

Association of Food and Drug Officials

◆ Elliot O. Grosvenor Food Safety Award ◆

*This nomination must be submitted by **April 1**  
to be considered for the current year's award*

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**Criteria for Nominations**

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The Elliot O. Grosvenor Food Safety Award is given to recognize outstanding achievements made by food safety programs within State Departments of Agriculture, Natural Resource Agencies, Public Health Departments or Environmental Conservation Departments in the United States or Canada. The award will go to the program that best showcases improvement, innovation or sustained high performance within a food safety program. A food safety program could include responsibility for: food safety, food protection, and food defense or food sanitation. The applications will be made to the AFDO awards committee by the deadline.

**(PLEASE TYPE)**

Date of Nomination: 3/31/2022 for the year ending December 31, 2021

Program's Full Name: PA Department of Agriculture, Bureau of Food Safety & Laboratory Services

Nominator: Sheri Morris, Acting Bureau Director

Immediate Organization: PA Department of Agriculture

Agency: Harrisburg, PA 17110

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AFDO Member: Sheri Morris

## Executive Summary:

The mission of the PA Department of Agriculture, Bureau of Food Safety and Laboratory Services, is to protect and keep food safe from the farm to the fork, by educating, regulating, and ensuring compliance with food safety laws and regulations. The Bureau of Food Safety and Laboratory Services plays a critical role in protecting public health by preventing foodborne illness, for commonwealth citizens, visitors, and national and worldwide consumers of Pennsylvania food products. Protecting public health by preventing foodborne illness, through education, as well as ensuring compliance, will also aid the commonwealth food industry to avoid the costly disruptions of the food system caused by illness outbreaks.

The Bureau is tasked with regulating food safety across the entire realm of food products from farm to fork - regulating all aspects of the food chain - from produce safety, to egg, milk, and food processors, warehouses, and distribution centers - to the multitude of consumer retail venues, such as restaurants, food stores, convenience stores, lunch trucks and fair vendors. The Bureau has additional program areas which indirectly support our mission of protecting public health. The Bureau regulates Seasonal Farm Labor Camps, in which employers provide housing to farm workers. The Bureau has a full-service ISO/IEC 17025 accredited laboratory, which has the capability to conduct microbiological, chemical, and microscopic analysis of food products. The Bureau also houses a 'Rapid Response Team' which is a multi-agency collaborative group that can be activated to respond to food and feed emergencies.

PA Department of Agriculture has oversight of all food programs within Pennsylvania; however, not all Retail Food Facilities in Pennsylvania are under the jurisdiction of the PA Department of Agriculture. Seven counties - Allegheny, Bucks, Chester, Delaware, Erie, Montgomery, and Philadelphia - and 85 local municipalities, boroughs, townships, cities, etc., have their own health departments and conduct inspections and licensing of retail food facilities within their jurisdictions. Seventy (70) local health departments and two counties (Chester & Delaware) are currently utilizing the Commonwealth's electronic inspection system. Under the PA Retail Food Facility Act, all Pennsylvania jurisdictions are required to enforce the Pennsylvania Food Code regulations uniformly.

An important aspect of the Bureau's mission includes working with our federal partners, to include the US Department of Health & Human Services, Food & Drug Administration (FDA) and the US Department of Agriculture (USDA), to advance the concept of an integrated food safety system and mutual reliance. By working collaboratively with our federal food regulatory partners, we can maximize efficiency of our resources, and work more effectively to oversee and monitor high risk food facilities with the ultimate goal of better protecting the public health.

□ **Agency Demography (Population Served, Age and Diversity)**

The Commonwealth of PA has a population of approximately 13 Million and has two of the 100 largest cities in the US – Philadelphia and Pittsburgh. The population of Pennsylvania is age diverse with 19% of the population over age 65, and 21% of the population under age 18. The racial makeup of the Commonwealth is 81.5% White, 12% Black, 4% Asian, 2% of multi-racial heritage, and 0.5% Native American, Hawaiian, or Alaskan. Of these ethnicities 8% also identify themselves as Hispanic or Latino.

Regulated Facilities by PDA in 2021 totaled 44,503. The total includes 30,553 retail food facilities, 2849 temporary retail food facilities, 8332 manufactured food establishments, 613 milk permitted firms, 1568 produce farms, 426 seasonal farm labor camps, 90 egg plants, and 72 shellfish certified firms.

