



Crosswalk Between the Standards

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Standards Crosswalk Workgroup Committee Purpose

1. Analyze VNRFPS (Retail), AFRPS (Animal Feed), and MFRPS (Food)
2. Identify potential areas of alignment or harmonization – specifically from the MFRPS perspective – for the next round of MFRPS revisions.

Standards Crosswalk Workgroup Committee Charge

This process may

1. identify areas from the other standards that contain elements that should be added to the MFRPS (Standard 11 from the AFRPS, for example); or
2. suggest elements that should be deleted or modified (the format of some of the appendices, for example).

This will result in a final recommendations document that will be available to the standards revisions workgroup beginning sometime in 2018

Standards Crosswalk Workgroup Committee Membership

1. MFRPA Board members,
2. State representatives, and
3. FDA SIS and AS staff

10-15 members or more as identified

Committee Members

Michael Antee – U. S. Food and Drug Administration

Amber Grisamore – State of Kansas

Patrick Guzzle – State of Idaho

Maria Ishida – State of New York

Ali Kashani – State of Washington

Jan Kelly – State of Minnesota

Stacy King – State of West Virginia

Tressa Madden* – U.S. Food and Drug Administration

Steve Morris – State of Kansas

Steve Mandernach – State of Iowa

Julie Loera* – State of Texas

Priscilla Neves – U.S. Food and Drug Administration

Carolina Schaffer – State of Florida

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Harmonization Opportunities

- Limited Opportunities Found
 - different purpose for standard
 - different techniques utilized
 - different laws and rules
- Other Possibilities?
 - Report findings
 - Share with other standards programs

Harmonization Opportunities

Standard 1

- Terms:

Equivalent/Equivalent in Effect/Not Equivalent

vs

Full Intent/Partial Intent/No Corresponding 95%
Equivalent

Harmonization Opportunities

Standard 6

- Use similar forms
- Use similar language
 - possible broadening of terms
 - not specific yes/no vs acceptable/not acceptable

Harmonization Opportunities

Standard 8

	MFRPS	VNRFPS	AFRPS
Evaluation Frequency	12 months	36 months	36 months

- AFRPS requires an evaluation of every three years. MFRPS must assess yearly. Possible reduction?
- Forms very different between all 3 standards. Option to harmonize the forms?

Harmonization Opportunities

Standard 9

	MFRPS	VNRFRPS	AFRPS
Self Assessment Frequency	12 months	60 months	36 months
Self Assessment Form	> elements		
Third Party Audit	Yes (FDA)	Yes	No, unless funded
Improvement Plan	Yes	Yes	Yes

- Could assessment be reduced to 36 months to match up with AFRPS
- Could self assessment forms be changed - MFRPS form has more elements than AFRPS to include hours spent on each standard (for OMB).
- AFRPS third party audit - but not mandate it be FDA. Funding requirements could mandate FDA if needed.
- Improvement Plan - Elements are similar enough between MFRPS & AFRPS - one format for reporting between the programs.

