

**ASSOCIATION OF AMERICAN FEED
CONTROL OFFICIALS**

MODEL TRAINING MANUAL

ANIMAL FEED INSPECTOR

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GLOSSARY OF TERMS

Animal Feed Inspector (AFI): is a regulatory employee responsible for conducting animal feed inspections of one or more of the following types of establishments:

- Institutional feed manufacturing;
- Facilities involved in animal feed receiving; and
- Facilities involved in animal feed storage and/or distribution.

Animal Feed Regulatory Program Standards: are a voluntary set of standards developed through the partnership of Association of American Feed Control Officials (AAFCO) and the US Food and Drug Administration to establish a uniform foundation for the design and management of State Programs responsible for the regulation of animal feed. The Program Standards serve as a model foundation and are designed to assist administrators of feed protection programs in their ability to enhance the services they provide to the public.

This *Training Manual* was developed using the *Animal Feed Regulatory Program Standards, Standard 2 – Training* as the basis for required elements. Standard 2 (Training) describes the elements of training for inspectors in a State Program to ensure they will have the knowledge, skills, and abilities to competently inspect feed facilities, conduct investigations, gather evidence, collect samples, and take enforcement actions.

Association of American Feed Control Officials (AAFCO): is a voluntary membership association of local, state, and federal agencies charged by law to regulate the sale and distribution of animal feed and animal drug remedies. Although AAFCO has no regulatory authority, the Association provides a forum for the membership and industry representation to achieve three main goals:

- Safeguarding the health of animals and humans;
- Ensuring consumer protection; and
- Providing a level playing field of orderly commerce for the animal feed industry.

Competency: is the state or quality of being adequately or well qualified; having the ability to perform a specific duty, task or role as measured by comparison against a standard of performance.

Consistent pattern of behavior: is a recurring pattern of action or performance that is recognizable and distinctive. As used in the context of this *Training Manual*, a “consistent pattern of behavior” means:

- The trainee can explain the purpose/objective of a job task and the steps necessary to carry it out effectively;
- The demonstration of a clear understanding of a given task; and

- A collective set of trainer observations which indicate that the trainee can successfully demonstrate the task correctly and repeatedly.

Establishment risk categories: are a defined grouping of types of feed establishments for risk based inspections; Standard 3 of the Animal Feed Regulatory Program Standards requires that regulatory State Programs use a process that groups feed establishments into categories based on potential and inherent feed safety risks. State Programs can use their own system for grouping establishments into categories based on potential feed safety risks.

Inspection Training Area: is a generalized grouping of like or similar competencies combined under a single category. As used in the context of this *Training Manual*, there are four (4) Inspection Training Areas:

- I. Pre-Inspection;
- II. Inspection Observations and Performance;
- III. Oral and Written Communication;
- IV. Sample Collection; and
- V. Additional Inspection Areas (State Program specific).

Trainee: is an individual newly hired or newly assigned to the animal feed protection program. These individuals (regardless of their previous inspection experience) are in the process of learning and successfully demonstrating the tasks identified in the State Program's training plan as essential for conducting effective animal feed inspections.

Trainee-Led Inspections: is a joint field-training inspection that includes both the State Program's designated trainer and the trainee: where the trainee takes the lead, and is responsible for conducting the inspection per the State Program's administrative procedures and policies. The trainee's inspectional approach, communication techniques, and feed safety priorities should reflect those followed as if he/she were conducting an independent inspection.

Trainee-led inspections provide an opportunity for the State Program's trainer to observe the trainee as he/she demonstrates tasks, and to identify those tasks that have yet to be learned or were not properly demonstrated.

Trainer-Led Inspections: is a method of joint field-training used by an experienced trainer or designated staff member to physically illustrate and explain to a trainee the processes and procedures used to conduct an animal feed safety inspection.

Training Plan and Log: is a structured approach for a regulatory feed protection program to identify and document training content, determine training methods, and track an Animal Feed Inspector's progress in demonstrating tasks specific to their job responsibilities and essential for conducting independent animal feed inspections.

An example of a training plan and log is offered as an attachment to this *Training Manual*.

Training Worksheet: is an optional form that can be used by a trainer to record their observations while a trainee is demonstrating the various tasks essential to conducting effective animal feed inspections. The minimum competencies and tasks (specific job-related skills and tasks) an AFI is expected to perform in the work setting are identified in the State Program's Training Plan and included on the *Training Worksheet*.

Qualified Field Inspection Trainer: is an individual who is recognized by the State's Program as having field experience and communication skills necessary to train inspectors/investigators.

DRAFT

I. Introduction

BACKGROUND

The Partnership for Food Protection (PFP) has progressed to develop an Integrated Food Safety System (IFSS). One of the foundational principles of an IFSS is the implementation and uniform application of model standards so that Federal, State, territorial, tribal, and local regulatory agencies conduct inspections under the same set of standards. As members of the PFP, the FDA and Association of American Feed Control Officials (AAFCO) began a partnership to develop the *Animal Feed Regulatory Program Standards* (AFRPS). These standards are designed to promote uniformity and consistency among animal feed regulatory programs.

The AFRPS is composed of eleven standards that serve as an objective framework to evaluate and improve components of a State Program. Each standard is laid out in the following format to ensure uniformity: purpose statement, requirement summary, description of program elements, projected outcomes, and a list of required documentation. Using the AFRPS, Standard 2 – Training, a model multi-tiered approach for training and standardizing Animal Feed Inspectors (AFIs) was developed.

This *Training Manual* focuses on coursework and field training for preparing newly hired AFIs or individuals newly assigned to the regulatory feed protection program to conduct independent animal feed inspections.

The manual consists of a model training policy, training plan, trainer's worksheets, and procedures that may be used by any regulatory feed protection program. State Programs do not have to be enrolled in the *Animal Feed Regulatory Program Standards* to use, and benefit from, this training structure for preparing AFIs to conduct independent animal feed inspections. This manual was developed to assist State Programs that do not have the available staff resources and funding necessary to develop a comprehensive training process. The training model presented in this manual can be readily integrated into existing regulatory feed protection programs. The instructions and worksheets provided in this manual constitute a training process, not a certification or audit process.

With the availability of this document, state, local, and tribal regulatory feed protection programs now have a nationally recognized model upon which to design training programs for AFIs. Moreover, ongoing use of this model will both enhance the effectiveness of regulatory animal feed inspections across the country and increase uniformity among regulatory professionals.

OVERVIEW – TRAINING MANUAL

All new employees or individuals new to the regulatory feed protection program should complete coursework and a field training process like that presented in this document. The FDA and AAFCO have identified the minimum competencies and tasks needed to conduct effective regulatory animal feed inspections. The *Training Plan and Log* along with the *Training Worksheets* provided in this manual are based on these minimum competencies and tasks.

Flexibility has been built into the process to allow regulatory State Programs the opportunity to customize training content and methods to represent a State Program's own administrative policies, procedures, and inspection protocol. As you read through this manual, it is important to keep in mind that State Programs are not obligated to use the forms; equivalent forms or training processes can be developed. The ultimate objective is to ensure AFIs are trained on, and provided an opportunity to successfully demonstrate, the competencies and tasks that are a vital part of their job responsibilities.

II. State Program Model Training Policy

1) Purpose

To ensure the State Program has trained inspectors with the knowledge, skills, and abilities to competently inspect feed facilities, conduct investigations, gather evidence, collect samples, and take appropriate enforcement actions when necessary.

2) Definitions

- a) AFRPS: The Animal Feed Regulatory Program Standards as developed in partnership between FDA and AAFCO.
- b) Contact Hour(s): One contact hour equals 60 minutes.
- c) Joint Field Training Inspections: An inspection conducted jointly by a Qualified Field Inspection Trainer and inspector trainee for the purpose of training and/or enforcement. A joint inspection is used to provide training during an inspection of a firm and may either be trainer led or trainee led.
- d) Program(s): An operational unit(s) in a regulatory agency that is responsible for the regulatory oversight of animal feed.
- e) Qualified Field Inspection Trainer: An individual who is recognized by the state's program as having field experience and communication skills necessary to train inspectors/investigators.
- f) Start Date: Date employee is hired or reassigned in or into the animal feed program and shall act as the beginning date for training timelines.
- g) Inspection Level: The required level of successfully completed training required by an inspector, as determined by the state program and noted in the programs feed inventory system, in order to conduct an inspection of such level, independently.