□ **Agency Resources and Budget (Staff, Facilities, Revenues)**

The Bureau leadership consists of a Bureau Director, Assistant Bureau Director, and 3 Division Chiefs (Food Safety Field Staff, Policy & Programs, and Laboratory Services). Additional management includes 11 Field Supervisors, 10 Program Specialists, a Laboratory QA Manager, Chemistry Section Supervisor, and Microbiology Section Supervisor. The Field Supervisors oversee a staff of 93 Inspectors. The Laboratory has a staff of 5 chemists, 3 microbiologists a chemistry QA technician, and a microbiologist QA technician. The Bureau also includes an administrative staff of 5. Total Bureau staff is 137 employees. The Department also hires 4-6 college student interns each summer – one working in the laboratory, and 4-5 working in the field conducting food safety inspections at summer food service for children sites, pulling food and dairy samples, and assisting with other types of food safety inspections.

All laboratory staff, leadership, Division Chiefs and Program Specialists work from the PA Department of Agriculture headquarters located in Harrisburg, PA. The Field Supervisors, and 93 Inspectors are all headquartered from their homes throughout the Commonwealth. All staff were teleworking full time from March 2019 through July of 2021. Since July 2021 staff have continued to work a part-time telework schedule of 2 or 3 days per week.

The Bureau has a state allocated budget of approximately \$11.5M. Revenue generated include \$3.0M, predominately from licensing and inspection fees with an additional \$2.7M received through USDA and FDA grants and contracts.

□ **Program Planning/Self Evaluation (Vision, Staff Participation)**

In 2019 the Bureau implemented a comprehensive the Results PA Management system. The system was initiated and developed by the entirety of Bureau management staff collaboratively. The initial efforts encompassed development of a Mission and Vision statement and establishing our Core Values as a Bureau. Proposed Mission and Vision statements as well as Core Values were shared with the entire Bureau staff for input and feedback. All feedback was responded to, and the management team proceeded to establishing our Bureau's Core Processes, and Key Process measurements. (See the attached Bureau Fundamentals Map). These initial key measures include data such as laboratory sample turnaround times, inspections not conducted on time, complaint response times, compliance rates, complaint response times, training completion rates, license processing turnaround time, and staff vacancy rates. To promote and drive ownership of the system, each management member oversees the data collection and presentation of the monthly data for a particular key measure, as well as rotation for leading and recording the notes of each monthly 'huddle' to review the measure data.

The Bureau's has demonstrated the vast benefits to the Results PA management system, from a morale and team building initiative, to having the ability to make data driven management driven decisions, and to quickly identify and allocate resources to trending problems. The Bureau of Food Safety & Laboratory Services team was the first at the PA Department of Agriculture to implement Results PA and several other Bureaus have now begun the process of developing their own Bureau Results PA systems. The Bureau has a vision to also expand the Results PA management system at our field team levels. As the system was so successful in team building, and promoting first level ownership of managing performance results, desire is to drive those benefits to all levels of Bureau staff.

The Bureau continues to evaluate our laboratory and regulatory programs against national standards, with full intentions of maintaining ISO/IEC 17025 laboratory accreditation, conformance with Manufactured Food Regulatory Program Standards (MFRPS), and increased conformance with the National Voluntary Retail Food Regulatory Program Standards (NVRFRPS) – all of which require regular self-assessment. The Bureau routinely discusses future strategy and maintains a continuous improvement posture by maintaining a documented strategic improvement plan for each of these three programs. The Bureau continues to fully participate in FDA audits of our cooperative regulatory program areas, Milk and Shellfish, and use those audits to continuously improve those programs.

□ **Program Management (Staff Control, Community/Industry/Consumer Support)**

The Bureau's reorganization in 2019-2020 established a more integrated, efficient, and effective 'chain of command' approach to the Bureau's regulatory activities. The Bureau reorganized in to three divisions to more effectively train, utilize, and support our field staff, while encouraging a more team focused approach, as opposed to operating in programmatic 'silos'.

All Field Staff report to one of 11 Field Supervisors, who provide training, support, guidance, formal auditing of their inspectional activities, and take the lead in conducting enforcement activities for non-compliant firms. The Bureau's staff of 10 Program Specialists serve as the Subject Matter Experts (SMEs) for their respective programs, drafting SOPs and policies, performing standardization activities, providing training, assuring conformance with Program standards, managing grant deliverables, and assisting with legislative or regulatory changes.

The laboratory staff support the Bureau, as well as the Department's Bureau of Plant Industry, in the regulatory testing of Food, Feed, and Fertilizer, conducting survey projects as requested by either regulatory Bureau, and responding to emergencies requiring laboratory testing.

The Bureau maintains a robust website with food safety information for consumers as well as our regulated industry. The Bureau's mission establishes an educational approach as a priority, whether that is through the free non-profit food safety training class taught by our staff, consumer publications and food safety education at the PA Farm Show, or educating operators during inspections.

The Bureau maintains relationships with our state trade and industry associations, such as the PA Restaurant & Lodging Association, PA Food Merchants Association, Showman's Association, PA Dairy Practices Council, Penn Ag Industries, and others, routinely participating on committees, and conference / training events.

