



On-Farm Readiness Review (OFRR) Program & Toolkit



Produce Safety Educator's Call #33
Organizer: Dr. Kristin Woods
July 31, 2018



Instructions

- **All participants are muted.**
- **There will be time for questions and answers throughout the meeting.**
 - We may not get around to all comments/questions, BUT you may leave additional comments in the comment box to be compiled after the session.
- **This session will be recorded and notes will be shared via the listserv and on our website after the call.**



Agenda

- Introductions
- Overview of OFRR & Goals
- How growers can register for OFRRs
- How to get involved
- Training opportunities
- Feedback & experiences from OFRRs
- Q & A
- Call Wrap Up



On-Farm Readiness Review (OFRR) Program and Tool Kit

Bob Ehart
NASDA

Michelle Danyluk
University of Florida

PSA Educators Call

July 31, 2018



On-Farm Readiness Review



On-Farm Readiness Review Partners



OFRR On-Farm Readiness Review



The purpose of an OFRR is...

...to prepare farmers for implementation of the FSMA Produce Safety Rule (PSR).

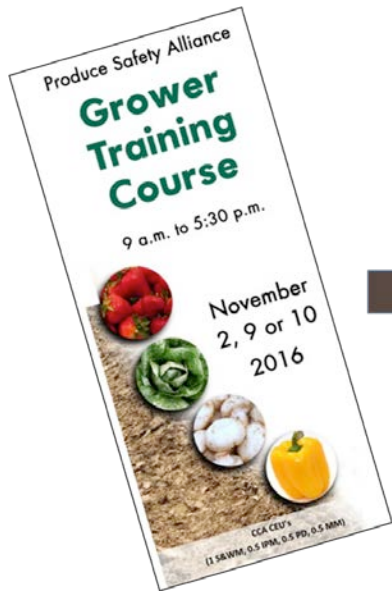
...to help reviewers better understand how the PSR gets translated on the farm.

...to practice a conversational approach to help farmers assess their readiness for implementation of the FSMA PSR.

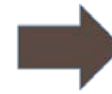
...to provide tools to help assess how prepared an individual farm is to implement the rule.



Farmer Steps to Readiness for the FSMA PSR



**Follow-up
Technical
Assistance**



**Inspection
Ready**

PSA Grower Training Course is a pre-requisite!



On-Farm Readiness Review



Why Might a Farmer Want an OFRR?

- It is voluntary and free.
- It helps align what they're doing to what's required in the rule.
- It helps them figure out what they're missing.
- It provides personalized discussion on their farm food safety activities.
- Notes taken remain the property of the farmer (no FOIA-able records)
- It will improve the farmer's readiness for a PSR inspection.



Difference Between Audits and Inspections

Traditional Audit Approach

Question: Do you have a sick leave policy.

Answer: Yes.

Question: Can I see it?

Answer: Here it is?

OFRR Approach

Question: What is your sick leave policy?

Answer: We don't allow sick workers to touch produce.

Question: How do you recognize when someone is ill on your farm?

Answer: Supervisors look for frequent trips to the bathroom, and other signs of illness.



On-Farm Readiness Review

- **Not points based**
- **Happens once (in most cases)**
- **Covers whole farm**
- **Highlights critical areas of the farm per the PSR**



Who performs OFRRs?

- In most states they will be run by the State Department of Agriculture
 - Should actively involve Cooperative Extension
- In states not actively participating in the FDA's CAP project
 - May be run by the FDA Produce Safety Network (PSN) staff



OFRR Process

1. Pre-review work
2. On the farm
 - Initial Interview
 - Walk Around
 - Final Meeting
3. Evaluation



OFRR Tool

- 15 tabs of information
 1. Glossary of Terms
 2. PSR Decision Tree, Exemption Questionnaire
 3. FSMA Factsheets
 - 4-15. Resource Documents

Every grower participating in an OFRR, will get an OFRR Tool.



OFRR Resource Document Modules

- Worker Health & Hygiene
- Preharvest water
- Preharvest sanitation
- Preharvest worker training
- Preharvest wildlife
- Preharvest soil amendments



- Harvest water
- Harvest sanitation
- Harvest worker training
- Harvest wildlife



- Postharvest water
- Postharvest sanitation
- Postharvest worker training



Initial Interview

- OFRR Decision Tree
 - Designed to figure out what parts of the PSR apply to the individual farm you're on
 - Removes parts of the review that don't apply to the specific farm you're on, simplifying the OFRR



OFRR Decision Tree

- Question 3 – Do you have **growing** operations covered under the PSR?
 - Yes
 - Preharvest Animals module applies
 - Preharvest Worker Training module applies
 - Preharvest Sanitation module applies
 - No
 - None of the preharvest modules apply, skip to question 6



OFRR Decision Tree

- Question 8 – Do you conduct packing and/or holding activities under the PSR in a packinghouse/shed?
 - Yes
 - Postharvest Worker Training module applies
 - Postharvest Sanitation module applies
 - No
 - You are done with the decision tree