3) Policy Statement

To ensure animal feed inspectors are adequately trained to perform their work assignments, the state program shall provide, or otherwise make available, inspection training and continuing education for all inspectors. All training assignment's and/or elements shall be identified and delivered to each inspector in the form of a written training plan that includes course curriculum for basic and advanced inspection training and continuing education. Newly hired inspectors shall progress thru all three phases of the ascribed training, and in the following order:

- a) Basic Feed Inspector Training contains both coursework and field training components.
 - i) The program requires a basic inspector to complete both basic coursework and basic field training:
 - (1) Prior to conducting independent basic inspections.
 - (2) Within 24 months of initial start date;
 - ii) Required subject areas for the basic feed inspector coursework shall include those basic subject areas as defined within the cAFRPS Training Standard;
 - iii) Basic field training shall be verified by a qualified field inspection trainer following program procedures for joint field inspector training and shall:
 - (1) Include verification that the trainee has been found competent by demonstrating the skills and tasks of a basic feed inspector in the following areas:
 - (a) Pre-Inspection
 - (b) Inspection Observations and Performance
 - (c) Oral Communication

- (d) Written Communication
 - (e) Professionalism
 - iv) Include at a minimum, 5 joint field inspections at facility types representative of the type of inspections to be conducted by a basic feed inspector as well as representative of the state feed program inventory.
 - b) Advanced Feed Inspector Training contains both coursework and field training components.
 - i) The program requires an advanced inspector to complete both advanced coursework and advanced field training:
 - (1) Prior to conducting independent advanced inspections.
 - (2) Within 60 months of initial start date;
 - ii) Required subject areas for the advanced feed inspector coursework must include those advanced subject areas as defined within the cAFRPS Training Standard;
 - iii) Advanced Field Training shall be verified by a qualified field inspection trainer following program procedures for joint field training inspections and shall:
 - (1) Include verification that the trainee has been found competent by demonstrating the skills and tasks of an advanced feed inspector in the following areas:
 - (a) Pre-Inspection
 - (b) Inspection Observations and Performance
 - (c) Oral Communication
 - (d) Written Communication
 - (e) Professionalism
 - (2) Include at a minimum, 5 joint field inspections at facility types representative of the type of inspections to be conducted by an advanced feed inspector as well as representative of the state feed program inventory.
 - c) Continuing Education (CE) for all inspectors shall begin upon completion of their required basic and advanced curriculum.
 - i) Inspectors must receive a minimum of 20 Contact Hours of CE every 36 months.
 - ii) The inspector may accrue one contact hour for each clock hour of participation in any of the following training sources: in-house training provided by a government agency; distance learning (e.g., satellite downlinks or web-based training); or feed-related courses provided by colleges, schools, associations, and research centers.
 - iii) Of the accumulated 20 contact hours of continuing education, a maximum of 10 contact hours may be accrued from the following activities: attendance at professional seminars, symposiums, or technical conferences and workshops; delivery of presentations at professional conferences; providing classroom or field training to new hires; being a course instructor in feed safety; or publishing an original article in a peer-reviewed professional or trade association journal, periodical, or publication.
- 4) **Documentation Requirements**
- a) The state program shall maintain records documenting the training completed by all inspectors.
 - i) Documentation shall be recorded and maintained in a manner compliant with the cAFRPS Training Standard.

- b) For inspectors with greater than five years of experience at the date of the initial AFRPS self-assessment, where such documentation is not available, the program shall conduct an evaluation of the inspector's previous performance and experience to determine if the inspector has completed the required training or whether additional training is needed.
- c) If relevant coursework was completed prior to the inspector's initial start date, and was subsequently utilized to meet coursework requirements, proper supporting documents shall be maintained to verify successful completion of the requirement.
- d) Documentation must accompany each activity submitted for continuing education credit. Examples of acceptable documentation may include:
 - i) certificates of completion including the course dates(s) and number of hours attended or CE credits granted;
 - ii) transcripts from a college or university;
 - iii) a letter from the administrator of the continuing education program attended;
 - iv) a copy of the peer-reviewed article or presentation made at a professional conference;
 - v) documentation to verify technical publications related to feed safety have been read including completion of self-assessment quizzes that accompany journal articles, written summaries of key points/findings presented in technical publications, and/or written book reports; an agenda and attendance roster;
 - vi) or documentation approved by the qualified field inspection trainer.

History Note: *Effective Date*

III. Coursework

COURSES

AAFCO has worked with the FDA to establish curricula for basic and advanced feed inspection training, each with their own coursework and field training requirements. They were designed to ensure an AFI will have the knowledge, skills, and abilities to competently inspect feed facilities, conduct investigations, gather evidence, collect samples, and take enforcement actions.

The *basic* (v.2017 AFRPS) feed inspection training consists of coursework in the following subject areas:

- Animal and Public Health Principles
- Basic Animal Nutrition
- Basic Feed Ingredients, Processing, and Technology
- Basic National Incident Management System and Incident Command System (ICS) - FEMA
- Communication Skills
- Current Statutes, Regulations, and Policies
- Feed Defense
- Inspections, Compliance, and Enforcement
- Labeling
- Professionalism
- Risk Awareness
- Safety
- Sampling

Two options are available for AFI to fulfill the *basic* coursework:

OPTION 1 – State Program and/or AAFCO Classroom Training/FDA OTED Web-based Training

All basic coursework can be completed by attending classroom training administered by the State Program and/or AAFCO. Only some coursework can be completed via web-based training that is available through FDA OTED at:

<https://www.fda.gov/Training/ForStateLocalTribalRegulators/ucm119016.htm>

Employees of regulatory agencies can obtain free access to these course offerings; access passwords can be obtained online. The time needed to complete the coursework will vary from one trainee to another.

OPTION 2 – Equivalent Coursework OR Recognized Examination

A State Program's trainer, designated manager, or feed administrator can allow credit for coursework that an AFI has completed from sources other than Option 1. A course is deemed equivalent if... [list requirements]

A State Program's trainer, designated manager, or feed administrator may also allow credit for coursework by providing documentation of successfully passing a written examination from one of the following categories:

1. *Association of American Feed Control Officials (AAFCO) examination*
2. *Any additional examination deemed equivalent by State Program's feed administrator*

The **advanced** (v.2017 AFRPS) feed inspection training consists of coursework in the following subject areas:

- Advanced Feed Ingredients, Processing, and Technology
- Advanced Labeling
- Animal Sickness and Death Investigation
- Current Statutes, Regulations, and Policies
- Epidemiology
- Microbiological Pathogens
- Traceback and Traceforward Investigation

Additional specialized coursework may be required in the advanced curriculum for those inspectors that will assist in emergency response or conduct specialized inspections. This coursework contains, but is not limited to, the following subject areas:

- Advanced National Incident Management System and Incident Command Systems (ICS) (Must include at a minimum ICS300 and ICS400)
- *BSE (Bovine Spongiform Encephalopathy) and Ruminant Feeding Ban
- *Medicated Feed Good Manufacturing Practices (GMP) Regulations
- *FSMA cGMP (Food Safety Modernization Act Current Good Manufacturing Practices)
- *FSMA PC (Food Safety Modernization Act Preventive Controls)
- FSPCA (Food Safety Preventive Controls Alliance)

*To conduct this type of FDA contract inspection, specialized coursework must be obtained through FDA's OTED web-based training.

Two options are available for AFIs to fulfill the *advanced* coursework:

OPTION 1 – State Program/AAFCO/FDA* Training

All advanced/specialized coursework can be completed by attending classroom training administered by the State Program and/or AAFCO. Coursework may also be obtained through FDA's OTED web-based training.

