

► SPOTLIGHT ON SUCCESS STORIES FROM THE FIELD



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Beyond Compliance: How Meeting FDA Voluntary National Retail Food Regulatory Program Standards Strengthened Our Retail Food Program

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Editor's Note: The National Environmental Health Association (NEHA) strives to provide relevant and useful information through the pages of the *Journal* for environmental health professionals. In a recent membership survey, we heard your request for information that spotlights successful environmental health programs across the different areas of environmental health and from different sectors of the profession. We listened and are pleased to offer a column that shines a spotlight on success stories from the environmental health field. These stories enable us to learn from our peers and provide an avenue to incorporate successful programs, innovative solutions, and unique approaches to our own programs and initiatives.

The findings and conclusions of this column are those of the authors and do not necessarily represent the official position of NEHA, our funders, or our partners.

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Introduction

Retail food regulatory programs face increasing expectations to protect public health while operating with limited staff and resources. The Food and Drug Administration (FDA) Voluntary National Retail Food Regulatory Program Standards (Retail Program Standards) provide a framework for continuous improvement and help jurisdictions evaluate the effectiveness of their programs. For the Food Safety Branch within the Kentucky Department for Public Health (KDPH), pursuing conformance with various Retail Pro-

gram Standards provided an opportunity to strengthen operations, improve consistency, and better serve the people of Kentucky.

Through support provided by the National Environmental Health Association (NEHA)-FDA Retail Flexible Funding Model (RFFM) grant, KDPH was able to dedicate time and resources toward achieving five standards. Initial efforts to build capacity enabled the team to improve regulatory staff training, standard operating procedure documentation, program resources, and community engagement. This column shares KDPH's

experience, lessons learned, unexpected benefits, and outlook as a program regarding the Retail Program Standards.

Where We Started

Like many jurisdictions, KDPH's retail food program was already performing many activities that aligned with the Retail Program Standards. A formal self-assessment revealed, however, opportunities for improvement in program resources and documentation. Many of the team's operational procedures existed primarily through institutional knowledge and best practices rather than formal written processes.

Several challenges became apparent during the assessment process. As a decentralized state food protection program, staff does not complete routine retail food establishment inspections. Rather, staff rely on local health department partners as agents of the state. Documentation practices varied, making it difficult to demonstrate consistency across the program. In some cases, staff records existed but were stored in multiple locations, creating inefficiencies when information was needed.

The self-assessment process ultimately provided a valuable roadmap. Rather than viewing the Retail Program Standards as an administrative burden, staff began to see it as a structured approach to strengthening the state's program and identifying priorities for consistency and continuous improvement.

Putting RFFM Funding to Work

RFFM funding played a crucial role in helping the program move from planning to implementation. The grant provided the flexibility



Photo 1. An all-staff photo from the 2024 Annual Food Safety Branch Meeting. Photo courtesy of the Kentucky Department of Public Health.



Photo 2: One of three strategically placed “Food make you queasy? Reporting it is easy.” billboards in Bowling Green promoting Kentucky’s Food Safety Reporting System. Photo courtesy of the Kentucky Department of Public Health.

needed to dedicate resources toward activities that directly supported conformance with Standards 1, 2, 5, 7, and 8.

- **Standard 1, Regulatory Foundation:** This standard required staff to review KDPH’s statutory/regulatory authority and ensure that the framework adequately supported Kentucky’s retail food program. This process allowed staff to evaluate existing statutes and regulations and identify areas where updates or clarification could be needed for future adoptions of FDA *Food Code* editions.
- **Standard 2, Trained Regulatory Staff:** This standard focused on ensuring that staff possess the knowledge and competencies needed to perform their duties consistently. RFFM funding supported multiple training opportunities (Photo 1), continuing

education, and efforts to improve tracking and documentation. As a result, staff have gained greater confidence and consistency in applying regulatory requirements.

- **Standard 5, Foodborne Illness and Food Defense Preparedness:** This standard encouraged staff to evaluate readiness to respond to foodborne illness complaints and to emergency foodborne illness outbreaks. Staff reviewed procedures, identified areas for improvement, and strengthened coordination with internal and external partners. These efforts improved the program’s preparedness and ability to respond effectively when needed through the Kentucky Food Safety Reporting System (KFSRS), which is an enhanced online consumer reporting system used to report suspected foodborne illness outbreaks

and to identify unsafe food handling practices. This system has significantly sped up the notification process and local health department response time.