Walk Around

- The Grower and OFRR team will then walk around the operation
 - The tool has been arranged to move from production, to harvest, then packing
 - Can work in the opposite direction too, depending on what is best on that operation
- Will keep to the pre-determined schedule, its intended to take about 2-4 h



Walk Around

- The OFRR team will ask questions based on the PSR as it applies to the specific operation
- The questions they ask will be linked to specific language in the Produce Safety Rule
- Those questions link back to specific information in the OFRR Manual



Additional Tool Components

- Each module of the OFRR corresponds to a resource document module in the tool

| Regulation | Recommendation | Evaluation |
|------------------------|--|------------|
| Text of the Regulation | Activities leading to compliance with the regulation | |
| | | |
| | | |
| | | |
| | | |



Additional Tool Components

- Each module of the OFRR corresponds to a resource document module in the tool

| Regulation | Recommendation | Evaluation |
|------------------------|--|------------|
| Text of the regulation | Activities leading to compliance with the regulation | |
| | | |
| | | |
| | | |
| | | |

The first column includes the section and the text of the regulation that apply to this module



Additional Tool Components

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| Regulation | Recommendation | Evaluation |
|------------------------|--|------------|
| Text of the Regulation | Activities leading to compliance with the regulation | |
| | | |
| | | |
| | | |
| | | |
| | | |

The second column addresses activities that may lead to compliance with the regulation. “Must” and “Should” are used



Additional Tool Components

- Each module of the OFRR corresponds to a resource document module in the tool

| Regulation | Recommendation | Evaluation |
|------------------------|--|------------|
| Text of the Regulation | Activities leading to compliance with the regulation | |
| | | |
| | | |
| | | |
| | | |

This column includes how compliance with the regulation may be evaluated by the assessors, it includes records, when the records are mandatory



Final meeting

- Highlight both positives and areas for improvement
- Review and explain how to use the tool
- **Make farmers aware that there will be changes to the regulations**
- Discuss potential follow up technical assistance
- Address specific questions the farmer may have



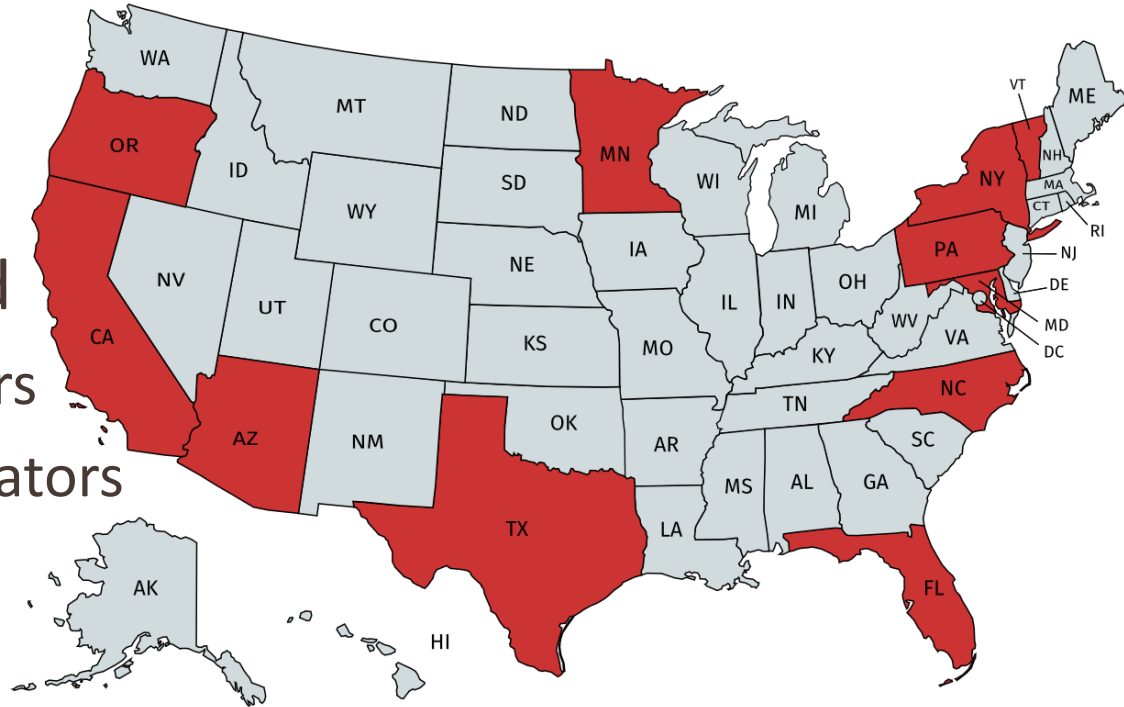
How can you get involved in OFRR?

