An In-Depth Look at FDA's FSMA Technical Assistance Network

American Spice Trade Association October 11, 2017



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FDA - Center for Food Safety and Applied Nutrition

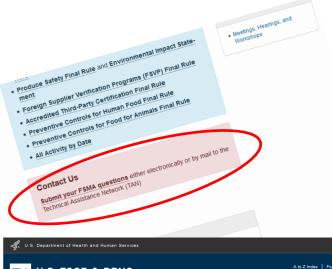


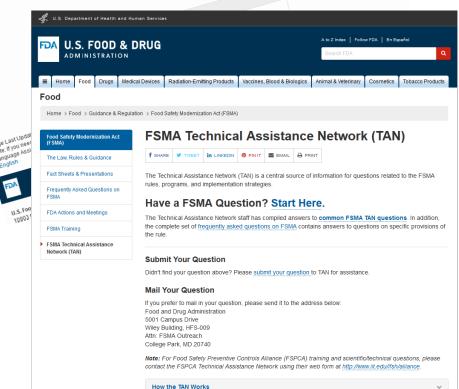
FDA FSMA Technical Assistance Network

- Launched FDA's FSMA Technical Assistance Network on September 9, 2015
- Provide technical assistance to industry, regulators, academia, and consumers regarding FSMA
- Address questions related to FSMA rules, programs, and implementation
- Collaborate with external technical resources, e.g. Alliances, Extension Specialists, Universities, International Partners

How to Contact Us?







- www.fda.gov/FSMA
- Go to Contact Us and How to Contact FDA on FSMA
- FSMA TAN Popular Topics posted April 2017
- Inquiries may be submitted by mail, if internet is not available.



Inquiry Web Form

| U.S. Department of Health and Human Services | | U.S. Department of Health and Human Services | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| U.S. Food and Drug Administration Protecting and Promoting Your Health | A to 2 Index Follow FDA FDA Volce Bitog Search FDA Q | U.S. Food and Drug Adm Protecting and Promoting Your H | ninistration lealth | A to Z Index Follow FDA FDA Volce Blog Search FDA Q |
| Food and Cosmetics Information Center (FCIC) Inquiry Form (FDA form # 3907) | | Food and Cosmetics Information Center (FCIC) Inqui | iry Form | |
| | * = Required Information | | | * = Required Information |
| I am a member of this category *None | • | I am a member of this category * | None | |
| Email * | | Email * | None Academia | |
| Country *None | • | Country * | Consumer Media Medical | • |
| Zip Code * | | Zip Code * | Industry/Business Other Government Official - Domestic | |
| Is your inquiry specific to the Food Safety Modernization Act requirements(FSMA) 🎳 🐧 | es No | Is your inquiry specific to the Food Safety Mo | Regulator - FDA Compliance Staff | s No 🖺 |
| Inquiry (2500 character limit) * | U.S. Department of Health and Human Services | p * | Regulator - State Inspector | |
| | U.S. Food and Drug Administration Protecting and Promoting Your Health | A to Z Index Follow FDA FDA Voice Blog Search FDA Q | Other Government Official - International | - |
| y o y j 9 u | Food and Cosmetics Information Center (FCIC) Inquiry Form (FDA form # 3907) | | y o y j 9 u | |
| Enter the code above here * | (LON JOHN # 9907) | * = Required Information | Enter the code above here * | |
| The Food and Drug Administration's (FDA), Food and Cosmetics Information Center (FCIC) possible. However, response times may vary, due to public health priorities and the high provide the public with accurate and current information, which at times requires extens respond as soon as possible. Thank you for your patience and for c | I am a member of this category * -None Email * | rary, c rent i | od and Cosmetics Information Center (FCIC) due to public health priorities and the high v information, which at times requires extensi ssible. Thank you for your patience and for c | volume of inquiries we receive. We strive to ive research. Please be assured that we will |
| | Country *None | , | , , , | • |
| Submit | Zip Code * | MAN O * Yee Ø No 🗎 | Submit | |
| | FSMA Topics * -None | IA) TES V NO | | |
| | Inquiry (2500 character limit) * Accredited Third-Party Certifice Food Facility Registration Foreign Supplier Verification Proteign Supplier Verification Proteign Supplier Verification Proteign Supplier Verification Proteign Accreditation Preventive Controls-Animal For Preventive Controls-Human For Produce Safety Sanitary Transportation for Hur Voluntary Qualified Importer Prother | ogram (FSVP) od od man and Animal Food | | |
| | The Food and Drug Administration's (FDA), Food and Cosmetics information Cerpossible. However, response times may vary, due to public health priorities and provide the public with accurate and current information, which at times require respond as soon as possible. Thank you for your patience | d the high volume of inquiries we receive. We strive to ses extensive research. Please be assured that we will | | 4 |



Web Form Auto Response



The Food and Drug Administration's (FDA) Food and Cosmetic Information Center (FCIC)/Technical Assistance Network (TAN) has received your inquiry. Your inquiry has been assigned case number 00137603. Please retain this case number and reference it in future correspondence regarding this inquiry.

