



Manufacturing Program Standards Coordinators: Working Together For Stronger Programs

March 1, 2017



Background of MFRPS

- ▶ What is MFRPS?
 - ▶ Manufactured Food Regulatory Program Standards
- ▶ MFRPS was created in 2007
- ▶ Five Pilot states were chosen
 - ▶ Missouri, New York, North Carolina, Oregon, Wisconsin



Background of MFRPS

- ▶ State Contract Options in 2008
 - ▶ Contract Option was \$5000
- ▶ Contract options ran from 2008-2012
- ▶ Five Year Cooperative Agreements began in 2012



Goal of MFRPS

- ▶ The goal of the MFRPS is to implement a nationally integrated, risk-based, food safety system focused on protecting public health. The program standards establish a uniform basis for measuring and improving the performance of prevention, intervention, and response activities of manufactured food regulatory programs in the United States.



MFRPS Standards

- ▶ Standard 1 – Regulatory Foundation
 - ▶ Standard 2 – Training
 - ▶ Standard 3 – Inspection Protocol
 - ▶ Standard 4 – Inspection Audit Program
 - ▶ Standard 5 – Food-Related Illness, Outbreak, and Hazards Response
 - ▶ Standard 6 – Compliance and Enforcement
 - ▶ Standard 7 – Industry and Community Relations
 - ▶ Standard 8 – Program Resources
 - ▶ Standard 9 – Program Assessment
 - ▶ Standard 10 – Laboratory Support
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Standards Crosswalk

- ▶ **Retail**
 - ▶ 9 Standards
 - ▶ No laboratory standard



Standards Crosswalk

▶ Standards Comparison

- ▶ Retail does not have a laboratory standard
- ▶ Retail requires a risk factor study in Standard 9
- ▶ Retail requires a data analysis of complaints and foodborne illness for trending in Standard 5.
- ▶ Retail requires written SOPs for variances and HACCP plan review in Standard 3
- ▶ Retail requires program to demonstrate that regulations meet the full intent of the FDA Food Code in Standard



Standards Crosswalk

- ▶ Standards Comparison
 - ▶ MFRPS Standards Implementation Staff
 - ▶ FDA Audit Staff

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**"We back up our data on sticky notes because
sticky notes never crash."**



Standards Crosswalk

- ▶ Opportunities For Collaboration
 - ▶ Standard 7
 - ▶ Standard 6
 - ▶ Standard 2



Roles and Responsibility of a Coordinator

- ▶ Coordinators are tasked with having the overall responsibility of implementing the Programs strategic plan.
- ▶ Preparing and submitting all reports required for the standards.
- ▶ Ultimately is responsible for completing compliance for their state.



Idea Sparks Coordination

- ▶ The idea was developed at the 2016 MFRPS Alliance meeting in Louisville, KY.
- ▶ A group of coordinators talked about putting together a regional meeting where we could bring together only Program Standards Coordinators (PSC's) with these initiatives in mind:
 - ▶ Networking with other PSC's,
 - ▶ Collaboration to enhance each state's MFRPS programs,
 - ▶ Current progress and program goals.



Coming together

- ▶ The 1st annual meeting was hosted in Manhattan, KS from August 16-18, 2016
- ▶ Participants
 - ▶ Kansas, Iowa, Illinois, Missouri, Nebraska, Minnesota, and Wisconsin
 - ▶ FDA SIS Staff
 - ▶ FDA State Liaisons
 - ▶ FDA Audit Staff



Networking creates great ideas!

- ▶ As a group we expanded our knowledge base of the standards.
- ▶ We shared our successes/struggles with each of the standards.
- ▶ Brainstormed to help enhance each state's program.
- ▶ Through these discussions we recognized the need for a Program Standards Coordinators Handbook, to better equip new and future coordinators in their roles.



Positive Outcome

- ▶ Let's make this national! A workshop was developed for the January 2017 national Alliance meeting in Florida.



MFRP Alliance Meeting

January 2017 – St. Petersburg, FL

- ▶ MFRPA Program Coordinators Workshop
- ▶ Monday, January 23, 2017
- ▶ 8 AM – Noon
- ▶ FDA SIS facilitated
- ▶ FDA Audit staff provide handouts and tips



MFRPA PSC Workshop

- ▶ Extension of the Regional Program Standards Meeting
- ▶ Workshop was developed by the participants through surveys
- ▶ Participants were receptive and positive about the idea.