Differences

Formats * Terminology * Timeframes * Documentation * Forms

MFRPS (Sep 2016)	VNRFRPS (Draft-Jan 2017)	AFRPS (Feb 2017)	Comments	Core Competencies
<i>Basic Food Inspection Training (2.3.2)</i>				
The State program requires that each inspector complete a basic food inspection training curriculum that consists of coursework and field training described here. (2.3.2)	90% of regulatory retail food inspections staff (Food Safety Inspection Officers FSIO) shall have successfully completed the 5 step training and standardization process .	The basic feed inspection training consists of coursework in the following subject areas. 2.3.2.2	MFRPS has course curriculum and AFRPS has subject areas.	Requires inspection training. VNRFRPS requires only 90% completion of the training and standardization process.
<i>Basic Food Inspection Timeframes (2.3.2.1)</i>				
The Basic Food Inspection Training course curriculum shall be successfully completed within 24 months of the inspector's START DATE with the manufactured food program. (2.3.2.1)	Steps 1 through 4 within 18 months of hire or assignment to the retail food regulatory program.	The State Program requires a basic inspector to successfully complete the basic coursework and field training within 24 months from the START DATE . (2.3.2.1)	MFRPS and AFRPS requirements are within 24 months of start date and VNRFRPS are within 18 months of hire or assignment (i.e. start date).	The State Program requires a basic inspector to successfully complete the basic coursework and field training within a specific timeframe from the START DATE. (Suggestion is to increase the VNRFRPS timeframe to 24 months to
<i>Basic Course Curriculum (2.3.2.2)</i>			<i>Subject areas</i>	
Prevailing statutes, regulations, and ordinances (2.3.2.2.1)	Prevailing statutes, regulations, and ordinances (Step 1)	Current Statutes, Regulations, and Policies (2.3.2.2.6)	AFRPS - "policies" rather than ordinances.	Prevailing statutes, regulations, ordinances, and policies. (Basic Feed Ingredients for AFRPS 2.3.2.2.3 covered here)
Public health principles (2.3.2.2.2)	Public Health Principles (Step 1)	Animal Public Health Principles (2.3.2.2.1)	same	Public Health Principles
Emergency management (2.3.2.2.3)	Emergency Management (Step 3)	Basic National Incident Management Systems and Incident Command Systems (2.3.2.2.4)	AFRPS uses MIMS and ICS - more specific	Emergency Management
Communications skills (2.3.2.2.4)	Communication Skills (Step 1)	Communication (2.3.2.2.5)	same	Communication Skills
Microbiology (2.3.2.2.5)	Food Microbiology (Steps 1 and 3)	n/a	Move from Advanced Coursework in AFRPS 2.3.3.2.6.	Microbiology
Epidemiology (2.3.2.2.6)	Epidemiology (Step 3)	n/a	Move from Advanced Coursework in AFRPS 2.3.3.2.5.	Epidemiology
Basics of HACCP (2.3.2.2.7)	Hazard Analysis Critical Control Points (HACCP) (Step 3)	n/a	Update to include as Risk Awareness in AFRPS.	Basics of HACCP (Risk Awareness in AFRPS 2.3.2.2.11)

Standard 2 Excerpt



“...effective inspection program...”

“...utilization of HACCP principles...”

“...determine compliance with laws...”

“focuses on the status of risk factors, determines and documents compliance, and targets immediate- and long-term correction...through active managerial control.”

MFRPS (Sep 2016)	VNRFRPS (Jan 2015)	AFRPS (Feb 2017)	Comments	Core Competencies
Inspection Program	Inspection Program Based on HACCP Principles	Inspection Program		
Purpose (3.1) This standard describes the elements of an effective inspection program for manufactured food establishments.	No title This standard applies to the utilization of HACCP principles to control risk factors in a retail food inspection program.	Purpose (3.1) This standard describes the elements of an effective ANIMAL FEED inspection program.	All 3 reference the inspection program; however, VNRFRPS is vastly different in that it does not require written inspection procedures and specifically addresses the use of "HACCP" principles.	Inspection program that is considered "effective" (presumably, in effecting positive public health outcomes).
Requirement Summary (3.2) The State program has a manufactured food inspection system. This system provides the foundation for inspecting food firms to determine compliance with the laws administered by Federal, State, and local governments. In addition, the State program has: (1) a risk based inspection program , (2) an inspection procedure , (3) an inspection report procedure , (4) a system to respond to CONSUMER COMPLAINTS , (5) a system to resolve INDUSTRY COMPLAINTS about inspections, (6) a recall system , and (7) a sampling procedure .	Requirement Summary An inspection program that focuses on the status of risk factors, determines and documents compliance, and targets immediate- and long-term correction of out-of-control risk factors through active managerial control .	Requirement Summary (3.2) The State PROGRAM administers an inspection program to determine compliance with ANIMAL FEED laws.	1) AFRPS and VFRPS use the words "inspection program"; MFRPS uses the word "food inspection system." Opportunity for harmonization. 2) the MFRPS describes the element of the program in the requirement summary these same elements are detailed in section 3.3 program elements 3) VNRFRPS Std 5 addresses consumer complaints in the requirement summary "The program has an established system to detect, collect, investigate and respond to complaints and emergencies that involve foodborne illness, injury, and intentional and unintentional food contamination.	Risk focused inspection program that includes procedures, and encompasses systems to address consumer and industry complaints, and recalls.