We will respond to your inquiry as soon as possible. However, response times may vary, due to public health priorities and the high volume of inquiries we receive.

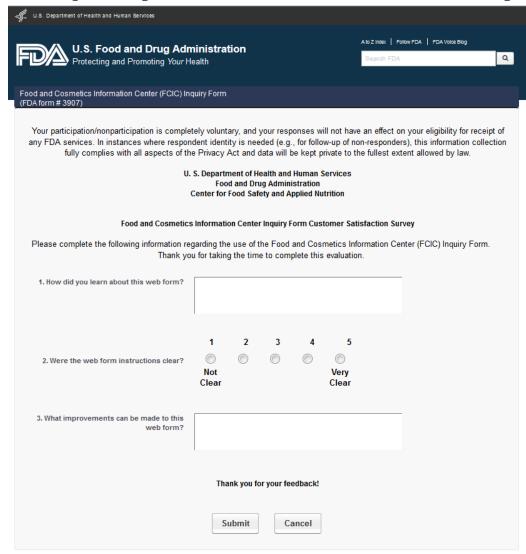
We strive to provide the public with accurate and current information, which at times requires extensive research. Please be assured that we will respond as soon as possible.

Thank you for contacting FDA's FCIC/TAN.





Inquiry Web Form Survey







Inquiry Web Form Survey

Survey Responses as of Sept. 15, 2017

Were Webform Survey Instructions Clear?

| Survey Rating | Survey Count | % of Total |
|---------------|--------------|------------|
| 1 | 325 | 3% |
| 2 | 443 | 4% |
| 3 | 1,739 | 17% |
| 4 | 2,840 | 27% |
| 5 | 5,044 | 49% |
| Total | | 100% |

How Public Learned of Web Form

| Rank | Term |
|------|----------------------|
| 1 | FDA Website |
| 2 | Google Search |
| 3 | Food Safety Training |
| 3 | PCQI Training |

Areas To Improve

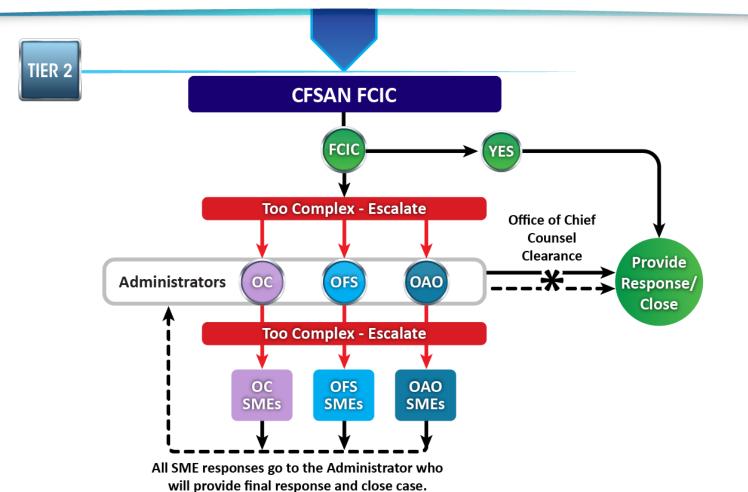
| Rank | Term |
|------|-----------------------------------|
| 1 | Web Form Text Box |
| 2 | Live Chat with Specialist |
| 3 | Direct Contact Information for PO |







TAN Process – CFSAN Stakeholder Inquiries (Phone or Web Form)

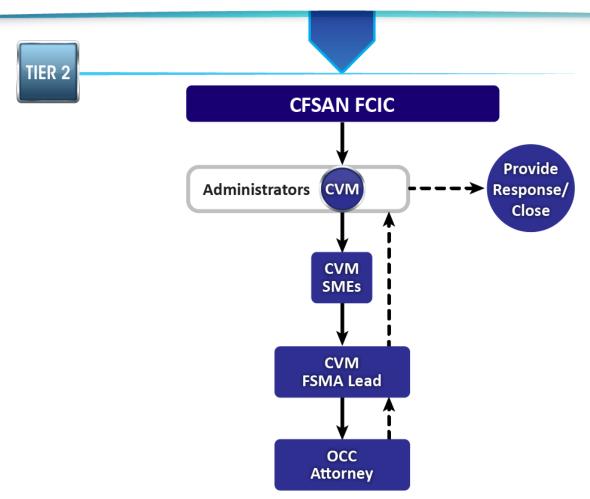








TAN Process – CVM Stakeholder Inquiries (Phone or Web Form)





