

## **FSPCA Recommendations for Successfully Advertising Your PC Animal Food Course**

Here are some helpful “dos and don’ts” when it comes to terms used to advertise your FSPCA Preventive Controls 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 Preventive Controls for Human Food 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 Preventive Controls for Animal Food Course.”
2. **Referencing “qualified individual” in your advertisement.** The term to be used is “Preventive Controls Qualified Individual.” A Preventive controls qualified individual “means a qualified individual who has successfully completed training in the development and application of risk-based preventive controls at least equivalent to that received under a standardized curriculum recognized as adequate by FDA or is otherwise qualified through job experience to develop and apply a food safety system.” This is the definition is from *Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food* regulation § 117.3 and the *Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Food for Animals* regulation § 507.3.

There is a separate definition for “qualified individual” in § 507.3 and § 117.3 and Lead Instructors should familiarize themselves with the distinction.

3. **Responsibilities of a Preventive Controls Qualified Individual.** Under the Preventive Controls for Human Food rule, the responsibilities of a “preventive controls qualified individual” include to oversee or perform 1) preparation of the Food Safety Plan, 2) validation of the preventive controls, 3) records review, 4) reanalysis of the Food Safety Plan, and other activities as appropriate to the food. See § 117.180 and 507.53 for more details.

4. **“Preventive” not “Preventative.”** The term used in the rules is “preventive.”
5. **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 standardized curriculum.

6. **Referencing FDA recognition of the FSPCA curriculum.** Do not use the phrase “FDA Approved.” The Preventive Controls courses developed by the Food Safety Preventive Controls Alliance (FSPCA) serve as the “standardized curriculum” that FDA recognizes as adequate; successfully completing this course is one way to meet the requirements for a “preventive controls qualified individual.” Here is some language you can use about the FSPCA Preventive Controls for Human Food Course and similar language can be used for the Animal Food Course:

*The Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food regulation (referred to as the Preventive Controls for Human Food regulation) is intended to ensure safe manufacturing/processing, packing and holding of food products for human consumption in the United States. The regulation requires that certain activities must be completed by a “preventive controls qualified individual.” This course, developed by FSPCA, is the “standardized curriculum” recognized by FDA; successfully completing this course is one way to meet the requirements for a “preventive controls qualified individual.”*

7. **Implying the course is required.** Do not state that the Preventive Controls regulations mandate the FSPCA Preventive Controls courses. The rule points out there may be others ways to meet the requirements, but successfully completing this course is one way to meet the requirements for a preventive controls qualified individual.
8. **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 standardized 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."
9. **Avoid use of the acronym "HARPC."** Prior to the release of the rules in 2015, many providers were offering training using the term "HARPC" and many continue to do so. Training delivered prior to publication of the final regulations may not include all provisions in the final regulation. To avoid confusion for those seeking the FSPCA certificate, use the official course name when advertising your course: "FSPCA Preventive Controls for Human Food" or "FSPCA Preventive Controls for Animal Food." Avoid use of the acronym "HARPC" in your advertising to differentiate the FSPCA course from those developed before the final regulation was released.
10. **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.
11. **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 has established an appeals policy.