Interstate Shellfish Sanitation Conference



Work Plan

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I. INTRODUCTION

The Interstate Shellfish Sanitation Conference (ISSC) exists to provide formal structure for State regulatory authorities and shellfish industry representatives to participate in establishing guidelines and procedures for uniform and consistent application of the National Shellfish Sanitation Program (NSSP). The ISSC accomplishes this by assisting with the adoption of sound uniform procedures into the NSSP Guidelines that protect the health of the public by ensuring that the harvest, storing, shipping, processing and preparation of shellfish that is made available for consumption is as safe as possible. The ISSC is also responsible for promoting mutual respect and trust among the state programs and participants and resolving disagreements between regulatory and industry partners involved with the ISSC and its activities.

The ISSC has its Executive Office in Columbia, SC. The Conference is responsible for three primary tasks; (1) the planning and execution of the Biennial Conference, the Executive Board Meetings and various other committee meetings; (2) communication of essential shellfish program information among the U.S. Food and Drug Administration (FDA), National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA), state regulatory authorities, members of the shellfish industry, the ISSC and (3) facilitation of the Model Ordinance implementation. The Executive Office carries out these three programs through cooperative relationships with federal agencies (FDA, NOAA, and EPA), states and the shellfish industry. The Executive Office provides guidance policy, interprets the Model Ordinance, and evaluates all aspects of the National Shellfish Sanitation Program. The Conference currently has three (3) full time equivalent (FTE's) positions and one (1) part time employee. This work plan has been developed with this staffing complement.

II. EXECUTIVE SUMMARY

A. Projected Accomplishments

The following accomplishments are expected to be successfully completed in 2010:

Project Description	Number Projected
PLANNING	
Biennial Meeting	1
Executive Board Meeting	2
Education Committee Meeting	2
Vibrio Management Committee Meeting	2
Other Committee Meetings	29
Develop Grant Proposals for FDA Grant	3
 FDA Shellfish Safety Assistance Project \$139,000 	
FDA Shellfish Safety Assistance Project Additional S	\$93,250
 FDA Cooperative Agreement Carryover Funds \$87,6 	531.53
• FDA <i>Vibrio</i> Illness Reduction Program \$174,000	
Provide Summary of Actions to FDA	1
Update NSSP Guide	1

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COMMUNICATIONS

COMMUNICATIONS	
Annual Updates to Regional Conferences	4
Maintain and Update ISSC Website	As Needed
Develop and Distribute Educational Materials	As Needed
Notify States Concerning Shellfish Recalls/Closures	As Needed
FACILITATION	
Initiating FDA Interpretations of the Model Ordinance	As Needed
Assisting States in resolving FDA Compliance Issues	As Needed
Assignments from Committees and Subcommittees	As Needed
Agency Interactions	As Needed
FINANCIAL ACCOUNTING	
Grant Administration	3
Budget Development	3
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B. Program Issues/Concerns

Audit

Budget Implementation

The ISSC is working to address a number of issues that will impact the organization in the coming year. Most notably, the Executive Director of ISSC resigned with the effective date to follow the Biennial Conference in 2009. The outgoing Executive Director will continue to offer guidance and assistance to the current Acting Executive Director as needed to allow the Acting Executive Director to continually increase his role in managing the Executive Office. The target date for this transition will be the Spring Executive Board Meeting in 2010, or sooner. In the interim the outgoing Executive Director will be available as needed on request. It is anticipated that the Conference will experience some organizational challenges during the transition.

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The grant process for the FY 2010 funding period was changed somewhat by the FDA. Instead of submitting one request for support as has been the case in past years, the ISSC was required to submit three separate grant requests for funding this year. While the scope of services for these grants will remain the same as it has been in years past, it is anticipated that some of the accounting functions may be complicated by the additional administrative structure of managing 3 grants and the grant expectations that have been implemented by FDA.

A reciprocity dispute occurred between two states during 2009 that raised concerns about the importance and necessity of following Procedure XVII of the Constitution, Bylaws and Procedures. This Reciprocity Procedure is to promote communication and trust among the organization's members. Protecting the public's health while following the guidelines for reciprocity became front and center as each of the affected parties dealt with their respective state's actions and concerns. It is of utmost importance that the Board reinforces its commitment to the ISSC and its expectations that states follow and adhere to the guidelines as written in the Constitution, Bylaws and Procedures.

