

Partnership for Food Protection (PFP) Strategic Plan

FY 2015 through FY 2020



November 19, 2014



Dear Valued Partner:

The Partnership for Food Protection (PFP) was established in 2009 to work on implementing the recommendations related to food safety initiatives from the 2008 50-State Workshop. Since 2009, a tremendous amount of work has been completed by the PFP workgroups. These workgroups are comprised of volunteers who have worked hard to develop best practices and resources that advance the goals of an Integrated Food Safety System (IFSS).

The PFP has always been focused on advancing an IFSS; however, there has not been a strategic vision or strategic plan to guide this work. Following the 2012 50-State Workshop, the PFP Governing Council (GC) was formed consisting of representatives of local and state health and agricultural departments and key FDA Centers and Offices. The role of the GC is to guide the work of the PFP and set strategic priorities. It is not a policy setting body. The GC is now pleased to share the PFP Strategic Plan for 2015-2020 (hereafter, the Plan) and the complementary PFP Vision document that outlines the GC's vision and mission for an IFSS. When developing the Plan, the GC considered the multi-dimensional facets of an IFSS. There are many strategic partners involved with creating an IFSS and we know that this will be a long-term endeavor.

The guiding principles for the PFP Strategic Plan are as follows:

- Reflects the PFP's vision for an IFSS;
- Is achievable by the PFP workgroups in the timeframes established, given its volunteer structure;
- Delivers tools, resources, and best practices that advance an IFSS, but it is up to the individual strategic partners to implement these products in their daily business; and
- Will evolve to meet the needs of our partners as it is a living document.

The Plan will focus primarily on integrating functions related to domestic manufactured human and animal food to address the seven goals outlined in the PFP Vision document. The Plan will be reviewed every two years in detail to allow for adjustments based on recent accomplishments and changes in the regulatory landscape.

The Plan was released as a draft in July 2014. During the PFP 50-State Workshop, held on August 12-14, 2014, over 200 strategic partners were given the opportunity to review and provide input into the draft plan. The feedback received during this workshop was used to update and revise the Plan. The Plan will be implemented over the next six years through the work of many dedicated volunteers across our strategic partnership.

The GC looks forward to working with our partners to build a true platform for mutual reliance. Please feel free to contact either of us with questions or comments and stay tuned for future postings on our [PFP web page](#).

Sincerely,

Barbara Cassens and Patrick Kennelly
Co-Chairs, PFP Governing Council

November 2014

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INTRODUCTION

The function of an Integrated Food Safety System (IFSS)

A national Integrated Food Safety System (IFSS)¹ includes a seamless partnership and operation among Federal, State, and Local agencies (strategic partners) to achieve the clearly defined public health mission of achieving a safer food supply. An IFSS also actively solicits input and support from stakeholders. The seamless operation of IFSS strategic partners will:

- Plan and prioritize work to coordinate resources;
- Implement and use data from foodborne illness and outbreak surveillance for evidence-based food safety policies and programs, and evaluation of their effectiveness;
- Implement efficient, prevention-focused, risk-based inspections and sample collections;
- Share data among strategic partners; and
- Promote use of compliance and enforcement tools for achieving compliance with food safety laws and regulations.

Role of the PFP

The Partnership for Food Protection (PFP) is a group of dedicated professionals from strategic partners with roles in protecting the food supply and public health. PFP is a primary contributor to the overall development and implementation of an IFSS, incorporating and coordinating input from those with expertise in human and animal food, epidemiology, laboratory, animal health, environment, and public health. The PFP is not a policy setting organization. The function of the PFP is to promote communication and integration between all jurisdictions and provide resources, risk-informed insight, and best practices to improve the system that partners can utilize to inform and enhance their work to protect public health.

PFP Vision

Mutual reliance for a safer food supply

PFP Mission

Collaboration – Sharing Solutions – Solving Problems

PFP Strategic Plan

The PFP Strategic Plan covers a six year period from FY 2015 through FY 2020. The strategic plan focuses primarily on integrating functions related to domestic manufactured human and animal food. This plan will be reviewed every two years to allow for adjustments based on

¹ The PFP's vision for an IFSS is currently intended as an initiative within the United States. Where appropriate, the PFP principles and resource documents may be shared with foreign government partners to promote a global approach to food safety.

recent accomplishments and changes in the regulatory landscape. Use of the word “food” in this strategic plan applies to both human and animal food.

