

# Managing Animal Food Safety Inspections During and After a Pandemic



Hosted by AAFCO & PFP  
September 24, 2020

# Agenda

## **Opening Statements:**

PFP Governing Council Co-Chairs: Barbara Cassens and Patrick Kennelly

AAFCO Executive Director: Sue Hays

## **Presentations:**

### **1. COVID Work Restrictions: Unexpected Opportunities**

*Erin Bubb, Division Chief, Division of Agronomics and Regional Services, Pennsylvania Department of Agriculture*

### **2. FDA COVID-19 Experiences & Stakeholder Resources**

*Jennifer Erickson, Regulatory Policy Analyst, Center for Veterinary Medicine, U.S. Food and Drug Administration*

### **3. Coping with COVID**

*Austin Therrell, Animal Feed Program Coordinator, South Carolina Department of Agriculture*

### **4. Work Planning Before, During, and After COVID-19**

*Hollis Glenn, Division Director, Division of Inspection and Consumer Services, Colorado Department of Agriculture*

## **Q&A and Conclusion**



# Barbara Cassens

*Co-Chairperson*

Partnership for Food Protection Governing  
Council

*Director*

Office of Partnerships  
Office of Regulatory Affairs  
Food and Drug Administration





Patrick Kennelly

*Co-Chairperson*  
Governing Council Partnership for  
Food Protection

*Program Director*  
Association of Food and Drug Officials





Sue Hays

*Executive Director*

Association of American Feed Control Officials



## **FDA COVID-19 EXPERIENCES & STAKEHOLDER RESOURCES**

Jennifer Erickson, JD  
Center for Veterinary Medicine  
Office of Surveillance & Compliance





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# Lessons Learned

- Flexibility is key
  - Both regulatory and operational
- Importance of strong, established relationships
- Disruptive changes = opportunity
- Importance of maintaining quality inventory data



# Stakeholder Resources

- Temporary regulatory flexibility, for example:
  - Onsite audits
  - Food labeling (wholesale v. retail)
- Factsheets & Checklists
  - [Fact Sheet: Safely distributing unused human food for use as animal food](#)
  - [Employee Health and Food Safety Checklist](#)

## Employee Health and Food Safety Checklist

### —Employee Health Section

- Bundles recommendations from CDC and OSHA to protect employee health

### —Food Safety Section

- Focus on potential changes due to supply-chain disruptions and changes in employee practices that may impact food safety, or the implementation of food safety practices
- Highlights key regulatory requirements that may apply to these changes

# Industry Feedback

- Positive feedback on:
  - Quick, easy to digest information
  - Willingness to work towards solutions to challenges
- Additional challenges identified:
  - A lot of changing information to absorb – difficult to use to make informed decisions
  - Consistency between regulators (between agencies, state/federal, etc.)



# Contact Information

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Jennifer Erickson

[Jennifer.Erickson@fda.hhs.gov](mailto:Jennifer.Erickson@fda.hhs.gov)

Cell: 240-506-8301



# Coping with COVID

Austin Therrell

Manager, Feed Safety Department

South Carolina Department of  
Agriculture





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Manager, Feed Safety Department

South Carolina Department of  
Agriculture

# South Carolina Response

- Governor Henry McMaster issued executive order No. 2020-11 on March 19, 2020
  - Directed all non-essential employees and staff of the State of South Carolina to work remotely effective March 20, 2020.
  - Roughly 3.5-month quarantine period
- Three phased re-entry plan started June 1, 2020
  - Phase I – June 1, 2020 - Essential Employees report back to office
  - Phase II – July 6, 2020 - Non-essential employees report back on alternating schedules keeping building capacity below 50%
    - Inspectors could resume field work
    - All employees in regulatory agencies report back August 17, 2020
  - Phase III – TBD for all state agencies



**20 Mar. 2020**

Partial Stop work order issued

- Limited to “for cause” or “emergency” situations only.
- Temporarily halted routine surveillance inspections.



**17 June 2020**

Partial Stop work order lifted

- Can resume work following safety precautions and state guidance.

