



An Organized Approach to Updating the Standards

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Manufactured Food Regulatory Program Alliance

The MFRPA serves as a forum to periodically evaluate the Manufactured Food Regulatory Program Standards:

- To make recommendations for enhancements or modifications to the standards;
- Evaluate the language of the standards and supporting forms or tools used to document conformance; and
- Provide a mechanism to receive, evaluate, and vote on recommended modifications to the standards.

Manufactured Food Regulatory Program Alliance

Recommendations for modification or enhancement of the standards are provided to FDA for consideration in updating the next version of the standards.



Proposing Modification of the Standards

- State Food Program submits a proposal to the MFRPA Board
 - Use a standardized Form
 - Identify the Standard
 - Identify the specific change or modification being recommended
 - Include the proposed language
 - Include any supporting documents



Timeframes for Submission



- Proposals must be received by August 1st of each year
 - This allows workgroups an opportunity to review proposals
- Late proposals received between August 1st and September 15th, must receive special Board approval to be considered during the current cycle;
- Proposals received after September 15th and those late proposals not receiving special Board approval will be deferred to the following year.

Proposal Acceptance

- Proposals will be reviewed by the Board or their designee for completeness and relevancy to the MFRPS Standards.
- Proposals determined to be incomplete or not relevant to the standards will be returned to the submitter with an explanation.
- Returned proposals may be updated and resubmitted.

Proposal Evaluation

- Accepted proposals will be assigned to one of four workgroups for evaluation and consideration.
- WG1: Standards 1, 2, 8, & 9
- WG2: Standards 3, 4, & 6
- WG3: Standards 5 & 7
- WG4: Standard 10



Proposal Evaluation

- Workgroups will review the proposals and evaluate the issue of concern and the proposed solution.
- Workgroups may accept the proposed modification language to the standard as presented or recommend modification to the language.
- Workgroup will make a recommendation for proposed action to the Board.



Workgroup Recommendations



RECOMMENDED

- Acceptance of the proposal as submitted;
- Acceptance of the proposal with the workgroup's amendments to the proposed Standard language;
- Rejection of the proposal with a recommendation to leave the standard in its present form.
- All Recommendations must be submitted to the Board by November 1st.



Board Action on Recommendations

- Board may concur with the workgroup's proposal recommendation and schedule for presentation at the annual meeting.
- Board may add their recommendation to the proposal but may not modify any of the proposal's language.
- Board may return the proposal to the workgroup if the issue was not adequately addressed or the proposed language is not consistent with good food safety or program management practices.

Presentation at the MFRPA Annual Meeting

- Proposals will be presented at the annual meeting.
 - Workgroup will provide an overview of the proposal along with the final recommendations from the workgroup and the Board.
 - Input will be taken from the membership and modification of the proposed standards language may be made based on input received.
 - Final proposals must be submitted to the Board by the close of business on the day presented.

Voting on Proposals



- Prior to the close of the annual meeting, voting delegates will be assembled to vote on each proposal.
- Delegates will be provided with copies of the proposal and the proposed modification to the standard language.
- Proposals will be presented and an opportunity for discussion provided.
- No modifications to language allowed at this time.
- Voting delegates will vote to accept or reject the proposal.

Accepted Proposals

- Those proposals receiving a majority vote to accept, will be compiled and transmitted to the FDA.
- FDA is not automatically obligated to accept every request for modification that comes from the MFRPA.
- FDA will evaluate the merits of each recommendation and must make any changes through their administrative process, which may include providing notice in the Federal Register.
- This is a lengthy process, so formal changes to the standards will not occur every year.

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