Proposal Subject	Inconsistent FDA "PEER" on Producing States
Specific NSSP Guide Reference	Model Ordinance IV, Chapter 1.01
Text of Proposal/ Requested Action	Call upon the ISSC to request the FDA to provide the Patrol Committee with the individual PEER for all producing states. Charge the Patrol Committee with making further recommendations to the FDA for standardization of Specialist training and PEER review.
Public Health Significance	N/A
Cost Information (if available)	None
Action by 2005 Task Force I	Proposal 05-102 was referred to Task Force III.
Action by 2005 Task Force III	Recommended referral of Proposal 05-102 to the NSSP Evaluation Criteria Committee to review and develop recommendations to improve consistency in evaluation of the patrol element. It is also recommended that the committee membership include members with patrol expertise.
Action by 2005 General Assembly	Adopted recommendation of 2005 Task Force III.
Action by USFDA	While FDA agrees with Conference action to refer Proposal 05-102 to the NSSP Evaluation Criteria Committee for review and development of recommendations to improve consistency in evaluation of the patrol element, we request that the ISSC Executive Board consider the following alternative approach by FDA. At the 2005 biennial meeting FDA committed to work internally to address state program evaluation and reporting inconsistencies brought to our attention through Proposal 05-102. Shortly after the ISSC meeting we established an internal work group to develop an evaluation and reporting guidance document. This approach, which has been used successfully by FDA under the National Conference on Interstate Milk Shipments (NCIMS), will specifically outline Agency expectations relative to state evaluations, reporting, and follow-up activities. FDA Shellfish Specialists and states will use the guidance document to ensure a more standardized evaluation process. In addition to ISSC concerns relative to the patrol element, the FDA work group will develop guidance for the plant sanitation and growing area elements as well. Once FDA has completed its drafting of the guidance document it will be shared with the ISSC for review and comment prior to finalization and implementation. FDA is confident that this approach will be most effective for addressing evaluation inconsistencies.