❑ **Program Implementation (Training, Compliance, Enforcement)**

The Bureau has an established training curriculum for all new hires. The training curriculum meets the standards outlined within MFRPS and NVRFRPS. The Bureau complies with the cooperative program standards outlined within the Milk and Shellfish programs, maintaining two State Standardization Officers in Shellfish, and 5 Milk Rating Officers, 2 State Standardized Sampling Officers, and 3 provisionally Certified Laboratory Evaluation Officers. The Bureau tracks all initial training, and specialized training, such as Preventive Control Rule, Acidified Food, Grade 'A' Milk, and Egg Grading certification, to name just a few, in order to assure trained inspection staff are assigned appropriate facility workloads. Continuing education occurs through a week-long 'annual training' for our entire Bureau (which was switched to monthly virtual training for 2020 and 2021), and through attendance at specialized program specific trainings offered by FDA, AFDO, Penn State Cooperative extension, and others. Chiefs & Program Specialists attend national trainings and conferences as they pertain to their programs, such as Conference for Food Protection, the National Conference for Interstate Milk Shippers, MFRPS, RRT, Produce Safety Consortium, AFDO & CASA Conferences, Partnership for Food Protection, and others.

The Bureau has formal compliance standards outlined within our SOPs for all programs. The Bureau has adopted by reference the most current FDA Food Code for retail, all federal regulations related to food for manufactured food establishments, the Grade 'A' PMO for milk, the Shellfish Model Ordinance, the Egg Safety Rule, and the Produce Safety Rule as Pennsylvania regulatory standards. Compliance standards established within the SOPs are audited to ensure that staff are uniformly applying the Bureau's standards established in the SOPs.

The Bureau has robust enforcement authority under all Pennsylvania food safety related statutes. Non-compliant firms routinely receive warning letters, followed by citations with the district magistrate if continued non-compliance. The Bureau also utilizes administrative meetings as a compliance tool when necessary, and also has the ability to assess civil penalties up to \$10,000 per violation for egregious violators. The Bureau routinely works with FDA, and USDA if appropriate, on obtaining compliance at chronic violative firms, and shares inspection information and actions.

Each of these activities - training, compliance and enforcement – are all regularly monitored under our PA Results management system. Training is reviewed monthly for completion of the hiring curriculum. Compliance rates by program are reviewed monthly. Enforcement activities are audited ongoing by the Field Supervisors, and at a minimum of annually by the Program Specialists in their respective programs. During 2020 and through spring 2021, the Bureau's key measures should a lower than normal rate of non-compliance, most likely due to decreased volume of customers, as well as the enhanced handwashing and sanitizing practices in place, while the latter part of 2021 has shown a distinct rise in the rate of non-compliance, most probably due to many facility's inability to find adequate employee staffing.

❑ **Program Outcomes (Measurable Outcomes)**

Throughout the COVID-19 pandemic, the Bureau of Food Safety field staff continued to perform our essential functions in enforcing food safety requirements and protecting public health. In March 2020 our staff took a two week 'stop the spread' break, but upon obtaining appropriate PPE, such as masks, gloves, sanitizer and disinfectant, the Bureau returned to the front lines in April to assist food businesses in changing their protocols and procedures to incorporate COVID-19 protection measures. The Bureau activated Pennsylvania's Rapid Response Team (PA RRT) and worked collaboratively with the PA Department of Health (PADOH) throughout the pandemic, initially targeting the manufactured food establishments identified by PADOH as having COVID-19 outbreaks, to assure food security and safety within the food distribution system, and then with retail food facilities to incorporate social distancing, masking, and employee protections required under PADOH orders, within their facilities. The collaborative effort was extremely successful, as the associated epi data showed a distinctive decline in food facility outbreaks by summer 2020 and did not see the subsequent spikes in outbreaks when compared with the general population epi curve. (See the attached Epi Curve charts.) The Bureau staff also worked collaboratively with PADOH to prevent outbreaks among the many seasonal farm labor camp workers that arrived in the Fall of 2020.

Despite the challenges presented by the COVID-19 pandemic, in 2020 PDA successfully completed a total of 47451 inspections (31,782 retail; 5079 manufactured food; 3401 dairy; and 7189 other inspections to include seasonal farm labor camps, shellfish, egg plant and produce safety) as well as 150 COVID-19 related audits at food manufacturers, 6223 COVID mitigation audits at retail, and over 264 in seasonal farm labor camps. In 2021 the Bureau completed 49,446 inspections (35,238 retail; 5262 manufactured food; 3546 dairy; and 5400 other inspections to include seasonal farm labor camps, shellfish, egg plant and produce safety). The Bureau also successfully completed our FDA contract work in 2020 and 2021, to include 100 limited scope and 35 full PC inspections both years.

