

**ISSC 2019
Interim Committee Report**

Committee Name : Training
Chairperson: Kohl Kanwit
Date of Meeting: Multiple Conference Calls 2018-2019

Committee Members:

Kohl Kanwit (Chairperson)	Mike Hickey Debbie Rouse	Kris Phelps (FDA Advisor)
Kirk Wiles	Bill Kramer (EPA Delegate)	Raymond Burditt (FDA Advisor)
Keith Skiles	Brent Higgs (FDA Delegate)	Luis Solorzano (FDA Advisor)
Johnathan Gerhardt	Lizzie Farrell (FDA Advisor)	Jon Bell (NOAA Delegate)
Kim Stryker		
Ruth Posadas		
Kim Norgren		

Charges

Charge 1: Proposal 17-302: Develop an NSSP training curriculum for inclusion into either Chapter I of the Model Ordinance or as a Guidance Document. The curriculum should include a comprehensive plan for training of individuals in the states responsible for implementing elements of the program.

Findings/Conclusions:

The Committee agreed that required training is needed but states need flexibility in reaching requirements due to course availability. The Committee developed training requirements for incorporation into the Model Ordinance.

Recommendations:

The Committee submitted Proposal 19-304. The Committee recommended Proposal 19-304 language be substituted as below:

Section I. Purpose & Definitions

Definitions

(120) ~~State~~ Shellfish Standardization Inspector means a person from either a state, federal or foreign authority who has met the requirements established in Chapter 1 @.01 (H.). ~~that has successfully completed the FDA standardization training course (or one deemed acceptable by the FDA and the field evaluation phase of shellfish plant inspection with either an FDA standardization officer or a state standardization officer).~~

(121) ~~State~~ Shellfish Standardization Officer means a person from either a state, federal or foreign authority who has met the requirements established in Chapter 1 @.01 (H.). ~~that has successfully completed~~

~~the FDA standardization training course and the field evaluation phase of shellfish plant inspection with an FDA standardization officer.~~

Add two new definitions.

~~(XXX) State Sanitary Survey Officer - means a person from either a state, federal or foreign authority who has met the requirements established in Chapter 1 @.01 (H.) means a person that has successfully completed the FDA Growing Area training course and has met experience requirement -~~

~~(XXX) Laboratory Evaluation Officer means a person from either a state, federal or foreign authority who has met the requirements established in Chapter 1 @.01 (H.) means a person that has successfully completed the FDA Laboratory Evaluation Officer training course and is certified by FDA.~~

Section II. Model Ordinance

Chapter I. Shellfish Sanitation Program for the Authority

@.01 Administration

H. Personnel training requirements for implementing the NSSP

(1) Shellfish Dealer Inspections:

(a) Shellfish Standardization Officer (SSO) shall successfully complete:

- (i) the FDA standardization training course,
- (ii) seafood HACCP, and;
- (iii) the field evaluation by a FDA standardization officer.

(b) Standardized Inspectors (SSI) shall successfully complete:

- (i) the FDA standardization training course,
- (ii) seafood HACCP, and;
- (iii) the field evaluation by a FDA standardization officer or the SSO.

(2) Growing Area Classification:

(a) Sanitary Survey Officer shall successfully complete:

- (i) the FDA growing area course, and;
- (ii) have a minimum of one (1) year of on the job experience in a NSSP growing area classification program within the shellfish sanitation program

(3) Patrol Enforcement:

(a) Officers responsible for the patrol of shellfish growing areas shall obtain the following training:

- (i) basic law enforcement before assuming patrol duties,
- (ii) shellfish control regulations before assuming independent patrol duties, and;
- (iii) updated shellfish control regulations at an interval deemed appropriate by the Authority.

(4) Laboratory:

(a) Laboratory Evaluation Officer (LEO) shall successfully complete:

- (i) the FDA Laboratory Evaluation Officer training course,
- (ii) field standardization by a FDA LEO, and;
- (iii) have a minimum of two (2) years of shellfish laboratory experience or a laboratory background with a minimum of three (3) years of bench level experience with the method types that will be evaluated.

@.02 Dealer Certification

A. General

(1) A person requesting certification shall be subject to a comprehensive, onsite inspection and meet the criteria in Section B. or Section C., as appropriate. The plant inspection shall be conducted by the State shellfish standardization inspector, using the appropriate inspection form reviewed and signed by the SSO, within the 120-day period immediately prior to the issuance or renewal of the certification.

Chapter IV. Shellstock Growing Areas

@.01 Sanitary Survey

A. General.

(1) The sanitary survey ...

~~(2)~~ The sanitary survey ...

