

Preventive Controls for Human Food Workgroup: **How We Got Here**

Presented by:

Nicole Richard,
Food Safety Specialist
University of Rhode Island



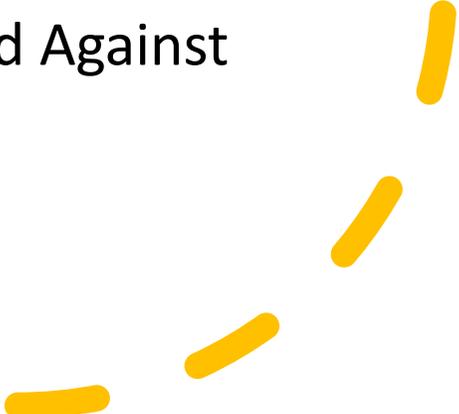
NECAFS

The Northeast Center to
Advance Food Safety





The Food Safety Modernization Act (FSMA)

- Produce Safety Rule
 - Preventive Controls for Human Food
 - Foreign Supplier Verification Programs
 - Accreditation of Third-party Auditors for Foreign Facilities
 - Preventive Controls for Animal Food
 - Mitigation for Intentional Adulteration
 - Sanitary Transportation of Human and Animal Food
 - Mitigation Strategies to Protect Food Against Intentional Adulteration
- 

Training Alliances

- Comprised of industry, academia and regulatory partners
- Developed standardized training curriculum



FSPCA

FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

FSPCA PCHF Training Curriculum

- Standardized curriculum recognized by FDA
- Aligns with FSMA PCHF rule
- Provides education regarding risk-based preventive controls
- Challenges encountered among less experienced small and medium scale processors





Regional Centers

- FDA and USDA funded the development of a national center as well as 4 regional centers
 - Goals aimed at improving coordinated training, education and outreach efforts related to food safety and compliance with FSMA.

Northeast Center to Advance Food Safety (NECAFS)

Focuses on coordination and facilitation of the Northeast regional network to support a national food safety training, education, extension, outreach, and technical assistance system among small and medium-sized producers and small processors, specifically around the **FSMA Produce Safety Rule** and the **FSMA Preventive Controls for Human Foods Rule**.





NECAFS Annual Conference and Meeting

Provides an opportunity for regional partners to **connect in person to discuss** current training, education and outreach trends and **activities related to** the FSMA associated **Produce Safety Rule** and the **Preventive Controls for Human Food Rule**.

Back where it all began...2018

PCHF focused meeting at 2nd NECAFS conference

- **Goal:** build a cohesive strategy to address the needs of small to medium-sized food processors impacted by the FSMA PCHF rule.
- **Objective:** facilitated group discussions to determine successes, challenges and opportunities regarding the PCHF standardized curriculum training program.
- **Outcome:** determine priorities or focus areas for immediate group work



2018 Meeting Summary

- **Small and medium-scale facilities with less food safety experience struggled**
 - understanding how the FSMA PCHF regulation impacts them
 - attending FSPCA training
 - finding reliable resources for help
 - knowing where to go for training and help
- **Need for regional coordination of PCHF related activities**

Priorities Identified



AWARENESS



RESOURCES



EVALUATION

Before we
adjourned....



Identified
workgroup (WG)
leads for each
priority

Identified
volunteer WG
partners for each
priority



Roadmap to Resources Workgroup

Roadmap to Resources Workgroup

Goal:

- Build a catalog of resources under defined categories specific to the needs of small and medium-scale facilities impacted by FSMA PCHF

Objectives:

- Create category content outline
- Identify and pool resources for each category
- Design and electronically publish and distribute

NECAFS

The Northeast Center to
Advance Food Safety



Annie Fitzgerald | Anne.Fitzgerald@uvm.edu



**Institute for Food Safety
at Cornell University**

Elizabeth (Beth) Demmings | emt32@cornell.edu

Acknowledgements: Resources Subgroup

Volunteer Resources Subgroup Participants

- **Jason Bolton**, Ph.D., *Associate Extension Professor and Food Safety Specialist, Academic Director of Innovation Engineering, University of Maine*
- **Amanda Chin**, *soon to be former Student and Extension Outreach Researcher, University of Massachusetts Food Science Program*
- **Cathy Davies**, *CEO, Food Industry Employment Program*
- **Elizabeth Demmings**, Ph.D., *Program Coordinator, Institute for Food Safety at Cornell University*
- **Chelsea Matzen**, *former FSMA Project Director, National Farmers Union*
- **Billy Mitchell**, *FSMA Training Coordinator, National Farmers Union*
- **Michele Pfannenstiel**, *CEO Dirigo Food Safety*
- **Rohan Tikekar**, Ph.D., *Associate Professor and Extension Specialist, University of Maryland*
- **Christopher Von Achen**, M.S., *former Student and Extension Research Assistant, University of Massachusetts Food Science Program*

NECAFS Staff Support (Current and Previous)

- **Annie Fitzgerald**, M.L.I.S., *Research Specialist, University of Vermont*
- **Andrea Gilbert**, *Graduate Assistant, University of Maryland*
- **Dave Seddon**, MBA R.D. L.D., *CEO/SQF Auditor, Peakcore, LLC | CEO, Maine Farm and Sea Cooperative*

PC Working Group Leads

- **Amanda Kinchla**, M.S., *Extension Associate Professor, University of Massachusetts Amherst*
- **Luke Laborde**, Ph.D., *Professor of Food Science, Penn State University*
- **Nicole Richard**, M.S., *Research Associate/Food Safety Specialist, University of Rhode Island*

Toward Building the 'Roadmap to Resources'