In addition to maintaining a nearly normal inspection posture, to protect the public health; and addressing the enormous challenges of COVID-19; the Bureau of Food Safety & Laboratory Services successfully accomplished an organizational restructuring. The Bureau established a Division of Policy and Program and a Division of Food Safety Field staff, to make the Bureau more efficient and effective by allowing for cross training of Inspectional staff across multiple programs as logistically efficient; and having our Program Specialists working collaboratively across Bureau SOPs and Policies for uniformity, rather than having the Bureau functioning in programmatic silos.

In Fall 2019, prior to the COVID-19 pandemic, the Bureau Laboratory Services division achieved ISO/IEC 17015 accreditation for Salmonella and Protein testing. With that accomplishment the Bureau achieved full conformance with the Manufactured Food Program Regulatory Standards (MFRPS) in our 2021 FDA audit, after being conformant with 9 of the 10 standards for 5+ years. The Bureau has worked since 2020 on implementing processes to advance the efforts toward integration of our food safety system and mutual reliance – to include participating in the AFDO pilot retail data analytics project and enrollment with FDA data exchange project, initially using the ORA Partners Portal (ORAPP), and now the National Food Safety Data Exchange (NSFDX), joint work planning and utilization of FDA conducted inspections within our state program. The Bureau is also enrolled in the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) and is conformant with 4 of the 9 standards. In 2021 the Bureau completed a retail risk factor study and developed a 5 year strategic plan to pursue conformance with the additional VNRFRPS.

In 2019 the Bureau also implemented a comprehensive the Results PA Management system. The system was developed by the entirety of Bureau management staff collaboratively, encompassing development of a Mission and Vision statement, establishing our Core Values, creating a Bureau Fundamentals Map (attached), and setting key process measurements. Key measures include data such as laboratory sample turnaround times, inspections not conducted on time, complaint response times, compliance rates, complaint response times, and training completion rates. Throughout 2020 and 2021, and despite COVID-19 related challenges, the Bureau continued to gather our key measurement data, had monthly virtual management "huddles" to review data and progress, and have successfully used the data to manage Bureau activities and identify several LEAN (improvement) projects.

## Goals for Improvement

The Bureau management staff are currently meeting to continue to refine the Bureau's Results PA management system is to refine, retire or add measures that the Core management team determines are important and will drive data driven decisions to manage the Bureau and its regulatory programs, as well as continuously improve services to our customers. Several of the key processes that were initially being measured have been 'in-control' for long periods of time and are no longer adding value as a management tool or to drive continuous improvement.

The Bureau will engage in the process of establishing a Results PA management system specific to the Food Safety Field Division.

The Bureau will continue to work toward conformance with VNRFRPS, as outlined in the 5-year strategic plan.

The Bureau Laboratory will continue to expand its scope of accreditation. For the 2022 ISO/IEC 17025 accreditation audit, Listeria testing will be added to the scope.

The Bureau will continue to utilize technology to revamp and enhance some of our antiquated databases, especially within the Milk Program.

The Bureau will continue mentoring new management staff and encourage involvement and participation at a national level to stay engaged and supportive of the dialogue revolving around and integrated food safety system and mutual reliance.

## □ Issues/Challenges/Risks

Pennsylvania is utilizing an electronic inspection system developed over 10 years ago. The system, although functional and user friendly, is reaching legacy status and will need replaced with a new solution.

Pennsylvania has an aging workforce and has experienced a high rate of retirements in recent years, with 30% of our staff eligible for retirement over the next three years.

Emerging regulatory issues will present challenges and risks to public health – food freedom movements advocating for sale of unregulated foods, e-commerce, CBD and other non-approved hemp additives in food, and expansion of raw milk dairy products.

Challenges include knowledge overload and 'burnout' among our field supervisors and inspection staff in trying to manage a multitude of food inspection programs and different types of inspections and expertise.

A risk is associated with the volume of grant funding and contract monies received by the Bureau and being utilized to fund staff positions. Currently 3 Program Specialist management positions and 7 field staff positions would most likely be lost by the Bureau if the grant funding was not available.



❑ **Summary (Improvement or Innovation that Merits Award)**

The PA Department of Agriculture, Bureau of Food Safety & Laboratory Services has operated in an exemplary fashion despite the challenges throughout 2020 and 2021 due to the COVID-19 pandemic. In addition to taking a different approach than most food safety regulatory bodies, the Bureau took a proactive approach to working with the manufactured food industry early in the pandemic, and with our retail industry as they reopened, to implement COVID-19 mitigation measures. By working proactively the PADOH epi-curves indicate the success of that approach as compared to the general population illness curve. PDA and PADOH also worked collaboratively with our seasonal farm labor camp population in fall 2020 and had a much lower outbreak rate in those workers than was occurring nationally.

Despite the challenges presented by the pandemic the Bureau has achieved numerous goals since 2019:

Reorganization of the entire Bureau's operating structure.

