



## CFR 117 Adoption to Implementation in Florida

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(FDACS)*

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*1:00PM*



# Adoption

## 117 Modernized GMPs

- Adoption by reference into 5K-4, Florida Administrative Code
- Adopted the April 1, 2016 version in October 31, 2017
  - Note: 0 comments received for this proposed rule change

# Outreach

- Prior to adoption, hosted two PCQI / FSPCA courses for industry (free)
- Prior to and after adoption, FDACS website hosted information
- Bulk email – letting industry partners know about adoption
- Fact Sheets – General FSMA and 117 specific
  - Handing out to all firms during all inspections

# Staff Training

## **117 Modernized GMPs- Training before and after October 2017 adoption by FDACS**

- All field staff attended the July 2016 live FDA training
- Observed FDA OJE PC inspections in: 2/2017, 3/2017 and 5/2017
- All staff - FDACS in person training utilizing draft hazard guide, May 2017
- All field staff attended FSPCA training, June 2017
- FDACS all staff in person training CFR117, November 2017
- Both FD8000L and FSPCA now part of Basic Training (MFPRS)

# Staff Training

## 117 Preventive Controls Training

- One inspector– memo as independent and a Qualified Trainer (QT)
- Handled as Advanced Food Inspection Training
  - Completion of Basic Food Inspection Training
  - Completion of FD254
  - OJE / Joint Inspections with a QT
    - Three(3) joint inspections with one acceptable evaluation for independence
    - Desk evaluations of independent work
    - Within 1 year, completion of the second evaluation for completion of training

# Inspections

## **117 GMP Inspections started November 2017**

- About 35 CFR 117 inspections conducted to date
  - Still conducting several CFR110 inspections
- Preventive Controls Inspections (Subp C/G) to begin February 2018
- Ten (10) Preventive Controls Inspections under contract 2017/2018
  - Simultaneously developing training plan, procedures and evaluating needed inspection time

# Challenges

- Hurricane Irma - staff that were to attend FD254
- PC cites in inspection system
  - Irma
  - Rule not in effect until 10/31/2017
  - Work could not start until 8/01/17 – budget

# Contact Information

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