# FDA Response

# Immediate Impacts



Cancelled Meetings

AAFCO Seminar  
AAFCO Annual Meeting



Cancelled Inspections

FDA & State



Cancelled Audits

Stuck in Audit  
Phase II



Cancelled Sample  
Collection  
Opportunities

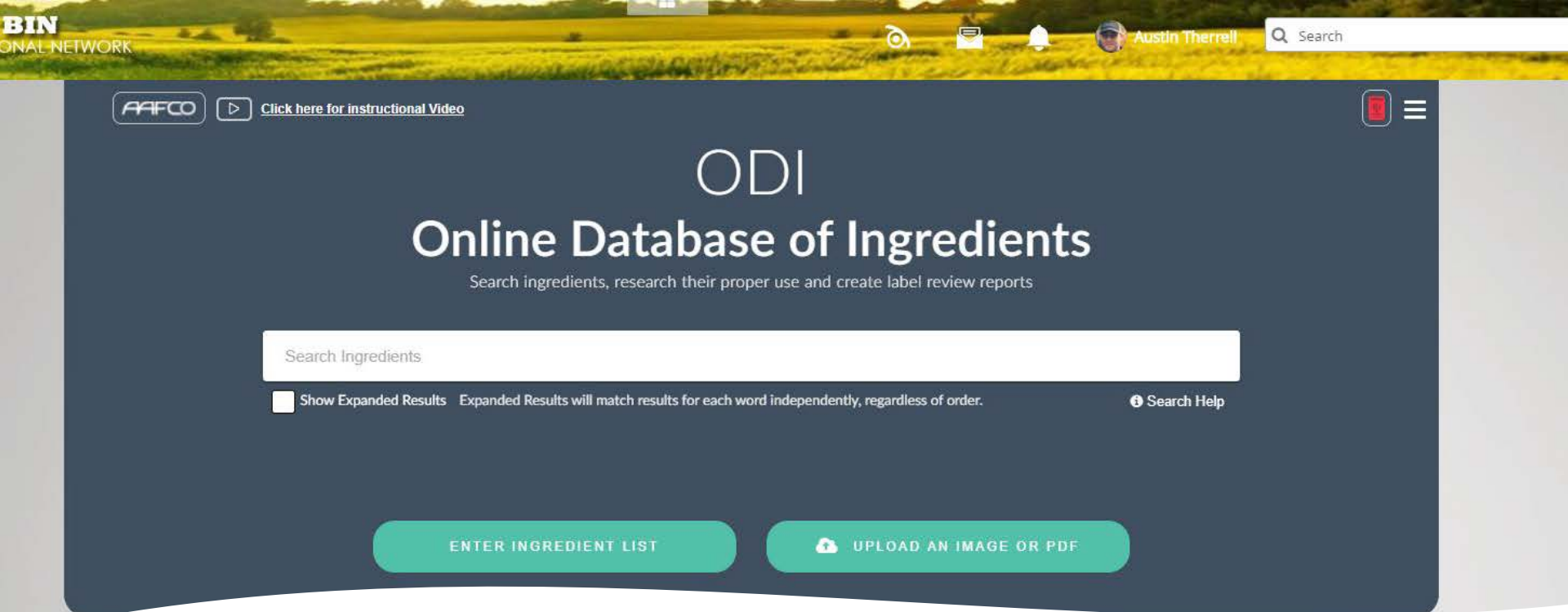
SCDA Feed Lab

## Shifted our Focus

- Training
- Virtual label review & Registration
- Inventory Update & Outreach to firms
- Surf Time
- Animal Feed Regulatory Program Standards

# Training

- SCDA has finalized a basic and advanced training curriculum as required by AFRPS Standard 2.
  - Inspectors were able to complete all online courses that are available through Pathlore and Compliance Wire during “quarantine.”
- A new hire was able to complete 31 Basic Training Courses & 15 Advanced Training Courses for a total of 46 out of 53 required courses.
  - The remaining 7 courses are all face-to-face
- Other inspectors were able to re-take courses to refresh knowledge on labeling and federal regulations.



## Virtual Label Review & Registration

- Created a process for an essential employee to collect hardcopy registration forms and checks and verify the information with our registration specialist.
- Inspectors were able to assist our registration specialist with over 150 online label reviews.
  - Utilized the AAFCO ODI online ingredient tool.
  - Helped speed the registration process and will benefit inspectors when they get back in the field.

# Inventory Update & Outreach

- Inspectors reached out to over 200 firms across the state
  - Updated contact information and POC's
  - Gathered COVID response data to inform our post-COVID inspection approach
    - Are you open for business? 100% Open
    - Have your hours changed due to COVID-19?
      - 34 firms answered yes
    - How many employees?
    - Are there any new visitor policies that would impact our ability to conduct an inspection?
      - Recommending masks/requiring masks
      - Temperature checks
      - Limiting visitors
      - Social distancing employees
  - Informed about FSMA requirements and upcoming PCQI courses being offered by Clemson University.

# Surf Time

- Inspectors were encouraged to spend time online searching for new businesses in their regions.
  - This resulted in over 10 new businesses being added to our inventory
    - Predominantly pet treat businesses with labeling errors
    - One firm that had been in business for 11 years with no inspection or registration history.

# Animal Feed Regulatory Program Standards

SCDA was able to slow down and re-evaluate our feed program.

- Where we currently align with the AFRPS Standards
- Where our gaps are
- Where we need to focus our time and energy to improve

Spent quality time writing new SOP's and reviewing our current procedures.

