

DHSS Manufactured Food Program

The Value of Program Standards

A decorative graphic consisting of several horizontal lines of varying lengths and colors (teal, light blue, white) extending from the right side of the slide.

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

Regulatory foundation	Compliance and enforcement program
Training program	Industry and community relations
Inspection program	Program resources
Inspection audit program	Program assessment
Food-related illness and outbreak response	Laboratory support

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
- 8. Acidified Foods 21 CFR 114
- 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

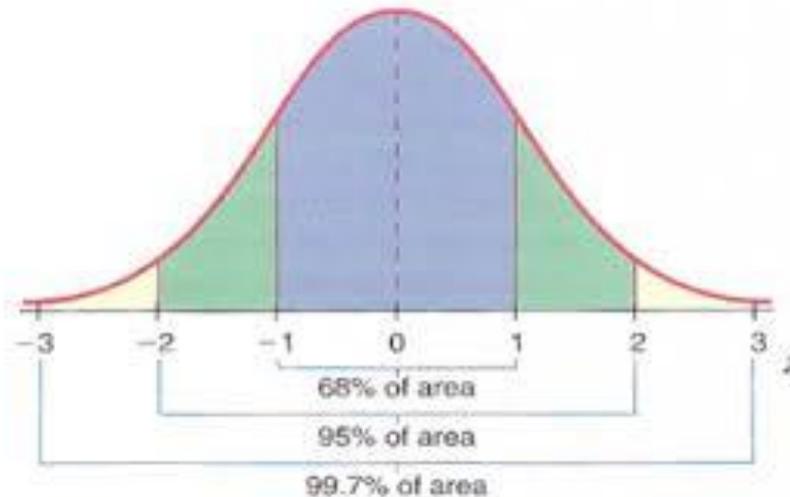
- Preparing for an inspection
 - File review
 - Equipment steel toed boots for grain elevator
- Conducting an inspection
 - Introduction
 - What to look at
 - Exit interview
- Complaints
 - About inspections
 - About inspectors

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

Total number of firms	1546	Percent inspected per year	
Percent high risk	8	High	100
Percent medium risk	24	Medium	50
Percent low risk	68	Low	33
Reinspection rate (percent)	5		
Number of visits	140		
Total hours per year per FTE	2080	Hours per inspection	
Vacation	144	Includes travel and paperwork	
Sick leave	120	High	12
Holidays	104	Medium	8
Office / administrative time	192	Low	6
Staff meetings / training	80		
percent time in this program	25	Total Hours	
Total deductions	640	visits	2
Hours for inspections	360	Hours per year	
Number of inspections per year by risk including reinspections			
High	130		
Medium	195		
Low	364		
Total desired inspections per year	689		

Number of FTE's needed

15.5

Number of FTE's available
Percentage of needed FTE's

16
103

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

The Standards

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