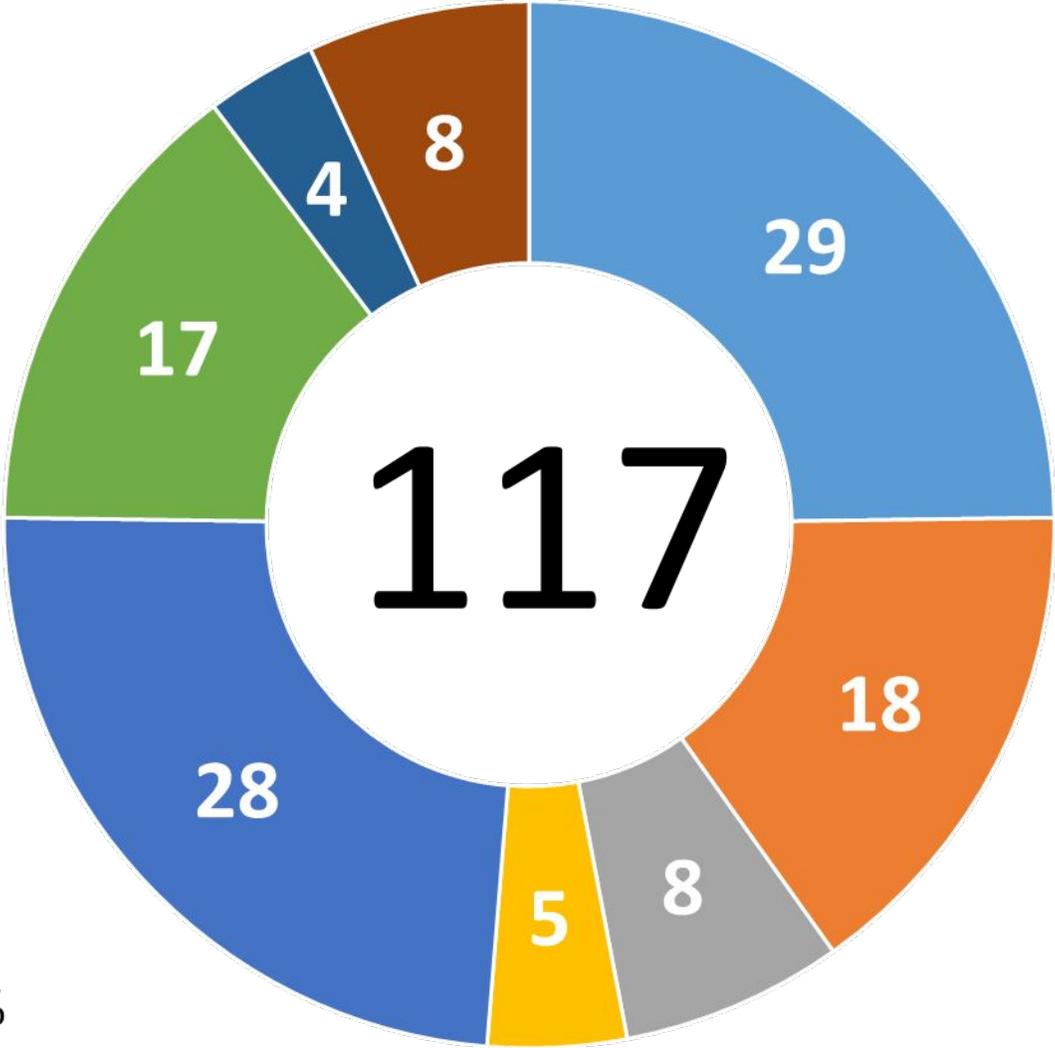
- Outlined and defined project
- Developed resource categories and descriptions
- Created rubric to assess resources*
 - Relevance, quality and content
- Searched for resources online
- Vetted resources against the rubric
- Catalogued approved resources



**Initial rubric template provided by Amanda Kinchla, Dept. Food Science, UMass Amherst*

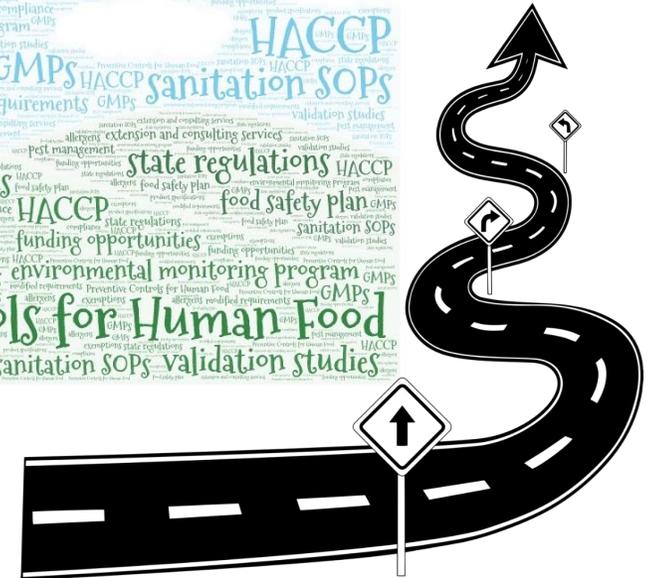
Approved Resources: Specific to the PCHF Rule

- Complying with the PCHF Rule, 24.8%
- GMPs, 15.4%
- Allergens, 6.8%
- Sanitation SOPs, 4.3%
- Developing a Food Safety Plan, 23.9%
- Validation Studies and Processes, 14.5%
- Production Specifications, 3.4%
- Environmental Monitoring Program, 6.8%



Toward Building the 'Roadmap to Resources'

- Outlined and defined project
- Developed resource categories and descriptions
- Created rubric to assess resources*
 - Relevance, quality and content
- Searched for resources online
- Vetted resources against the rubric
- Catalogued approved resources
- Incorporated resources into website design/layout
- Started to evaluate and conduct pilot testing