OPTION 2 – Equivalent Coursework OR Recognized Examination

A State Program's trainer, designated manager, or feed administrator can allow credit for coursework that an Animal Feed Inspector has completed from sources other than those described above in Option 1. A course is deemed equivalent if... [list requirements]

A State Program's trainer, designated manager, or feed administrator may also allow credit for coursework by providing documentation of successfully passing a written examination from one of the following categories: [list equivalent examinations].

IV. Training Plan and Log

TRAINING PLAN AND LOG

The *Training Plan and Log* (see Attachment A) provides a structured approach for identifying the training content, determining the training methods, documenting coursework training, and tracking the AFI's progress in successfully demonstrating competencies and tasks specific to their job responsibilities.

The *Training Plan and Log* provides areas for documenting:

- Trainee and Trainer information;
- Curriculum level and coursework completion;
- A State Program's method of training for each of the tasks;
- Completion of competencies and/or tasks for each training area;

and optional areas for:

- Maintaining a weekly training log for tracking accomplishments and identifying future training goals; and
- Tracking the number and type of animal feed facilities included as part of the field training inspections.

Association of American Feed Control Officials	
TRAINING PLAN and LOG	
Animal Feed Facilities Animal Feed Inspector	
<p>NOTE: The AAFCO Model Training Manual for Animal Feed Inspectors (AFIs) should be reviewed prior to using the Training Plan and Log. The manual provides State Programs with information that will be helpful in customizing an AFI training plan and implementing a training process that meets the specific needs of the State Program.</p>	
Animal Feed Inspector's (AFI) Name:	Start Date of the Training Process:
Animal Feed Inspector's (AFI) Agency:	Curriculum Level: BASIC: <input type="checkbox"/> ADVANCED: <input type="checkbox"/>
Trainer's Name (if multiple trainers list all):	Trainer's Agency:
1.	
2.	
3.	
4.	
Signatures below indicate AFI has completed all coursework and field training elements and is ready to conduct independent animal feed facility inspections	
Completion Date & Option of Coursework: OPTION 1: <input type="checkbox"/> or OPTION 2: <input type="checkbox"/>	
Completion Date of Field Training - (Competencies & Tasks):	
Animal Feed Inspector's (AFI) Signature:	Trainer's or Feed Administrator's Signature:

DESCRIPTION OF HEADER INFORMATION

Animal Feed Inspector's (AFI) Name – The name of the individual who will receive the training.

Animal Feed Inspector's (AFI) Agency – The name of the animal feed protection program where the AFI receiving training is employed.

Start Date of the Training Process – The date any part of the AFI's training for conducting independent animal feed inspections is initiated; this includes review of the State Program's procedures, rules, manuals; classroom or web-based coursework; joint field training inspections; or other training methods identified in the State Program's training plan.

Curriculum Level – The level of training that the AFI is receiving.

Trainer's Name (if multiple trainers, list all) – The name(s) of the individual(s) delivering or overseeing the training of the AFI.

Trainer's Agency – The name of the animal feed protection program or agency where the trainer is employed.

Completion Date of Coursework – The date the trainee completes **all** coursework identified by the State Program and Association of American Feed Control Officials as essential for conducting independent animal feed inspections. Two options are available for completing the coursework:

OPTION 1 – Box is checked to indicate the AFI has completed the State Program/AAFCO coursework delivered via classroom training and FDA ORA U web-based training, **and** has completed training on the State Program's prevailing statutes, regulations, and/or ordinances.

OR

OPTION 2 – Box is checked to indicate the AFI has submitted documentation of completing coursework equivalent to the State Program, AAFCO, or FDA ORA U coursework/training, **and** has completed training on the State Program's prevailing statutes, regulations, and/or ordinances, **or** has certification or other documentation of successfully passing one of the written examination, such as the [insert equivalent examination].

Completion Date – (Competencies & Tasks) – The date the AFI has successfully demonstrated **all** competencies and tasks identified in the State Program's training plan. At this point, the State Program's trainer and/or feed administrator has determined that the AFI is now ready to conduct independent animal feed inspections of animal feed facilities in the area they have been trained.

Animal Feed Inspector's (AFI) Signature – Signature of the AFI is applied when **all** competencies and tasks have been successfully demonstrated.

Trainer's or Feed Administrator's Signature – Signature of the individual responsible for making the determination that the trainee has completed **all** the training areas and successfully demonstrated **all** the competencies and tasks.

STATE PROGRAM'S TRAINING METHODS

The *Training Plan and Log* is designed to incorporate a variety of training methods appropriate for each of the competencies and tasks. State Programs are free to select the training method most appropriate for their individual situation and needs. A table (see example below) is included in the *Training Plan and Log* to document and summarize the various training methods a State Program may use. Examples of training methods include, but are not limited to, classroom presentations or exercises, laboratory workshops, office demonstrations, and joint field training inspections.

STATE PROGRAM'S TRAINING METHODS	
Code	Training Method
CE	Classroom Exercise
OD	Office Demonstration
LE	Laboratory Exercise
JFT	Joint Field Training Inspection
O	Other (described in Training Plan)

The column with the heading '*Code*' can be used to record an abbreviation that describes the training method. For example, the abbreviation 'LE' in the above table is used to describe 'Laboratory Exercise'. The abbreviation 'JFT' is used to describe 'Joint Field Training Inspections'.

INSPECTION TRAINING AREAS

The *Training Plan and Log* is divided into four (4) inspection training areas:

- I. Pre-Inspection
- II. Inspection Observations and Performance
- III. Oral and Written Communication
- IV. Sample Collection
- V. Additional Inspection Areas (State Programs can add competencies and tasks not contained in the *Training Plan and Log*)

COMPETENCIES

The *Training Plan and Log* contains a total of 23 "competencies" within the four (4) inspection training areas.

I. Pre-Inspection – (2 Competencies)

- Reviews the feed facility's previous inspection report(s) and complaint(s).
- Uses the appropriate equipment and forms needed to conduct inspections.

II. Inspection Observations and Performance – (14 Competencies)

- Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspection; and determine inspection authority.

- Follows the safety protocols required by the feed facility and the State Program.
- Follows the biosecurity protocols required by the feed facility and State Program.
- Establishes interstate jurisdiction for FDA inspections, if applicable.
- Recognizes the relative risk (high to low) of feed facilities based on the State Program's risk-based inspection program and categorization assigned to a facility or product, the manufacturing processes, and the inspection history of the facility.
- Conducts inspection activities focused on those firms, products, and processes determined to be high-risk.
- Assesses employee activities critical to the safe manufacture, distribution, storage, handling, and disposition of feed.
- Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.
- Recognizes significant non-compliant conditions or practices and documents findings consistent with Program procedures.
- Distinguishes between significant and insignificant observations and isolated incidents versus trends.
- Reviews and evaluates the appropriate feed facility records and procedures and verifies that the procedures are being followed.
- Collects adequate evidence to include samples and documentation to support inspection observations in accordance with Program procedures.
- Verifies correction of deficiencies identified during the previous inspection(s).
- Conducts activities in a professional manner.

III. Oral and Written Communication – (6 Competencies)

- Uses effective interviewing techniques.
- Explains findings clearly and adequately throughout the inspection.
- Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.
- Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge.
- Answers questions and provides information as appropriate.
- Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.

IV. Sample Collection – (1 Competency)

- Uses a feed sample collection method consistent with criteria established by laboratory serving State Program to avoid cross-contamination.

V. Additional Competencies – (State Program Specific)

- Other competencies identified by the State Program.

V. Creating Your Training Plan

This section presents five (5) basic steps State Programs should consider when developing a training plan for your regulatory feed protection program:

STEP 1 – Select Appropriate Coursework to be Included in Your Training Plan

STEP 2 – Determine Competencies to be Included in Your Training Plan

STEP 3 – Determine Tasks for Each Selected Competency

STEP 4 – Determine Need for Additional Competencies and Tasks

STEP 5 – Determine Appropriate Training Method for Each Task

STEP 1 – Select Appropriate Coursework to be Included in Your Training Plan

A blank page has been inserted into the manual to act as a placeholder for the Trainer or designated manager to insert the State Program's basic or advanced coursework into the *Training Plan and Log*, based on the Trainee's level of training. The State Program is responsible for determining what subject areas should be covered during basic or advanced feed inspector coursework training. The State Program may reference Section III of the manual for details on the subject areas that basic and advanced feed inspection training coursework might consist of. The manual has also provided areas for documenting completion of the feed inspection training coursework outlined in Section III.