“...must use risk factors & classification criteria described...”

“...develops & uses a process that groups...into at least three categories based on potential & inherent food safety risks...”

“...required to use a minimum of three factors in 3.3.12 to assign risk categories...”

MFRPS (Sep 2016)	VNRFRPS (Jan 2015)	AFRPS (Feb 2017)	Comments	Core Competencies
The State program has an inventory of food establishments for which the State has regulatory oversight. The inventory is categorized by the risk associated with the likelihood that a food safety or defense incident will occur. (3.3.1)	<i>(not stated, but implied)</i>	The state program has documented procedures to define an up to date inventory of feed facilities (3.3.1.1.1); Maintain the inventory of feed facilities defined in 3.3.1.1.1(3.3.1.1.2)	Retail does not require firm inventory management (though implied). Food Defense only specifically mentioned as a context to what "risk" means. Suggestion to separate inventory, risk categories and inspection frequency format-wise.	Inventory that is categorized by risk.
Inspections are prioritized and frequencies assigned based on established risk categories . The State program has written procedure documenting their classification criteria and inspection frequencies. (3.3.1.1)	Assigns inspection frequency based on the risk categories to focus program resources on food operations with the greatest food safety risk. (Std 3)(3) <i>(Written procedure required under Documentation)</i>	Based on risk factors assigned to a facilities or produce, the manufacturing processes , and the compliance history of the facility, inspections: are prioritized (3.3.1.4.1); have assigned frequencies (3.3.1.4.2) and resources allocated (3.3.1.4.3)	1) MFRPS and VFRPS include "frequency"; 2) VFRPS and AFRPS use "3 factors or 3 categories" to assign risk. MFRPS does not quantify a specific amount. 3) AFRPS and MFRPS (appx 3.2) incorporate compliance history as part of risk 4) they are all in agreement with "frequency" as a criteria 5) MFRPS uses "written" procedures; AFRPS uses "documented"	Inspections are prioritized based upon risk.
The state program must use the risk factors and classification criteria as described in: • Appendix 3.2 ; or • FD&C Act, Section 421(a)(1) ; or (3.3.1.2) • Develop its own risk factor and classification criteria . If the state chooses to develop its own	Develops and uses a process that groups food establishments into at least three categories based on potential and inherent food safety risks . (Std 3)(2)	The state program has documented procedures for defining risk categories (3.3.1.2) The State Program is required to use a minimum of the three factors in 3.3.1.2 to assign risk categories to feed facilities. (3.3.1.3)	Varying methods of defining risk categories.	Risk categories must be defined.

There's Got to Be a Better Way...

- Public Health Accreditation
- International Standard
ISO 17020 (Inspection Bodies)
- International Comparability Assessment Tool



BACKGROUND

- objective framework to determine robustness of potential participating country's food safety authority's overall food safety systems.
- originally based on MFRPS in 2008, a voluntary program that aligns domestic U.S. FDA to U.S. states' food safety systems.
- modifications made to provide tool more suitable for international use.

STANDARD 1 Narrative

Legal and Regulatory Foundation

Purpose of the Standard - The Regulatory Foundation Standard describes the laws, regulations, rules, ordinances, or other regulatory requirements that govern the operation of a food safety control system which are used by participating country to define and ensure compliance with food safety regulations.

STANDARD 1 Narrative

Legal and Regulatory Foundation

Basic Requirement of this Standard – To demonstrate that the participating country has the legal authority and regulatory provisions to perform inspections and investigations, gather evidence, collect and analyze samples, and take enforcement actions to protect the public health by ensuring the safety and security of the food supply.