Implementation of a comprehensive performance management system (Results PA)

Achievement of laboratory ISO/IEC 17025 accreditation

Full Conformance with 10 of 10 MFRPS.

Conformance with 3 of 9 VNRFRPS, completion of a self-assessment, risk factor study, and development of a 5 year strategic plan for full conformance.

Completion of all FDA Contracted inspections

Maintenance of a near normal inspection posture, accomplishing 90% of inspections in 2020, and exceeding normal inspection numbers by 15% in 2

The PDA Bureau of Food Safety & Laboratory Services staff have accomplished a huge amount of work within the last 3 calendar years to achieve its goals, while responding to an ongoing emergency. The Bureau is positioned with its PA Results management system, conformance with regulatory program standards, and established strategic plans, to aspire to lofty goals, and continue on the path of continuous improvement, with the end result being a key partner in mutual reliance and the vision of an integrated food safety system.

❑ **Attachments**

- Letter of Support - PA Department of Health
- Bureau of Food Safety & Laboratory Services Fundamental Map
- COVID-19 Epi curve comparison

Nominated by: Sheri Morris

Signature: 

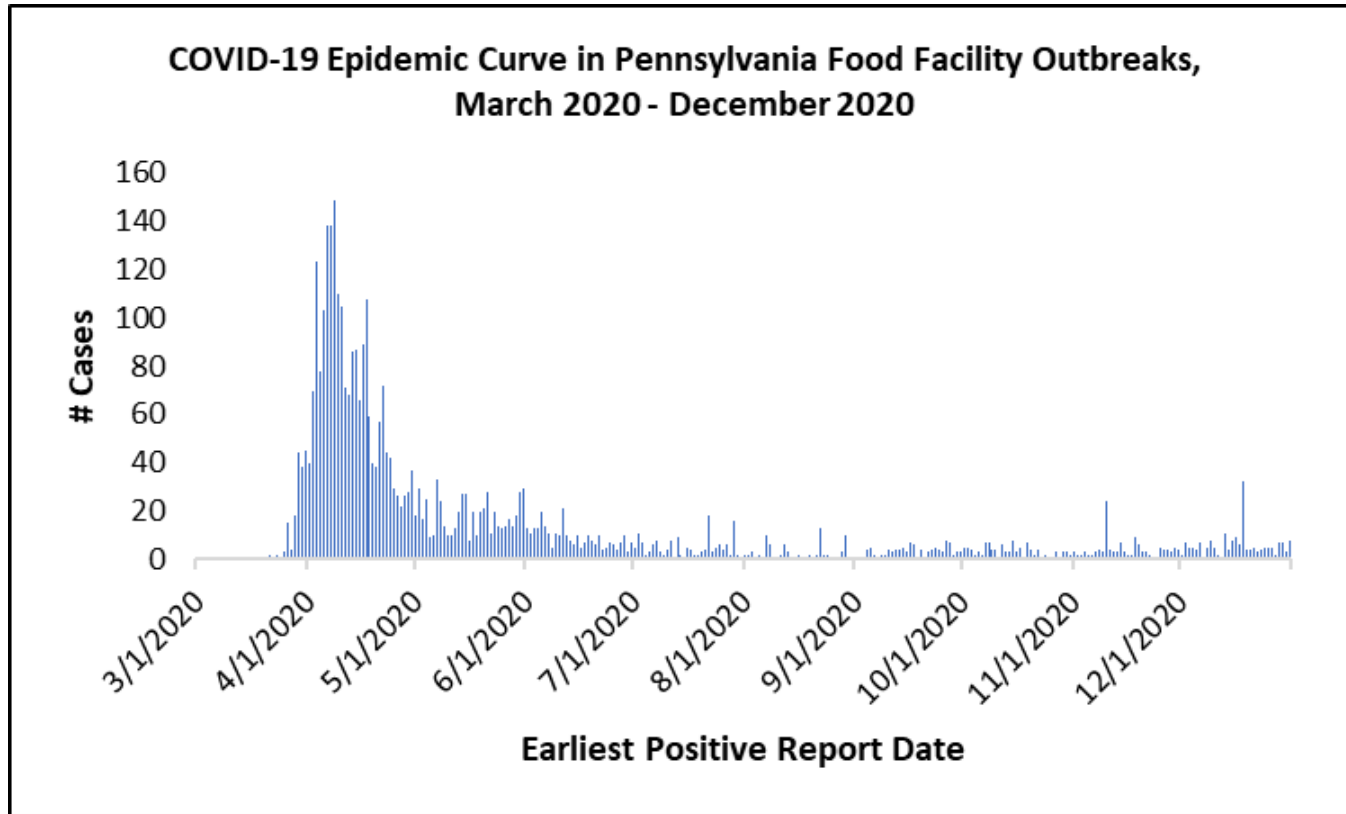
The winner of this award will identify an individual to receive travel funds (if available and pursuant to AFDO's travel policy) to attend the annual AFDO conference held in June in order to publicly receive an official plaque of recognition and will be given time on the program agenda to comment on the award. The winner will be invited to attend the AFDO Wiley Awards Banquet during the conference.

