MFRPS Change Proposals

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FSMA Workgroup

The FSMA Workgroup was charged with reviewing the standards and identifying any changes that should be made to incorporate preventive controls.
FSMA Workgroup Members

Chair: Matthew Colson

Jennifer Bonsky
Michelle Boyd
Robin Brown
Eric Carlson
Matthew Colson
Steve Honn
William Hull
Jennifer Hutson
Mark Jenkerson
Jan Kelly
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Kara Miller
Melissa McCauley
Priscilla Neves
Brian Schuettler
Dawn Smith
Troy Sprecker
Mark Jenkerson
Proposal 19-001 Related to Standard 2

Standard 2 addresses training coursework that is required for staff conducting specialized inspections. Updating the list of specialized inspections to include “Preventive Controls for Human Food Regulators” is consistent with the administration of training for other specialized inspections.

Workgroup Recommendation:
- Update the Standard
Proposal 19-002 Related to Standard 3

Standard 3 provides a general framework for key elements that should be covered during inspections and included in the state’s inspection procedures. Addition of key elements related to the Preventive Controls for Human Food inspections would be consistent with existing Standard 3 provisions.

Workgroup Recommendation:
- Update the Standard
Proposal 19-003 Related to Standard 4

Standard 4 establishes requirements for conducting field inspection audits. Inspection elements established in Standard 3 are evaluated during the field inspection audit via questions in Appendix 4.5 (equivalent to the FDA 3610 Contract Audit Form).

Workgroup Recommendation:

- Update the Standard
Voting on Proposals

• Voting delegates will assemble to discuss and vote on the proposals.

• Proposals will be presented and an opportunity for discussion provided.

• No modifications to language will be allowed during this process.

• 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 includes providing notice in the Federal Register.