

Preventive Controls Inspections in Florida

AFDO Annual Education Conference 2018

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About FDACS – Bureau of Food Inspection

- **Four Program Areas**

- **Manufactured Food Team**
- **Retail Food Team**
- **Poultry & Egg grading**
- **PDP – Sample collection**

Unit Support

- **Division of Food Safety**
- **Admin Support**

- **Manufactured Food Team**

25 Field Inspection Staff, 3 Managers & 1 Administrator

Field Staff working from home offices located throughout Florida

- **Conduct inspections of Food Processors (except Dairy and Meat) and Warehouses**



Content

- **Adoption of the Regulation**
- **Outreach**
- **Staff Training**
- **GMP Inspections**
- **Preventive Controls Inspections**
- **Challenges**
- **Next Steps**



Adoption of the Regulation

117 Modernized GMPs

- Adoption by reference into 5K-4, Florida Administrative Code
- Adopted April 1, 2016 version on October 31, 2017

Note: 0 comments received for this proposed rule change



Outreach

- **Prior to adoption, presented and hosted two Preventive Controls Qualified Individual (PCQI) FSPCA courses for industry(free)**
- **FDACS website links customers with information**
- **Bulk email – letting industry and regulatory partners know about adoption**
- **Fact Sheets – General FSMA and 117 specific**



Manufactured Food Staff Training

117 Modernized GMPs- Training before and after October 2017 adoption by FDACS

- Both FD8000L and FSPCA PCQI (online or in-person) part of Basic Training (MFRPS)
- All staff - FDACS in person training utilizing draft hazard guide, May 2017, November 2017, February 2018 and planned July 2018



CFR117 Inspections

117 GMP Inspections started November 2017

- About 700 CFR 117 inspections conducted to date (11/1/2017-6/7/18)
 - Still conducting some CFR110 inspections, approximately 160 conducted
- 1,652 visit (offsite & onsite) reports (11/1/2017-6/7/18)
 - Offsite visit gains



Preventive Controls Staff Training

117 Preventive Controls Training - Handled as Advanced Food Inspection Training

- One inspector– memo as independent and a Qualified Trainer (QT)
- Observed FDA OJE PC inspections in: 2/2017, 3/2017, 5/2017 & 4/2018
 - Completion of Basic Food Inspection Training
 - Completion of FD254
 - Joint Inspections with a QT
 - Three(3) joint inspections for independence – no evaluation form available yet
 - Desk evaluations of independent work until an evaluation process is established



Preventive Controls Staff Training

- **Implementation of 117 Subpart C – Preventive Controls Training**
 - **All current field staff have completed PCQI Training – Online FSPCA flexibility**
 - **FD254 – PC Regulator Training**
 - **Four(4) inspectors have completed FD254**
 - **Two(2) Managers have completed FD254 *****
 - **In the process of completing Joint Inspections that will lead to Evaluations**
 - **Joint inspections for all four(4) field staff by December, 2018**



Preventive Controls Staff Training

Who should conduct Preventive Controls Inspections?

- **Select staff? Identify skills needed**
 - **Attention to detail – “mentally exhausting”**
 - **Systems based thinking – evolution similar to Retail approach**
 - **Technical expertise balanced with strong people skills**



Preventive Controls Inspections

- **(10) PC (Subpart C/G) under contract 2017/2018**
- **Preventive Controls Inspections (Subpart C/G) started April 2018**
 - **FDA Contract 2017/2018 - Ten(10) inspections**
 - **5 completed so far, 5 to go**
 - **2,651 miles & \$1,000 hotel rooms**
 - **State inspections – 2 so far**
 - **Simultaneously developing procedures, training plan, future evaluation form and future audit form**



Preventive Controls Inspections - Challenges

- Hurricane Irma - staff that were to attend FD254 – canceled
- PC cites in FDACS inspection system (data base)
- Irma – Emergency response mode
- Rule not in effect until 10/31/2017
- Work could not start until 8/01/17 – budget



Preventive Controls Inspections - Challenges

- Progress challenged by passion
- Limited staff (starting point)
- Covering a large State –
 - PC contracts from Pensacola to Miami (675 miles)



Next Steps Preventive Controls- Concerns

- **Investment staff training for PC Inspections and customer support \$\$\$**
 - **Estimation of XXX food establishments that may fall under PC**
 - **Four (4) seats for FD 254 in FY 19 ?**
 - **Preventive Controls Qualified Individual (PCQI) training for all field staff, administrators, managers, support staff, compliance officers, etc.**
 - **PCQI training to date – 29 \$\$\$**



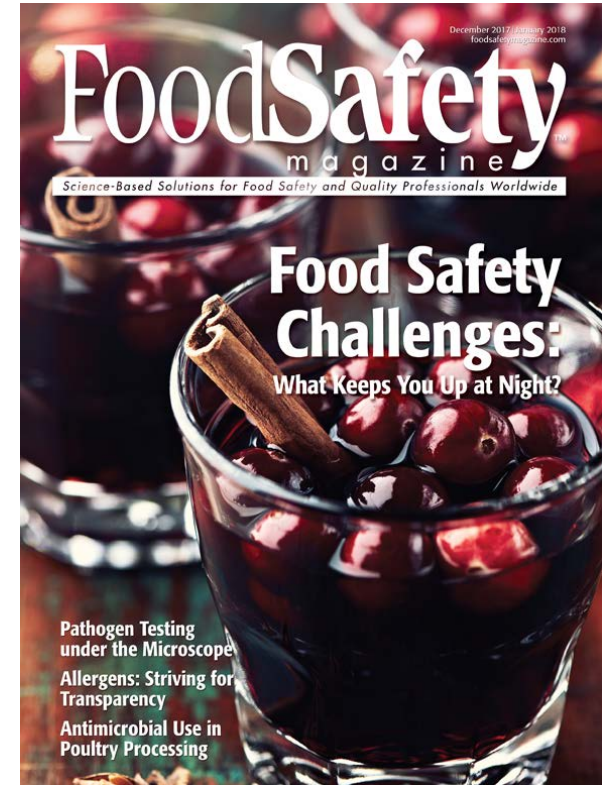
Next Steps Preventive Controls - Concerns

- **Program Reassessment**
 - Risk classification – Moving towards categories 3, 2, & 1
 - Inspection frequency reality while moving towards an IFSS
 - 55% trained field staff attrition January 2016 to date
- **Industry relationships & fostering an Integrated Food Safety System**
 - Lifting the rug
 - Changing the dynamic of onsite visits



Next Steps - Concerns

- Application of similar regulation changes
 - Reflection of 20 years of Fish and Fishery Products (AKA Seafood HACCP)
 - Use of Critical Control Points (CCPs) in Florida Seafood HACCP Plans
 - <https://www.foodsafetymagazine.com/>





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