

Preventive Controls Inspections Update State of Florida Implementation Progress

Matthew Coleman
*Environmental Administrator
Florida Department of Agriculture and
Consumer Services (FDACS)*

June 24, 2019



Content

- **Our FDACS Manufactured Food Team**
- **cGMP Inspections**
- **Preventive Controls Inspections**
- **Challenges**
- **Our next steps**



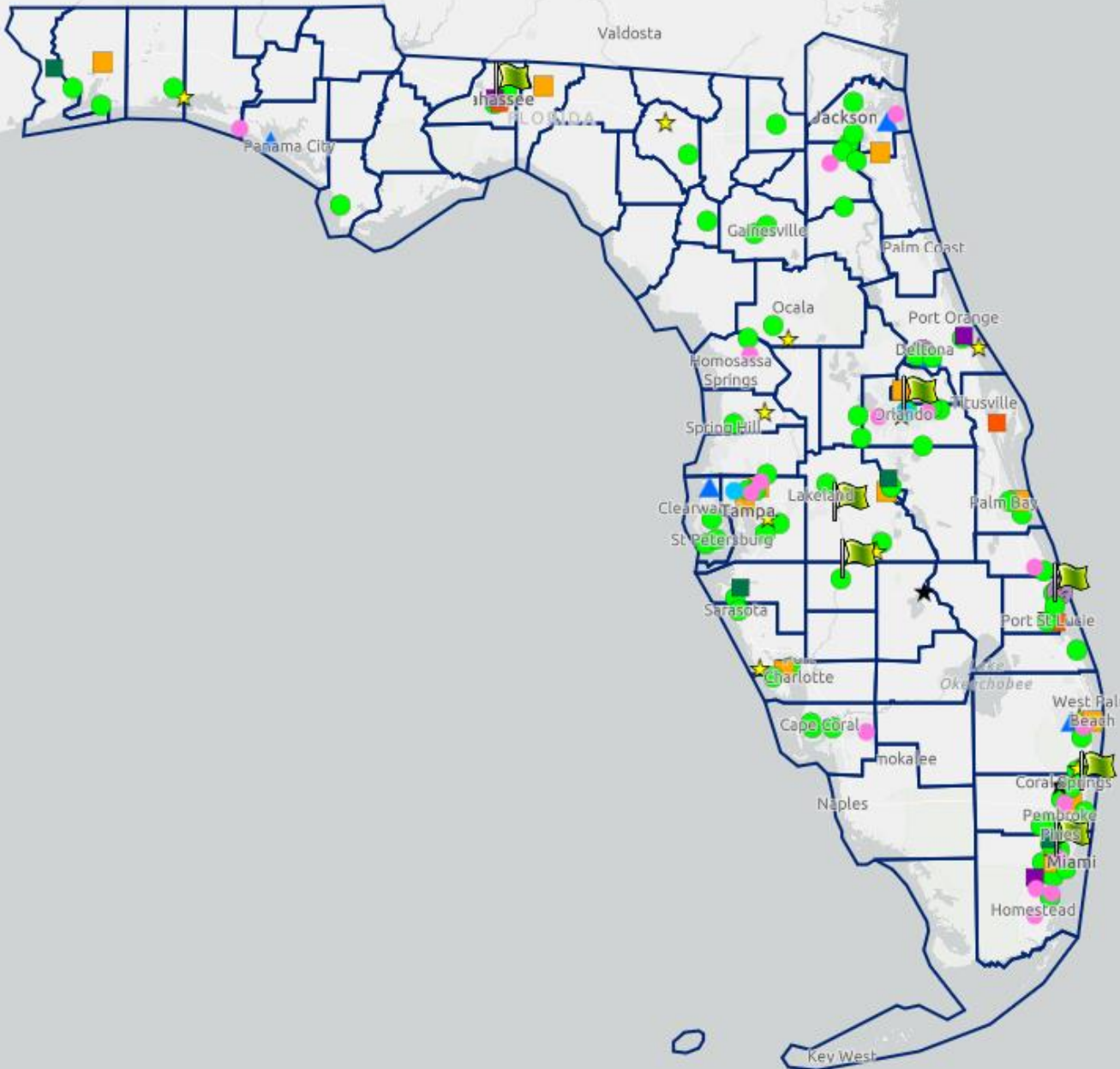
Our Team– Division of Food Safety

Bureau Food Inspection - Manufactured Food Team

- **20 ish Field Inspection Staff, 3 Managers & 1 Administrator**
- **Field Staff working from home offices**
- **Inspections of Food Processors and Warehouses**



Our Team – Bureau of Food Inspection



Division of Food Safety District Office Locations



Manufacturing Inspector Locations

- Position
- Environmental Manager
 - Environmental Specialist III
 - Inspector
 - Quality Assurance
 - Senior

Retail Inspector Locations

- Position
- GOVERNMENT ANALYST I
 - SUPERVISOR
 - SENIOR
 - INSPECTOR
 - STANDARD

Authority

- **cGMP, Hazard Analysis, and Risked-Based Preventive Controls For Human Food - adoption by reference**
- **Adopted April 1, 2016 version on October 31, 2017**



CFR117 / cGMP Inspections - #s to date

- 117 GMP Inspections started November 2017
- About 4,274 CFR 117 inspections
- 1,608 ancillary visits reports



Preventive Controls Staff Training- Who

- **Attention to detail – “mentally exhausting”**
- **Systems based thinking**
- **Technical expertise balanced with strong people skills**
- **Years of experience**



Preventive Controls Staff Training - Approach

- **Handled as Advanced Food Inspection Training**
- **2 Qualified Trainers (QTs)**
 - **Basic Food Inspection Training**
 - **FD254**
 - **Joint Inspections with a QT**



Preventive Controls Staff Training – to date

- Eleven(11) inspectors FD254
- Two(2) Managers FD254 ***
- Five(5) inspectors independent by memo



Preventive Controls Inspections - #s to date

- Inspections started April 25, 2018
- 41 full PC inspections conducted
- 27 Observation / OJE / joint



Preventive Controls Inspections - Challenges

- **Progress challenged by passion**
- **Limited staff (starting point)**
- **Staff attrition ... the ish in the 20**
- **Covering a large State**









SeaWorld

Orlando



WALT DISNEY WORLD[®]
RESORT











[Forgot Password](#) | [Forgot Login ID](#)

envision

SUCCESS IN FLORIDA

[Contact Us](#)

Next Steps

- **Integrated working planning with FDA**
- **Strategic planning of field staff training**
- **Focused Industry outreach**
- **Continued commitment – Advanced Inspection area**



Contact Information

Matthew Coleman

Environmental Administrator

Florida Department of Agriculture and Consumer Services

Matthew.Coleman@FreshFromFlorida.com



Preventive Controls Inspections - Challenges

- All potential hazards being viewed as hazard that requires a control
- 20 years of Seafood HACCP
 - Use of Critical Control Points (CCPs) in Florida Seafood HACCP Plans
 - <https://www.foodsafetymagazine.com/>



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**



Where we have been -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



Preventive Controls Inspections - Challenges

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 \$\$\$



Preventive Controls Inspections - Challenges

- **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
 -



Where we have been - Outreach

- **2017 - hosted two Preventive Controls Qualified Individual (PCQI) FSPCA courses**
- **FDACS website**
- **Bulk email**
- **Fact Sheets**