Strategic Partners²

- Federal Agencies
- Local Governments
- State Governments

Stakeholders

- Academia
- Consumer groups
- Industry
- Industry associations
- Public
- Public health and regulatory associations
- Strategic Partners

Summary of Goals

- A – Outreach
- B – Work Planning, Inspections, and Sampling
- C – Compliance and Enforcement
- D – Surveillance, Response, and Post-Response
- E – Laboratory Science
- F – Training and Certification
- G – Information Technology

² The United States Department of Agriculture’s (USDA) Food Safety and Inspection Service (FSIS) shares the public health regulatory responsibility with the U.S. Food and Drug Administration (FDA) for ensuring the safety of the U.S. food supply. FSIS is an IFSS and PFP partner, however the accompanying strategic plan does not include or reflect FSIS laws and regulations and the way it relates to state agencies.

GOALS AND OBJECTIVES

A – Outreach

Goal: Communicate the benefits of an IFSS and the role and accomplishments of the PFP.

Outreach is required to communicate the importance and benefits of an IFSS and the role of the PFP in this effort. The PFP outreach plan will increase visibility, awareness, support, and participation from managers, stakeholders, legislators, and appropriators of PFP activities. Greater awareness will likely lead to an increase in the number of IFSS participants and supporters, and will ultimately help in realizing the vision of the PFP – mutual reliance.

Objectives:

1. Create strategic outreach plan to promote the PFP and the importance and benefits of an IFSS
 - a. **Activity:** Identify stakeholders
 - b. **Activity:** Gather existing outreach materials and identify any gaps (i.e., topics, audiences)
 - c. **Activity:** Identify and develop core elements for the outreach plan, including metrics, vehicles, and timelines
2. Implement the outreach plan
 - a. **Activity:** Develop key messages on the IFSS and the role of the PFP
 - b. **Activity:** Develop necessary outreach materials and vehicles to deliver the messages
 - c. **Activity:** Deliver key messages, share success stories, promote PFP workgroup products to demonstrate IFSS progress and benefits and promote overall value of the PFP
3. Evaluate and improve outreach efforts
 - a. **Activity:** Identify what tools are available to measure outreach efforts
 - b. **Activity:** Perform evaluation of the PFP outreach program using quantitative and qualitative measures
 - c. **Activity:** Develop mechanism to incorporate lessons learned into overall outreach plan

B – Work Planning and Inspections³

Goal: Strategic partners protect public health through coordinated approaches in planning and conducting industry oversight activities such as work planning, inspections, and sampling to promote compliance with applicable food safety laws and regulations.

³ The activities in Goal B – Work Planning and Inspections are aligned to those in Goal C- Compliance and Enforcement. The PFP Governing Council will ensure that the work in these two goal areas is coordinated, where appropriate.

Strategic partners must coordinate work planning efforts, inspections (including joint inspections), and sampling to ensure appropriate industry oversight, ensure coverage of food facilities, and leverage resources. This ensures that priorities are well defined and understood, available resources are targeted and leveraged, and that a level playing field is created for industry.

Objectives:

1. Integrate and coordinate partner agency work planning efforts to ensure appropriate industry oversight, ensure appropriate coverage of food facilities, and leverage resources
 - a. **Activity:** Develop a tool to gain feedback on the adoption and usability of the local work planning processes identified as best practices in the document titled, “*Model for Local Federal/State Planning of Field Operations and Training*”⁴ (Model Work Plan Document)
 - b. **Activity:** Develop a procedure to promote communication and transparency with strategic partners about FDA’s foods program work planning prioritization, and determine how these FDA activities can be better integrated with local, state and FDA District work planning efforts
 - c. **Activity:** Establish a pilot protocol plan to gain partner agency input into FDA’s work planning prioritization for the foods program
2. Identify core areas to cover during inspections and data collection for inspections of manufactured food facilities, and develop criteria and processes for conducting joint inspections
 - a. **Activity:** Identify model protocols for manufactured food inspection
 - b. **Activity:** Develop a model protocol for conducting routine and for cause joint inspections
3. Develop a pool of subject matter experts (SME) comprised of strategic partners to provide input on strategies for inspections conducted under the new Food Safety Modernization Act (FSMA) preventive controls and produce rules
 - a. **Activity:** Provide input on the approach including core areas of coverage and data collection strategies for conducting inspections under FSMA’s Preventive Controls (PC) for Human Foods final rule
 - b. **Activity:** Provide input on the approach including core areas of coverage and data collection strategies for conducting inspections under FSMA’s PC for Animal Foods final rule
 - c. **Activity:** Provide input on the model protocol for core areas of coverage for the FSMA Produce rule

