Partnership for Food Protection (PFP)

Strategic Plan

FY 2018 through FY 2020

Revised December 2018
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, Local, and Territorial government agencies (strategic partners) to achieve the clearly defined public health mission of achieving a safer food supply. An IFSS 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 evaluate 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 comprised of dedicated professionals from strategic partners with roles in protecting the food supply and public health. The PFP is the structure used to coordinate representatives from these institutions with expertise in food, feed, epidemiology, laboratory, animal health, environment, and public health to develop and implement an Integrated Food Safety System (IFSS). 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
This is an update to the PFP 2015 - 2020 Strategic Plan. In evaluating changing conditions within the regulatory environment such as implementation of the Food Safety Modernization Act (FSMA), and

\(^1\) 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.
FDA’s Program Alignment, the remaining implementation period and activities have been adjusted. In this next phase of the PFP, a new approach will be used to better utilize PFP resources and knowledge and skills of the membership by avoiding duplication of integration activities already in progress by other integration working groups. The PFP Governing Council sees the PFP as a unique resource to stakeholders for obtaining the tools and knowledge available to support integration.

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 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 Partners**
- Federal Agencies
- Local Governments
- State Governments
- U.S. Territories

**Stakeholders**
- Academia
- Consumer groups
- Industry
- Industry associations
- Public health and regulatory associations

**Workgroups**
- Outreach
- Work Planning, Inspections and Compliance
- Surveillance, Response, and Post-Response
- Laboratory Science
- Training and Certification
- Information Technology

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**GOALS AND OBJECTIVES**

**Outreach Workgroup**

*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. Outreach 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.

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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.
The Outreach Workgroup has developed marketing and educational materials for PFP. This includes an e-newsletter/newsfeed, PFP informational brochure, a new website, informational videos for YouTube, and written articles for associations on PFP and its activities.

Objectives:

1. Work with PFP Workgroups to help promote understanding of different IFSS contributions through focus areas (or subject areas represented by the PFP workgroups).
   a. **Activity:** Work with each PFP workgroup to develop their content for the PFP Website.

2. Identify long term strategy to maintain operational programs within the workgroup including website maintenance and organization.
   a. **Activity:** Gather latest IFSS news and information to post on the PFP Website.
   b. **Activity:** Develop process for workgroup page updates.

3. Consistently evaluate and improve outreach efforts.
   a. **Activity:** Perform evaluation of the PFP outreach program using quantitative and qualitative measures (e.g. website visits, sign-up requests).

**Work Planning, Inspections and Compliance Workgroup**

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

Strategic partners should coordinate work planning efforts, inspections (including joint inspections), and enforcement activities to ensure appropriate industry oversight and leveraging of regulatory resources.

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:** Document key state workplan development processes, including the mechanisms utilized for identification of firms for inspection, criteria utilized for prioritizing inspections, firm risk assignment processes, and the basis for establishing inspection frequencies for regulated facilities. Identify commonalities and challenges between the state workplan development process and the FDA workplan development process and identify opportunities for increased collaboration in establishing coordinated workplans within geographic areas.

2. Review/update the model “work planning” document.
a. **Activity**: Review and update the “Model for Local Federal/State Planning and Coordination of Field Operations and Training”, ensuring that FSMA inspection frequencies and FDA organizational changes are appropriately reflected in the document.

**Surveillance, Response, and Post-Response Workgroup**

**Goal**: *Strengthen and enable faster and more effective surveillance, 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.
   
   a. **Activity**: Pilot the *Model for Local Federal/State Planning and Coordination of Field Operations and Training* document with a Rapid Response Team and local agencies within one (1) state.
   
   b. **Activity**: Develop a *Food Related Emergency Exercise Bundle (FREE-B)* that includes local agencies in RRT activities.

2. Promote the integration of local jurisdictions into Rapid Response Teams (RRTs) by exploring the role Retail Food Programs have in the response to human and animal food emergencies.
   
   a. **Activity**: Document how RRTs and local agencies currently interact to prepare for food emergencies and outbreaks, enhance communication capabilities, conduct joint training exercises, and identify potential prevention practices to reduce foodborne illness and injury.
   
   b. **Activity**: Identify the role Retail and Manufactured Food Programs play in RRTs
   
   c. **Activity**: Analyze identified gaps between Retail and Manufactured Food Programs roles in RRT operations and develop best practices to address identified gaps.