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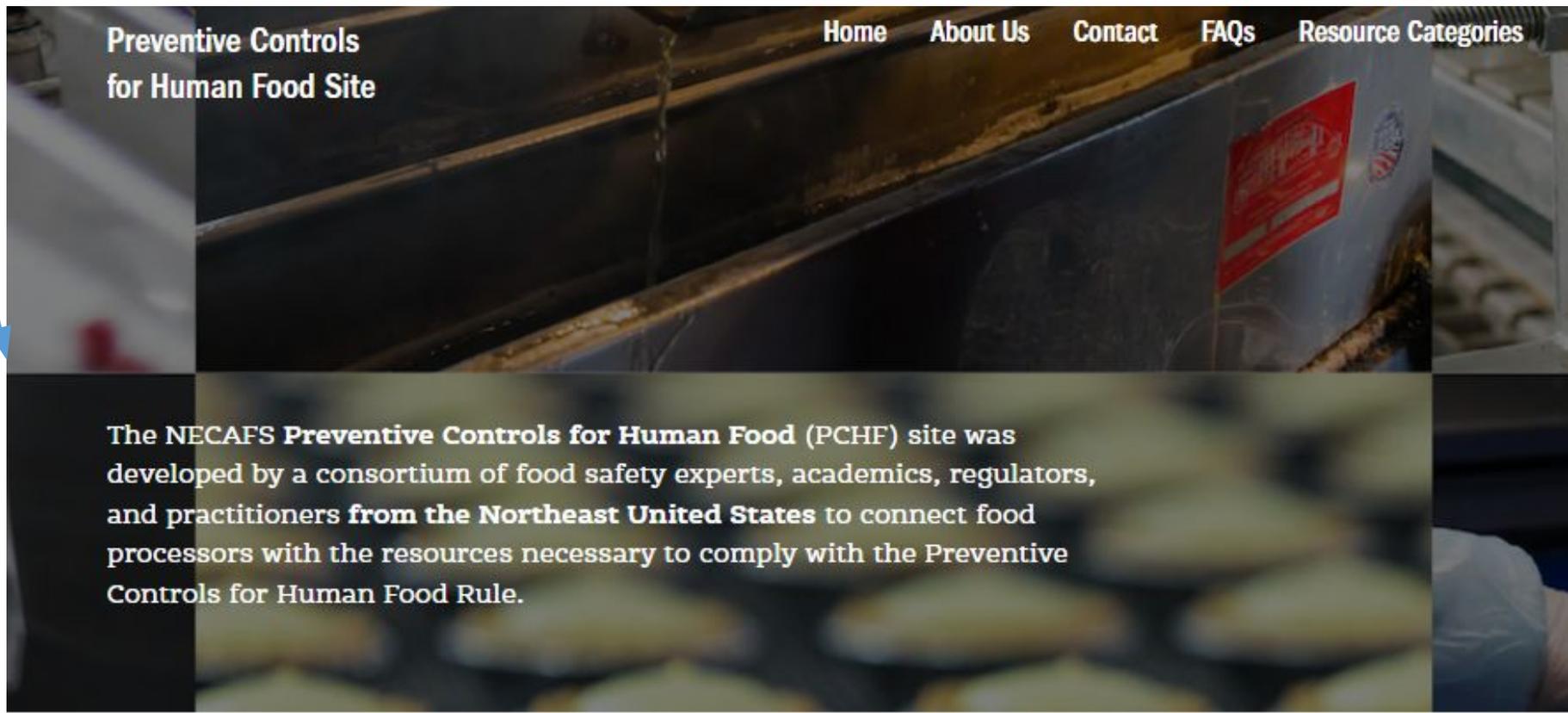
NECAFS PCHF Website

Connect to Resources

- Roadmap to Resources**
Learn more about the Preventive Controls for Human Food Rule and where to find answers to your questions.
[Find out more](#)
- Templates, Examples & Forms**
Here you can find sample and real working documents that food processors can use to follow the Preventive Controls for Human Food Rule. These resources can serve as a useful reference as users create their own unique, tailored documents and plans.
[Find out more](#)
- Connect to a Professional**
Find preventive controls educators, experts, and specialists in your area.
[Find out more](#)

Popular Topics

- Complying with the PCHF Rule**
Tools for determining requirements under the Preventive Controls for Human Food (PCHF) rule and resources on how to comply with basic requirements.
[View resource](#)
- Developing a Food Safety Plan**
Food Safety Resources for developing an easy-to-follow and complete food safety plan.
[View resource](#)
- Sanitation SOPs**
Resources and strategies for developing sanitation standard operating procedure (SOPs) also known as SSOPs.
[View resource](#)
- Environmental Monitoring Program**
Resources and strategies for developing and implementing an environmental monitoring program (EMP).
[View resource](#)
- GMPs**
Resources and strategies for developing good manufacturing practices.
[View resource](#)
- Validation Studies and Processes**
Studies and other required documentation to justify process preventive controls in food safety plan.
[View resource](#)
- Allergens**
Resources for creating and implementing an allergen control program.
[View resource](#)
- State and Local Regulations**
Information about state-specific regulations which have been adopted by each state represented in NECAFS.
[View resource](#)
- Production Specifications**
Product development guidelines to ensure food quality and safety.
[View resource](#)
- Extension and Consulting Services and Resources**
Services, contacts and resources to assist stakeholders in meeting PCHF rule requirements such as developing food safety plans or auditing a selected process.
[View resource](#)
- Funding Opportunities**
Grants and other funding sources for beginning and expanding food safety operations.
[View resource](#)
- Directory of Services**
Contact information for consultants, educators, and other professionals in the field.
[View resource](#)



Preventive Controls for Human Food Site

[Home](#) [About Us](#) [Contact](#) [FAQs](#) [Resource Categories](#)

The NECAFS Preventive Controls for Human Food (PCHF) site was developed by a consortium of food safety experts, academics, regulators, and practitioners from the Northeast United States to connect food processors with the resources necessary to comply with the Preventive Controls for Human Food Rule.



Connect to Resources



Roadmap to Resources

Learn more about the Preventive Controls for Human Food Rule and where to find answers to your questions.

[Find out more](#)



Templates, Examples & Forms

Use your own knowledge and real working documents. Use food processors' real life to follow the Preventive Controls for Human Food Rule. These resources can serve as a useful reference as users create their own unique, tailored documentation and plans.

[Find out more](#)



Connect to a Professional

Find preventive controls educators, experts, and specialists in your area.

[Find out more](#)

Popular Topics



Complying with the PCFH Rule

Understand the regulatory requirements under the Preventive Controls for Human Food (PCFH) rule and where to find answers to your questions.

[Find out more](#)



Developing a Food Safety Plan

Food Safety Educators are developing an easy-to-use and complete food safety plan.

[Find out more](#)



Facilitative GMPs

Documents and strategies for developing facilities' standard operating procedures (SOPs), which become GMPs.

[Find out more](#)



Environmental Monitoring Programs

Understand how to design, develop, and implement an environmental monitoring program (EMP).

[Find out more](#)



GMPs

Resources and strategies for developing good manufacturing practices.

[Find out more](#)



Validation Studies and Processes

Learn how to design, develop, and implement an environmental monitoring program (EMP).

[Find out more](#)



Allergens

Resources for creating and implementing an allergen control program.

[Find out more](#)



State and Local Regulations

Information about state and local regulations that affect food processors.