MFRPA PSC Meeting Topics

- ▶ **Standard 4 – Innovative Quality Assurance**
 - ▶ Roundtable discussion on QA methods used for Standard 4.

- ▶ **Audit Lessons Learned**
 - ▶ What to expect from an 18, 36, or 60 month audit?
 - ▶ Most common findings
 - ▶ State methods for audit preparation

- ▶ **Standard 6 – Monitoring and Review of Compliance**
 - ▶ Innovative state procedures for Standard 6





PSC Workshop Goals

- ▶ Meet and network with colleagues in other states
- ▶ Dig deep into successes/issues with different standards
- ▶ Expand knowledge base with the standards
- ▶ Help new MFRPS Coordinators develop their programs moving forward



PSC Workshop Objectives

- ▶ Network with Peers and learn from shared experiences
- ▶ List of Standard 4 and 6 Challenges and Innovations
- ▶ Solutions to improve audit deficiencies



Outcome from the National Meeting

- ▶ 35 Participates from MFRPS states attended.
- ▶ States received information and handouts to further enhance conformance to the Standards.
- ▶ States learned innovative ways to make processes more efficient.
- ▶ Participants were able to meet and network with colleagues in other states.



How do you channel your inner auditor?

- organize docs on SharePoint or central location for easy access for staff.
- personnel buy-in between audits
- have someone compare SOP to standard requirements.
- mock traceback / traceforwards
- utilize auditing courses
- quarterly meetings with other Coordinators

- mock auditing
- previous audit elements included in improvement plan
- review appendices on regular basis
- staff meetings to review procedures / updates
- challenge our own auditing skills
- meeting with program managers to identify roles / expectations

Innovations

- Share results w/ Inspectors
- spreadsheets - Working forms ✓
- Supervisors helping
- Alternate auditing roles
- System to audit factors automatically
- Program specific SOPs
- Provide audit form to Inspector with good feedback
- Quarterly / monthly schedule to keep up

- ## CHALLENGES
- Time to audit ✓✓
 - Turnover / Staff ✓✓
 - Train before audit ✓
 - Train after audit ✓
 - Transition to 2016 ✓

- IT ✓
- Differences between contract & state reports. ✓
- Consistency between auditors

CHALLENGES

* Writing SOP First

- * Feedback to individuals. Making it positive

- * New coordinator / loss of experience

- * Timing of audits (annual, quarterly, etc.)

CHALLENGES

- * Identify Triggers
- * Time spent ✓
- * Separate Retail / MAP ✓
- * What's OAI vs VAI
- * IT system for tracking ✓
- * Definitions for Critical, Chronic

- * Political Pressures
- * Creating Policy that meets the needs
- * How many do you need to review?
- * Data entry / NO staff

SOLUTIONS (Innovations)

- * Identify root cause
- * More frequent audits
- * Develop mission statement
- * Increased health related education
- * Take the 10 minutes (small idea) if you can't track it all
- * Expand timelines - acceptable procedure
- * Using computer software for compliance action
- * Inspection forms searchable
- * Create forms to see if there is a delay SOP
- * Partner w/ other agencies to pay for IT system - also enter data on compliance action(s)
- * USAFS Dashboard - generate report
- * Supervise work instructions for Retail / Manufacture
- * Simplify audit form as much as possible
- * Better guidelines on statistically significant # of compliance action

Innovations

- * Allow inspector to check critical and chronic violations with IT system

WHAT
WE
LEARNED!



How did we help each other?

- ▶ “Excellent ideas, especially liked the idea to add hyperlinks for each item on audit sheet to provide more information and guidance around auditing.”
- ▶ “It was interesting to get various perspectives on how different states were handling this Standard. We still struggle with it some on our end, but got good ideas to possibly implement in the future.”



How did we help each other?

- ▶ “It let me know that I was not alone with some of the obstacles that we face in meeting conformance with Standard 4, and provided some useful tools for performing audits in the future.”
- ▶ “I really found the round table discussions to be beneficial. Each participant at the table had valid information. As always, each was ready and able to lend assistance to fellow coordinators. We received a few pointers that will help our program also.”



Final Thoughts

- ▶ **The PSC Meetings will continue to be replicated.**
 - ▶ Midwest regional meeting August 2017
 - ▶ PSC Session at next Alliance Meeting in 2018
 - ▶ Interest from other regions in holding regional PSC meetings
- ▶ **Retail Coordinators Unite!**
 - ▶ A similar model can be used



Thank You!

