



A presentation slide with a blue header and footer. The main content area is white. On the left, the names "Rene Nieto" and "Kristin Esch" are listed, separated by a vertical blue line. To the right of the line, the title "STRATEGIES TO PROMOTE CONSISTENCY IN THE IMPLEMENTATION OF THE PRODUCE SAFETY RULE" is displayed in blue, all-caps text.

Rene Nieto
and
Kristin Esch

STRATEGIES TO PROMOTE
CONSISTENCY IN THE
IMPLEMENTATION OF THE
PRODUCE SAFETY RULE

WHY THIS
WEBINAR?

- To share an educational resource
 - Promote collaboration
 - Strategies to encourage discussion
 - Provide and share where resources have been collated into one location

WHY THIS PROGRAM?

- Current opportunities were not addressing a need to prepare for inspection activities.
- Learned that states across the country were doing similar activities
 - Wanted to streamline
 - Provide a common strategy for all states
 - Increase consistency of implementation

WHAT IS THE GOAL OF THE STATE PROGRAMS?

- Effectively and consistently implement the PSR
- How?
 - Education
 - Training
 - Evaluations
- Three different concepts, three different goals.

KEY EDUCATION GOALS FOR CONSISTENTLY IMPLEMENTING THE PSR

- Are the goals established?
- Are they being met?
- Have they evolved?
 - Transition from knowledge to understanding
 - Linear thinking
 - Big picture thinking

HOW DO WE GET STARTED? WHAT DO WE ALREADY HAVE?

Resources inventory:

- FDA
 - Rule
 - Preamble *Produce Safety Rule with Preamble*
 - C & I Guidance
 - At-a-Glance documents
 - Fact sheets
- State-specific education resources
 - Example guides
 - Scenarios
 - Data

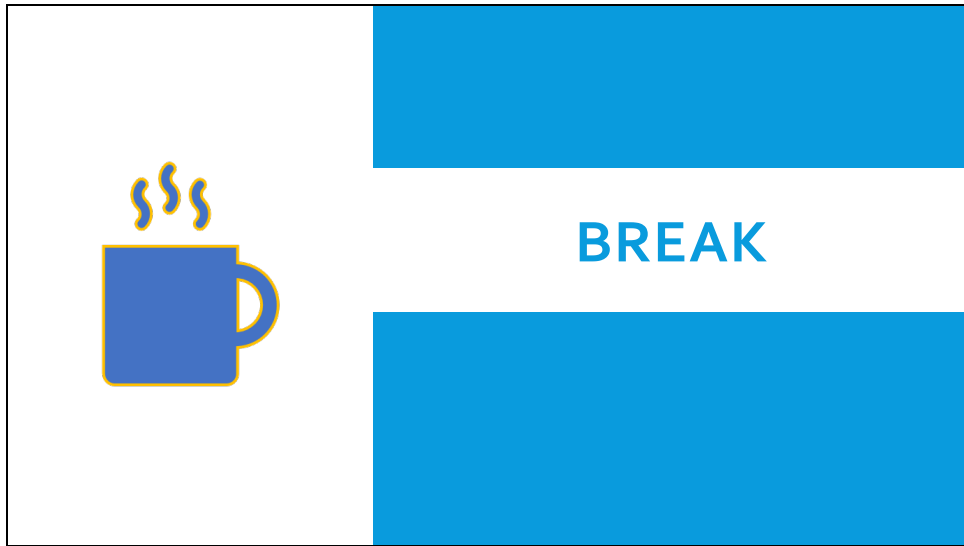
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OTHER CONSIDERATIONS

- Make up of the class
 - Different states
 - FDA
 - Extension
- Organization structure/process
- Need to think about
 - Who's educating your inspectors?
 - How are inspectors being taught?
- What are the learning needs?
 - Everyone learns differently
- Resources to facilitate
 - What do you need?
 - Is it already out there?
 - Time

[illegible]



PROGRAM OVERVIEW

Broken up into 8 parts

Meant to:

- Be flexible
- Facilitate discussion
- Utilize already available resources
- Interject State specific resources
- Reinforce knowledge retention

PART 1

- Establishing Ground Rules
 - Introductions and housekeeping
 - Roles of responsibilities
 - Review what the meeting will NOT cover

PART 2

Understanding to Apply

- Key concept of this entire endeavor
- Without understanding, how can one ensure effective application
- Change in approaching the rule

PART 3

Resources

- FDA
 - Rule
 - Preamble
 - C & I Guidance
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PART 4

- The Subparts
 - Reviewing and discussing the Subparts
- Understanding the structure of the PSR
 - General to specific
 - Words have meaning!
- 21 CFR 112 Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption


PART 5


Differences Between


- Audits
 - Buyer required
 - Farmer defines the scope
- On Farm Readiness Reviews (OFRRs)
 - Voluntary and educational
- Inspections
 - Mandatory
 - Inspector defines the scope
- Investigations
 - Usually after something bad has already happened



PART 7

 Enforcement Discretion Document from the FDA

 What is an Egregious Condition?

 How the PSR May Apply Within Business Interactions with Other States

- Moving outside the classroom (as mentioned in Part V)
 - Mock inspection
 - Allows for inspectors to see other inspections styles
 - Putting the training to use in a neutral environment
 - Appoint a "farmer" to each group
 - Keep groups small
 - Start groups in different sections of the farm
 - Group discussion after inspections
 - Have each group provide their top three issues
 - <https://www.afdo.org/trainings/strategies-to-promote-consistency-in-the-implementation-of-the-produce-safety-rule/>

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QUESTIONS?

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