[Find out more](#)



Product Specifications

Resources for creating and implementing an allergen control program.

[Find out more](#)



Extension and Consulting Services

Services, training, and resources to help processors in meeting PCFH rule requirements such as developing food safety plans or identifying work-based plans.

[Find out more](#)



Funding Opportunities

Learn how to apply for funding to help with PCFH rule requirements.

[Find out more](#)



Directory of Services

Learn how to find services to help with PCFH rule requirements.

[Find out more](#)

Connect to Resources



Roadmap to Resources

Learn more about the Preventive Controls for Human Food Rule and where to find answers to your questions.

[Find out more](#)



Templates, Examples & Forms

Here you can find sample and real working documents that food processors can use to follow the Preventive Controls for Human Foods Rule. These resources can serve as a useful reference as users create their own unique, tailored documentation and plans.

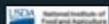
[Find out more](#)



Connect to a Professional

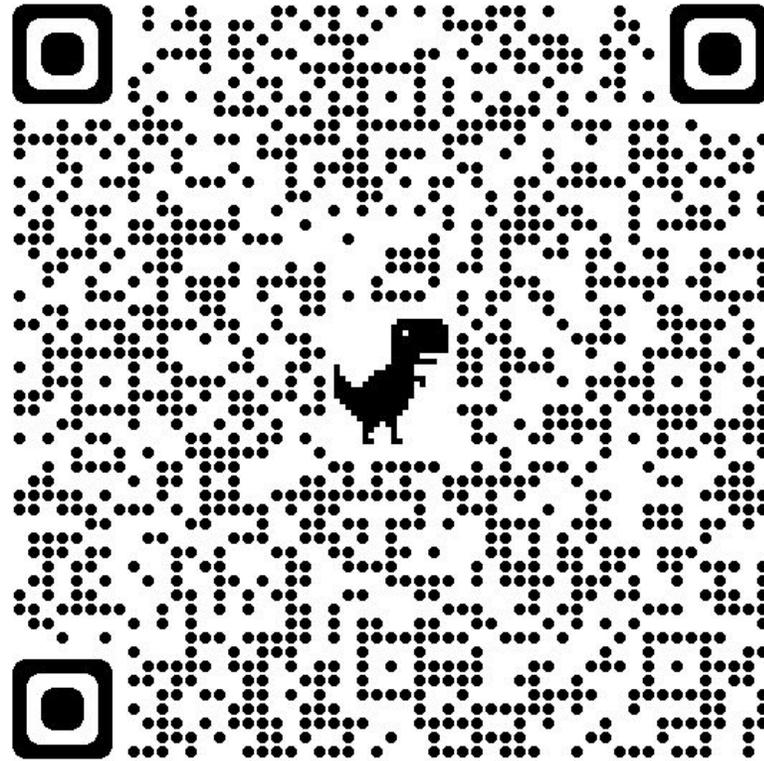
Find preventive controls educators, experts, and specialists in your area.

[Find out more](#)



Want to be listed in the directory?

Join here: <https://go.uvm.edu/pcspecialist>





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Connect to Resources



Roadmap to Resources

Learn more about the Preventive Controls for Human Food Rule and where to find answers to your questions.

[Find out more](#)



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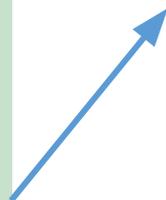
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Popular Topics

 Complying with the PCHF Rule Tools for determining requirements under the Preventive Controls for Human Food (PCHF) rule and resources on how to comply with basic requirements. View resources	 Developing a Food Safety Plan Food Safety Resources for developing an easy-to-follow and compliant food safety plan. View resources	 Sanitation SOPs Resources and trainings for developing sanitation standard operating procedures (SOPs; also known as SSOPs). View resources
 Environmental Monitoring Program Resources and trainings for developing and implementing an environmental monitoring program (EMP). View resources	 GMPs Resources and trainings for developing good manufacturing practices. View resources	 Validation Studies and Processes Studies and other required documentation to justify process preventive controls in food safety plan. View resources
 Allergens Resources for creating and implementing an allergen control program. View resources	 State and Local Regulations Information about state-specific regulations which have changed by each state represented in NECAFS. View resources	 Production Specifications Product development guidelines to ensure food quality and safety. View resources
 Extension and Consulting Services and Resources Services, training and resources to assist stakeholders in meeting PCHF rule requirements such as developing food safety plans or auditing a regulated process. View resources	 Funding Opportunities Grants and other funding sources for beginning and expanding food safety operations. View resources	 Directory of Services Contact information for consultants, educators, and other professionals. View resources



Popular Topics



Complying with the PCHF Rule

Tools for determining requirements under the Preventive Controls for Human Food (PCHF) rule and resources on how to comply with basic requirements.

[View resources](#)



Developing a Food Safety Plan

Food Safety Resources for developing an easy-to-follow and compliant food safety plan.

[View resources](#)



Sanitation SOPs

Resources and trainings for developing sanitation standard operating procedures (SOPs; also known as SSOPs).

[View resources](#)



Preventive Controls for Human Food Site

Roadmap to Resources

Welcome to the Roadmap to Resources. This roadmap is intended to provide you with key resources available to help you meet requirements in the FDA's Food Safety Modernization Act Preventive Controls for Human Food (PCHF) rule.

The Roadmap to Resources is divided into twelve categories to provide resources tailored to the specific needs of small and very small processors who must comply with the PCHF rule.

You can find links to each of the twelve core topics listed below along with a general introduction and selected article that summarizes each topic.



Complying with the PCHF Rule

On this page of the PCHF site, you will find tools for determining requirements and guidance for the PCHF Rule and resources on how to comply with the rule. For a quick introduction to the topic, check out this resource: "FSMA FAQs: What are the Basic Requirements of FSMA's Preventive Controls Rules for Human Food?".

[Find out more](#)



Developing a Food Safety Plan

On this page of the site, you will find tools and resources for understanding the necessary components of a food safety plan and learning how to write your own customized plan. For an introduction to the topic, check out IMAS Auburn's Food Safety Plan page.

[Find out more](#)



Sanitation SOPs

On this page of the site, you will find tools and templates for developing and implementing good sanitation practices and Sanitation Standard Operating Procedures (SOPs). Here is a resource from PennState Extension to learn more about SOPs.