NOTE: State Programs that are enrolled in AFRPS should consult the cAFRPS Training Standard for the appropriate subject areas required to be covered during basic and advanced coursework training.

The graphic below is an illustration of the *Basic Inspector Coursework Training Record* form. The headings appear in the **shaded areas** of the training record.

Inspector Name: _____			Employment START DATE: _____		
A. Basic Feed Inspector Training					
<i>Instructions: If the inspector has greater than five years of experience and an evaluation of the inspector's previous performance and experience shows adequate training has been completed, mark the Name and Location of Training Column, with "Met via Evaluation."</i>					
Subject Areas	Name and Location of Training	Completion Date	Inspector Initials	Supervisor Initials	Documentation Verifying Completion (Y/N)
Animal and Public Health Principles					
Basic Animal Nutrition					
Basic Feed Ingredients, Processing, and Technology					
Basic National Incident Management System and					

An *Advanced Inspector Coursework Training Record* form was also created which is illustrated below in the graphic.

Inspector Name: _____			Employment START DATE: _____		
B. Advanced Feed Inspector Training					
<i>Instructions: If the inspector has greater than five years of experience and an evaluation of the inspector's previous performance and experience has found that no additional training for a subject area is needed, mark the Name and Location of Training Column, with "Met via Evaluation."</i>					
Subject Areas	Name and Location of Training	Completion Date	Inspector Initials	Supervisor Initials	Documentation Verifying Completion (Y/N)
Advanced Feed Ingredients, Processing, and Technology					
Advanced Labeling					
Animal Sickness and Death Investigation					
Current Statutes, Regulations,					

NOTE: The *Training Plan and Log (Attachment A)* should be used for both basic and advanced feed inspector training. The competencies and job tasks that the AFI should demonstrate will remain the same, while the level of inspection and facility type will be more advanced or high-risk.

STEP 2 – Determine Competencies to be Included in Your Training Plan

Competencies appear in the **shaded areas** of the *Training Plan and Log*. The State Program's trainer should review the competencies contained in the *Training Plan and Log* and determine those that are part of the job responsibility of an AFI in their State Program. If a competency is conducted by an AFI, it is to be included in the training plan. An 'X' is to be placed in the box adjacent to each competency included in your State Program's training plan.

I. Pre-Inspection

<input checked="" type="checkbox"/>	1. Reviews the feed facility's previous inspection report(s) and complaint(s).	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected tasks for this competency are to be indicated below)					
	Reviewed the previous inspection report and complaints.				
	Reviewed the response letter to the previous establishment inspection in which corrective actions were promised.				
	ADDITIONAL (State Program specific tasks)				
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

<input checked="" type="checkbox"/>	2. Uses appropriate equipment and forms needed to conduct inspections.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected tasks for this competency are to be indicated below)					
	Had a copy or had electronic access to the pertinent laws and regulations.				

Using the graphic above as an example, an 'X' appears in the box for included competencies within the 'Pre-Inspection' training area. The trainer has determined that both of these competencies are part of the AFI's job responsibility in their State Program.

STEP 3 – Determine Tasks for Each Selected Competency

The *Training Plan and Log* provides a list of job tasks under each competency. These tasks are intended to serve as examples of job related tasks an AFI will be expected to successfully demonstrate during field training inspections.

The State Program's trainer should review tasks listed under the selected competencies and place an 'X' in the box for each of the tasks that are part of the AFI's job responsibility in their State Program.

Some of the tasks listed for a competency may not be applicable to an AFI within a given State Program. In the graphic below, the use of a receipt for sample(s) taken is not part of the standard protocol for inspection staff. The AFI would not, therefore, be responsible for using this type of equipment for feed sample collection(s). If this is the case, the box adjacent to this task is to be left blank as they would not be included in that State Program's training plan.

Tasks that are applicable to the AFI's job should not be arbitrarily removed or deleted from the *Training Worksheet*.

IV. Sample Collection

X	1. Uses a feed sample collection method to avoid cross-contamination consistent with criteria established by the laboratory serving State Program.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
X	Followed safety precautions on the feed label.				
X	Followed the State Program's safety protocol for collecting samples.				
X	Used appropriate sampling equipment for the selected product, as described in the AAFCO Feed Inspector's Manual.				
X	Used appropriate sample containers as specified by the State Program.				
X	Used appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual.				
X	Followed the State Program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).				
X	Followed the State Program's procedure for documenting and maintaining sample integrity, security, and chain of custody.				
	Issued a receipt for sample(s).				
X	Shipped sample to the appropriate laboratory within the timeframe specified by the State Program.				
X	Followed the State Program's procedures for handling, packaging, and shipping samples to maintain sample integrity.				
	ADDITIONAL (State Program specific tasks)				
X	Used infrared thermometer in accordance with manufacturer's instructions.				
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

Conversely, there may be tasks not listed under a competency that are important for a State Program to include in an AFI's training. The *Training Plan and Log* has been designed to accommodate 'Additional' State Program specific tasks. In the example from the previous graphic, the State Program issues infrared thermometers to all AFIs for product assessments during inspections. If this is the case, the AFI will need to successfully demonstrate the use of the infrared thermometer during their training and it is to be included as part of the training plan.

STEP 4 – Determine Need for Additional Competencies and Tasks

The competencies and tasks that comprise the *Training Plan and Log* represent a national model and the overwhelming majority of these apply to every State Program. There will be instances, however, where a State Program may need to add competencies and tasks that are not listed on the *Training Plan and Log*.

Section V – Additional Competencies includes blank templates which a State Program can use to further customize their training plan. Additional competencies are placed in the shaded boxes circled in the graphic below. Any tasks that an AFI will need to successfully demonstrate during the training process for this competency need to be identified and listed in the spaces indicated with the arrows.

V. Additional Competencies – State Program Specific

		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected tasks for this competency are to be indicated below)					
→					
→					
→					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected tasks for this competency are to be indicated below)					
→					
→					
→					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

STEP 5 – Determine Appropriate Training Method for Each Task

Once the AFI's tasks have been identified in the training plan, consideration needs to be given as to how the training will be delivered. Training methods vary from State Program to State Program, and resources available to a State Program (time, money, personnel, etc.) may have a significant impact on determining the type of training that can be provided. Whatever training methods are selected, it is important to ensure that the process will cover all the job tasks AFIs will be expected to successfully demonstrate during animal feed inspections.

Training is most effective when it is delivered within the context or environment in which an individual would be expected to apply the knowledge and skills. For AFIs, the appropriate training environment is one that mirrors the actual experience of inspecting animal feed facilities. When developing the training plan, every effort should be made to provide the AFI with opportunities to demonstrate a task during actual joint field training inspections.

In an ideal training environment, the selection of establishments used for training will provide adequate opportunity to demonstrate all tasks. However, for a variety of reasons, it may not always be possible for the trainee to demonstrate all tasks during joint field training inspections. Should this occur, other training options will need to be considered and implemented.

Some of the competencies that comprise the *Training Plan and Log* include tasks that **frequently occur as part of the inspection process** giving multiple opportunities for the trainer to observe the trainee demonstrating these job tasks during joint field training inspections. These competencies include:

- Reviews the feed facility's previous inspection report(s) and complaint(s);
- Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspection; and determine inspection authority;
- Uses appropriate equipment and forms needed to conduct inspections;
- Conducts activities in a professional manner;
- Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge;
- Answers questions and provides information as appropriate; and
- Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.

