DHSS Manufactured Food Program

The Value of Program Standards
Program Overview

- 1200 firms
Big/Small, Simple/Complex

- Airgas
- ADM grain elevators
- Bimbo bakeries
- Anheuser-Busch
- Reckitt Benckiser (French’s mustard)
- Unilever (Breyers) Ice Cream
- Wal-Mart Distribution Centers
It is very interesting work

• “How it is made” live and in person...
My goal is to

- Encourage you to engage with the retail food standards
- And if you don’t want to...
  - Think about how you deal with the issues raised
    - As a matter of best practice
Life use to be

- So easy
  - 3 inspectors
Manufactured Food Regulatory Program Standards

- Developed by FDA and a group of states with larger more advanced programs
  - I thought a lot of it was “over the top”
    - I was wrong
FDA

- Felt strongly enough to support the standards with money
  - We are in year 3 of 5
  - Enough to add a few inspectors and a program person
## The Standards

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Standard 1 Regulatory Foundation

- The state adopted a number of federal food safety laws as Missouri regulation by reference
  - Good manufacturing practices
  - Food labeling
  - Acidified foods
  - Juice HACCP
  - Seafood HACCP
Standard 1 Regulatory Foundation

- We still need to address statewide licensing of food processing plants
- A comprehensive rewrite of our 1943 food laws would be great
Is your food ordinance current?

• Based on the current food code
• License fees adequate
  ▫ Temporary food events covered
• Mandatory manager certification
• Mandatory food worker training
• Plan review
Standard 2 Training Program

• The manufactured food program
  ▫ Established a new training policy
Standard 2 Training Program

- We have two levels of approval
- Classroom/online training
- Field Training
- Training must be completed before doing independent work.
Standard 2 Training Program

- Extensive list of online training courses (FDA ORAU)
- Mandatory reading
- Joint inspections/evaluations
- Continuing education
  - 36 Hours each 3 years
- Advanced training
Standard 2 Training Program

- **Examples of the Mandatory Reading Requirements**
- 1. Training Policy
- 2. Inspection Process, Inspection Workflow and Inventory Maintenance Policy
- 3. Inspection Audit Policy
- 4. Compliance and Enforcement Policy
- 5. Industry and Community Relations Policy
- 6. State Food Law 196.010 to 196.271
- 7. Federal GMPs 21 CFR 110
- 9. Environmental Health Operational Guidelines 2.1, 2.4, 2.6, 2.7, 2.10, 2.11, 2.13, 2.14, Chapter 4, Chapter 7

21CFR 110 should be read a minimum of two times on separate dates.
Trained Regulatory Staff

• BEHS has recently developed structured training modules for all EH programs within the Bureau.

  ▫ We are beginning discussions with LPHA’s to see if and how they can be involved
How do you train a new EPHS?

• DHSS district staff have limited capacity
  ▫ Develop relationships with your neighboring LPHAs for training opportunities

• Should it be a more formal process

• Organize differently to deliver environmental health services in rural areas?
Standard 3 Inspection Program

- Another new policy
  - Definitions
  - Responsibilities of program administration, field staff, support staff
  - Workflow
  - Work planning
    - Risk based
    - Inspection frequency
Standard 3 Inspection Program

- **Preparing for an inspection**
  - File review
  - Equipment steel toed boots for grain elevator

- **Conducting an inspection**
  - Introduction
  - What to look at
  - Exit interview

- **Complaints**
  - About inspections
  - About inspectors
What are your inspection policies?

- Environmental Health Operational Guidelines (EHOG)?
  - They really are guidelines
    - Tool or aid
    - Manual addresses best practices
Standard 4 Inspection Audit Program

• The Quality Assurance piece
  ▫ How do you know how good you are?