**Laboratory Science Workgroup**

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

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

   
   a. **Activity:** Disseminate and promote the use of the revised Laboratories Best Practices Manual.

2. Review current laboratory data sharing mechanisms for effectiveness.
   
   a. **Activity:** Evaluate the effectiveness of existing laboratory data sharing systems for their ease of use and the ability for federal, state and local agencies to access violative sample data. Develop recommendations for improving the sharing of laboratory analytical data and the capacity for sharing and using laboratory data amongst regulatory partners.

3. Utilize the PFP’s laboratory best practices manual “Food/Feed Testing Laboratories Best Practices Manual (DRAFT)” and the APHL Data Acceptance White Paper to prepare a checklist of analytical worksheet elements that should be present for a laboratory analysis to be utilized for regulatory action, in a format that facilitates compliance reviews.
   
   a. **Activity:** Review LBPM and the Data Acceptance White Paper to identify appropriate elements.
   b. **Activity:** Determine a standard order of analytical elements, ordered for clarity.
   c. **Activity:** Work with PFP Work Planning, Inspections and Compliance workgroup and other appropriate stakeholders to reach concurrence on elements and order.

**Training and Credentialing Workgroup**

**Goal:** Continue to support the development of national curricula standards and credentialing programs that will promote consistency and competency amongst the IFSS workforce.

A critical element for the success of an IFSS is having a well-trained and educated workforce doing comparable work across strategic partners. The PFP Training and Credentialing Workgroup will provide expertise to assist in the development of training and credentialing programs for an IFSS to work towards uniform and consistent approaches to food safety throughout a national system. National training and credentialing programs will help promote that regulatory and public health activities are being completed to the same standards of proficiency and quality across the Nation.

**Objectives:**
1. Develop a National Curriculum Standard (NCS) for Human and Animal Food Regulatory Professionals and Laboratory Analysts to implement consistency and comparability of training content and field performance.
   a. **Activity:** Utilize SMEs to provide input on NCS development for inspectors/investigators and laboratorians (and other future IFSS professional tracks) (curriculum frameworks, competency statements, performance indicators, online, field, and classroom training).
   b. **Activity:** Engage stakeholders to ensure training standards are aligned with need.
   c. **Activity:** Align and sequence training content and learning events (new and existing) to meet the NCS.
   d. **Activity:** Collaborate with the PFP Laboratory Sciences Workgroup to develop the National Laboratory Curriculum Framework and subsequent training products.
   e. **Activity:** Collaborate with the PFP Outreach Workgroup to share training resources available to strategic partners.

2. Participate in the development of credentialing programs that work in tandem with the NCS program.
   a. **Activity:** Utilize SMEs to participate in credentialing feasibility studies.
   b. **Activity:** Utilize SMEs to participate in determining specific credentialing needs for the various NCS professional career tracks and levels.
   c. **Activity:** Utilize SMEs to assist with developing the system and tools needed to support credentialing under an IFSS.
   d. **Activity:** Engage stakeholders to determine if credentialing standards are aligned with need.
   e. **Activity:** Collaborate with the Outreach Workgroup to share credentialing resources available to strategic partners.

**Information Technology Workgroup**

**Goal:** Provide a collaborative vision and approach for a sustainable uniform electronic data exchange with Integrated Food Safety System (IFSS) partners.

Information technology (IT) needs 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. Develop initial operating capabilities (IOC) for National Food Safety Data Exchange (NFSDX) to demonstrate data exchange features in supporting State to FDA, FDA to State, and State to State data sharing. The activities proposed for fiscal year 2017 are:
   a. **Activity:** Develop initial operating capabilities (IOC) for National Food Safety Data Exchange (NFSDX) to demonstrate data exchange features in supporting State to FDA, FDA to State, and State to State data sharing.
   b. **Activity:** Engage pilot states to configure their systems for NFSDX integration along with the various legal agreements and support.
c. **Activity:** Develop a draft Full Operating Capabilities (FOC) for data sharing.