Some of the competencies, though they frequently occur during joint field inspections, **will have tasks that the AFI will need to successfully demonstrate throughout the course of the joint field training process.** These competencies represent tasks for which the trainer will observe a trainee's continued development and improvement with each subsequent training inspection. Most of the competencies fall into this category and include:

- Follows the safety protocols required by the feed facility and the State Program;
- Follows the bio-security protocols required by the feed facility and the State Program;
- Recognizes the relative risk (high to low) of feed facilities based on the State Program's risk-based inspection program and categorization assigned to a facility or product, the manufacturing processes, and the inspection history of the facility;
- Conducts inspection activities focused on those firms, products, and processes determined to be high-risk;
- Assesses employee activities critical to the safe manufacture, distribution, storage, handling, and disposition of feed;
- Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded;
- Recognizes significant non-compliant conditions or practices and documents findings consistent with Program procedures;
- Distinguishes between significant and insignificant observations and isolated incidents versus trends;
- Reviews and evaluates the appropriate feed facility records and procedures and verifies that the procedures are being followed;
- Collects adequate evidence and documentation to support inspection observations in accordance with Program procedures;
- Verifies correction of deficiencies identified during the previous inspection(s);
- Uses effective interviewing techniques;

- Explains findings clearly and adequately throughout the inspection; and
- Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.

There are, however, some competencies that are important inspection responsibilities but **may seldom or rarely occur during the AFI field training process**. Due to the variable nature of inspections, the trainee may not be presented with an opportunity to demonstrate these tasks as part of the joint field training process. Although less frequently encountered, these competencies include knowledge and skills integral to enhancing the effectiveness of the inspection process and include:

- Establishes interstate jurisdiction for FDA inspections, if applicable;

Whenever possible, tasks are to be assessed in the field inspection environment. If this is not feasible **laboratory, classroom, or office exercises** may be used to assess competencies difficult to observe in the field. Examples of such training exercises may include:

- Trainee photographing a specific object in the office, field, or laboratory;
- Trainee explaining to the trainer the State Program's policy regarding disclosure of confidential information;
- Trainee explaining to the trainer the State Program's policy regarding conflict resolution (the trainer may develop scenarios for the trainee to review and discuss appropriate conflict resolution techniques); or
- Trainee demonstrating feed sampling in the office, laboratory, or during a designated field training inspection.

The graphic below provides an illustration to document alternative training methods.

III. Oral and Written Communication

X	1. Uses effective interviewing techniques.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
X	Requests for information are unambiguous and resulted in relevant information provided from the firm.	JFT			
X	Avoided using jargon and acronyms, without explanation.	JFT			
X	Was not confrontational.	JFT			
X	Did not ask pointed and directed questions in order to solicit a desired response.	CE And/or JFT			
X	Was a good listener and did not interrupt the facility personnel in their responses.	JFT			
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

X	2. Explains findings clearly and adequately throughout the inspection.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
X	Discussed significant deficiencies as they are observed throughout the inspection with the agent in charge.				

In this example, the types of establishments selected for the joint training process did not present an inspection environment that required the trainee to ask open-ended questions. An opportunity for the trainee to demonstrate these tasks was addressed by incorporating a classroom exercise as an alternative training method.

VI. Planning for Joint Field Training Inspections

STEP 1 – IDENTIFY & ENSURE ACCESS TO SOURCE DOCUMENTS FOR JOINT FIELD TRAINING ORIENTATION

Information that a regulatory State Program should review as part of the Animal Feed Inspector's joint field training orientation includes but is not limited to:

- The State Program's animal feed inspection training plan that identifies the coursework level and specific competencies and tasks an AFI will need to successfully demonstrate during joint field training inspections;
- The State Program's current statutes and regulations governing animal feed under its inspection authority;
- Any written policies or interpretations implemented by the State Program that carry the same weight as their prevailing statutes and regulations;
- The State Program's current animal feed program inspection forms;
- Any marking instructions the State Program may have developed to assist staff with documenting inspection findings;
- The coursework obtained through State Program/AAFCO classroom training and/or posted on FDA's ORA U web site and the web address for obtaining an access password; and
- Additional documents specific to the animal feed program that the State Program has determined are integral to the animal feed inspection training plan.

The inclusion of the above list of source documents is not meant to imply that all material must be reviewed during a single joint field training orientation session. These documents are included here to provide a starting point for a checklist of materials a trainer will likely need to review with the AFI over the first weeks of employment or assignment to the animal feed inspection program.

STEP 2 – REVIEW LIST OF COURSEWORK WITH TRAINEE

The courses listed as the coursework should be reviewed with the Animal Feed Inspector. The trainer, designated manager, or animal feed program administrator is to decide whether a candidate has met any or all the coursework requirements **and** has documentation indicating successful completion. If the AFI needs to complete coursework, the trainer should assist him/her with obtaining an access password to the FDA ORA U web site, or decide as to whether equivalent courses are a more viable option.

Reserving designated blocks of time each week for the AFI to devote to this coursework often facilitates timely completion of the coursework. Keep in mind that the AFI can participate in joint field training inspections while they are in the process of completing the coursework.

STEP 3 – REVIEW TRAINING PLAN WITH TRAINEE

A review of the State Program's Animal Feed Inspector training plan should include a discussion of:

- The level of training, associated coursework with that level of training, and subject areas to be covered during coursework training;
- The competencies, how they were determined, and their impact on conducting effective animal feed inspections;
- The specific tasks that comprise each competency so the trainee has a clear understanding of what job tasks they will be expected to successfully demonstrate during the joint field training process;
- Training methods and approaches that will be offered to facilitate a trainee's demonstration of the tasks;
- How joint field training objectives will be determined and communicated to the trainee;
- How the trainer will observe the trainee perform tasks during joint field training inspections and share feedback on their observations;
- How progress and accomplishments will be documented on the Animal Feed Inspector training plan; and
- The State Program's criteria for determining a trainee's readiness to conduct independent inspections of animal feed facilities.

VII. Conducting Joint Field Training Inspections

Joint field training inspections are a core component for preparing an AFI to perform their job responsibilities independently. There are two types of joint field training inspections: trainer-led and trainee-led.

Field training will initially be comprised of trainer-led inspections. Providing an opportunity for the AFI to observe experienced staff conducting animal feed facility inspections is an essential step in preparing a trainee for taking the lead during joint field training inspections.

Trainee-led inspections provide the opportunity for the State Program's trainer to observe the trainee build their skills and successfully demonstrate competency. Inspections led by a trainee are not part of an examination or audit process. They are intended to be part of a structured training process where learning is still occurring, where trainers are providing feedback, and where correct demonstration of tasks is continually being re-enforced.

A sufficient number of field training inspections led by the trainee are to be conducted to allow the demonstration of all tasks identified in the State Program's animal feed inspector training plan. Upon completion of the joint field training process, the trainee should have successfully demonstrated all tasks in the animal feed inspector training plan and be ready to conduct independent inspections of animal feed facilities.

STEP 1 – SELECTING APPROPRIATE TRAINERS

The administrator of the animal feed program or designated manager has the discretion of deciding who will serve as trainers. In making this decision, available training resources (e.g., personnel, time, funding) and overall program objectives will need to be considered when selecting staff to oversee and conduct the AFI's field training.

A trainee can garner important knowledge and perspective from observing different inspection approaches from experienced staff. During joint field training inspections, it is expected that a trainee will observe experienced staff demonstrate all competencies and tasks that are part of the State Program's animal feed inspector training plan.

STEP 2 – CONDUCTING TRAINER-LED INSPECTIONS

When selecting staff for trainer-led inspections, management should consider experienced staff with a solid command of all the tasks the AFI will be expected to demonstrate in the training process. These experienced staff members will lay the foundation for the trainee's assimilation of the knowledge and skills needed to conduct animal feed facility inspections as they will be initially demonstrating how to correctly perform specific job tasks.

If possible, management should consider pairing the trainee with several different AFIs during trainer-led inspections to allow exposure to different inspection approaches

and techniques. Moreover, these trainer-led inspections should be conducted in a variety of establishments that cover the spectrum of facilities that the AFI will eventually be inspecting on their own.

