff benefited most from the peer-to-peer sharing as they quickly adopted best practices and leveraged the experiences of their peers who had already achieved conformance. LHDs with limited staff capacity also felt that it was helpful to have access to documents and resources that larger LHDs created regarding standards and other food safety messaging. Groups of members (and in some instances, the whole network) focused on conformance with individual standards, which greatly expanded the number of partners to work with especially for LHDs with fewer staff.



"The network [members] currently meet Standard 1 and 2, [because of the network] we know who to call and have an FDA retail specialist in the region who can point to someone who can really help you."

"It's nice to be able to lean on one another to see how others have achieved a standard, once an agency completes it they can set their process in front of others."

Testimonials from Retail Program Standards Network Participants

"There are specific resources that the larger counties

have developed that are extremely useful. Communication within the network allows us to know who has the expertise, so you can go quickly to those programs and use the resources they've developed if you have a deficiency."

"It just really helped us to not have to reinvent the wheel, which I think is the goal here: to try and share information and make it as easy as possible while still being impactful."

Improvement of Food Safety Standards Overall

- ♦ **Network members shared strategies for regulatory inspections and compliance activities with each other which led to more uniform enforcement of food safety regulations.** During network meetings, members discussed how they conducted routine inspections and enforcement procedures to ensure practices were consistent and aligned with the Retail Program Standards. Retail food service operations with locations across regulatory jurisdictions were subject to the same guidelines. Additionally, the networks served as a place for members to have a single point for communication regarding compliance to state mandates and emerging threats to food safety.

"I think that [for us], especially as a state, having those tough conversations...really helps us think about also where we need to go as a state program...I think we all still fear that *"oh, they do it differently in that county vs. this county"* and I think that the [Retail] Program Standards can help with that by also showing that other jurisdictions, whether it's your own-sized jurisdiction, a county, or a quad county, that someone else being successful really does help as a selling point."

- ♦ **Network members strengthened their own project management skills and LHD food safety programs beyond Retail Program Standards initiatives.** Network meetings were used to discuss a wide range of food safety topics and provided peer connection beyond Retail Program Standards initiatives and activities to achieve conformance.

Network members who were recently hired or promoted into program management positions learned from their more experienced peers about how to run a food regulatory program including purchasing equipment, identifying funding opportunities, and establishing goals and priorities.

"Since I've come, I think we've gotten six, maybe seven Standards...we have completed some of the Standards that are not required by the Department of Inspections and Appeals – I'd like to think that by moving forward through the Standards it leads to some synergistic effects and we're able to complete some Standards that are not required because we've completed the Standards that are, so why not? Recently we've expanded out into conducting audits for external public health departments."

"Some of the ways that the Retail Program Standards have helped [my county] has just been equipment. We didn't have the equipment to complete the tasks ahead of us; we didn't have any way to run reports, to monitor compliance, so the funding for equipment was huge. Also, the training and being able to connect with others with similar challenges. We would not have been able to connect with other counties without the Standards."

Improving and Creating Partnerships

- ♦ **Network members connected and worked with one another through the networks, regarding food safety issues and other public health topics.** Network members collaborated to inform the food industry regarding standards and provided a single voice for enforcement of regulations. Network members also noted strengthened partnerships with other regulatory specialists that often overlap within health departments including environmental regulators, sanitation specialists, and other entities responsible for active managerial control (AMC) activities.

Connections formed through the networks provided opportunities to improve collaboration and relationships between jurisdictions. In this way, the Retail Program Standards networks became a catalyst for beneficial communication between departments within LHDs.



"I think policy strategy as we try to deal with legislative initiatives that might otherwise come out that relates to [...] our various programs and it gives us an opportunity to share in conversation in ways in which to deal with those environmental health related issues that might be happening locally...I mean, the world really works off a good, solid system of collaboration."

"Working together on the auditing class really provided a lot of bonding throughout the network. It was really like we were a Greek organization. You got to know who has specific strengths and weaknesses and really rely on folks in the network for things that they're strong in."

Strengthening Communication with State and Federal Entities

- ♦ **Networks gave LHDs a platform to stay up-to-date on information from state or federal agencies.** LHDs often engage with state and federal agencies in one-on-one conversations or through individual correspondence which can lead to fractured communication across jurisdictions within a state. The networks provided a space for members to disseminate information they received from state and federal entities regarding new policies or upcoming updates and promote equity in communication throughout the network. This ensured that LHDs had access to current information and could act according to shifting state or federal priorities.

One network had direct participation from the state food regulatory agency during network meetings, while another used the network to communicate feedback from local agencies back to the state.

These networks can provide an opportunity for LHDs to ask any questions they may have for state agencies and provide feedback to those agencies regarding Food Code and Retail Program Standards adoption.

"Our state agencies kind of have a bad habit where if you ask a question, they'll answer you and only you, they don't send it out to everyone else. So these calls have helped us...even on the call we'll share this stuff over email to figure out what's their current status."

"We talk about once a month on the phone...it helps keep us consistent throughout the state, which I think is a goal. We had started, once a year, having in-person meetings where we would have our FDA retail food specialist join us and do some education with the standards or be there to answer questions."

Barriers to Participating in Networks

- ♦ **While networks provide a wealth of benefits, LHD staff face internal and external barriers to investing in network participation.** Barriers to participation included limited staff time and program funding, resistance to adopting Retail Program Standards from late-career staff, perceived burden of achieving conformance, shifting priorities because of COVID-19, and political resistance to additional regulations.

"Our metro areas and then those who have been active in the past and want to become more active after COVID-19 calms down a little bit..they are definitely more willing to join in. Some of our more rural county sanitarians, and especially our older sanitarians, don't buy into [Retail Program Standards] at all."

Summary and Conclusions

All members agreed that being a part of a network had benefits beyond conformance with the Retail Program Standards. The focus groups found that success of the network was highly dependent on its facilitator's ability to bring people together and support knowledge-sharing among network members. Additionally, fostering an atmosphere of trust encouraged LHDs with varying degrees of experience with food safety enforcement to lean on each other for advice and guidance. The network also offered LHDs a sense of community and helped reduce feelings of isolation by demonstrating that they were not alone in working towards conformance with the Retail Program Standards. Networks are multi-faceted and provide health departments opportunities to:

- » incubate innovative practices;
- » develop a single voice to communicate with state and local jurisdictions;
- » access resources and materials to fill gaps of under-resourced LHDs;
- » develop a fast-track to adopting Retail Program Standards; and
- » act as a sentinel group to monitor and share emerging trends and threats within states.

This study revealed that barriers to participation in networks and enrollment in the Retail Program Standards still exist. However, jurisdictions that participated in a network were found to gain confidence and improve their regulatory programs through collaboration. Furthermore, by increasing members' knowledge of the Retail Program Standards, participants can engage with neighboring LHDs to explain both the importance of the standards as well as actionable steps that can be taken to achieve conformance. The recognition that achieving conformance with the Retail Program Standards is possible is a critical step in increasing the enrollment of

other jurisdictions.

One recommendation to improve conformance with the Retail Program Standards is to provide funding for networks. Currently, there are no federal resources specifically identified to support Retail Program Standards networks. With more research into the effectiveness of networks, it may be prudent for NEHA and FDA to develop mechanisms within the [NEHA-FDA Retail Flexible Funding Model Grant Program](#) to support the development of and participation in networks. When seeking funding opportunities, it is key to have a knowledgeable and driven leader with a vision for using the network to advance conformance with the Retail Program Standards. These effects could be optimized through additional technical assistance and funding specific to creating networks.

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The National Connection for Local Public Health



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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