• We are all “tall enough”
We audit

- Inspections
  - 2 per inspections per year
    - Separate from joint training inspections
    - FDA audits our auditors
- 75 inspection reports per year
  - Are the violations they write real?
- Laboratory inspection reports
Statistical analysis

• All of our inspectors combined cite pest violations on 26% of their inspections
  ▫ One of our inspectors marked this on 4% of their inspections
Program Evaluation

• How do you evaluate the quality of your environmental health program?
Standard 5  Food-related Illness and Outbreaks and Response

- Cooperative effort with the Bureau of Communicable Disease Control and LPHA’s
- We investigate when there is a possible link to a Missouri food processor
- We assist with trace-back efforts when foods leading to illnesses were sold in Missouri
What is your threshold for engagement?

- Do you have policies and procedures
  - Do you practice them
- As a state we “find” fewer foodborne illnesses than other states with our population
- We identify the causative agent in a smaller percentage of outbreaks than most
Standard 6 Compliance and Enforcement

• More new policy
  ▫ When to do reinspections
  ▫ How to do work orders
  ▫ How to process and serve closing orders
    • Contact Legislative Liaison
  ▫ Accelerated inspections after work/closing orders
  ▫ Track violations and violators
Program Evaluation

• Do you do any enforcement activities?
• Have you fostered relationships with the county prosecuting attorney?
  ▫ Compliance and enforcement best practices
    • Chapter 8 of the Food Code
    • Annex 1 of the FDA Food Code
Chapter 7 Industry and Community Relations

- Food safety website
- Food Safety Task Force
- Heartland food safety roundtable (ConAgra)
- Speak at farmer’s market workshops
- Interactions with partners
  - FDA, SMB,
  - MDA-MO meat inspection, feed program
- It is challenging to engage some food safety partners in the processing industry
How do you engage your communities?

- Do they know who you are and what you do?
  - Education
  - Public service group presentations
  - PSAs
Standard 8 Program Resources

• Do you have enough staff, money, equipment and supplies to comply with standards 1-7?
## Staffing Analysis

<table>
<thead>
<tr>
<th></th>
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<th>Percent inspected per year</th>
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<tbody>
<tr>
<td>Total number of firms</td>
<td>1546</td>
<td></td>
</tr>
<tr>
<td>Percent high risk</td>
<td>8</td>
<td>High 100</td>
</tr>
<tr>
<td>Percent medium risk</td>
<td>24</td>
<td>Medium 50</td>
</tr>
<tr>
<td>Percent low risk</td>
<td>68</td>
<td>Low 33</td>
</tr>
<tr>
<td>Reinspection rate (percent)</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Number of visits</td>
<td>140</td>
<td></td>
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<table>
<thead>
<tr>
<th></th>
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<th>Hours per inspection</th>
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<tbody>
<tr>
<td>Total hours per year per FTE</td>
<td>2080</td>
<td></td>
</tr>
<tr>
<td>Hours for inspections</td>
<td>360</td>
<td></td>
</tr>
<tr>
<td>Total deductions</td>
<td>640</td>
<td></td>
</tr>
<tr>
<td>Visits</td>
<td>2</td>
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<tr>
<td>Total desired inspections per year</td>
<td>689</td>
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### Number of FTE’s needed

- **15.5**

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<tr>
<td>Number of FTE’s available</td>
<td>16</td>
<td>Percentage of needed FTE’s</td>
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<td>103</td>
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### Inspections that can be completed

- **High**: 134
- **Medium**: 201
- **Low**: 376

Total per inspections that can be completed: **711**
Program Resources

• Does your environmental health program have adequate resources?
  ▫ Any portion of the standards we are not in compliance with we must develop a strategic plan outlining the steps we will take to come into compliance
Standards 9 and 10

- Program Assessment
  - Do a formal evaluation of compliance with each standard every year
- Laboratory Support
  - The State Public Health Laboratory is excellent
    - They are becoming accredited
    - Do you know when and how to engage them
Involvement with the Standards

• Has been a **fabulous thing** for our manufactured food program
• We developed a new database
  ▫ That has saved my life...
  • We can plan
  • We have data upon which to make decisions
Involvement with the Standards

• Can be of benefit to your environmental health program too
  ▫ They are logical and well thought out
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