The Conference continues to provide leadership and assist in the implementation of *Vibrio vulnificus* and *Vibrio Parahaemolyticus* Control Plans. As environmental issues become more prevalent and the general public demands more transparency in handling of consumer and food products, the Conference will be forced to anticipate the ever

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changing issues that impact the availability and sanitation of shellfish. Maintaining the Conference's reputation and position as the leading authority on shellfish sanitation will require diligence and careful planning and decision making skills as the issues affecting the industry become more complex.

III. PRIORITIES

A. Executive Office

The highest priority for the Executive Office during this coming year is to ensure that the proposals and proceedings from the Biennial Conference are documented and properly prepared prior to forwarding the Summary of Actions to FDA for review. The second priority is to properly account for the financial assets of the Conference and disbursement of grant funding for which the Conference is involved. Third highest priority is to hire an Executive Director. The Board will be asked by the Executive Committee to provide guidance for proceeding with the hiring. The fourth priority is the continued facilitation of the uniform implementation of the National Shellfish Sanitation Program according to the requirements in the Model Ordinance provided in the Guide to the Control of Molluscan Shellfish.

1. Conference Follow up

The highest priority for the Executive Office in the coming year is to make sure the results and proceedings or Summary of Actions from the Biennial Conference are documented and disseminated to the appropriate agencies, groups and individuals. Once the FDA has evaluated the issues and accepts or rejects the proposal and its corresponding actions, the Executive Office incorporates these proposal outcomes as new revisions to the NSSP Guide for the Control of Molluscan Shellfish. These actions are designed to provide a legislative mechanism by which states can effectively regulate shellfish in interstate commerce. While this type of cooperative approach is productive, it is quite time consuming and labor intensive. The Conference carries with it a great deal of responsibility to communicate with FDA and other ISSC partners to ensure that the recommendations that are proposed and approved by the Conference are documented properly and presented to FDA for review, approval and inclusion into the NSSP Guide for the Control of Molluscan Shellfish.

2. Communications

The Conference must continue to be effective with ongoing communication with FDA, NOAA, EPA, states and the Industry concerning the importance of protecting the public's health while ensuring the availability of shellfish that is safe to consume. It is necessary to advise, alert and notify these groups as issues develop whether they consist of product recalls, emerging public health issues or concerns or other information that may be of imminent concern to the membership and public at large.

The Conference has become the recognized leader in the area of shellfish safety. Communicating this information and educating the public about the impact of shellfish consumption and the potential hazards continues to be an increasingly difficult and complex effort. With naturally occurring toxins, viruses and bacteria producing algae as potential public health threats the Conference's mission has never been more important.

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3. Financial Accounting

The main priority in the area of financial accounting is ensuring that the funds received by the Conference are managed as required by federal regulations. It is also imperative that the Conference be able to document and account for all funds received through the Executive Office (i.e., dues, registration fees, etc.).

IV. WORK PLAN EVALUATION

The 2009 Work Plan Evaluation will be submitted to the Executive Board for review prior to the Spring 2010 meeting.

V. PROJECTED WORK LOAD ACCOMPLISHMENTS

A. Planning

1. <u>Biennial Meetings</u>

The highest priority projects within the Executive Office involve the Biennial Meeting, the Executive Board meetings and all other committee and subcommittee meetings. Coordination of selection of site and meeting arrangements are critical to the success of the meetings.

2. <u>Executive Board Meetings</u>

The Executive Office prepares the material for two Executive Board and VMC meetings and communicates with both groups should issues arise or information need to be disseminated during the interim between the Biennial Conference periods. This communication is vital in keeping Board Members informed of current and emerging issues as well as Conference business.

3. *Vibrio* Management Committee Meeting(s)

The Executive Office handles the coordination of the *Vibrio* Management Committee (VMC). The VMC often has numerous work groups with ongoing tasks and projects. The Executive Office works diligently to coordinate conference calls and the clarifying of information among committee members, surveys among states and industry groups concerning *Vibrio* controls and disease reporting.

4. Education Committee Meeting(s)

The Executive Office coordinates the activities of the Education Committee in concert with the VMC. The work of these two groups include ongoing assistance and coordination with state and federal agencies as well as industry groups to better plan strategies to address methods of educating regulatory, industry and consumer groups in order to better understand the impact of *vibrios* on the public's health.

5. Other ISSC Committees

The Executive Office coordinates the activities of the committees listed below: Administrative Procedures, Audit, Biotoxin, Communications, Credentials, Depuration/Wet Storage, Education, Foreign Relations, Harvester Sanitation, Import Assessment, Laboratory Methods Review, Laboratory Quality Assurance, NSSP Evaluation Criteria, Patrol, Plant Sanitation, Plant Standardization

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Advisory, Post Harvesting Processing, Processing and Handling, Product Recall, Proposal Review, Research Guidance, Resolutions, Shellfish Restoration, Time/Temperature, Traceability, Unresolved Issues and Use of Press.