Attendance is not mandatory for receiving the award. Return this form, a photocopy of this form (both sides) and ***please submit by April 1*** to:

Dr. Joanne M. Brown  
Chair, AFDO Awards Committee  
Association of Food and Drug Officials  
155 W Market Street, 3<sup>rd</sup> Floor  
York, PA 17401

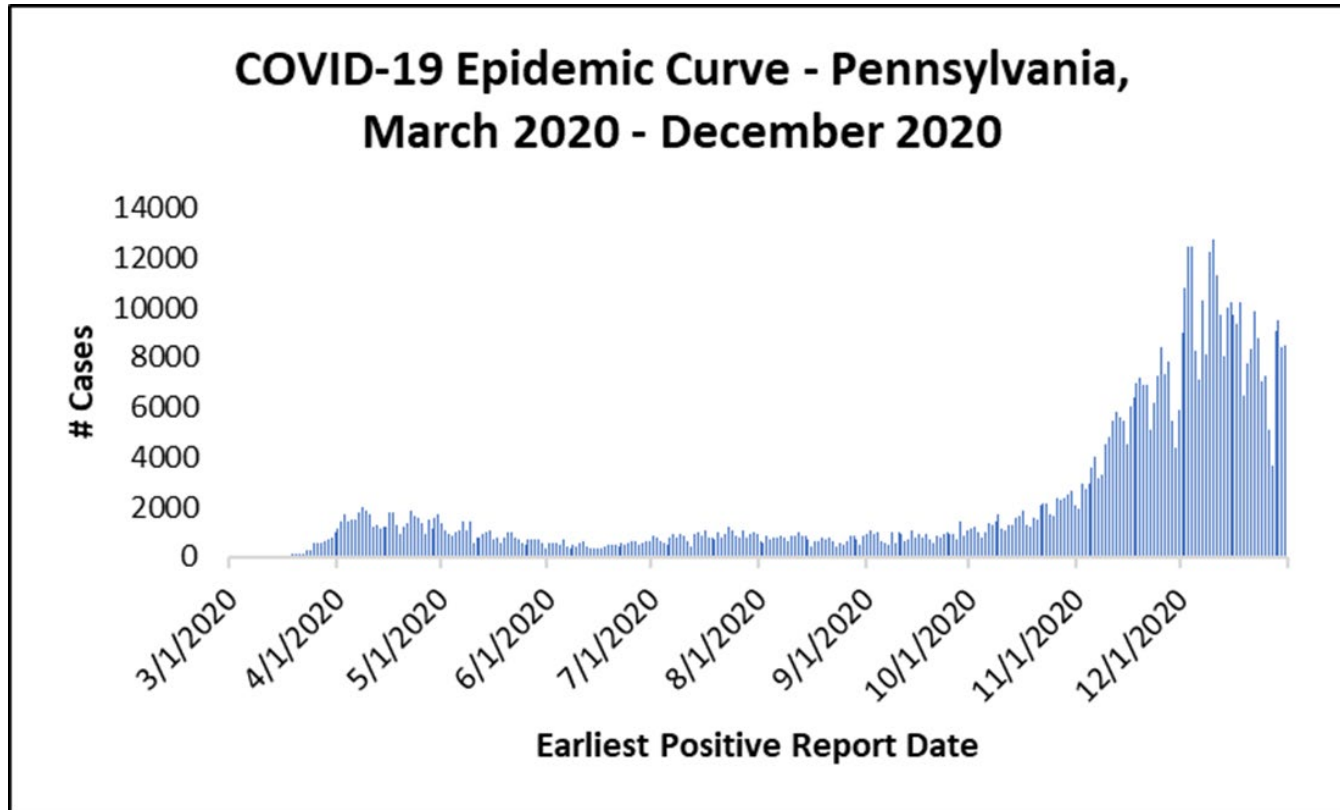
Phone: 717-757-2888  
FAX: 717-650-3650  
E-Mail: [afdo@afdo.org](mailto:afdo@afdo.org)

