

## FSPCA Recommendations for Successfully Advertising Your FSVP Course

Here are some helpful “dos and don’ts” when it comes to terms used to advertise your FSPCA Foreign Supplier Verification Programs (FSVP) course.

- 1. Referencing your distinction as a Lead Instructor.** The easiest way to distinguish yourself as a Lead Instructor is to reference the title of the course: “I am a Lead Instructor for the FSPCA Foreign Supplier Verification Programs (FSVP) course.” Do not use terms such as ‘certified,’ ‘recognized,’ ‘approved,’ etc. It is acceptable to include your certificate number if you wish: “Lead Instructor (certificate #5G67D9) for the FSPCA FSVP course.”
- 2. Use of the FSPCA logo.** A high quality FSPCA logo is available for your use in advertising your course. It can be downloaded from the Instructor Portal on the LMS. Be sure to associate the logo with the course using the correct course title. It should be clear that the advertisement is associated with your company or organization – so your logo should be predominant. The FSPCA logo should be subordinate and used in sub-context where the course is mentioned:

### Example of logo usage



Remember that the logo is for advertising use. Do not use the logo on course slides that you have created and that are not part of the FSPCA FSVP curriculum.

- 3. Referencing FDA recognition of the FSPCA FSVP curriculum.** Do not use the phrase “FDA Approved.” The FSVP curriculum was designed by regulatory, academia, and industry professionals and developed with funding from FDA as part of the FSPCA. While FDA assisted in the preparation of the course materials, the materials have been written and produced by the Alliance and are not official FDA materials.

4. **Implying the course is required.** Do not state that the FSVP course is mandatory or that FDA's FSVP regulation requires an FSVP "qualified individual" to take the FSPCA FSVP course. In contrast to the Preventive Controls (PC) rules for human or animal food, the FSVP rule does not require an FSVP "qualified individual" to attend a training program following a "standardized curriculum" recognized by FDA. Therefore, completing this course is not mandatory. Attending this course, however, will help course participants understand the FSVP requirements and how those requirements can be met in their particular circumstance.
5. **Responsibilities of an FSVP "Qualified Individual."** Under the FSVP rule, a "qualified individual" must develop an importer's FSVP and perform activities required in the rule. An importer can use one or more "qualified individuals" to carry out all the FSVP requirements. A "qualified individual" must have the education, training, or experience (or a combination thereof) necessary to perform their assigned activities and must be able to read and understand the language of any records that must be reviewed in performing an activity.
6. **Adding requirements for obtaining a certificate.** To successfully complete the course, a participant must be present for the entire delivery and actively participate in the exercises. Otherwise, do not approve participant completion. An FSPCA assessment is not associated with the FSVP course at this time. If a Lead Instructor chooses to add additional requirements to their own delivery, such as passing a test or demonstrating the ability to perform a task, a distinction must be made that the additional requirements are the Lead Instructor's and not FSPCA's. Example: "In addition to the FSPCA course completion requirements, our delivery will require passing an exam."
7. **Referencing regulator attendance in your course.** You can reference regulator attendance if you wish to emphasize a collaborative course environment. However, do not imply that regulator attendance is special to this course or offers an advantage in order to attempt a marketing edge. The purpose of regulator attendance is to obtain training, not to provide answers to rule and policy interpretation questions.
8. **Considerations for conducting Virtual Courses:** If you are conducting a virtual course, you will want to consider the following:
  - a) Remote participant identification and verification
  - b) Specific active-participation strategies that are used by the Lead Instructor
  - c) How instructor engagement is used
  - d) How interaction is assured between participants, participant to course material, and participant to instructor
  - e) How group work is conducted
  - f) Seat time
  - g) Any administrative, electronic monitoring tools used to assure participant activity during the course
  - h) If an evaluation takes place and whether you would share it with the Alliance
  - i) Provide a recorded broadcast to the Alliance

If you wish to report advertising that does not comply with these recommendations, you may contact FSPCA. FSPCA uses a progressive approach to assist the advertiser in correcting any discrepancies such as:

1. A friendly reminder by email
2. A request for correction
3. A warning
4. A suspension of Lead Instructor status (or possibly all Lead Instructors associated with the advertiser)

FSPCA embraces the right of due process and established an appeals policy.