⁴<http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/FoodSafetySystem/PartnershipforFoodProtectionPFP/UCM404722.pdf>

C – Compliance and Enforcement

Goal: Strategic partners protect public health through coordinated approaches in planning and conducting industry oversight and enforcement activities to promote compliance with applicable food safety laws and regulations.

A consistent, coordinated approach to industry oversight among strategic partners is needed to promote compliance with food safety laws and regulations. Strategic partners should identify best practices and approaches, versus taking enforcement action, for achieving compliance. Strategic partners need to understand the enforcement tools available to all partners, and their application, to determine the best approach for firms that fail to comply with laws or regulations.

Objectives:

1. Coordinate among strategic partners to promote, educate, and achieve compliance following inspectional findings
 - a. **Activity:** Identify current best practices for promoting education and compliance
 - b. **Activity:** Develop and disseminate model best practices for achieving compliance
2. Increase the knowledge of partner agency enforcement tools and their application to promote the use of coordinated enforcement strategies
 - a. **Activity:** Develop and implement a plan to improve the understanding of the availability and threshold for use of partner agency enforcement tools
 - b. **Activity:** Establish best practices for designing and implementing coordinated compliance strategies
 - c. **Activity:** Identify and disseminate best practices for coordinated enforcement activities
 - d. **Activity:** Pilot best practices among strategic partners
 - e. **Activity:** Establish mechanisms to accept compliance data from strategic partners

D – Surveillance, Response, and Post-Response

Goal: Strengthen and enable faster and more effective surveillance⁵, response, and post-response efforts through coordination among strategic partners.

The PFP will support and promote greater coordination of surveillance, response, and post-response activities. There are many resources currently available that can be better leveraged across strategic partners. The PFP will help the strategic partners to promote the use of these existing resources and will create new tools to further enhance the goals of an IFSS.

Objectives:

1. Promote the use of existing guidance documents, best practices, and tools to improve surveillance, response, and post-response

⁵ For purposes of this document, surveillance can include information related to monitoring illness and food contamination and data collected during inspections and investigations.

- a. **Activity:** Pilot the PFP's District and State Recall Cooperative Plan that establishes best practices to enhance communications between FDA and State recall staff during recall events and determine how to include local health departments in future revisions
 - b. **Activity:** Pilot the response Model Food Emergency Response Framework (MFERF) with focus groups composed of retail, manufactured food, shellfish, dairy, feed and emergency response SME
 - c. **Activity:** Develop a resource library of best practice documents and protocols
2. Document and improve information sharing and coordination processes used during multi-agency food and feed responses
 - a. **Activity:** Document current practices and data needs (i.e., the information sharing and coordination business processes used during surveillance, response, and post-response activities among response partners)
 - b. **Activity:** Identify gaps and areas for improvement
 - c. **Activity:** Identify and/or develop best practices to address the identified gaps
 - d. **Activity:** Pilot the best practices

E – Laboratory Science

Goal: Promote consistency and facilitate information sharing through establishing and utilizing national laboratory best practices.

The PFP will support development of a laboratory science system that allows for the sharing of results between strategic partners, recommends processes to leverage laboratory resources to increase information about the food supply chain, and promotes the use of national laboratory best practices. This will encourage partners to utilize each other's results to support aligned decision making and coordinate compliance and enforcement actions in an IFSS.

Objectives:

1. Increase the sharing and use of laboratory information among strategic partners
 - a. **Activity:** Map current major laboratory initiatives, including information sharing initiatives, to ensure that there is coordination and cooperation among strategic partners
 - b. **Activity:** Identify gaps and areas for improvement
 - c. **Activity:** Develop best practices to address the identified gaps
 - d. **Activity:** Pilot the best practices
2. Optimize initiatives among strategic partners for the use of best practices, specifically the PFP's laboratory best practices manual titled "Food/Feed Testing Laboratories Best Practices Manual (DRAFT)"⁶, to prepare human and animal food testing laboratories for accreditation

⁶<http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/FoodSafetySystem/PartnershipforFoodProtectionPFP/UCM404716.pdf>

- a. **Activity:** Review current PFP laboratory best practices manual
- b. **Activity:** Establish procedures for maintaining and updating the PFP laboratory best practices manual
- c. **Activity:** Identify ways to maximize use of the PFP laboratory best practices manual

F – Training and Certification

Goal: Provide input into the development of standard curricula and certification programs that will promote consistency and competency among the IFSS workforce.

