

Here are some helpful “dos and don’ts” when it comes to terms used to advertise your FSPCA Intentional Adulteration Conducting Vulnerability Assessments (IA VA) course.

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 Intentional Adulteration Conducting Vulnerability Assessments (IA VA) 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 IA VA course.”

Referencing “food defense qualified individual” in your advertisement

The term to be used is “Food Defense Qualified Individual.” A Food Defense Qualified Individual is an individual who meets the requirements in 21 CFR 121.4(c)(1) and (2) does or oversees the activities listed in 21 CFR 121.4(c)(3).

There is a separate definition for “qualified individual” in § 121.3 and Lead Instructors should familiarize themselves with the distinction.

Responsibilities of a Food Defense Qualified Individual

The IA rule does not specify a particular method that you must use to conduct your vulnerability assessment. Two potential methods that can be used are the Key Activity Type (KAT) and/or the Three Fundamental Elements methods. If you conduct your vulnerability assessment using the KAT method with no modifications, you should consider completing the FSPCA IA Conducting Vulnerability Assessments Using Key Activity Types course and may not need the training provided in this course. However, if you use any modifications to the KAT method, then this course would provide valuable insights.

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 IA VA Lead Instructor Resource Portal (<https://lms.ifpti.org/>). 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 IA VA curriculum.

Referencing FDA recognition of the FSPCA curriculum

Do not use the phrase “FDA Approved.” The IA courses developed by the Food Safety Preventive Controls Alliance (FSPCA) serve as the “standardized curriculum” that FDA recognizes as adequate; successfully completing this participant course is one way to meet the requirements for a “food defense qualified individual” responsible for conducting a vulnerability assessment. Here is some language you can use about the FSPCA IA VA Course:

The *Mitigation Strategies to Protect Food Against Intentional Adulteration* regulation (referred to as the IA regulation) is intended to protect food from acts of intentional adulteration. The regulation requires that certain activities must be completed by a “food defense qualified individual.” This participant course, developed by FSPCA, is one of the “standardized curriculum” courses recognized by FDA; successfully completing this participant course is one way to meet the requirements for conducting a vulnerability assessment by a “qualified individual.”

Implying the course is required

Do not state that the IA regulation mandates the FSPCA IA VA course. The rule points out there may be other ways to meet the requirements, but successfully completing this participant course is one way to meet the requirements for conducting a vulnerability assessment by a food defense qualified individual.

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.”

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.

Considerations for conducting Virtual Courses

At this time, FSPCA is not considering virtual IA VA courses.

Reporting advertising issues

If you wish to report advertising that does not comply with these recommendations, you may email fspca@iit.edu. 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.