STANDARD 1 Narrative

Legal and Regulatory Foundation

Program Elements to Satisfy Basic Requirements:

1. **Legal Authority** - Describes the set of laws which provide the participating country with the legal authority to protect the public health by ensuring the safety and security of the food supply, by performing such actions as: inspections and investigations, gathering evidence, collecting samples, and enforcement.
2. **Regulatory Foundation** – Describe the set of regulations that provide the provisions.
3. **Documentation** – Food safety laws and regulations are documented, maintained, and accessible

STANDARD 1 Worksheet

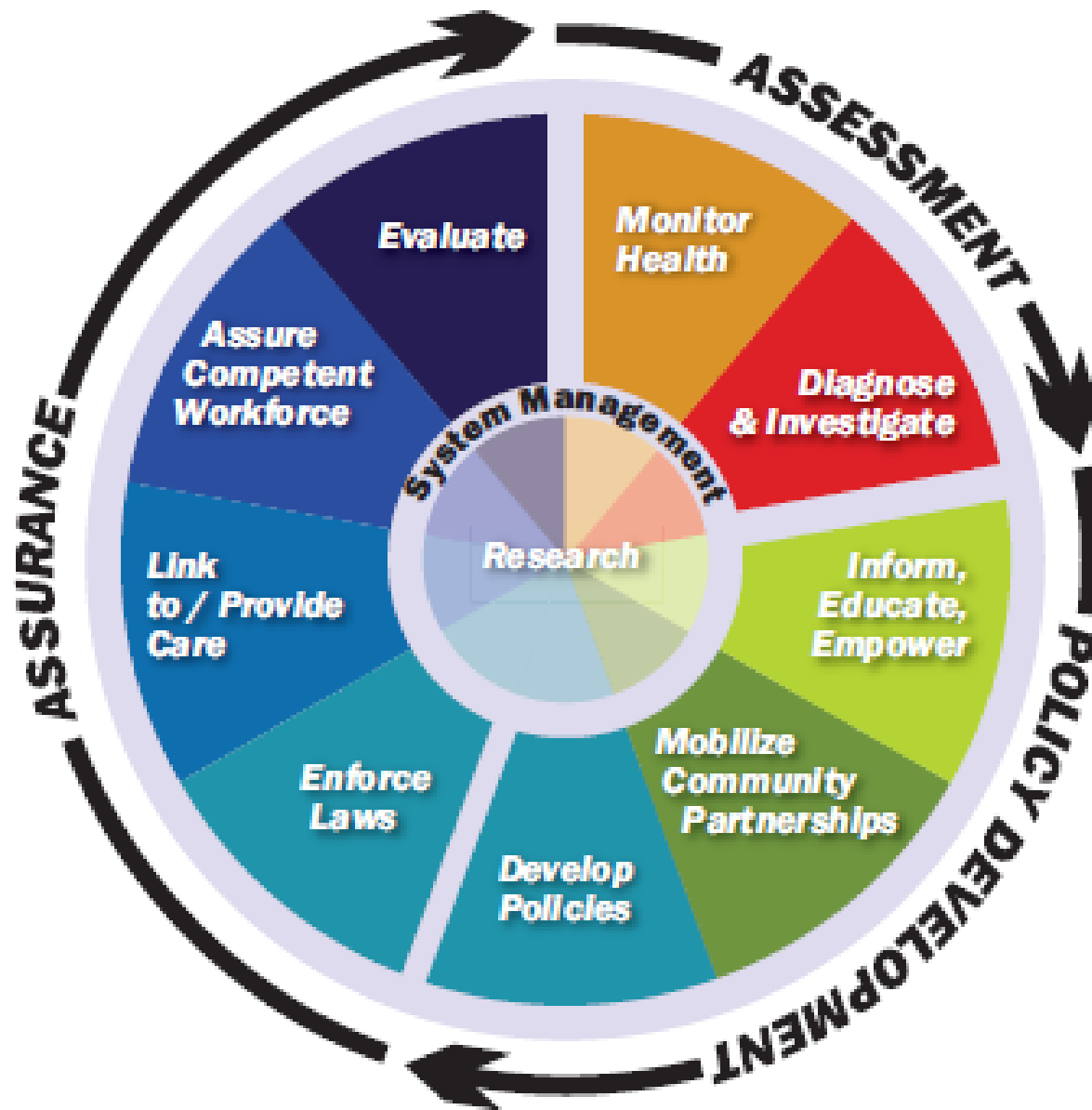
Legal and Regulatory Foundation

Competent Authority

	Comparability Element	United States Reference	Comparable Element (Include brief description, with reference or citation)	Differences with United States Reference
1.1	Competent Food Safety Authority and scope of Jurisdiction over Food Supply	United States Food and Drug Administration has jurisdiction over all foods except meat, poultry and certain egg products		
1.2	Statutory or legal definitions for “food” and “food additive”	<u>Federal Food Drug and Cosmetic Act:</u> <ul style="list-style-type: none"> • Sec 201 (§321) – <ul style="list-style-type: none"> ○ Definition (f) – “Food”; ○ Definition (s) – “Food Additive” 		

[Standard 1 – Narrative](#)

[Standard 1 – Reference Guide](#)



The Essential Public Health Services and Core Functions

Source: Core Public Health Functions Steering Committee, Fall 1994

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Critical Control Point (CCP)	Significant Hazard(s)	Critical Limits for each Preventive Measure	Monitoring				Corrective Action(s)	Verification
			What	How	Frequency	Who		
Cooker	Bacterial pathogen survival	Cook at 212°F for 3 minutes	Cooker temp and cook time	Continuous temperature recorder and conveyor belt time checks with a marked block	Continuous temperature monitoring with hourly checks of continuous temperature log and conveyor belt speed using a marked block	The cooker operator	If cooker temperature <212°F the cook time <3 minutes, then processing line is stopped until temperature is 212°F or > or cook time is > 3 minutes. Affected product is re-cooked or destroyed.	Thermometer calibrated quarterly. Records reviewed daily. Cooked shrimp tested semi-annually for pathogens. Time and temperature critical limits and cooker equipment performance validated as needed. HACCP system verification annually and as needed.

STANDARD 2.1: Conduct timely investigations of health problems and environmental public health hazards.