[Find out more](#)



Environmental Monitoring Program

Environmental Monitoring Programs are an essential system of preventing contamination of a finished food product from the environment. To understand more about these programs, check out our page on EMPs or read this Environmental Monitoring Handbook.

[Find out more](#)



GMPs

On this page, you can find information and resources about Good Manufacturing Practices, also called current Good Manufacturing Practices or cGMPs. These are regulations to ensure that manufactured products are safe, clean, and effective. cGMPs are a broad topic that include several of the major sections of this website, such as Environmental Monitoring Practices and Sanitation Standard Operating Procedures. For a quick introduction to cGMPs, check out this resource from Cornell University.

[Find out more](#)



Validation Studies and Processes

Validation of a food process requires establishing and documenting the scientific evidence that preventive controls are effectively managing hazards and reducing food safety risks. Validation studies and processes can be challenging and this section allows users to understand the process and how to develop validation measures for their food. For a quick introduction resource of the topic, read this article entitled, "Validation and Verification for Food Safety Control Measures". To find more resources on the topic, check out our page on validation studies and processes.

[Find out more](#)



Extension and Consulting Services and Resources

Each state offers support and resources through their Department of Extension. On this page you will find extension and consulting services, training and resources to assist establishments in meeting PCHF rule requirements such as developing food safety plans or obtaining a scheduled process.

[Find out more](#)



Funding Opportunities

On this page of the site, you will find grant programs available for different food processors and projects. Be sure to check the open and close dates and regions for each grant, as they are likely to change.

[Find out more](#)



Directory of Services

This section contains a map and contact information for state, extension, and consulting personnel or programs. This has is comprised of individuals willing to offer help and support and does not constitute an endorsement of any individual or company.

[Find out more](#)

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[Find out more](#)

Complying with the PCHF Rule

Tools for determining requirements under the Preventive Controls for Human Food (PCHF) rule and resources on how to comply with basic requirements.

VIEW BY CATEGORY:

(or you can view by keyword)

Getting Started

[FSMA FAQs: What are the Basic Requirements of FSMA's Preventive Controls Rules for Human Food?](#)

A quick questions and answers sheet that explains the basic components of the preventive controls rule and who needs to comply with them.

TAGS: QUALIFIED FACILITY, COVERED FACILITY

Exemptions

[Completing Form FDA 2541a for Acidified Foods](#)

A guide for producers of shelf-stable acidified foods and low acid canned foods on completing FDA documentation

TAGS: ACIDIFIED FOODS, PROCESS CONTROLS, LACF

[Establishment Registration & Process Filing for Acidified](#)

Records

[Guidance for Industry: What You Need To Know About Establishment, Maintenance, and Availability of Records Small Entity Compliance Guide](#)

A guidance publication explaining which records producers are required to maintain, how long they must be held, which records are

FSMA FAQs: What are the Basic Requirements of FSMA's Preventive Controls Rules for Human Food?



Link

<https://www.carolinafarmstewards.org/wp-content/uploads/2019/12/PCR-FAQ-6.pdf>

Author

Carolina Farm Stewardship Association

Source

Carolina Farm Stewardship Association

Summary

A quick questions and answers sheet that explains the basic components of the preventive controls rule and who needs to comply with them.

State(s)

- North Carolina
- South Carolina

Year

2019

Language

- English

PCHF Category

- Complying with the PCHF Rule » Getting Started

Keywords

- qualified facility
- covered facility



- Complying with the PCHF Rule
- Developing a Food Safety Plan
- Sanitation SOPs
- Environmental Monitoring Program
- GMPs
- Validation Studies & Processes
- Allergens
- State & Local Regulations
- Production Specifications
- Extension & Consulting Services
- Funding Opportunities
- Directory of Services

Tools for determining requirements under the Preventive Controls (PCHF) rule and resources on how to comply with basic

VIEW BY CATEGORY:

- Please select -
- Please select -
- Allergens
- Complying with the PCHF Rule
- Developing a Food Safety Plan
- Directory of Services
- Environmental Monitoring Program
- Extension and Consulting Services and Resources
- Funding Opportunities
- GMPs
- Production Specifications
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- State and Local Regulations
- Validation Studies and Processes

Getting Started

FSMA FAQs: What are the Basic Requirements of FSMA's Preventive Controls Rules for Human Food?

A quick questions and answers sheet that explains the basic components of the preventive controls rule and who needs to comply with them.

TAGS: QUALIFIED FACILITY, COVERED FACILITY

Industry: What About Maintenance, Records

Small Entity Compliance Guide

A guidance publication explaining which records producers are required to maintain, how long they must

Establishment Registration &

acid canned foods on
completing FDA
documentation
TAGS: ACIDIFIED FOODS, PROCESS
CONTROLS, LACF

Complying with the PCHF Rule

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qualified facility

VIEW BY KEYWORD:

(or you can view by category)

FSMA FAQs: What are the Basic Requirements of FSMA's Preventive Controls Rules for Human Food?

A quick questions and answers sheet that explains the basic components of the preventive controls rule and who needs to comply with them.

TAGS: QUALIFIED FACILITY, COVERED FACILITY

FSMA FAQs: Is my business a farm mixed-type facility?

A question and answer sheet that clarifies the differences between a retail food establishment and a farm mixed-type facility, which FSMA rules apply, and some exceptions to the rule.

TAGS: FARM, MIXED-TYPE FACILITY, COVERED FACILITY

FSMA FAQs: What are the Special FSMA Rules for Low-Risk Processing?

A list explaining the conditions that must be met for farms of a certain size that perform certain actions to not need to follow the HARPC or SCP (supply chain program) portions of the preventive controls rule.