2. Expand data exchange beyond the three Use Cases (Submit Contracted Inspection Results, Firm Data Search, and State to State Firm Data Exchange) to include a web-based Portal for data exchange. The portal could address the growing need to share ORA data with States and other partners for various FDA programs. It could provide integrated security, standardize data sharing across all initiatives (UI and system to system), Library (Shared content and reference resources), and access to common information (e.g., Firms, Inspections, Compliance Action) and potentially address State Sunshine laws. The activities proposed for fiscal year 2018 are:

   a. **Activity:** Continue data exchange integration with seven pilot States expanding capabilities to accept additional regulatory and enforcement information (e.g., BSE Checklist, Seafood HACCP, additional assignment information)
   
   b. **Activity:** Implement ORA Partners Portal (ORAPP), a portal with User Interface integrating a broad range of functionality for NFSDX:
      i. Account Management
      ii. Content Management
      iii. Search features
      iv. Reporting capabilities
      v. Document and API catalog
   
   c. **Activity:** Initiate Lab data structures analysis and develop services to enable States to submit lab/sample analysis data.
   
   d. **Activity:** Expand NFSDX adoption to additional regulatory partners.

3. Expand the data exchange integration to the Portal along with additional data exchange functionality. The activities proposed for fiscal year 2019 are:

   a. **Activity:** Continue expanding support for data exchange with regulatory partners using the NFSDX and ORAPP.
   
   b. **Activity:** Enhance data exchange to allow submission of Sample Analysis for Labs (assignments and work packages), Preventive Controls (Human and Animal) Inspections, and Produce Safety Firm Inventory information.
   
   c. **Activity:** Technical readiness of data exchange for Inspection related data structures and automation of work assignments to regulatory partners.
   
   d. **Activity:** Implement support for Attachments, specifically receiving and sharing documents for Inspections.
   
   e. **Activity:** Enhance Portal to allow regulatory partners to access:
      i. Prior Inspections and Firm Search
      ii. Farm Inventory upload capability
      iii. Integrated Security and Access Controls
      iv. Resource Library
      v. Other Food Safety Documents

4. Initiate projects for increasing data sharing with regulatory partners including support for Attachment Services and Work Assignment Services. The activities proposed for fiscal year 2020 are:

   a. **Activity:** Continue expanding support for external data sharing with regulatory partners.
b. **Activity:** Explore integration of Document Management and Attachment capabilities with eSAF.

c. **Activity:** Increased engagement with broader audiences.

d. **Activity:** Support additional Inspection types and additional FSMA related activities.

5. Increase the centralized data sharing across various regulatory partners. The activities proposed for fiscal year 2021 are:

   a. **Activity:** Continue expanding support for external data sharing with regulatory partners.
   
   b. **Activity:** Continue system and technology agnostic data sharing with industry.

6. Work closely with internal teams within FDA, other PFP Workgroups, and external regulatory partners for PFP IT solution for data sharing related to improved integrated food safety and regulatory enforcement. The goal for data sharing is to have improved access to data, elimination of double data entry across regulatory partners and FDA systems, improvements in timely enforcement decisions, etc. The proposed activities for cross team collaboration are:

   **Activity:** Coordinate and collaborate internally within FDA with various teams and externally with regulatory partners to further enhance data exchange capabilities.

   High-level coordination and collaboration internally within FDA for:
   
   i. Data Privacy and Disclosure
   
   ii. Data Exchange Agreements
   
   iii. Technology Infrastructure and Access Security
   
   iv. Applications and Databases information
   
   v. Help Desk and Support
   
   vi. Data Element Definition, Privacy Classification, DAS and NFSDX Services Architecture
   
   vii. Lab process and data element analysis with PGP Lab WG
   
   viii. NFSDX and ORAPP Outreach with PFP Outreach WG
   
   ix. NFSDX and ORAPP training with PFP Training WG

   High-level coordination and collaboration externally with various regulatory partners to:
   
   i. Gather information to understand the process and system requirements
   
   ii. Assist and guide in end-to-end planning, development, testing and integration with data exchange
### Appendix A: PFP Governing Council Members (2018)