- You need to attend an OFRR Training Class
- OFRR Classes are accessible for extension educators through State Departments of Agriculture
 - Please contact your State to attend
 - If you don't know who your state contact is, let us know



OFRR Trainings Held

- 16 trainings held
- 8 trainers
(plus 4 PSA staff)
- 296 people trained
 - 185 state regulators
 - 90 Extension educators
 - 21 FDA/ORR and CFSAN PSN
- 33 farm participants



Training Observations

- 20% response (n=59)
 - 87% expect to inspect farms for the FSMA PSR
 - 80% indicated a moderate or major impact on their ability to inspect for the FSMA PSR
 - 97% expect to use the OFRR Walk Around Questions (WAQ)
 - 93% indicated that they are likely to use the OFRR resource manual
 - 92% indicated that they were satisfied with the OFRR training



Training Observations

- Observations and improvements to be made
 - Familiarity with the WAQ is critical to smooth Q&A with the farmer
 - Mentoring is desired by some after the OFRR training
 - Guidance is still needed from the FDA on sections of the rule – interpretation of the rule is an issue
 - FSMA PSR and third party audits are very different!
 - Many FSMA PSR inspectors are often coming from food facility inspection positions



Future OFRR Training classes

- OFRR Training classes (beyond September) are not yet scheduled
- Expected to continue January – June, 2019
 - Currently no confirmed dates



How do growers sign up for an OFRR?

- That will vary depending on the state you're in.
 - FL - online registration
 - www.freshfromflorida.com/FSMA
 - Its in the top left box
- NASDA is launching a website in early September 2018 to list how to register in each state



I went to an OFRR training and heard there would be an updated manual, what's its status?

- The updated manual is at the printer!
- Watch for a storefront from NASDA for states to purchase updated manuals soon!
- The WAQ has also been updated, and will be sent to training participants



How is OFRR Roll out going?

- OFRRs are a team effort
 - Usually a state regulator and an Extension educator
 - OFRRs are a free and confidential assessment of preparedness
 - All documents specific to the OFRR stay at the farm, including notes taken
 - The OFRR resource manual is given to the farmer
 - Farmer requests technical assistance from Extension after the OFRR takes place



Trends with the OFRR – so far

- 91% of farms are under 500 acres in size
- 64% of farms sell over \$500,000 worth of produce
- 43% of farms meet minimum FSMA PSR requirements
- 42% of farms need minor improvements to meet FSMA PSR
- Time and technical assistance are needed the most (43% and 42%)



Challenges noted

1. Pre-harvest water testing
2. Annual water system inspections
3. Record keeping of sanitation activities
4. Notification of food safety policies to farm visitors
5. Improved toilet and handwashing facilities
6. Increased implementation of rodent control programs



Does the OFRR include a records review?

- NO – the OFRR will ask if you are keeping the records required by the PSR, but will not perform a records review.



What if something wrong is found during an OFRR?

- Egregious Conditions
 - A practice, condition, or situation on an farm or in a packinghouse that is reasonably likely to lead to:
 - Serious adverse health consequences or death from the consumption of or exposure to covered produce
 - An imminent public health hazard is posed if corrective action is not taken immediately
- If an “Egregious Condition” is found assessors have been trained in a course of actions to follow up with the grower
 - If the grower has the ability to contain and prevent the potential public threat, FDA will **not** be notified



QUESTIONS?



Betsy Bihn
Cornell University

Travis Chapin
University of Florida

Michelle Danyluk
University of Florida

Chris Gunter
North Carolina State University



Wesley Kline
Rutgers, The State University

Meredith Melendez
Rutgers, The State University

Phillip Tocco
Michigan State University





Next Meeting

- **Tentative:** September, Date TBD
- Meeting info to be sent out via the listserv closer to the time of the call
- Submit other topics for discussion to Gretchen (glw53@cornell.edu)



The PSA Website

<http://producesafetyalliance.cornell.edu/>

Produce Safety Alliance

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Portland Market

WELCOME TO THE PRODUCE SAFETY ALLIANCE WEBSITE!

Produce Safety
ALLIANCE

Providing fundamental, science-based, on-farm food safety knowledge to fresh fruit and vegetable farmers, packers, regulatory personnel and others interested in the safety of fresh produce.

The Produce Safety Alliance (PSA) is a collaboration between Cornell University, FDA, and USDA to prepare fresh produce growers to meet the regulatory requirements included in the United States Food and Drug Administration's Food Safety Modernization Act (FSMA) Produce Safety Rule.

STAY UP-TO-DATE!

- Read our latest newsletter: January 2017
- August 2016 PSA Factsheet

Join the PSA Listserve!

The listserv is a great way to receive the most current information related to educational and training opportunities, FSMA updates, and produce safety research and events.

- Like us on Facebook!



- Or Follow us on Twitter!



@Produce_Safety

Join the listserv

Elizabeth A. Bihn, Ph.D., Director, eab38@cornell.edu, 315.787.2625
Gretchen L Wall, M.S., Coordinator, glw53@cornell.edu, 607.255.6806



PSA Team

Northwest:
Connie Fisk, Ph.D.



Midwest:
Don Stoeckel, Ph.D.



Northeast:
Betsy Bihn, Ph.D.
Gretchen Wall, M.S.
Michele Humiston
Rob Way



Southwest:
Donna Pahl, M.S.



Southeast:
Kristin Woods, Ph.D.