- **Standard 7, Industry and Community Relations:** This standard highlighted the importance of communication and outreach. Staff used this opportunity to strengthen relationships with industry partners and communities by providing educational resources that support compliance and continuous improvement efforts. By emphasizing collaboration and education, the program was able to build further trust and encourage proactive food safety practices.

Perhaps the most significant success story to date, particularly in terms of education and outreach, was the 2024 launch of a media and advertising campaign to promote the KFSRS. The 2-month campaign, a grant-funded special project, was launched in Bowling Green, Kentucky, with three billboards strategically placed in high-traffic locations with the slogan: “Food make you queasy? Reporting it is easy.” (Photo 2).

Additionally, steps were taken to improve our search engine optimization score for the KFSRS website, making it even more user-friendly. This project also included both a Google search engine optimization (SEO) that pushed the website to the top of every Google search and a social media advertising campaign with ads placed on Google, YouTube, and Facebook.

The campaign proved hugely successful, with over 290,000 website impressions and 4,769 consumer clicks for our KFSRS landing page. The KDPH Food Safety Branch is especially grateful to FDA and NEHA partners for the special projects funding used to execute this initiative. With the restoration of special projects funding, the program hopes to repeat this campaign in other metropolitan areas of the state, with expanded KFSRS advertising on billboards, bus stop benches, and public transit vehicles.

- **Standard 8, Program Support and Resources:** This standard required the team to take a broader look at program management and sustainability. Through strategic planning and resource evaluation, staff identified opportunities to improve efficiency and support long-term program success with the Retail Program Standards.

Lessons Learned Along the Way

One of the most important lessons staff learned was the importance of documentation. Many of the activities required by the Retail Program Standards were already taking place, but they were not always documented in a way that clearly demonstrated conformance. Developing written procedures, organizing records, and establishing consistent documentation practices have become essential components of our program's capacity building process.

Another lesson involved staff engagement. Involving the Retail Food Team throughout the process helped build ownership and ensured that improvements were practical and sustainable.

Staff also learned that progress takes time. Some tasks took longer than anticipated, and certain improvements required multiple revisions before reaching a final form. Maintaining flexibility and celebrating incremental successes helped sustain momentum.

Finally, staff found tremendous value in leveraging available resources. Guidance from FDA and NEHA, support from states and local health departments enrolled in the Retail Program Standards, and conversations with peer jurisdictions through the Association of State and Territorial Health Officials' Mentorship Program provided insights that

helped us avoid common pitfalls and identify effective strategies.

Unexpected Benefits Beyond Compliance

Although the primary objective was to achieve conformance with specific Retail Program Standards, some of the most meaningful outcomes were unexpected, including:

- Enhanced training opportunities that better prepared staff for complex situations
- A stronger foundation for the onboarding and professional development of new team members
- A significant reduction in uncertainty among program staff when addressing complex challenges
- Significantly improved documentation across all program areas as records became easier to locate and procedures more clearly defined
- Standardized procedures that increased consistency
- Increased outreach, communication, and collaboration with industry, academia, and local health department partners

Looking Ahead

Achieving conformance with five Retail Program Standards represents a significant milestone for our agency, but it is not the end of the

journey. Continuous improvement remains at the core of the Retail Program Standards framework, and the program intends to build on the progress already made.

The team will continue pursuing opportunities to strengthen the retail food program by maintaining the framework that has been developed and working toward additional Retail Program Standards. The RFFM grant provided more than financial support; it provided a catalyst for meaningful program improvement.

For jurisdictions considering or actively pursuing the Retail Program Standards, our team's experience demonstrates that the process is much more than compliance. It is an opportunity to invest in staff, strengthen program infrastructure, and ultimately, protect every Kentucky community. 🌸

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Did You Know?

October 8 is Children's Environmental Health Day. The observance increases the visibility of children's environmental health issues and empowers action to create a healthier, safer, and more equitable world for all children. Learn more at <https://cehday.org>.

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