On-Farm Readiness Review (OFRR) Program & Toolkit

Produce Safety Educator’s Call #33
Organizer: Dr. Kristin Woods
July 31, 2018
Instructions

• All participants are muted.
• There will be time for questions and answers throughout the meeting.
  – We may not get around to all comments/questions, BUT you may leave additional comments in the comment box to be compiled after the session.
• This session will be recorded and notes will be shared via the listserv and on our website after the call.
Agenda

• Introductions
• Overview of OFRR & Goals
• How growers can register for OFRRs
• How to get involved
• Training opportunities
• Feedback & experiences from OFRRs
• Q & A
• Call Wrap Up
On-Farm Readiness Review (OFRR) Program and Tool Kit

Bob Ehart
NASDA

Michelle Danyluk
University of Florida

PSA Educators Call
July 31, 2018
On-Farm Readiness Review Partners

FDA
USDA
NASDA

Produce Safety Alliance

Michigan Department of Agriculture & Rural Development

Department of Agriculture and Consumer Services

Vermont Agency of Agriculture, Food & Markets

Oregon Department of Agriculture

UF IFAS Extension
UNIVERSITY of FLORIDA

Michigan State University Extension

NC Cooperative Extension

Rutgers New Jersey Agricultural Experiment Station

OFRR On-Farm Readiness Review
The purpose of an OFRR is...

...to prepare farmers for implementation of the FSMA Produce Safety Rule (PSR).

...to help reviewers better understand how the PSR gets translated on the farm.

...to practice a conversational approach to help farmers assess their readiness for implementation of the FSMA PSR.

...to provide tools to help assess how prepared an individual farm is to implement the rule.
Farmer Steps to Readiness for the FSMA PSR

PSA Grower Training Course is a pre-requisite!
Why Might a Farmer Want an OFRR?

- It is voluntary and free.
- It helps align what they’re doing to what’s required in the rule.
- It helps them figure out what they’re missing.
- It provides personalized discussion on their farm food safety activities.
- Notes taken remain the property of the farmer (no FOIA-able records)
- It will improve the farmer’s readiness for a PSR inspection.
## Difference Between Audits and Inspections

### Traditional Audit Approach

**Question:** Do you have a sick leave policy.

**Answer:** Yes.

**Question:** Can I see it?

**Answer:** Here it is?

### OFRR Approach

**Question:** What is your sick leave policy?

**Answer:** We don’t allow sick workers to touch produce.

**Question:** How do you recognize when someone is ill on your farm?

**Answer:** Supervisors look for frequent trips to the bathroom, and other signs of illness.
On-Farm Readiness Review

- Not points based
- Happens once (in most cases)
- Covers whole farm
- Highlights critical areas of the farm per the PSR
Who performs OFRRs?

• In most states they will be run by the State Department of Agriculture
  – Should actively involve Cooperative Extension

• In states not actively participating in the FDA’s CAP project
  – May be run by the FDA Produce Safety Network (PSN) staff
OFRR Process

1. Pre-review work
2. On the farm
   - Initial Interview
   - Walk Around
   - Final Meeting
3. Evaluation
OFRR Tool

• 15 tabs of information
  1. Glossary of Terms
  2. PSR Decision Tree, Exemption Questionnaire
  3. FSMA Factsheets
  4-15. Resource Documents

Every grower participating in an OFRR, will get an OFRR Tool.
OFRR Resource Document Modules

- Worker Health & Hygiene
- Preharvest water
- Preharvest sanitation
- Preharvest worker training
- Preharvest wildlife
- Preharvest soil amendments
  - Harvest water
  - Harvest sanitation
  - Harvest worker training
  - Harvest wildlife
- Postharvest water
- Postharvest sanitation
- Postharvest worker training
Initial Interview

• OFRR Decision Tree
  – Designed to figure out what parts of the PSR apply to the individual farm you’re on
  – Removes parts of the review that don’t apply to the specific farm you’re on, simplifying the OFRR
OFRR Decision Tree

• Question 3 – Do you have growing operations covered under the PSR?
  – Yes
    • Preharvest Animals module applies
    • Preharvest Worker Training module applies
    • Preharvest Sanitation module applies
  – No
    • None of the preharvest modules apply, skip to question 6
OFRR Decision Tree

• Question 8 – Do you conduct packing and/or holding activities under the PSR in a packinghouse/shed?
  – Yes
    • Postharvest Worker Training module applies
    • Postharvest Sanitation module applies
  – No
    • You are done with the decision tree
Walk Around

• The Grower and OFRR team will then walk around the operation
  – The tool has been arranged to move from production, to harvest, then packing
  – Can work in the opposite direction too, depending on what is best on that operation

• Will keep to the pre-determined schedule, its intended to take about 2-4 h
Walk Around

• The OFRR team will ask questions based on the PSR as it applies to the specific operation
• The questions they ask will be linked to specific language in the Produce Safety Rule

• Those questions link back to specific information in the OFRR Manual
Additional Tool Components

- Each module of the OFRR corresponds to a resource document module in the tool.

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Recommendation</th>
<th>Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Text of the Regulation</td>
<td>Activities leading to compliance with the regulation</td>
<td></td>
</tr>
</tbody>
</table>
Additional Tool Components

• Each module of the OFRR corresponds to a resource document module in the tool

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Recommendation</th>
<th>Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Text of the regulation</td>
<td>Activities leading to compliance with the regulation</td>
<td></td>
</tr>
</tbody>
</table>

The first column includes the section and the text of the regulation that apply to this module.
### Additional Tool Components

- Each module of the OFRR corresponds to a resource document module in the tool.

