
ASSOCIATION OF FOOD AND DRUG OFFICIALS

2017

RESOLUTION NUMBER 2017-3

Submitted by: AFDO Board of Directors

Date: June 16, 2017

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Concerning: Flexible; Cost Effective; Sustainable and Accessible FDA Training for State Programs

Whereas, a primary goal of the Manufactured Food Regulatory Program Standards (MFRPS) is to establish equivalency among state manufactured food regulatory programs by identifying and consistently applying key elements of a high quality framework to their existing programs, and

Whereas, a major hurdle for states to comply with these standards relates to the training required of individuals who conduct manufactured food regulatory inspections, and

Whereas, state's participating in the MFRPS program are annually assigned FDA contract inspections that must be completed including Good Manufacturing Practices (GMP) type inspections, HACCP inspections of seafood and juice, and acidified and low-acid canned food inspections, and

Whereas, states are reporting difficulty in meeting the training requirement necessary to conduct FDA contract inspections as a result of employee turn over within the state and the lack of available FDA training courses, and

Whereas, in order to enhance an integrated federal/state partnership, alternative training solutions must be considered, and

Whereas, AFDO believes flexibility in the overall training delivery system will be necessary to resolve this training concern, therefore be it

Resolved, that AFDO request FDA to consider the following training options to be made available for state manufactured food regulatory programs that will better fit their training needs and support an Integrated Food Safety System (IFSS):

- Host additional classes to assure all areas of the country are covered
- Utilize web-ex technology where available to allow training programs to be recorded, monitored and attended by others equipped with the same technology.
- Work with higher education institutes such as land grant universities to provide FDA equivalent classes within the state

- Offer additional online classes and/or virtual video conferencing segments as training alternatives thus shortening the length of time travelling. Many states cannot afford the cost and time to have their inspectors out of the field for extended periods of time. Online classes offer a more efficient, cost effective platform for multiple inspectors to attend classes, simultaneously. Online classes can also be built to track attendance, test scores and upload certificates automatically into a training database and/or email account.
- Consider in-state 'Train-the-Trainer' programs for each FDA class. Providing each state the option to have one of their own trainers classified as a 'FDA in-state trainer' would give each state the flexibility to provide this training within the state.
- Consider contracting with a food regulatory association such as AFDO to coordinate a cadre of qualified trainers who could deliver to state manufactured food regulatory agencies in-person training, including the Food Safety Preventive Controls training course developed through the Food Safety Preventive Controls Alliance (FSPCA).