A critical element for the success of an IFSS is having a competent workforce doing comparable work across strategic partners. The PFP will provide expertise to assist in the development of training and certification programs for an IFSS to help ensure uniform and consistent approaches to food safety throughout this national system. A national training and certification program will ensure that regulatory and public health activities are being completed to the same standards of proficiency and quality.

Objectives:

1. Develop a pool of subject matter experts (SME) comprised of strategic partners to provide input to cultivate a competent workforce through training and certification
 - a. **Activity:** SME provide input to identify core competencies through such tools as Job Task Analyses (JTA), needed for IFSS regulatory and public health partners
 - b. **Activity:** SME provide input on national curriculum development
 - c. **Activity:** SME provide input for determining what training courses satisfy curriculum requirements
 - d. **Activity:** SME provide input to assist with developing the system and tools to support certification under an IFSS
2. Provide input on and disseminate the products coming out of 2015 Training Summit
 - a. **Activity:** Participate in 2015 Training Summit and provide input, identify gaps, identify connections, and help validate the work
 - b. **Activity:** Disseminate resources developed out of the 2015 Training Summit
 - c. **Activity:** Work with the Outreach Workgroup to better communicate training and certification resources available to strategic partners

G – Information Technology

Goal: Promote data standards to improve the ability to share information electronically among strategic partners.

Information technology (IT) will need to be addressed across all facets of an IFSS including within each of the other goals outlined in the Strategic Plan. The PFP will define and understand the requirements for developing an integrated electronic information infrastructure by undertaking technical projects to advance a harmonized and compatible IT environment among food safety officials.

Objectives:

1. Undertake technical projects that will advance abilities to harmonize a compatible IT environment among food safety officials
 - a. **Activity:** Conduct a review of current data exchange standards for sharing and exchanging data between strategic partners
 - b. **Activity:** Evaluate the functional utility of FDA's electronic State Access to Facts (eSAF) IT solution
 - c. **Activity:** Establish systematic survey mechanism to measure and track the implementation of PFP IT Workgroup products

Appendices

Appendix A: Additional Description of Selected Activities

Sub-activities or steps that could be utilized to accomplish an activity were identified for certain activities during the development of the PFP Strategic Plan. In the table below, the activities that had respective sub-activities are provided. The chart is arranged to coincide with the body of the strategic plan and is arranged by goal area.

A – Outreach	
Objective 2, Activity a:	Develop key messages on the IFSS and the role of the PFP
i.	Target key messages for specific stakeholder groups based upon deliverables from outreach plan
Objective 2, Activity b:	Develop necessary outreach materials and vehicles to deliver the messages.
i.	Gather success stories from PFP, associations, strategic partners, and stakeholders
ii.	Develop roll-out strategies for PFP workgroup products
iii.	Incorporate messaging in PFP publications and websites
iv.	Leverage stakeholders to disseminate information
B – Work Planning and Inspections	
Objective 1, Activity a:	Develop a tool to gain feedback on the adoption and usability of the local work planning processes identified as best practices in the document titled, “ <i>Model for Local Federal/State Planning of Field Operations and Training</i> ”
i.	Identify barriers to sharing work plan related data among partners that have adopted the aforementioned best practices and mechanisms to overcome the barriers
ii.	Identify barriers to coordinating inspection and compliance activities under the Model Work Plan document and mechanisms to overcome those barriers
iii.	Identify mechanisms to increase the adoption of and improve upon the best practices of the Model Work Plan document based on feedback, including identify lessons learned
iv.	The process should include how the tool be will be administered, how the data is analyzed, and how to communicate the results
Objective 2, Activity b:	Develop a model protocol for conducting routine and for cause joint inspections
i.	Define the situations, scenarios, and criteria that should be considered when making decisions to conduct joint inspections
C – Compliance and Enforcement	
Objective 2, Activity a:	Develop and implement a plan to improve the understanding of the availability and threshold for use of partner agency enforcement tools.
i.	Collect baseline knowledge of available tools of partner agencies through an on-line survey and determine sampling strategy to get a representative sample
ii.	Collect inventory of compliance tools across all partner agencies
iii.	Review Model Work Plan document to identify gaps and recommend improvements focusing on compliance and enforcement coordination section
Objective 2, Activity b:	Establish best practices for designing and implementing coordinated enforcement strategies
i.	Reach out to partners to see what works
ii.	Look at NGOs and Associations (e.g., NEHA, NACCHO website for Crumline