B. Communications

1. Annual Updates at Regional Shellfish Conferences

The Executive Office prepares and maintains a presentation of the activities of the Conference and the Executive Office during the previous year. This presentation is given to regional shellfish group meetings and other external constituencies that have interests in shellfish sanitation. Included in these groups are state officials, members of academia and the shellfish industry. These meetings provide a forum for the exchange of information to communicate changes in policies adopted by the Conference that impact the shellfish industry.

2. <u>Maintain and Enhance ISSC Website</u>

Executive Office staff with the assistance of an internet technology provider, manages and maintains the web site that provides information about the ISSC and its functions. The web site also provides documentation of previous Conference proceedings and linkages to sites that are relevant to issues regarding shellfish sanitation. Executive staff and staff from the internet technical provider continually update the web site to ensure that current information is accessible to regulatory and industry members as well as consumers.

3. Develop Educational Material

The Executive Office will develop a grant program that will allow industry representatives to develop innovative control strategies for *Vibrios*. This program will require a one to one match from applicants and the purpose of the grant or research project must be focused on *Vibrios*.

The three online *Vibrio vulnificus* education courses for the medical community have recently been updated to ensure the most current information is available for medical providers to receive CME credits.

The Executive Office will form a workgroup to compile existing material on the public health aspects of shellfish gardening in non-approved waters. The workgroup will make that material available to the Shellfish Restoration Committee for consolidation into one document. The ISSC would function as a repository for the collection of these materials.

4. Notification of Recall and Shellfish Closures

The Conference plays a critical role in communicating information and coordinating responses on shellfish recalls to the appropriate state agencies. This timely communication ensures that recalls are performed as quickly as possible to minimize health risks from shellfish that may be associated with a shellfish borne disease outbreak.

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C. Facilitation

1. <u>Initiating FDA Interpretations of the Model Ordinance</u>

The Executive Office receives numerous inquiries concerning interpretations of the Model Ordinance. In response to these inquiries, the Executive Office performs two functions. One is to assist individuals in understanding interpretations. The second is to request that interpretations be developed by the FDA.

2. Assist States in Resolving FDA Compliance Issues

Should the FDA and states disagree over the findings of a State Shellfish Sanitation Program evaluation and are unable to resolve these differences, the Executive Director can provide assistance. This role is critical in resolving issues. The work of the Executive Director can often assist affected parties in avoiding the formal Unresolved Issue Process of the Conference. In the instances where there is disagreement in the evaluation of a State Shellfish Sanitation Control Program the Executive Director is looked upon as the first step to facilitating a resolution to the disagreement.

3. Assignments from Committees and Subcommittees

The Executive Office staff often receives tasks to complete and provides follow up for committee, subcommittee, task forces and work group meetings. Executive Office staff also tracks progress of these groups and provides technical and logistical assistance.

4. Agency Interactions

The Conference works cooperatively with other governmental agencies in the pursuit or advancement of issues concerning shellfish sanitation. These projects enhance the ability of the Conference to accomplish its mission and Executive Board objectives.

5. Training

It is necessary to continually assure that the Executive Office staff is adequately trained in Conference policies and procedures to maximize efficiency. Additionally, the staff is provided with training opportunities to advance their knowledge, skills and abilities to maximize their performance. Providing opportunities for advancing technical knowledge, skills and abilities of the Executive Office staff are of critical importance to the Conference.

D. Financial Accounting

1. Grant Administration

The Conference has successfully obtained grants that assist in the administrative costs of the day to day operations of the Executive Office. These grants address specific activities that deal with issues that are important to the conference.

2. <u>Budget Development</u>

The Executive Office works to develop a general revenue operating budget that focuses on the costs of the Biennial Meeting and a portion of the Executive Office operating budget. Grant specific budgets are developed, monitored and

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implemented to adherence to the fiscal requirements established and required by the granting agencies.

3. <u>Budget Implementation</u>

The Executive Office implements the budgets as adopted by the Conference Executive Board. This involves assuring that monies are spent appropriately within each budget category and that amounts designated with these categories are not exceeded. The tracking of expenditures and prompt payment of accounts payable is a primary focus of the financial accounting function.

4. Audit

The Executive Office works with the Audit Committee to assure that the budgets developed and implemented are properly audited on an annual basis. The Executive Office provides guidance to the Audit Committee concerning current financial operations and audit controls practiced by the Executive Office. Additionally, the Executive Office implements any supplementary directives from the Audit Committee or auditor.

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