#### State and Local Representatives:

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Location</th>
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</thead>
<tbody>
<tr>
<td>Patrick Kennelly, Co–Chair</td>
<td>State Health Rep (Food Safety)</td>
<td>California Department of Public Health - Retired Sacramento, CA</td>
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<tr>
<td>Claudia Coles</td>
<td>State Ag Rep (Food Safety)</td>
<td>Washington Department of Agriculture Olympia, WA</td>
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<td>Roy Kroeger</td>
<td>Local Rep</td>
<td>Cheyenne–Laramie County Health Department Cheyenne, WY</td>
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<tr>
<td>Pieter Sheehan</td>
<td>(At-Large State/Local)</td>
<td>Fairfax County Health Department Fairfax, VA</td>
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<tr>
<td>Mark Sestak</td>
<td>(At-Large State/Local)</td>
<td>Alabama Department of Health Montgomery, AL</td>
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<tr>
<td>Gary Horvath</td>
<td>(State Laboratory)</td>
<td>Minnesota Department of Agriculture St. Paul, MN</td>
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<tr>
<td>Robert Waltz</td>
<td>(Feed Safety)</td>
<td>Office of Indiana State Chemist West Lafayette, IN</td>
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<tr>
<td>Bob Ehart</td>
<td>(Association Representative)</td>
<td>National Association of State Departments of Agriculture Washington, DC</td>
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#### U.S. Food and Drug Administration Representatives:

<table>
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<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Barbara Cassens, Co–Chair</td>
<td>FDA – Office of Regulatory Affairs</td>
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<tr>
<td>Jeff Farrar</td>
<td>FDA – Office of Foods and Veterinary Medicine</td>
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<tr>
<td>Tracey Forfa</td>
<td>FDA – Center for Veterinary Medicine</td>
</tr>
<tr>
<td>Michael Rogers</td>
<td>FDA – Office of Regulatory Affairs</td>
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<tr>
<td>Doug Stearn</td>
<td>FDA – Center for Food Safety and Applied Nutrition</td>
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#### U.S. Department of Agriculture Representative:

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<thead>
<tr>
<th>Name</th>
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<tr>
<td>David Goldman</td>
<td>USDA – Food Safety and Inspection Service</td>
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#### U.S. Centers for Disease Control and Prevention Representative:

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<tr>
<th>Name</th>
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<tr>
<td>Sherri McGarry</td>
<td>CDC</td>
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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
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- 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

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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 Partners**
- Federal Agencies
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- 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

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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 Inspections

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.

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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” (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

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4http://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 surveillance\(^5\), 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

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\(^5\) 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)”, to prepare human and animal food testing laboratories for accreditation

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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
### 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.

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

**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:

<table>
<thead>
<tr>
<th>Name</th>
<th>Department/Office</th>
<th>Location</th>
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</thead>
<tbody>
<tr>
<td>Pat Kennelly, Co–Chair</td>
<td>State Health Rep (Food Safety)</td>
<td>California Department of Public Health Sacramento, CA</td>
</tr>
<tr>
<td>Claudia Coles</td>
<td>State Ag Rep (Food Safety)</td>
<td>Washington Department of Agriculture Olympia, WA</td>
</tr>
<tr>
<td>Roy Kroeger</td>
<td>Local Rep</td>
<td>Cheyenne–Laramie County Health Department Cheyenne, WY</td>
</tr>
<tr>
<td>Adam London</td>
<td>(At-Large State/Local)</td>
<td>Kent County Health Department Grand Rapids, MI</td>
</tr>
<tr>
<td>Dan Rice</td>
<td>(At-Large State/Local)</td>
<td>New York State Department of Agriculture and Markets Albany, NY</td>
</tr>
<tr>
<td>Robert Waltz</td>
<td>(Feed Safety)</td>
<td>Office of Indiana State Chemist West Lafayette, IN</td>
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### U.S. Food and Drug Administration Representatives:

<table>
<thead>
<tr>
<th>Name</th>
<th>Division/Office</th>
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<tbody>
<tr>
<td>Barbara Cassens, Co–Chair</td>
<td>FDA – Office of Regulatory Affairs</td>
</tr>
<tr>
<td>Jeff Farrar</td>
<td>FDA – Office of Foods and Veterinary Medicine</td>
</tr>
<tr>
<td>Tracey Forfa</td>
<td>FDA – Center for Veterinary Medicine</td>
</tr>
<tr>
<td>Steve Solomon</td>
<td>FDA – Office of Regulatory Affairs</td>
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<tr>
<td>Roberta Wagner</td>
<td>FDA – Center for Food Safety and Applied Nutrition</td>
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### U.S. Department of Agriculture Representative:

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<tr>
<th>Name</th>
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<tbody>
<tr>
<td>David Goldman*</td>
<td>USDA – Food Safety and Inspection Service</td>
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### U.S. Centers for Disease Control and Prevention Representative:

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<th>Name</th>
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<tr>
<td>Marguerite Pappaioanou*</td>
<td>CDC</td>
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*Non-voting member of the PFP Governing Council