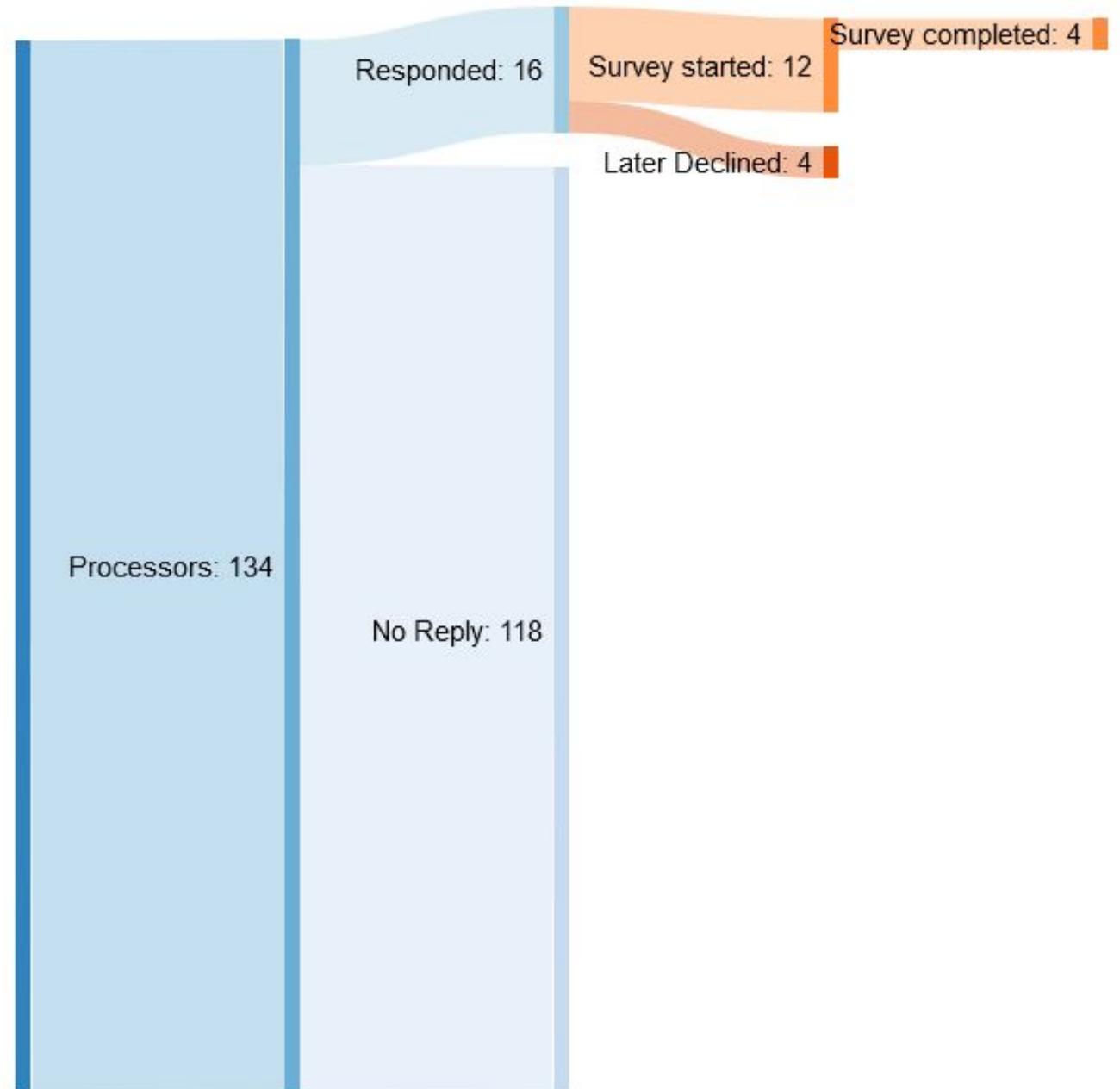
TAGS: LOW-RISK FOODS, QUALIFIED FACILITY

User Experience Survey Development

- A paid quality improvement program– designated not research
- Survey developed in Qualtrics to take one hour
- Demographic information, first impressions, activities, suggestions and takeaways
- Sought feedback from 20 processors
- Used several tactics to contact processors
 - Contacted processors directly, members of the PC working group contacted their network, Cornell Food Venture Center newsletter

Preliminary Results

- Feedback has been limited.
- Most mentioned positive:
Accessible layout
- Most mentioned drawback:
Some links are broken
- Recruitment is still open
 - Contact Annie for more information



Next Steps

- Survey food safety communicators for site content
 - <https://go.uvm.edu/pchfsite>
- Implement feedback from both surveys
- Survey content for information gaps
- Launch and promote site
- Potential future projects
 - Analysis of gaps in available resources
 - Developing new resources to fill in gaps identified

Anticipated Timeline

- Surveys (6 weeks) January 15 – February 26
- Implementation (4 weeks) February 26 – March 26
- Site survey and correcting gaps (6 weeks) March 26 – May 7
- Launch and promotion (4 weeks) May 7- May 28



Awareness
Campaign
Workgroup

Awareness Campaign Workgroup

Goal:

- Increase awareness of the FSMA PCHF regulation, especially among small and medium-scale facilities.

Objectives:

- Identify food safety communicators in Northeast region
- Develop portfolio outreach/awareness products
- Disseminate products to food safety communicators

Current Status: Awareness Campaign

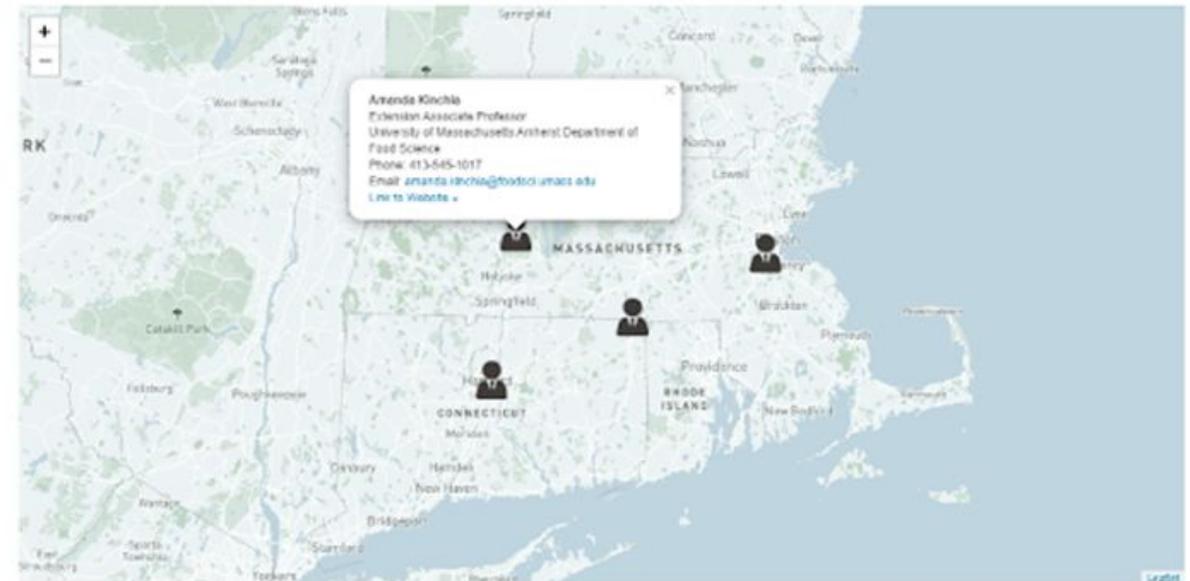
- Identify food safety communicators in Northeast region
 - Status: On-going
 - Directory of Services

Contact information for state, extension, and consulting personnel or programs.