# Pennsylvania COVID-19 Epidemic Curve in Food Facility Outbreaks, March 2020 – December 2020



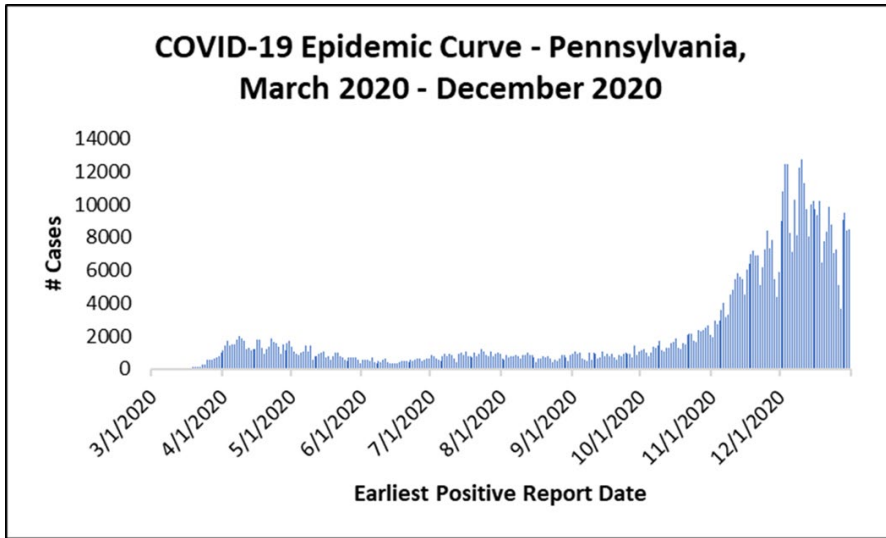
\*data are confidential

# Pennsylvania COVID-19 Epidemic Curve, March 2020 – December 2020

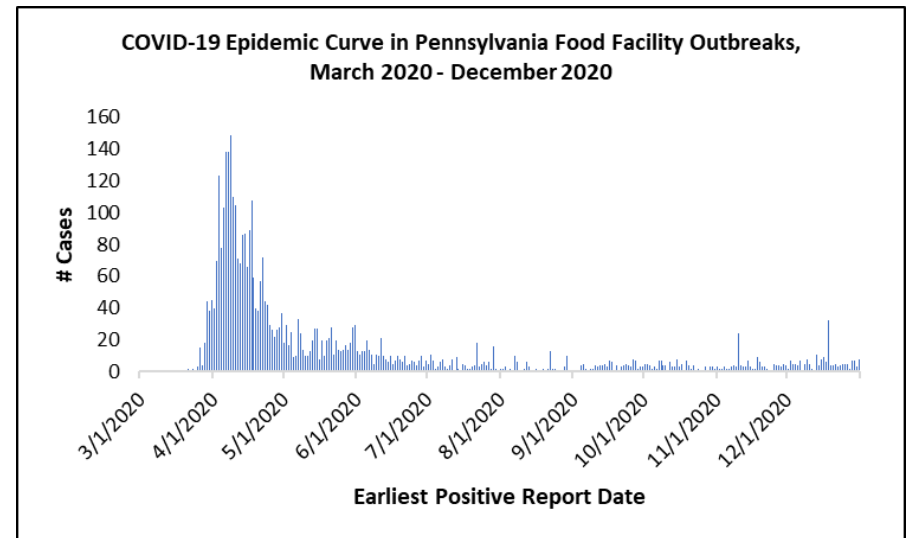


\*data are confidential

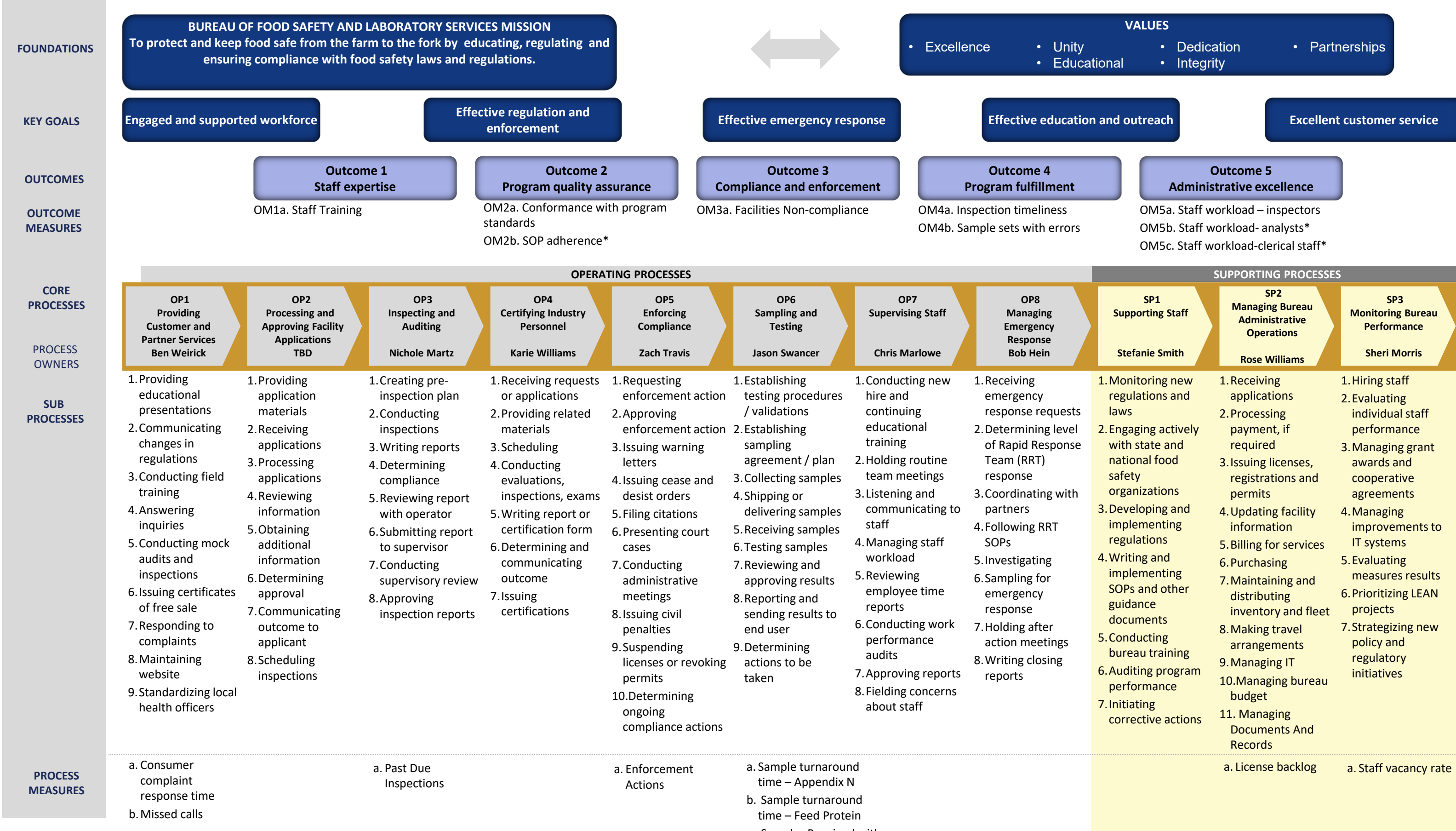
# COMPARISON: PA COVID-19 Epidemic Curve vs PA Food Facility Epidemic Curve, March 2020 – December 2020



\*data are confidential



\*data are confidential



March 31, 2022

To whom it may concern:

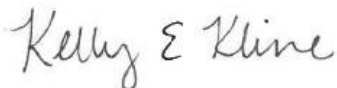
I am writing in strong support of the Pennsylvania Department of Agriculture (PDA)'s application for the Elliot O. Grosvenor Food Safety Award. Based on my experience as the Pennsylvania Department of Health (PADOH)'s enteric disease coordinator, I can attest to PDA's excellence in food safety and innovative public health response.

Some of our recent collaborations that showcase PDA's consistently high performance include:

- Our joint COVID-19 response. The Pennsylvania Rapid Response Team (PA RRT) was activated in April 2020 to respond to COVID-19 outbreaks in food facilities, including food manufacturers/processors, food distributors (i.e., warehouses) and retail food facilities. When PADOH identified a COVID-19 outbreak in these settings, PDA deployed Bureau of Food Safety food inspectors to conduct COVID-19 emergency response inspections. By September 2020, inspectors had conducted more than 130 emergency response inspections. As the pandemic