Working Committee 9
Outreach to Regulators & Trainers

Date: 05/07/2012
Revision: Final
Introduction

Working committee #9 is tasked with the development and discussion of challenges related to outreach programs, materials, and delivery to regulators and trainers. There are four primary tasks delegated to this committee for which this report is written. The four areas are as follows:

9.1. Train the Trainer Programs
9.2. Train the Trainer Materials
9.3. Target Audience Training Materials
9.4. Training Delivery

Working Committee Chairs

Anita MacMullan  
*FDA Branch Director, Contracts and Grants*

William Miller  
*Farm Products Grading Inspector III, New York State Dept. of Ag & Markets*

Meetings Held

<table>
<thead>
<tr>
<th>Date</th>
<th>Attendance</th>
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<tbody>
<tr>
<td>July 29, 2011</td>
<td>11</td>
</tr>
<tr>
<td>November 18, 2011</td>
<td>13</td>
</tr>
<tr>
<td>December 20, 2011</td>
<td>12</td>
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<tr>
<td>February 14, 2012</td>
<td>11</td>
</tr>
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<td>April 10, 2012</td>
<td>10</td>
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Total Meetings: 5  
Total committee members\(^1\): 45

\(^1\) See [Appendix I](#) for full list of members
Data Collection

Information from committee members was collected during five teleconferences held in the months of July 2011 to April of 2012. Each meeting held was approximately one hour long where detailed notes were taken and submitted to the committee for review. From the notes taken during the teleconferences, a summary of working committee discussions was created by the PSA facilitators and committee co-chairs. Recommendations to the PSA Executive Committee were then drafted based on the summary of discussions held.

This working committee will continue to discuss topics related to outreach for regulators and trainers after the FDA’s promulgation of the Produce Safety Rule in early 2012.
Summary

I. Who Will Be Trained
A list of potential audiences to be trained includes the following:

- Government officials and regulators (e.g. FDA, USDA, State Dept. of Ag)
- Private third party auditors/inspectors
- Industry stakeholders
- Extension professionals

*A more exhaustive list of potential audiences to be trained is provided by Working Committee #8 (Outreach to Farmers) and #7 (Train-the-Trainer). The diversity of potential audiences for training sessions highlights the need for an easily adaptable curriculum to meet the demands and requirements for each unique group. Regulators in particular will need job specific training above the base curriculum to carry out their daily tasks.

II. Challenges and Considerations for Training Sessions
Specific challenges exist which need to be addressed in the curriculum and during trainings. They include the following:

1.) Course Availability – By utilizing a Train the Trainer model and allowing many training entities to conduct training, a multitude of courses should be made available. Training entities such as government, industry trade associations, Cooperative Extension, Universities, and consultants should be utilized to maximize the training effort.

2.) Limitations on Registration – The demand for trainings fluctuates greatly based on buyer demand for grower audits, commodity requirements, and eventually, Federal regulation (Food Safety Modernization Act). In addition, availability of Extension professionals, qualified trainers, and funding is limited.

3.) Cost of Attendance – Program costs will vary greatly, and the PSA must assure cost effective options are available.

4.) Specific Audiences – Government regulators will need specialized training to conduct regulatory inspections. In addition, regulators may have a potentially diverse educational background and experience with produce safety; therefore additional modules which are tailored to their specific job tasks need to be developed outside of the base training for growers.

5.) Regulator experience, knowledge, and enforcement of regulations – Regulators must have an understanding of applicable regulations and the ability to consistently enforce regulations across the country.
6.) **Language** – A key aspect to training and the retention of information. Language may be defined in two ways. Language must be appropriate to the audience.
   1. Cultural language (e.g. English, Spanish, French)
   2. Terminology & Technical language (e.g. science based language that might not be familiar to all)

**Additional concerns brought forth by committee members:**
- The issue of training regulators and growers together was discussed with several viewpoints.
  - Regulatory agencies may have standards and wish to have their own separate training program.
  - Some trainers may not be in touch with agriculture, which could make it critical to include a tiered system of education based on experience.
- Basic training in the principles of GAPs, food safety, and food microbiology should be a pre-requisite prior to enrolling in a Train-the-Trainer session. (Refer to WC #7 – Train the Trainer for further details on criteria for enrollment).
- Training manual must provide base curriculum for all parties involved in training, followed by more specific information as needed by audience type and experience.