VIEW BY CATEGORY:

(or you can view by keyword)

Filter by Group:



Current Status: Awareness Campaign

- Develop portfolio outreach/awareness products
 - Promotional materials: completed
 - Awareness outreach materials
 - NECAFS Preventive Controls for Human Food (PCHF) site
 - Status: Paused



IS YOUR BUSINESS READY FOR NEW FOOD REGULATIONS?

Learn about FSMA federal regulations and how they could affect your operations.

USDA NECAFS The Northeast Center to Advance Food Safety FDA

> LEARN MORE necafs.org

The graphic features a dark blue background with white text. On the right, there are three images: a collection of various food products, two people in white lab coats and hairnets reviewing documents in a kitchen setting, and several jars of pickled vegetables.

The challenge. The U.S. Food Safety Modernization Act (FSMA) is a federal law that requires all food processors to develop and document procedures to minimize product contamination and the potential for foodborne illnesses. Deadlines for implementation have already passed. Act now to learn how FSMA regulations could affect your food business.

The solution. The Northeast Center to Advance Food Safety (NECAFS) is one of four federally funded regional centers working closely with USDA, FDA, and state and local agencies to increase awareness and understanding of FSMA food safety regulations. NECAFS food safety experts are drawn from University extension and industry experts who can

help you learn how your business fits into the new regulatory climate and where you can find food safety education and training opportunities near you.

Don't wait for a federal or state food safety inspector to find food safety problems in your facility! Prepare yourself now by accessing the free technical support and food safety resources on the NECAFS website.

Learn more. Visit the NECAFS website at necafs.org (tentative URL) to find FSMA food safety experts in your area, get access to food safety and regulation resources tailored to small and medium sized food processors, and find upcoming training programs you will need to comply with the FSMA Preventive Controls Rule.

Funding for NECAFS is made possible, in part, by the Food Safety Outreach Program grant no. USDA-NIFA-FSMA-006546 from the USDA National Institute of Food and Agriculture.

[CONTACT ME FOR ASSISTANCE](#)

Get started



Learn which federal and state regulations affect your food business



Find training opportunities to help you comply with regulations and customer expectations



Contact a NECAFS expert who can guide you through your state's laws and regulations

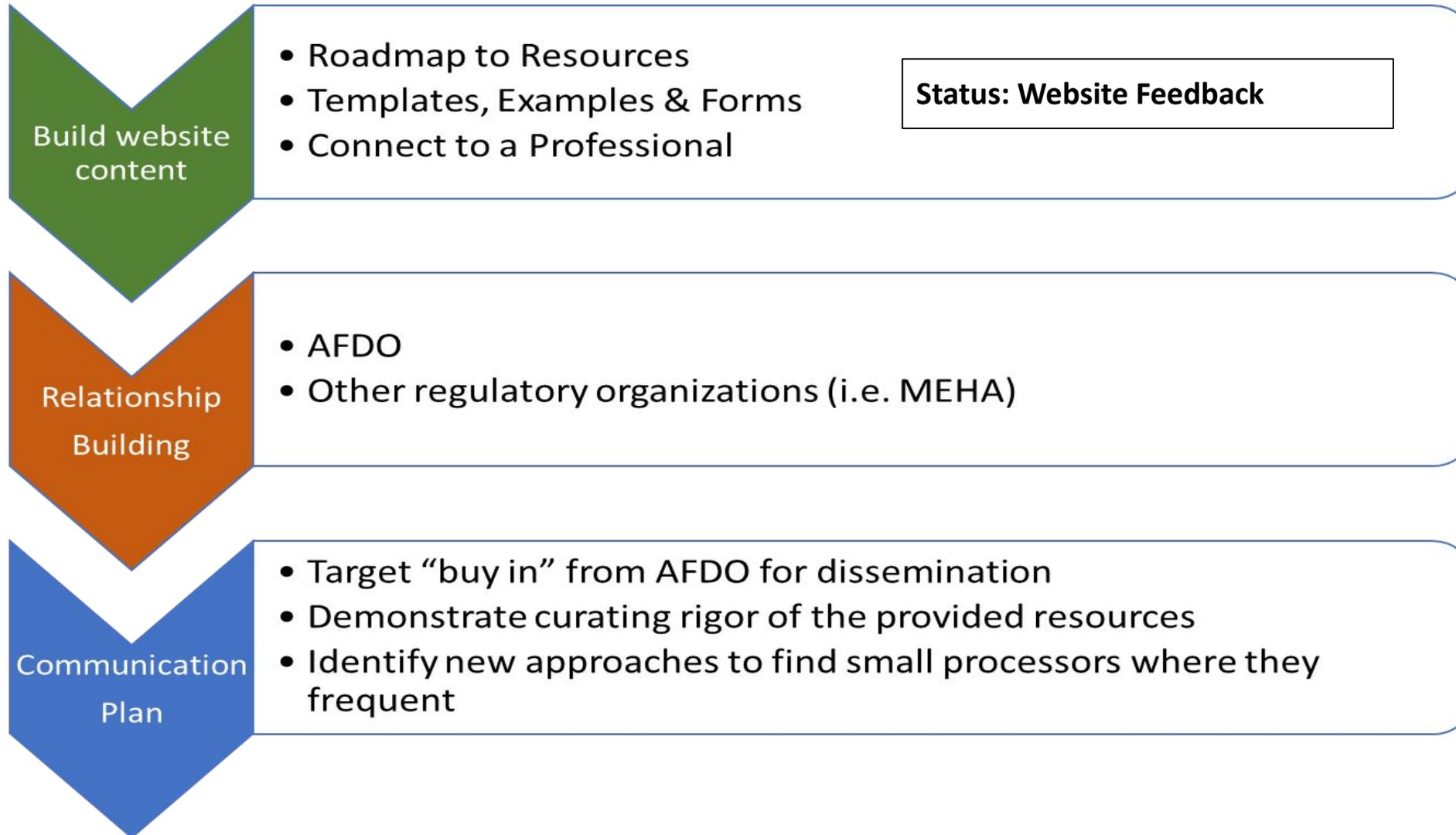


Know that you are doing all you can to sustain your business and keep your customers safe and healthy.