NOTE: *Some State Programs have suggested conducting some or all the trainer-led inspections in a territory different than where the trainer will eventually oversee animal feed facility inspections. It allows the trainee to gain confidence learning competencies and demonstrating job tasks without the added stress of their territory's feed facility managers observing their training.*

The level of preparedness and time needed to assimilate knowledge from observations made during trainer-led inspections will vary with each trainee. When a determination has been made that the trainee is ready to take the lead during an inspection, it is important to keep in mind that training has not stopped. Trainees will still need trainers to demonstrate tasks and provide feedback. The AAFCO training process is designed to facilitate a continuous improvement learning experience.

STEP 3 – PREPARING FOR INSPECTIONS LED BY THE TRAINEE

Inspections led by the trainee consist of two inter-related but separate activities: one is specific to the role of the State Program's trainer, the other relates to the role and responsibilities of the trainee.

- The **trainer** is responsible for observing the trainee as he/she demonstrates tasks identified in the State Program's animal feed inspector training plan.
- The **trainee** is responsible for conducting the inspection in the presence of the trainer, per the State Program's administrative procedures and policies.

Even though there is a relationship between these activities, it is important to recognize the need to view them separately.

Trainer's Role

During trainee-led inspections, the trainer observes the trainee conducting the inspection and demonstrating the tasks. The trainer participates ***only*** when the inspection process dictates their assistance or intervention.

No single joint field training inspection will provide an opportunity for the trainee to demonstrate all the tasks listed in the animal feed inspector training plan. The trainer should allow the inspection process to unfold as it normally would; in other words, the State Program's animal feed inspector training plan should ***not*** be used as a checklist for structuring the inspection to accommodate observations of a trainee demonstrating tasks. Requesting that a trainee demonstrate a task that is not integral to the inspection that is occurring may be disruptive and create unwanted confusion and stress for the trainee.

As the field training process progresses, the trainer may note that the selection of establishments has not provided the trainee an opportunity to demonstrate some tasks. The trainer can try to remedy this situation by selecting establishments that may provide appropriate environments where the trainee can demonstrate the job tasks. If this is not feasible, the trainer can set up field exercises during inspections led by the

trainee; however, the exercise should be conducted at a time that will not disrupt the flow of the inspection and the trainer should discuss these exercises with the trainee prior to the inspection so expectations are clear.

Trainee's Role

Since the trainee will be taking the lead during these joint field training inspections, their focus should be on observations of animal feed safety practices and procedures within the establishment. During these inspections, the trainee is responsible for:

- Initiating contact with the person in charge;
- Explaining the purpose of the inspection;
- Directing the inspection process;
- Establishing a dialogue with management and employees;
- Making the observations of animal feed safety practices;
- Documenting corrective actions initiated/taken by management in response to specific objectionable conditions observed during the previous and/or current inspection;
- Preparing the inspection report; and
- Facilitating and conducting the exit discussion of the report.

The trainee's inspection approach, communication techniques, and animal feed safety priorities should be reflective of those they would implement if inspecting independently. The inspection should not be structured solely around the demonstration of tasks. The trainee should concentrate on conducting an effective animal feed inspection. Providing an appropriate variety of establishments will help ensure the tasks listed on the State Program's animal feed inspector training plan do not drive the inspection approach.

STEP 4 – SELECTING ESTABLISHMENTS FOR INSPECTIONS LED BY TRAINEE

The ideal establishment for conducting an animal safety inspection led by the trainee is one that will provide an opportunity for the trainee to successfully demonstrate the greatest number of tasks. The majority of these inspections should be completed in establishments that are representative of the highest risk categories within the State Program or the AFI's assigned training area.

State Programs can use their own system for grouping establishments into categories based on potential or inherent animal feed safety risks. The most current *AFRPS* can be also be used as a reference for assigning risk categories.

STEP 5 – DETERMINING THE NUMBER OF INSPECTIONS LED BY TRAINEE

There is no definitive number of inspections led by the trainee that can be used as a standard for all newly hired employees. The number of inspections necessary is one that provides adequate opportunity for all tasks to be demonstrated. Some of the tasks, such as those related to conducting a risk-based inspection, must be continually demonstrated throughout the course of the field training process.

NOTE: *For State Programs enrolled in the FDA Animal Feed Regulatory Program Standards, staff conducting animal feed inspections must conduct a minimum number of joint field inspections, as determined by the State Program, comprised of both trainer-led and trainee-led inspections, and include a variety of establishment types available within the State Program.*

The AAFCO field training process is ***not*** intended to be part of an audit or evaluation process, therefore a ‘scoring system’ has not been included. The primary objective of this process is to ensure that the AFI has received training for all the tasks that are part of the job responsibilities within that State Program. As part of this training, the AFI is to successfully demonstrate their ability to perform each of these tasks. No single inspection or observation should be used by the trainer(s) as the standard of measurement; the State Program’s trainer(s) need to evaluate the trainee’s ability to demonstrate tasks throughout the entire process.

STEP 6 – OBSERVING TRAINEES DEMONSTRATE TASKS

There is no single ‘correct’ method for determining when a trainee has successfully demonstrated a task during joint field training inspections. Throughout the series of training inspections, the trainer will observe the trainee demonstrate many tasks. For some tasks, the trainer will be able to ascertain relatively quickly whether a trainee has demonstrated the job task correctly. For example, once a trainee successfully demonstrates the proper use of inspection equipment, he/she generally will maintain that skill throughout the training process.

Almost all the tasks listed, however, should be demonstrated by the trainee several times. The trainer should observe the trainee successfully demonstrate a consistent pattern of behavior for each task. As defined in this document, a ‘**consistent pattern of behavior**’ means:

- The trainee can explain the purpose/objective of the job task and the steps necessary to carry it out effectively;
- The demonstration of a clear understanding of a given task; and
- A collective set of trainer observations which predominately indicate that the trainee can successfully demonstrate the task correctly and repeatedly.

Trainees will be on a continuous learning curve throughout the training process; inconsistencies in their inspection approach from one facility to another should be expected. Trainers will need to determine whether these inconsistencies are due to a lack of understanding, an inability to successfully demonstrate a task, or simply inexperience.

In some cases, a trainee may be capable of successfully demonstrating a task but fails to do so during an inspection. For example, he/she may not address an important animal feed safety risk with the person in charge. The trainee may understand and can demonstrate the proper approach to assessing an animal feed safety risk within an establishment, but forgets to do so because they may have become distracted by other risk related observations and the need to work with management to obtain corrective

actions. This is an example of a trainee who is still in the process of developing his/her own organized risk-based inspection approach.

It is important for trainers to recognize that during the training process, trainees are not only learning tasks but are also becoming acclimated to their working environment. Trainer's decisions regarding a trainee demonstrating a task should be based on a collective set of observations which predominately indicate the job task is being performed correctly.

When the trainee successfully demonstrates a task, the State Program's trainer or designated staff person documents the completion of the skill on the training plan. Some options and forms for tracking the trainee's progress and accomplishments are presented in Section VII of this document.

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VIII. Documenting Training Progress and Accomplishments

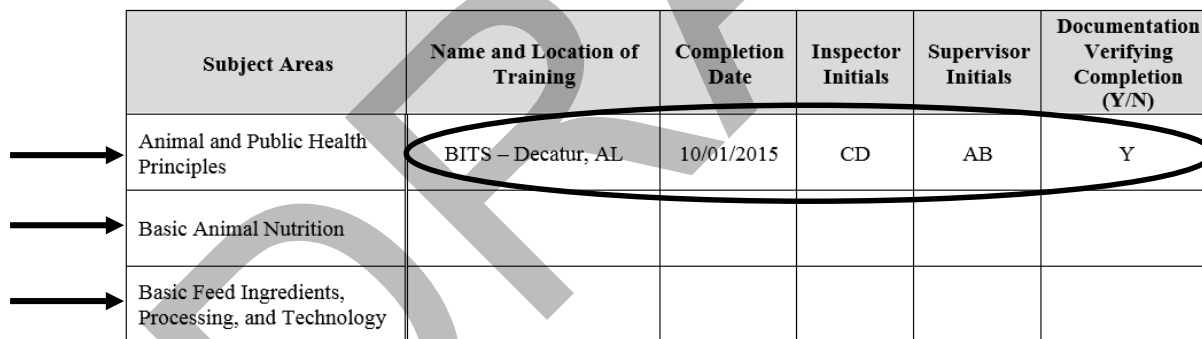
Each animal feed inspection program will need to develop a system to track an AFI's training progress and accomplishments. A State Program can customize the forms provided in this manual or develop their own. Any system for documenting training should provide a method for:

- Identifying the AFI's coursework level;
- Recording completion of AFI's coursework with provided documentation;
- Recording tasks that have been demonstrated by an AFI;
- Determining tasks an AFI has not yet demonstrated;
- Identifying the trainer(s) responsible for observing an AFI demonstrating a task;
- Providing feedback to the AFI on training objectives; and
- Obtaining confirmation from both the AFI and trainer that tasks have been demonstrated correctly.

