

Proposal Subject:	Changes to Procedure for Evaluation of Shellfish Sanitation Program Elements.
Specific NSSP	ISSC Constitution, Bylaws & Procedures
Guide Reference:	Procedure XV. Procedure for Evaluation of Shellfish Sanitation Program Elements
Text of Proposal/ Requested Action Public Health Significance:	<p>Refer to the <i>Proposals for Consideration at the 2013 Biennial Meeting.</i></p> <p>Current Infield Plant criteria automatically “fails” a plant even if the critical deficiency is address and corrected. This puts a plant in non-compliance but still operating which is inconsistent with the evaluation of deficiency follow-up in Subdivision v (f).</p> <p>States are deemed in compliance when evaluating deficiency follow-up when critical deficiencies have been addressed. During a plant inspection, the professional discretion of the inspector is used to determine the severity of the critical deficiency. In some cases a critical deficiency that is addressed and corrected at the time of inspection allows the plant to legally continue to process and sell product. Critical deficiencies that are addressed and corrected at the time of the infield Plant Sanitation Element should be consistent with this.</p> <p>Deficiencies with a criticality code of “Other” vary widely in public health significance and in many cases may be the result of normal wear or use during the operating season. This is especially true with items in Item 17; Plants and Grounds, and Item 21; Equipment Condition, Cleaning, Maintenance and Construction of Non-Food Contact Surfaces. Many of these “other” deficiencies are addressed prior to re-certification for the following season.</p>
Cost Information (if available):	No cost to states or industry.
Action by 2013 Task Force III	Recommended referral of Proposal 13-308 to the NSSP Evaluation Criteria Committee.
Action by 2013 General Assembly	Adopted recommendation of 2013 Task Force III on Proposal 13-308.
Action by FDA May 5, 2014	Concurred with Conference action on Proposal 13-308.