LEARN MORE
necafs.org



Current Status: Awareness Campaign





Evaluation:
Training to
Implementation
Gap Analysis
Workgroup

Evaluation: Training to Implementation Gap Analysis Workgroup

Goal:

- Identify knowledge gaps contributed to difficulties after taking the FSPCA PCHF training.

Objectives

- Develop PCHF training evaluation tool
- Promote regional usage
- Identify supports needed for compliance with PCHF rule

How to View the Evaluation Tool

- Complete Google form (*access link in the chat*)
- Receive an email
 - Copy of the evaluation tool
 - Instructions on how to utilize the tool

PCHF Workshop Evaluation Tool

If you would like to receive a copy of the PCHF workshop evaluation tool, please enter your contact information into the form below.

*** Required**

First Name *

Your answer

Last Name *

Your answer

Email Address *

Your answer

Data Analysis

- This data are intended to provide a regional picture of topic areas where workshop participants have difficulties.
- This data will be integrated with regional and national efforts.



- Summary of your workshop evaluation
- Summary of regional efforts

Questions?

Contact: Evaluation Workgroup Lead

Nicole Richard

University of Rhode Island

nicolerichard@uri.edu

THE
UNIVERSITY
OF RHODE ISLAND
COLLEGE OF
THE ENVIRONMENT
AND LIFE SCIENCES

Workgroup Timeline Review Recap

Identified focus areas or priorities and established workgroup leads.

2018

Hired 2 project coordinators and formalized each plan of action.

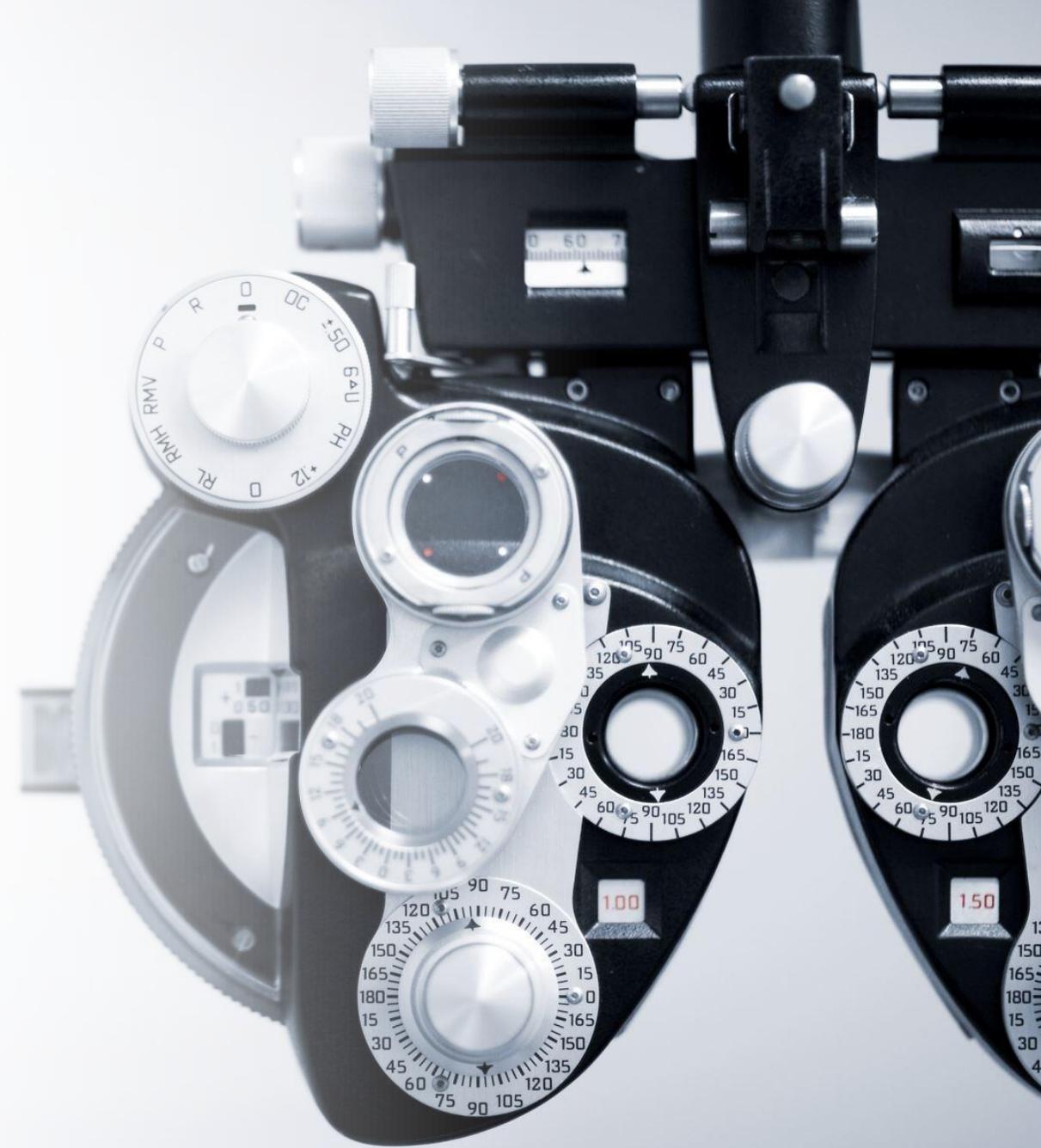
2019

Implemented each workgroup's plan of action.

2020 - 2021

Looking Forward

Tomorrow's discussion: 11:00 am – 12:30 pm



<https://www.uvm.edu/extension/necafs>

NECAFS

The Northeast Center to
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