MEASURE	PURPOSE	SIGNIFICANCE
<p>Measure 2.1.1 A</p> <p>Protocols for investigation process</p>	<p>The purpose of this measure is to assess the health department's ability to conduct standardized investigations with consistent procedures and a set of rules to follow.</p>	<p>Health departments require standard operations, assigned roles and responsibilities, and well thought out coordination to study patterns of health and illness and their associated factors. A standardized approach ensures thorough investigation into the cause of a public health problem or environmental public health hazard and timely response so that further disease and illness can be prevented.</p>

REQUIRED DOCUMENTATION	GUIDANCE	NUMBER OF EXAMPLES	DATED WITHIN
<p>1. Protocols that include:</p> <p>a. Assignment of responsibilities for investigations of health problems, environmental, and/ or occupational public health hazards</p>	<p>1. The health department must provide written protocols that include a procedure for conducting investigations of suspected or identified health problems and environmental and occupational public health hazards.</p> <p>Examples of health problems that require investigation include infectious disease, sexually transmitted disease/infection, injury, chronic disease, chemical emissions, and drinking water contamination, etc.</p> <p>a. The protocol must delineate the assignment of responsibilities for investigations of health problems and environmental public health hazards. The assignment may be to a specified position or positions (for example, all environmental public health sanitarians, epi-diagnostic teams, and/or community health outreach staff in the health department) or may be assigned to a named individual. Documentation must include specific responsibilities shown in a procedure, protocol, or flow chart.</p> <p>If this function is carried out in full or in part by a federal agency, other health department, or other entity, then an MOU/MOA or other agreement, must be provided to demonstrate the formal assignment of responsibilities for investigation of health problems and environmental</p>	<p>1 comprehensive protocol or a set of protocols that covers diseases and environmental health issues</p>	<p>24 months</p>

What Now?

- Report Harmonization Opportunities to MFRPA Board
- Share findings with other Standards Programs
- Collaboration among Standards Groups
- Feedback to Alliance Representatives
- Input and Participation on Workgroups
- Continue to Explore Concept of Generalized Standards

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