FDA FSMA Technical Assistance Network

- The FSMA TAN received a total of 6,471 inquiries from September 9, 2015 through September 15, 2017. Of the FSMA inquiries received, 1,216 still remain open while 5,255 have been responded to and closed
- Median response time is 15 days
- Average response time is 44 days



Case Count by FSMA Topic

| FSMA Topics | Inquiry Count = |
|---------------------------------------------------|-----------------|
| Preventive Controls-Human Food | 2,279 |
| Foreign Supplier Verification Program (FSVP) | 1,298 |
| Sanitary Transportation for Human and Animal Food | 845 |
| Produce Safety | 664 |
| Preventive Controls-Animal Food | 456 |
| Other | 438 |
| Accredited Third-Party Certification (3rd Party) | 207 |
| Food Facility Registration | 177 |
| Intentional Adulteration | 74 |
| Voluntary Qualified Importer Program (VQIP) | 18 |
| Lab Accreditation | 15 |
| Grand Total | 6,471 |

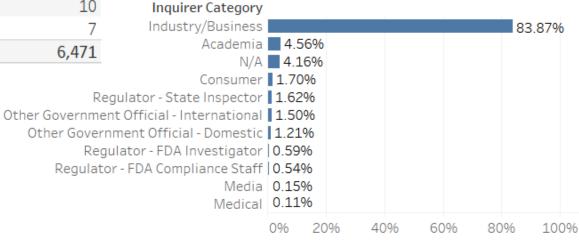
Percentage of Total FSMA Cases by FSMA Topic

| FSMA Topics | % of Total |
|---------------------------------------------------|------------|
| Preventive Controls-Human Food | 35.22% |
| Foreign Supplier Verification Program (FSVP) | 20.06% |
| Sanitary Transportation for Human and Animal Food | 13.06% |
| Produce Safety | 10.26% |
| Preventive Controls-Animal Food | 7.05% |
| Other | 6.77% |
| Accredited Third-Party Certification (3rd Party) | 3.20% |
| Food Facility Registration | 2.74% |
| Intentional Adulteration | 1.14% |
| Voluntary Qualified Importer Program (VQIP) | 0.28% |
| Lab Accreditation | 0.23% |
| Grand Total | 100.00% |



| Inquirer Category | Inquiry Count = |
|-------------------------------------------|-----------------|
| Industry/Business | 5,427 |
| Academia | 295 |
| N/A | 269 |
| Consumer | 110 |
| Regulator - State Inspector | 105 |
| Other Government Official - International | 97 |
| Other Government Official - Domestic | 78 |
| Regulator - FDA Investigator | 38 |
| Regulator - FDA Compliance Staff | 35 |
| Media | 10 |
| Medical | 7 |
| Grand Total | 6,471 |

Percentage of Total FSMA Cases by Inquirer Category

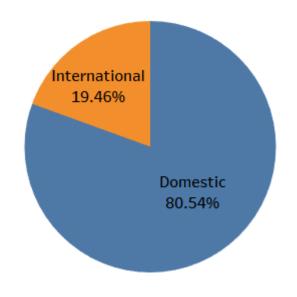


% of Total Number of Records



International/Domestic Inquiry Count

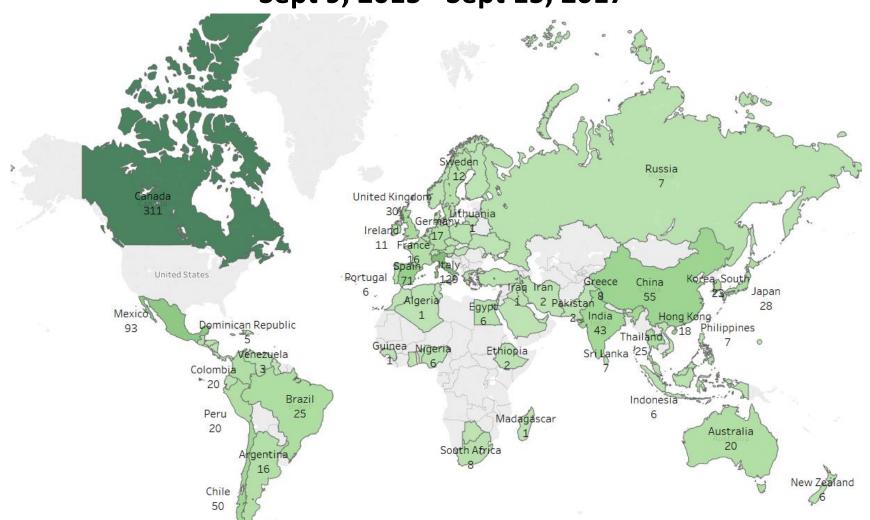
| International/Domestic | Inquiry Count |
|------------------------|---------------|
| Domestic | 5,212 |
| International | 1,259 |
| Grand Total | 6,471 |