TRAINING PLAN AND LOG USED AS A SINGLE-SOURCE DOCUMENT

The *Training Plan and Log* (Attachment A) can be used as a single-source document for recording an AFI's training progress and accomplishments.

The example below presents an illustration of how an AFI's coursework can be identified, recorded, and tracked for completion with documentation. Different training record forms were created for basic and advanced coursework subject areas.



Subject Areas	Name and Location of Training	Completion Date	Inspector Initials	Supervisor Initials	Documentation Verifying Completion (Y/N)
Animal and Public Health Principles	BITS – Decatur, AL	10/01/2015	CD	AB	Y
Basic Animal Nutrition					
Basic Feed Ingredients, Processing, and Technology					

The trainer identifies and records the subject areas to be covered during the AFI's coursework training (indicated with the arrows in the graphic). For each of the subject areas, the trainer records the name, location, and date of the AFI's training. The trainee's initials (represented by 'CD' in the graphic), indicates his/her agreement with the completion date recorded (represented as 10/01/2015). The trainer or designated manager's initials or signature confirms that the trainee has successfully completed coursework pertaining to that subject area (represented as 'AB' in the graphic). Documentation verifying completion of coursework should accompany the AFI's coursework training record.

The graphic below provides an illustration of how an AFI's training status can be tracked with documentation entered for the four tasks listed under this competency.

II. Inspection Observations and Performance

	1. Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspection; and determine inspection authority.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
X					
(Training method and selected tasks for this competency are to be indicated below)					
X	Presented credentials to the owner, operator, or agent in charge of the establishment.	JFT	10/23/2015	CD	Arnold Baker
X	Made appropriate introductions, explained the purpose and scope of the inspection, and determined inspection authority.	JFT	10/23/2015	CD	Arnold Baker
X	Entered the firm through the front/main entrance and issued a Notice of Inspection prior to the beginning of the inspection.	JFT	10/05/2015	CD	John Smith
X	Issued a Notice of Inspection to the appropriate person.	JFT	11/05/2015	CD	Arnold Baker
	ADDITIONAL (State Program specific tasks)				
Comments: Trainee did not make appropriate introductions at the beginning of the inspection. Further discussion and demonstration will be provided prior to the next inspection. (John Smith, 10/05/2015)					
Trainee has demonstrated acceptable performance for all tasks listed					
	Date: 11/05/2015	Trainee's Initials: CD	Trainer's Signature: Arnold Baker		

For each of the tasks, the trainer records the date a determination was made that the trainee successfully demonstrated the task. The trainee's initials (represented by 'CD' in the graphic on the previous page), indicate his/her agreement with the date recorded (represented as 10/23/2015). The training officer's name or signature indicates confirmation that the trainee successfully demonstrated the task. When the trainee has demonstrated all the tasks for a competency, the bottom row is completed as indicated with the arrow in the graphic.

Documentation on the *Training Plan and Log* does not have to follow this format exactly. For example, a State Program that has only one trainer may find it redundant to record the trainee's initials and trainer's name for all tasks within each competency. In scenarios like this, a trainer may choose to simply record the date when each task was demonstrated under the 'Date Demonstrated by the Trainee' column. Then, when the trainee has demonstrated all the competencies and tasks, he/she places their initials in the bottom row (indicated with the arrow in the graphic), and the trainer signs confirming completion.

However, if multiple trainers are used, tasks demonstrated by the trainee may be confirmed by different individuals. In a case like this, to ensure open communication between the training staff and the trainee throughout the field training process, it may be important to know which trainer actually observed that the trainee demonstrated a specific task.

A 'comment' section is provided at the bottom of each of the competency tables. This area can be used to describe future training objectives or to provide a method of communicating training observations among multiple trainers. It can also be used to describe changes to the training plan to ensure opportunity to demonstrate a task that may be difficult to observe during field training inspections.

From the example presented on the previous page, the comment section includes the following note:

Trainee did not make appropriate introductions at the beginning of the inspection. Further discussion and demonstration will be provided prior to the next inspection. (John Smith, 10/05/2015)

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OPTIONAL TRAINING LOGS

Two optional training logs are included at the end of the *Training Plan and Log* that can be used to track an AFI's progress and achievements.

- Weekly Planning Log; and
- Joint Field Training Inspections – Establishment Log

A determination on whether to use these optional training logs should be made by the administrator of the animal feed inspection program or designated manager **before** initiating joint field training so their intended use and purpose can be communicated to AFIs in training and staff who will serve as trainers.

Weekly Planning Log

The optional *Weekly Planning Log* provides a method for tracking an AFI's progress and accomplishments from one week to another by noting tasks demonstrated each week. Training objectives for the upcoming week can be established and communicated with the trainee to clarify expectations and assist in focusing on specific tasks. This weekly training log can also be an important means of sharing information in situations where multiple trainers are working with an AFI.

OPTIONAL - WEEKLY PLANNING LOG

Trainee's Name: Connor Davis

Week: 4 Date Ending: 10/30/2015		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Provides name/agency to the agent in charge	Observe use of all inspection equipment (see items noted in additional comments)	Focus on the use of flashlight, probe, probe wipes, respirator. Use of inspection forms
Presents appropriate credentials prior to inspection	Continue to observe communication with operator (focus areas described in additional comments)	Dialogue with manager/employees to understand operation; response to questions asked by management and employees; how exit interview is conducted
States the purpose and scope of the inspection	Continue training on preparing the written inspection report	Focus on correctly writing the observation; citing the correct law, rule, or regulation; completeness of the report
Confirms authorization to conduct inspection with agent in charge before proceeding	Observe process for review of establishment file prior to inspection	Review of past inspection report; follow-up actions noted on report; complaints
Demonstrated use of camera		
Trainee's Initials: CD		Trainer's Signature: Arnold Baker

Week: 5 Date Ending: 11/06/2015

Joint Field Training Inspections – Establishment Log

The optional *Joint Field Training Inspections – Establishment Log* provides a method of tracking the number and type of establishments within which training has been conducted. A 'Risk Category' column provides a quick reference as to the complexity of the animal feed facility's processes that have been included in the AFI's training and assists in determining what types of establishments to include in future joint field training inspections.