Award) iii. Look at other regulatory platforms (i.e., EPA) iv. Identify triggers and players for coordinated enforcement strategies (look at different scenarios) v. Utilize the information related to enforcement found in the Model Work Plan document as a starting point vi. Incorporate and address the lessons learned and next steps from the joint enforcement pilot conducted in FY 2012 in which five states and FDA districts participated vii. Identify criteria and thresholds for determining when the development of coordinated enforcement strategies is warranted
Objective 2, Activity e: Establish mechanisms to accept compliance data from strategic partners i. Identify critical components of inspection and sampling to ensure quality so that data can be used for action <i>Note: this is multi-way stream: state use FDA data, FDA use state data, state-to-state, state-to-local, vice versa</i>
D – Surveillance, Response, and Post-Response
Objective 1, Activity a: Pilot the PFP’s District and State Recall Cooperative Plan that establishes best practices to enhance communications between FDA and State Recall staff during recall events and determine how to include local health departments in future revisions i. Review the PFP’s District and State Recall Cooperative Plan to identify how to include local health departments ii. Update the PFP’s District and State Recall Cooperative Plan to include local health departments
Objective 1, Activity c: Develop a resource library of best practice documents and protocols i. Link the resource library to other existing libraries ii. Catalog and provide insight into which best practices would be most suited for federal, state, and local agencies
E – Laboratory Science
Objective 1, Activity a: Map current major laboratory information sharing initiatives to ensure that there is coordination and cooperation among strategic partners i. Focus on the goals, objectives, activities, and anticipated outcomes of the current initiatives (e.g., APHL-AAFCO-AFDO cooperative agreement) ii. Include current initiatives between human and animal food, public health laboratories, federal agencies, non-government organizations, and other associations iii. Evaluate current and new technologies being used, plans for improving infrastructure, and other essential information
Objective 2, Activity b: Establish procedures for maintaining and updating the PFP laboratory best practices manual i. Identify where the document is stored ii. Identify mechanism for updating the document iii. Identify what entity maintains the document
Objective 2, Activity c: Identify ways to maximize use of the PFP laboratory best practices manual, “Food/Feed Testing Laboratories Best Practices Manual (DRAFT)” i. Include recommendations for promoting and distributing the document to laboratories ii. Review document and determine if updates are needed

Appendix B: PFP Governing Council Members (2014-2016)

State and Local Representatives:

Pat Kennelly, Co–Chair State Health Rep (Food Safety)	California Department of Public Health Sacramento, CA
Claudia Coles State Ag Rep (Food Safety)	Washington Department of Agriculture Olympia, WA
Roy Kroeger Local Rep	Cheyenne–Laramie County Health Department Cheyenne, WY
Adam London (At-Large State/Local)	Kent County Health Department Grand Rapids, MI
Dan Rice (At-Large State/Local)	New York State Department of Agriculture and Markets Albany, NY
Robert Waltz (Feed Safety)	Office of Indiana State Chemist West Lafayette, IN

U.S. Food and Drug Administration Representatives:

Barbara Cassens, Co– Chair	FDA – Office of Regulatory Affairs
Jeff Farrar	FDA – Office of Foods and Veterinary Medicine
Tracey Forfa	FDA – Center for Veterinary Medicine
Steve Solomon	FDA – Office of Regulatory Affairs
Roberta Wagner	FDA – Center for Food Safety and Applied Nutrition

U.S. Department of Agriculture Representative:

David Goldman*	USDA – Food Safety and Inspection Service
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U.S. Centers for Disease Control and Prevention Representative:

Marguerite Pappaioanou*	CDC
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*Non-voting member of the PFP Governing Council