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Recommendation</th>
<th>Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Text of the Regulation</td>
<td>Activities leading to compliance with the regulation</td>
<td></td>
</tr>
</tbody>
</table>

The second column addresses activities that may lead to compliance with the regulation. “Must” and “Should” are used.
Additional Tool Components

- Each module of the OFRR corresponds to a resource document module in the tool

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Recommendation</th>
<th>Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Text of the Regulation</td>
<td>Activities leading to compliance with the regulation</td>
<td></td>
</tr>
</tbody>
</table>

This column includes how compliance with the regulation may be evaluated by the assessors, it includes records, when the records are mandatory.
Final meeting

• Highlight both positives and areas for improvement
• Review and explain how to use the tool
• **Make farmers aware that there will be changes to the regulations**
• Discuss potential follow up technical assistance
• Address specific questions the farmer may have
How can you get involved in OFRR?

• You need to attend an OFRR Training Class
• OFRR Classes are accessible for extension educators through State Departments of Agriculture
  – Please contact your State to attend
  – If you don’t know who your state contact is, let us know
OFRR Trainings Held

- 16 trainings held
- 8 trainers (plus 4 PSA staff)
- 296 people trained
  - 185 state regulators
  - 90 Extension educators
  - 21 FDA/ORA and CFSAN PSN
- 33 farm participants
State Participants at OFRR Trainings
Training Observations

- 20% response (n=59)
  - 87% expect to inspect farms for the FSMA PSR
  - 80% indicated a moderate or major impact on their ability to inspect for the FSMA PSR
  - 97% expect to use the OFRR Walk Around Questions (WAQ)
  - 93% indicated that they are likely to use the OFRR resource manual
  - 92% indicated that they were satisfied with the OFRR training
Training Observations

• Observations and improvements to be made
  – Familiarity with the WAQ is critical to smooth Q&A with the farmer
  – Mentoring is desired by some after the OFRR training
  – Guidance is still needed from the FDA on sections of the rule – interpretation of the rule is an issue
  – FSMA PSR and third party audits are very different!
  – Many FSMA PSR inspectors are often coming from food facility inspection positions
Future OFRR Training classes

- OFRR Training classes (beyond September) are not yet scheduled
- Expected to continue January – June, 2019
  – Currently no confirmed dates
How do growers sign up for an OFRR?

- That will vary depending on the state you’re in.
  - FL - online registration
    - www.freshfromflorida.com/FSMA
    - It's in the top left box
- NASDA is launching a website in early September 2018 to list how to register in each state
I went to an OFRR training and heard there would be an updated manual, what’s its status?

- The updated manual is at the printer!
- Watch for a storefront from NASDA for states to purchase updated manuals soon!
- The WAQ has also been updated, and will be sent to training participants
How is OFRR Roll out going?

• OFRRs are a team effort
  – Usually a state regulator and an Extension educator
  – OFRRs are a free and confidential assessment of preparedness
  – All documents specific to the OFRR stay at the farm, including notes taken
  – The OFRR resource manual is given to the farmer
  – Farmer requests technical assistance from Extension after the OFRR takes place
States Responding to OFRR Survey
86 OFRRs Completed between 4/27/18 and 7/27/18

OFRR post-farm visit survey in use
Trends with the OFRR – so far

• 91% of farms are under 500 acres in size
• 64% of farms sell over $500,000 worth of produce
• 43% of farms meet minimum FSMA PSR requirements
• 42% of farms need minor improvements to meet FSMA PSR
• Time and technical assistance are needed the most (43% and 42%)
Challenges noted

1. Pre-harvest water testing
2. Annual water system inspections
3. Record keeping of sanitation activities
4. Notification of food safety policies to farm visitors
5. Improved toilet and handwashing facilities
6. Increased implementation of rodent control programs
Does the OFRR include a records review?

- NO – the OFRR will ask if you are keeping the records required by the PSR, but will not perform a records review.
What if something wrong is found during an OFRR?

• Egregious Conditions
  – A practice, condition, or situation on an farm or in a packinghouse that is reasonably likely to lead to:
    • Serious adverse health consequences or death from the consumption of or exposure to covered produce
    • An imminent public health hazard is posed if corrective action is not taken immediately

• If an “Egregious Condition” is found assessors have been trained in a course of actions to follow up with the grower
  – If the grower has the ability to contain and prevent the potential public threat, FDA will not be notified
QUESTIONS?

Betsy Bihn  
Cornell University

Travis Chapin  
University of Florida

Michelle Danyluk  
University of Florida

Chris Gunter  
North Carolina State University

Wesley Kline  
Rutgers, The State University

Meredith Melendez  
Rutgers, The State University

Phillip Tocco  
Michigan State University
Next Meeting

• **Tentative**: September, Date TBD
• Meeting info to be sent out via the listserv closer to the time of the call
• Submit other topics for discussion to Gretchen (glw53@cornell.edu)
The PSA Website
http://producesafetyalliance.cornell.edu/

- Like us on Facebook!
- Or Follow us on Twitter!
  @Produce_Safety

Join the listserv

Elizabeth A. Bihn, Ph.D., Director, eab38@cornell.edu, 315.787.2625
Gretchen L Wall, M.S., Coordinator, glw53@cornell.edu, 607.255.6806
PSA Team

Northwest:
Connie Fisk, Ph.D.

Southwest:
Donna Pahl, M.S.

Northeast:
Betsy Bihn, Ph.D.
Gretchen Wall, M.S.
Michele Humiston
Rob Way

Midwest:
Don Stoeckel, Ph.D.

Southeast:
Kristin Woods, Ph.D.