continued, PDA integrated COVID-19 responses into routine food inspections. By the end of the PA RRT activation in May 2021, food inspectors had completed more than 15,000 retail inspections and more than 500 food processor and warehouse inspections.
- Responding to COVID-19 in seasonal farm labor camps (SFLCs). PDA also swiftly responded to COVID-19 outbreaks in SFLC settings, conducting more than 400 inspections, issuing COVID-19 prevention guidance for SFLCs, and through an October 2021 PA RRT activation, forming the SFLC Advisory Coalition to evaluate response activities and improve the statewide COVID-19 response in these settings.
- Foodborne disease outbreak response. For example, in July 2019 PDA responded to a *Yersinia enterocolitica* outbreak associated with pasteurized milk produced by a Pennsylvania dairy. PDA actions included an emergency inspection at the dairy, reviewing cleaning protocols and pasteurization records. The PDA laboratory also tested environmental swabs for *Yersinia enterocolitica* and coordinated all activities with the dairy.

These are three of many examples of PDA's reliable performance as a public health partner. Whether it's an emergency inspection, testing food, or obtaining traceback records, PDA consistently and quickly performs food safety activities necessary to ensure the health of Pennsylvanians. I'm pleased to recommend them for the Elliot O. Grosvenor Food Safety Award.

Sincerely,



Kelly E. Kline, MPH  
Enteric Disease Coordinator  
Pennsylvania Department of Health