AFRPS set us up to be successful virtually

- Updated technology
- New virtual memberships

# Future Activities



MORE OUTREACH  
TO INDUSTRY



MORE VIRTUAL  
LABEL REVIEWS



MORE CONNECTION  
WITH INSPECTORS

# Contact Information

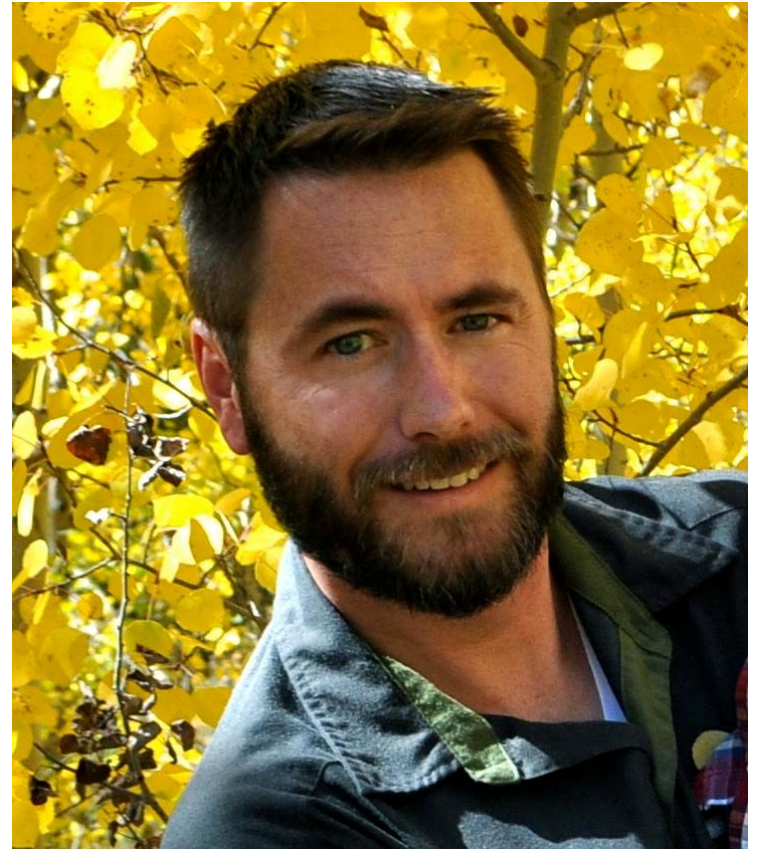
South Carolina Department of Agriculture

123 Ballard Ct.  
West Columbia, SC 29172

[atherrell@scda.sc.gov](mailto:atherrell@scda.sc.gov)  
Office: (803) 734-2035

# **Work Planning Before, During, and After COVID-19**

*Hollis Glenn, Division Director, Division of  
Inspection and Consumer Services, Colorado  
Department of Agriculture*





# WORK PLANNING BEFORE, DURING AND AFTER COVID-19

Hollis Glenn

## BEFORE COVID-19

### Impact to Program Structure

- Regulatory Program Staff (In Office)
- Field Staff (In field but home-based)
- Laboratory Staff (In the lab)

### Quick shut down: the fog of war effect

- Send staff home with proper resources
- Scramble to find work for inspectors

### Initial concerns

- Impact on FDA contract inspections
- Impact on renewal season?
- What would a long term shut down do to the feed supply chain?



## COORDINATION WITH LARGER STATE ACTIONS

### **State Emergency Response Command**

- Relay any industry information

### **Governor Executive Orders:**

- “Stay at Home”
  - Agriculture operations essential
    - What about feed?
- “Work From Home”
  - Gradual reopening
  - inspections resumed





## DECISION ON INSPECTIONS

- Reschedule inspections
  - Feed Mills: essential agriculture
  - Investigate complaints
  - Work with other inspection programs
  - FDA's Partial Stop Work Order

# WORK AT HOME

## Freezing all inspections

- Moved inspectors and program staff home
- Technology needs
- Move equipment

## Reimagine work for inspectors

- Label reviews
- SOP review and revision
- Trainings Pathlore & AFDO Trainings

## Staying Connected with Staff

Check-in, Virtual Happy Hour, Trivia



# GETTING BACK INTO THE FIELD

## COVID-19 Specific SOP

- Temp monitoring
- PPE Inventory
- Travel Logs
- Priority-based inspections
- Contact log

## Inspector's Concerns and Safety

### Travel restrictions

- Limited areas and protocol
- Reduced # of overnights
- Management approval



LIMIT TRAVEL  
STOP THE SPREAD  
OF COVID-19



## GETTING BACK INTO THE FIELD

### **Sampling**

- Adjust sample plan
- Impact on lab staff
- Slow ramp up of sampling
- Retraining/refresher for inspectors

### **COVID Scares**

- Inspectors/Staff coming into contact
- Error on side of caution and keep them home.



## FOOD SECURITY TASK FORCE

- Monitor supply chain issues
  - Regularly contacted industry to gauge impacts.
  - Met weekly to discuss issues.
  - Informed leadership of findings.

## PREPARE FOR THE LONG TERM



- Program Assessment and Develop a Strategic Plan
  - 2-6-12 month plan
  - Budget, Staffing, Policy, Outreach
  - AFRPS Standard 8 usefulness

# POST COVID 2020

## **Another Shutdown**

- Renewal season adjustment
- Inspector work?

## **Documenting Lessons Learned**

- Statewide hot wash

## **Budget and Staffing Impact**

- Budget cuts
- Vacancies, furloughs



# THANK YOU

Hollis Glenn

[Hollis.glenn@state.co.us](mailto:Hollis.glenn@state.co.us)

303-503-2668



# Questions?