~~(2)~~~~(3)~~ The sanitary survey reviewed and signed by the SSO.

~~(3)~~~~(4)~~ The documentation supporting each sanitary survey shall be maintained by the Authority. For each growing area, the central file shall include all data, results, and analyses from:

- (a) The sanitary survey;
- (b) The triennial reevaluation; and
- (c) The annual review.

~~(4)~~~~(5)~~ Wherever possible, the Authority shall provide the necessary information to Federal, State, or local agencies which have the responsibility to minimize or eliminate pollution sources identified in the sanitary survey.

~~(5)~~~~(6)~~ The Authority shall maintain a current comprehensive, itemized list of all growing areas, including maps showing the boundaries and classification of each shellstock growing area.

Chapter VIII. Control of Shellfish Harvesting

@.01 Control of Shellstock Growing Areas

A. Patrol of Growing Areas.

(1) The Authority shall...

(2) The Authority shall...

(3) Exceptions...

(4) The Risk Category...

(5) The Authority may...

~~(a) Officers responsible for the patrol of shellfish growing areas shall obtain the following training:~~

~~(b) Basic law enforcement training, before assuming their patrol duties;~~

~~(c) Training on shellfish control regulations within the jurisdiction of the patrol agency, before assuming independent patrol duties; and~~

~~(d)(a) In-service training on the shellfish control regulations within the jurisdiction of the patrol agency, when the regulations change.~~

Section III Public Health Reasons and Explanations

Chapter I. Shellfish Sanitation Program

@.01 Administration

G. Training

Training is required for state, federal or foreign authorities implementing the NSSP. These training requirements ensure that persons in positions of responsibility understand the foundational elements of the program and demonstrate proficiency. Training is required for four elements of the program; Shellfish Dealer Inspection, Growing Area Classification, Patrol Enforcement and Laboratory. Each training requirement is linked to individuals designated as “Officers” who either sign off on inspections and reports or who enforce laws and regulations.

Section IV Guidance Documents

Chapter 1. General

.03 Training requirements and recommendations

NSSP Training Curriculum

<u>BASIC TRAINING</u>	<u>Integrated Food Safety System</u>	<u>Jurisdiction</u>	<u>Laws, Regulations, Policies and Procedures</u>	<u>Communication Skills</u>	<u>Professionalism</u>	<u>Data and Information Systems</u>	<u>Public Health Principles</u>	<u>Biological Hazards</u>	<u>Environmental Hazards</u>	<u>Sampling</u>	<u>Traceability</u>	<u>Recalls</u>	<u>NSSP Program Overview</u>
<u>TRAINING BY ELEMENT</u> (bold outline indicates required course)													
<u>LEADERSHIP AND MANAGEMENT</u>		<u>GROWING AREA CLASSIFICATION</u>			<u>LABORATORY</u>			<u>PATROL ENFORCEMENT</u>		<u>SHELLFISH DEALER INSPECTION</u>			
<u>Risk Analysis</u>		<u>Shellfish Growing Area</u>			<u>Laboratories</u>			<u>Basic Law Enforcement</u>		<u>Seafood HACCP</u>			
<u>Project Management</u>		<u>Sanitary Surveys of Shellfish Growing Areas; FD242</u>			<u>Shellfish Laboratory Methods and Evaluation; FD246</u>			<u>Shellfish Control Regulations</u>		<u>Shellfish Plant Standardization; FD245</u>			
<u>Program Evaluation</u>		-			-			<u>Shellfish Control Regulations Update</u>		<u>Shellfish Plant Program</u>			
<u>Policy Development</u>		-			-			<u>Inspections, Compliance and Enforcement</u>		<u>Inspections, Compliance and Enforcement</u>			
<u>Leadership Skills</u>		-			-			<u>Shellfish Patrol Program</u>		<u>Labeling</u>			
<u>Critical Thinking</u>		-			-			<u>Control of Harvest; FD243</u>		<u>Pest Control</u>			
<u>Traceback Investigation; ER220</u>		-			-			-		<u>Plumbing</u>			
<u>Imports</u>		-			-			-		<u>Basic Inspection; FD190</u>			
<u>Investigation Principles</u>		-			-			-		<u>Sanitation Practices</u>			
<u>Emergency Response; ER310</u>		-			-			-		<u>Transportation</u>			
<u>Foodborne Illness Investigations; ER225</u>		-			-			-		<u>Shellfish State Standardization Officer; FD241</u>			
-		-			-			-		<u>Special Processes; FD152</u>			
-		-			-			-		<u>Shellfish Tanks at Retail; FD312</u>			