

The Food Safety Preventive Controls Alliance (FSPCA) has the following requirements when it comes to advertising an FSPCA Preventive Controls for Human Food participant 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 Preventive Controls for Human Food participant 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 Human Food participant course."

Referencing certification in your advertisement

FSPCA participant courses are NOT certification courses. Do not use the terms certification course or Preventive Controls Qualified Individual (PCQI) certification. The certificates that are issued by the FSPCA for the participant course are certificates of successful completion. FSPCA does not currently provide or manage certifications.

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 21 *Code of Federal Regulations (CFR)* 117.3. There is a separate definition for "qualified individual" in § 117.3 and Lead Instructors should familiarize themselves with the distinction.

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 for more details.

"Preventive" not "Preventative"

The term used in the rules is "preventive." Do not use "preventative".

Use of the FSPCA[®] logo

A high quality FSPCA[®] is available for your use in advertising your participant course. It can be downloaded by Lead Instructors from the Human Food 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 FSPCA logo is for advertising use. Do not use the FSPCA logo on course slides that you have created and that are not part of the standardized curriculum.

Referencing FDA recognition of the FSPCA curriculum

Do not use the phrase “FDA Approved.” The Preventive Controls participant 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:

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.”

Referencing versions of the course

Version 2.0 of the FSPCA Preventive Controls for Human Food participant course represents a significant update to the curriculum. Therefore, to avoid confusion with participants when advertising a participant course, you must include the version of the participant course you are offering. After a certain date (to be announced), only Version 2.0 may be used by FSPCA Lead Instructors. Here are the official titles of the courses that must be appropriately referenced until that time:

1. FSPCA Preventive Controls for Human Food Participant Course Version 1.2
2. FSPCA Preventive Controls for Human Food Participant Course Version 2.0

Version 2.0 Marketing

With the release of the Version 2.0 curriculum, Lead Instructors are encouraged to promote the new version of the participant course to both new audiences and those who have already completed the earlier versions of the course. An important change in the curriculum was a heightened emphasis on the connection between HACCP and Preventive Controls in order to gain recognition from the Global Food Safety Initiative as a recognized HACCP training. It is important to note that PCQIs who have already completed an earlier version are NOT required to complete Version 2.0 to retain their status as a PCQI. Therefore, it is incorrect to imply that PCQIs “must” complete Version 2.0. It is acceptable, however, to promote the advantages of taking Version 2.0, such as:

This updated version addresses important updates in FDA guidance documents; important knowledge that PCQIs will need to keep their Food Safety Plans up-to-date. In addition to FDA guidance updates, other updates in Version 2.0 include:

- Updated references, e.g., RFR, CDC
- Streamlined sections, reduced redundancy
- Better supports development of key concepts
- Expanded examples to better support application by small and mid-sized producers
- Gain recognition as an approved HACCP-based curriculum

Implying the course is required

Do not state that the Preventive Controls regulations mandate the FSPCA Preventive Controls participant courses. The rule points out there may be other ways to meet the requirements, but successfully completing this course is one way to meet the requirements for a preventive controls qualified individual.

Adding requirements for obtaining a certificate

To successfully complete the participant 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."

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 participant course: "FSPCA Preventive Controls for Human Food". Avoid use of the acronym "HARPC" in your advertising to differentiate the FSPCA course from those developed before the final regulation was released.

Referencing regulator attendance in your participant 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.

Requirements for delivering and registering an FSPCA Preventive Controls Human Food participant course

Use properly descriptive terms for identifying whether your participant course is face to face live instructor-led; virtual (web-based, live) instructor-led; hybrid (a course that includes virtual and in-person participants) instructor-led; or 100% online, self-paced asynchronous course (Lead Instructor is not present). The requirements FSPCA lead Instructors and their administrators must follow to register and deliver an FSPCA Preventive Controls for Human Food participant course are outlined in FSPCA Policy 0017 which is located in the FSPCA Lead Instructor Resource Portal at <https://lms.ifpti.org>. The policy includes criteria for conducting a virtual (web-based, live) course. Criteria for 100% online, self-paced asynchronous courses are outlined in FSPCA Policy 0019.

Reporting advertising issues

If you wish to report advertising that does not comply with these requirements, 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.