

Intentional Adulteration Rule

FDA's final Intentional Adulteration (IA) rule is aimed at preventing intentional adulteration from acts intended to cause wide-scale harm to public health, including acts of terrorism targeting the food supply. Such acts, while not likely to occur, could cause illness, death, and economic disruption of the food supply, absent mitigation strategies. Rather than targeting specific foods or hazards, this rule requires mitigation (risk-reducing) strategies for processes in certain registered food facilities.

Food Safety Preventive Controls Alliance (FSPCA) Intentional Adulteration courses were developed to provide a low-cost training solution to complete the qualified individual requirements found within the Intentional Adulteration rule.

FSPCA IA Conducting Vulnerability Assessments using Key Activity Types

The Food Safety Modernization Act (FSMA) Final Rule on Mitigation Strategies to Protect Food Against Intentional Adulteration (21 CFR Part 121) (IA Rule) regulation is intended to protect food from intentional acts of adulteration where there is an intent to cause wide scale public health harm. The regulation requires covered facilities to conduct a vulnerability assessment (VA) to identify actionable process steps (21 CFR 121.130). The regulation further requires that individuals conducting or overseeing the conduct of a VA "have successfully completed training for the specific function at least equivalent to that received under a standardized curriculum recognized as adequate by FDA or be otherwise qualified through job experience to conduct the activities" (21 CFR 121.4(c)(2)). This training developed by the FSPCA is the "standardized curriculum" recognized by FDA; successfully completing this course is one way to meet this training requirement.

This training course is targeted towards food professionals using FDA's Key Activity Type (KAT) method to conduct their facility's vulnerability assessment (VA). By successfully completing this course, the learner will have satisfied the training requirement to conduct a VA using the KAT method.

Please note that this course satisfies the training requirement to conduct a VA using the KAT method ONLY. Any deviation from the KAT method described in this course will necessitate that the individual take a vulnerability assessment training recognized as adequate by the FDA, or be otherwise qualified through job experience to conduct a VA using another VA methodology.

REMEMBER!

- You have six months to complete the course after you enroll, otherwise your enrollment will expire, and you will need to re-enroll and pay the enrollment fee.
 - You must pass the 10-question final assessment at the end of the course with a score of 80% or higher. If you do not pass after 3 attempts, you will need to contact LMSadmin@ifpti.org, pay the enrollment fee again, and start over.
 - If you click too quickly through the course, the screen may freeze, and you will have to restart the course where you left off.
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- **Delivery Format:** Online course
 - **Estimated Seat Time:** 45-62 minutes. There is a 4-hour inactivity time-out, so once started, complete the entire course.

- **Certificate:** An FSPCA Certificate of Completion is issued at the end of the course. The certificate will remain in your transcripts of the Learning Management System (LMS). If you need a replacement certificate, you will be able to login to the LMS and download the certificate at any time.
- **Cost:** \$169.00 USD per user
- **Recommendation:** If you plan to take the 1-day, in-person FSPCA IA Vulnerability Assessments course (coming soon), while not required, it is **STRONGLY RECOMMENDED** that you complete this FSPCA IA Conducting Vulnerability Assessments using Key Activity Types course before attending the in-person FSPCA IA Vulnerability Assessments course.

Starting the FSPCA IA Conducting Vulnerability Assessments using Key Activity Types Course

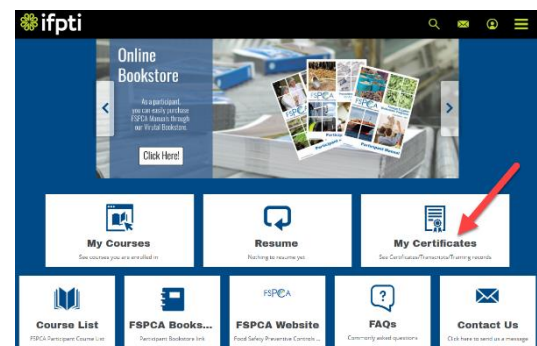
Enrollment in the online course is easy. [Click here to enroll](#)

Once enrolled, you can begin the course immediately. You will also receive an automated enrollment confirmation email.

Printing Certificate(s)

1. [Log in to the LMS](#)
2. Once logged in, click "My Certificates"
3. Select the Certificate of Training by clicking the "Download" button
4. Save the Certificate of Training to your desired location

Please note, the latest Adobe Reader is required to properly print the certificate. If you have technical issues, please follow [this link](#) to a short video showing the printing process.



Minimum Computer Requirements

Browser: Online courses run on the latest versions of all popular internet browsers; however, for best results we recommend Google Chrome. If you are using a PC, your operating system should be at least Windows 7. If you are using a Mac, your operating system should be at least OSX 10.11. Mobile devices are not supported at this time.

FAQ

What are the compatible browsers for this course?

We highly recommend using Google Chrome with popup blocker turned off. The course may not work properly in other browsers.

Why do I get a "This page can't be displayed" message?

Some antivirus programs may be blocking the course from loading. If you receive a "This page can't be displayed" message, you may wish to temporarily disable your antivirus. If you are in a business environment, contact your system administrator to verify your permission and access levels.

FAQ (continued)

Why am I unable to move to the next slide?

Certain circumstances prevent the course from moving to the next section. One way to prevent this is to wait at least 10 seconds before clicking the "Next" button. If you click too quickly through the course, the screen may freeze, and you will have to restart the course where you left off.

Why are portions of the page showing in another language?

The course is given in English only. If another language is appearing, you may change it back to English. Clicking on the globe icon on the bottom left of the page will allow you to change it back to English.

Support

If you need technical assistance completing the course or printing your certificate, please contact our LMS administration team at LMSadmin@ifpti.org or by phone at (269) 488-3258.

If you have a scientific/technical question, contact the [FSPCA Technical Assistance Network](#).

For questions related to the FSMA rules, FSMA programs, and implementation strategies, please submit your questions electronically to FDA's FSMA Technical Assistance Network at:

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm459719.htm>

For additional information on **FSPCA Intentional Adulteration courses**, visit the FSPCA website:

<https://www.ifsh.iit.edu/fspca/courses/intentional-adulteration>

Disclaimer

The information provided by the Food Safety Preventive Controls Alliance (FSPCA) is for training purposes only. The FSPCA is not your attorney and cannot provide you with legal advice. The FSPCA curriculum is intended as a training tool to assist companies in complying with the FDA Food Safety Modernization Act (FSMA) intentional adulteration regulation; however, following this curriculum does not ensure compliance with the law or FDA's regulations. For advice regarding the legal compliance with FSMA, please consult your legal counsel.

The information provided by the FSPCA will vary in applicability to each food manufacturer. It is not possible for the FSPCA training curriculum to address every situation. Companies should implement practices and programs that are appropriate to their individual operations. FSPCA materials do not outline the only approach to developing and implementing a Food Defense Plan. Companies can follow any approach that satisfies the requirements of the applicable statutes and regulations related to FSMA. The information provided by FSPCA does not create binding obligations for the Food and Drug Administration or industry.

FSPCA does not guarantee the accuracy, adequacy, completeness or availability of any information provided in its curriculum and is not responsible for any errors or omissions or for any results obtained from the use of such information. FSPCA gives no express or implied warranties, including but not limited to, any warranties of merchantability or fitness for a particular purpose or use. In no event shall FSPCA be liable for any indirect, special or consequential damages in connection with any use of this training curriculum.