**III. Key Attributes for Trainings**
The committee discussed the following attributes of training sessions for regulators:
- Regulators should attend basic training with growers, then each move on to further training for their specific tasks/needs.
- Trainings for regulators must be conducted state by state. Small grower states might require different training since they may not be as likely to have to comply with rules set by FSMA.
- Training sessions for regulators should be conducted in person, based on currently used training models for regulators.
  - USDA Auditor Training Requirement: 3 day on-site training session, plus on the job training prior to approval.
  - JIFSAN’s Train the Trainer course requires 5 days of on-site training.
- Online educational programs should be explored as potential refresher programs or additional modules, much like continuing education credits, for regulators.

1. **Optimum length**
- Given WC #8’s recommendation that grower training be kept to a minimum amount of time (1-2 days), trainers and regulators should be required to attend extra sessions to prepare them for their specific job tasks above and beyond the base education that growers receive.
- Training length should be tailored to accommodate different regulatory groups by covering only certain ‘modules’ of the curriculum.
  - For instance, base modules will include topics which are essential to all attendees or are mandated by government regulations.
2. Availability and Location of Training
   - Training should be provided at a convenient time, typically off production season for growers. Trainers, regulators, and auditor’s schedules often coincide with the clientele (producers) they work with.
   - Training should be held at a location which is within reasonable travel distance for attendees.
   - The training minimizes time away from home and farm.
   - The potential for online learning should be considered for audiences who cannot travel to training sessions. Online learning tools may also be used for continuing education for those who have completed a full training in person but want to further their education or refresh their knowledge.
   - Training schedules must have flexible options for weekend, mid-week, or split training dates according to audience preferences.

3. Training Participants and Dynamic
   - Regulators and growers are trained on the basic principles of GAPs together. Both parties benefit from hearing questions and experiences. This ensures growers, trainers, and regulators are being provided consistent messages.

4. Competency Exercises
   - The curriculum and training must include quizzes or exercises to test competency and confirm knowledge gain throughout the course.

IV. Training Materials
A wide variety of training materials are already available from a number of resources including, but not limited to, industry groups (e.g. LGMA), government organizations (e.g. FDA, USDA), and numerous educational institutions and Universities for food safety on the farm and GAPs. This committee will utilize the resources collected by the PSA staff from the June 29-30, 2011 GAPs Education and Training Materials Conference held in Orlando, Florida. Many of these educational training materials are already catalogued and available online from the PSA website for review.

Existing Training Materials and Models for Regulators
The workgroup discussed the need to look at educational and outreach materials and models that currently exist which are specifically tailored for regulators and trainers. The following programs were suggested as models for future training of regulatory officials.
   a. USDA GAPs Auditor Training
      http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5080329
b. Seafood HACCP
   http://www.fda.gov/Food/FoodSafety/RetailFoodProtection/ManagingFoodSafetyHACCPPrinciples/Regulators/default.htm

c. Office of Regulatory Affairs-Integrated Food Safety System for Regulators
   http://www.fda.gov/Food/FoodSafety/FSMA/ucm272566.htm
   http://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm274064.htm

Educational Materials
The preferred educational materials for regulator trainings include:

1. **Binders**- effective as long as regulators can access the materials and keep them updated, for example, by posting new materials online.
2. **Web-based Materials**- videos, webinars, and podcasts may be utilized to deliver short, educational videos for regulators.
3. **Annotated slide sets**- useful during training sessions for notes.
4. **Templates for food safety plans**- useful for regulators to see what tools are being utilized by growers.
5. **On-the-Job Training** – required for USDA auditors as well as other entities working in the field.
6. **Additional Resources** – web links, sites, publications, and other supporting material that can be referred to at a late date.

Outreach
As a companion piece to training, outreach efforts must include on-going efforts to keep information readily available and up-to-date for regulators and trainers. This might include sending a newsletter to trained individuals, posting information online, offering continuing education classes and trainings, or education ‘pods’ to address deficiencies in the curriculum or training.
Recommendations

1. The ultimate training program needs to be a living one; it must be flexible and adaptable to new science and changes in industry best practices based on emerging science.

2. The intent of outreach to regulators and trainers is to create a competent, trained inspection body that is keenly aware of current requirements and standards for the industry and government.

3. Regulators must not be trained in isolation – hands on experience in the field as well as attending trainings with growers will ensure a consistent and accurate assessment or inspection is completed.