Top International Case Count by Country

| Country | Inquiry Count = |
|----------------|-----------------|
| Canada | 311 |
| Italy | 129 |
| Mexico | 93 |
| Spain | 71 |
| China | 55 |
| Chile | 50 |
| India | 43 |
| United Kingdom | 30 |
| Japan | 28 |
| Brazil | 25 |
| Thailand | 25 |
| Korea, South | 23 |
| Australia | 20 |
| Colombia | 20 |
| Peru | 20 |







Top 5 Spice Related Inquiries

Top 5 Non-FSMA Spice Inquiries:

- Labeling of spice products
- Importing of spice products
- FDA regulations on spice products
- Safety Information
- Complaints about spice products

Top 5 FSMA related Spice Inquiries:

- Labeling of spice products
- Importing of spice products
- How do spice Importers comply with FSMA?
- Is there an exemption list for small businesses?
- FDA regulations on spice products



Process Improvements (internal):

- Administrators received system licenses
- Meet regularly with FSMA Administrators and Specialists
- Access database with all cleared TAN responses on intranet
- Monthly expanded report showing outstanding inquiries
 30/60/60+ days
- Implementation of a new Agency-wide phone system as well as Single Sign On (SSO) functionality.
- Established internal target days for responses



Process Improvements (external):

- Auto-responses after 30/60 days
- Summary TAN reports posted on web
- Survey to track effectiveness of web form
- Developed survey to track effectiveness of FSMA responses – Effective December 2017
- Popular topics posted on the web 75 FAQs

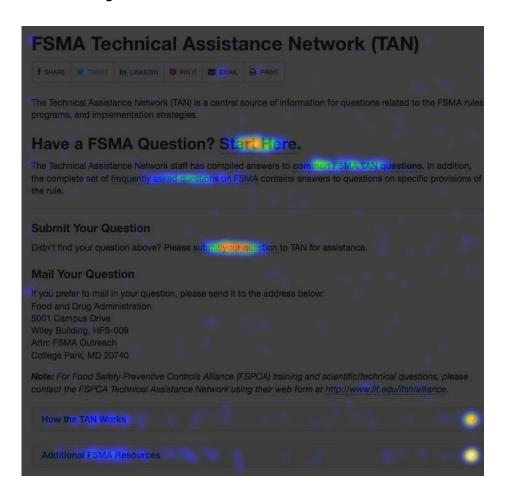


Web Analytics – FSMA TAN Page

| Year | Page views | Unique views |
|------|------------|--------------|
| 2015 | 5,043 | 4,343 |
| 2016 | 25,997 | 21,929 |
| 2017 | 29,300 | 22,315 |

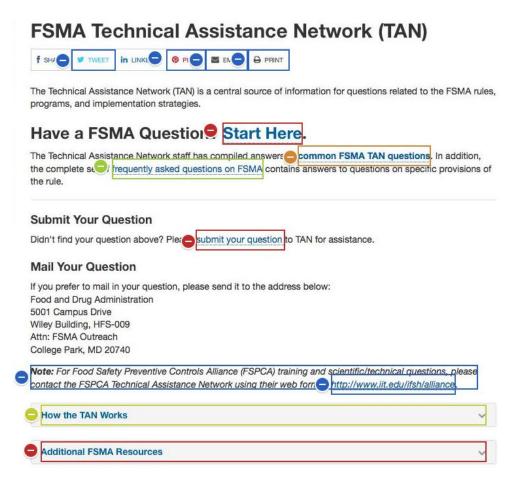


Web Analytics – FSMA TAN Page





Web Analytics – FSMA TAN Page





Benefits of TAN

- Inquiries inform guidance and other implementation document development
- Inquirers receive personalized responses about their specific situations
- Identify gaps and needs that can be addressed by web posting, trainings and other communication
- Strengthen relationship with external Alliances through information sharing



Planned Future Improvements

- Continue to reduce response time for inquiries
- More information sharing with Alliances and other partners
- Continue to update FSMA TAN Popular Topics
- Implement Customer Satisfaction Survey



Regulator TAN

- Provides technical assistance regarding FSMA regulations for FDA Investigators before or during the course of an inspection
- The Regulator TAN is an appointment and phone-based system designed to connect investigators with FSMA Subject Matter Experts
- Initially supported the Preventive Control rules and now supporting sprout inspections and FSVP inspections but will ultimately support all FSMA regulations
- Future implementations will include state and local investigators as well



Questions?