4. Training materials and methods must encompass a diverse set of needs and learning styles preferred by regulators. Binders, web based materials, on-the-job training, or mobile technology should be explored as potential content material and tools for the curriculum.

5. Securing funding sources will be critical to support future outreach and training programs to regulators. Future mandates from the Food Safety Modernization Act will require significant sources of funding to educate and train a cadre of competent regulators.

6. The availability, location, and time of trainings must be convenient and cost effective for the majority of attendees, whether conducted state-by-state or in a centralized location.

7. The committee acknowledges that this document and final curriculum may need to be adjusted appropriately to comply with the FDA’s final Produce Safety Rule, once released.
APPENDIX I: Working Committee Members (45)

1. Bauer, Audrey; Biological Scientist; Florida Department of Agriculture
2. Bianchi, Mary L.; Extension Farm Advisor; UC Cooperative Extension
3. Bihn, Elizabeth; PSA Program Director; Cornell University
4. Bonanno, Richard A.; Extension Specialist; University of Massachusetts
5. Broughton, Fred; Marketing Specialist; S.C. Department of Agriculture
6. Brown, Reggie; Association Manager; Florida Tomato Exchange
7. Carlson, Cathy; Food Safety Program Manager; Community Alliance with Family Farmers
8. Chase, Eileen; West Coast Manager; NSF Ag
9. Cripe, Jennifer; Biological Administrator; Florida Department of Agriculture
10. DeSantis, Valeria J.; Farm Products Grading Inspector; NYS Dept. of Agriculture
11. D’lima, Carol; Produce Safety Staff Fellow; FDA-CFSAN
12. Ducharme, Diane T.; Educator; North Carolina State University
13. Foster, Steven; Food Safety Director; Wholesale Produce Supply Co.
14. Farwell, Mike; Farm Products Inspector; NYS Dept. of Agriculture
15. Green, Karen; Ag Marketing Specialist; Missouri Dept. of Agriculture
16. Hepner, Johnna; Director Food Safety; PMA
17. Haskins, Cynthia; Consultant; Illinois Farm Bureau
18. Hirsch, Diane; Extension Educator; University of Connecticut Cooperative Extension
19. Jay-Russell, Michele; Project Manager; Western Center for Food Safety
20. Johnson, Cindy; Training Coordinator; KSDE, Child Nutrition & Wellness
21. Kiger, Luana E.; Special Assistant to STC; USDA NRCS
22. Kline, Wesley L.; Agricultural Agent; Rutgers Cooperative Extension
23. Kulhanek, Ashley L.; Food Safety Education Associate; The Ohio State University
24. MacMullan, Anita; Branch manager, Grants & Contracts; FDA, Office of Regulatory Affairs
25. McGinnis, Yvonne R.; CEO; Remembering Mary, LLC
26. McSwane, David Z.; Professor; Indiana University
27. Miller, Bill; Farm Prod. Grdg. Insp. 3; NYS Dept. of Agriculture and Markets
28. Mountjoy, Daniel; Asst. State Conservationist; USDA NRCS
29. Nieto-Montenegro, Sergio; President; Hispanic Workforce Management, LLC
30. Nolte, Kurt D.; Extension Agent; University of Arizona
31. Petersen, Ken; Audit Program Manager; USDA AMS
32. Peterson, Kim R.; Outreach Program Specialist; University of Nebraska Rural Initiative
33. Phelps, Laura; President; American Mushroom Institute
34. Pivarnik, Lori; Educator; University of Rhode Island
35. Roberts, Martha Rhodes; Special Assistant to Dean for Research; University of Florida
36. Rushing, Jim; Training and Program Manager; University of Maryland
37. Salas Gutierrez, Sonia E.; Science/Technology Manager; Western Growers Association
38. Sanchez, Marcos; Food Safety Specialist; IICA
39. Saulo, Aurora; Primary Food Safety Contact; University of Hawaii
40. Sharp, Adam J.; Public Policy; Ohio Farm Bureau Federation
41. Snellman, Erick; Policy Analyst; FDA/CFSAN
42. Thomas, Steven; Branch Chief 1; California Department of Food and Agriculture
43. Tocco, Phil; Extension Educator; Michigan State University Extension
44. Wall, Gretchen; PSA Program Coordinator; Cornell University
45. Zambrana, Ingrid A.; National Expert-Foods; USFDA/Office of Regulatory Affairs