OPTIONAL
JOINT FIELD TRAINING INSPECTIONS - ESTABLISHMENT LOG

#	Date	Permit #	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection
1	9/29/15	07896	Dig These Dogs	6437 Oak Street, Marion, OH	1	X	
2	9/29/15	07912	Try R Feed	1919 Park Place, Monopoly, OH	1	X	
3	9/30/15	07485	Happy Paws	2100 3 rd Street, Marty, OH	2	X	
4	9/30/15	07020	Tractor Plus	739 Rick Street, Roll, OH	1	X	
5	10/01/15	08923	No Place Like Home	881 S. Prairie Lane, Marty, OH	2	X	
6	10/01/15	08237	Chicken Kitchen	23 N. Main Street, Marty, OH	1	X	
7	10/02/15	07654	Happy Hooves	34 Tender Care Road, Marty, OH	2	X	
8	10/02/15	07345	Claws in the City	421 W. Desert Avenue, Marty, OH	2	X	
9	10/05/15	08787	Zesty Delights	971 Center Lane, Marion, OH	2	X	
10	10/05/15	07001	Desert Pets	699 Desert Avenue, Marty, OH	1		X
11	10/05/15	07492	Tasty Treats	567 Illinois Avenue, Monopoly, OH	1		X
12	10/06/15	07113	Columbus Feed Mill	23 Pizza Place, Marion, OH	2		X
13	10/06/15	07222	Farm & Feed Supply	1 Elm Street, Monopoly, OH	1		X
14	10/05/15	07555	Sweet Tweets	7 Ocean Drive, Ocean Park, OH	1		X
15	10/12/15	07639	Livestock Milling Co.	538 Broadway Blvd, Ocean Park, OH	1		X
16	10/15/15	07777	Midwestern States	679 W. Olive Avenue, Marion, OH	2		X
17	10/23/15	07184	Hungry Horses	972 E. West Street, Ocean Park, OH	2		X
18	10/23/15	07014	Pets Unleashed	871 W. Mushroom Blvd, Marty, OH	2		X
19	10/24/15	07296	Twin Peaks Feed	43 N. Madison Street, Monopoly, OH	1		X
20	10/24/15	07666	Shamrock Feed Mill	3030 Big Bucks Lane, Monopoly, OH	2		X

In addition, the establishment log provides a quick method for distinguishing trainer-led inspections from those which were trainee-led. An "X" is placed in the appropriate column to denote the type of joint field training inspection conducted. In the above graphic, the first 9 inspections were trainer-led, and the trainee first took the lead during joint field training inspections when establishment #10 was visited.

SUPPLEMENTAL FIELD TRAINING WORKSHEET FOR TRAINERS

Some State Programs who field tested the AAFCO training process requested optional *Training Worksheets* that trainers could use during trainee-led inspections to record observations that will aid in determining when a task has been consistently demonstrated. The *Training Worksheet* also provides a means for identifying tasks that the trainee has not had the opportunity to successfully demonstrate.

Two versions of a worksheet have been developed:

- Training Worksheet: a distilled version of the *Training Plan and Log*.
- Abbreviated Training Worksheet: listing only the competencies.

Either version can be used in conjunction with the *Training Plan and Log* to track an AFI's progress and accomplishments. The administrator of the animal feed inspection program or designated manager has the discretion of determining whether to use a *Training Worksheet* as part of their training process.

Training Worksheet

The *Training Worksheet*, included as Attachment B, is a distilled version of the *Training Plan and Log*.

Association of American Feed Control Officials TRAINING WORKSHEET <i>(Competencies and Tasks)</i> Animal Feed Facilities Animal Feed Inspector				
<p>NOTE: The Training Manual for Animal Feed Inspectors (AFIs) should be reviewed prior to using the Training Worksheet. The manual provides State Programs with information that will be helpful in customizing the Field Training Worksheet and implementing a training process that meets the specific needs of the State Program.</p>				
Establishment Name: Animal Feed Inspector's (AFI) Name: Trainer's Name: Date of Inspection led by Trainee:	Establishment Address: Animal Feed Inspector's (AFI) Agency: Trainer's Agency: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Time IN:</td> <td style="width: 50%;">Time OUT:</td> </tr> </table>		Time IN:	Time OUT:
Time IN:	Time OUT:			
<p>The Association of American Feed Control Officials (AAFCO) has identified the basic minimum tasks needed to perform effective regulatory animal feed inspections. The Training Worksheet has been designed as a trainer's tool to be used in conjunction with the Training Plan and Log. It provides a method for tracking an AFI's progress and accomplishments in successfully demonstrating competencies and tasks during field training inspections.</p>				

For each of the tasks included in the State Program's *Training Worksheet*, the trainer:

- Determines whether or not there was an opportunity to demonstrate a task; and

- Determines when an AFI consistently demonstrates a task correctly.

X	1. Uses effective interviewing techniques.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
X	Requests for information are unambiguous and resulted in relevant information provided from the firm.		X		
X	Avoided using jargon and acronyms, without explanation.	X		X	
X	Was not confrontational.	X		X	
X	Did not ask pointed and directed questions to solicit a desired response.	X			X
X	Was a good listener and did not interrupt the facility personnel in their responses.	X		X	
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments: Reviewed techniques with the AFI for asking open ended questions when checking feed employees understanding of information presented during the inspection. Discussed the importance of asking open ended questions regarding a procedure when it appears that management or feed employees may not clearly understand it. I will continue to work with the AFI on this task during the field training inspections scheduled for next week. (Arnold Baker)					

The *Training Worksheet* contains two major columns for recording observations:

- *Opportunity occurred for AFI to demonstrate task during joint field training inspection.*

YES – An “X” is placed in this box if the trainee had an opportunity to successfully demonstrate the listed task during the inspection. In the graphic above, the trainee had opportunity to demonstrate tasks pertaining to ‘avoiding the use of acronyms/jargon’ and ‘checking the person in charge’s understanding of information.’

NO – An “X” is placed in this box if the inspection environment did not require or present an opportunity for the trainee to successfully demonstrate the task. Using the graphic above, an opportunity did not occur during the joint field training for the trainee to demonstrate ‘the use of interpreters/drawings/demonstrations, etc., to overcome language or communication barriers.’ If this pattern continues throughout the joint field training inspections an alternative training method may need to be considered.

- *Task demonstrated during joint field training inspections.*

YES – An “X” is placed in this box if the trainee successfully demonstrates the task during the inspection. When possible, a trainer should observe a

trainee demonstrating a task several times. In the graphic displayed on the previous page, the trainer has indicated that the trainee has successfully demonstrated the ability to avoid acronyms/jargon when providing explanations to feed facility employees during inspections.

NO – An “X” is placed in this box if the trainee has an opportunity to demonstrate a task during the inspection but does not do so correctly or does not act correctly on the inspectional situation. It is important to emphasize that a ‘NO’ determination for the task does *not in any way* denote or indicate that the trainee has failed. It is simply part of the continuous learning process and is intended to identify areas where additional training is needed. When a ‘NO’ determination is made regarding a specific task, the trainer should take immediate steps to review or demonstrate the correct procedure or protocol with the trainee. In the graphic on the previous page, the trainer has indicated that the trainee needs additional training related to communication techniques for determining the person in charge’s level of understanding for the information presented during the inspection.

Comments – The trainer can provide detailed descriptions of observations made during joint training inspections in the ‘comments’ section at the bottom of each competency table, as well as additional training provided and future training objectives. In the example used for this discussion, the trainer has provided the following statements in the comment section:

Reviewed techniques with the AFI for asking open ended questions when checking feed employees understanding of information presented during the inspection. Discussed the importance of asking open ended questions regarding a procedure when it appears that management or feed employees may not clearly understand it. I will continue to work with the AFI on this task during the field training inspections scheduled for next week. (Arnold Baker)

The *Training Worksheet* is a method for trainers to organize and record their notes from observations made of the trainee demonstrating tasks during training inspections.

As indicated in the graphic at the top of the next page, information from the *Training Worksheet* can be transferred to the *Training Plan and Log* when a trainee has demonstrated a task.

II. Inspection Observations and Performance

X	1. Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspection; and determine inspection authority.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
X	Presented credentials to the owner, operator, or agent in charge of the establishment.	JFT	10/23/2015	CD	Arnold Baker
X	Made appropriate introductions, explained the purpose and scope of the inspection, and determined inspection authority.	JFT	10/23/2015	CD	Arnold Baker
X	Entered the firm through the front/main entrance and issued a Notice of Inspection prior to the beginning of the inspection.	JFT	10/05/2015	CD	John Smith
X	Issued a Notice of Inspection to the appropriate person.	JFT	11/05/2015	CD	Arnold Baker
ADDITIONAL (State Program specific tasks)					
Comments: Trainee did not make appropriate introductions at the beginning of the inspection. Further discussion and demonstration will be provided prior to the next inspection. (John Smith, 10/05/2015)					
Trainee has demonstrated acceptable performance for all tasks listed					
Date: 11/05/2015		Trainee's Initials: CD		Trainer's Signature: Arnold Baker	

In this example, the trainee has demonstrated all 4 tasks during 'Joint Field Training Inspections – JFT'. The trainers, 'Arnold Baker' and 'John Smith' have recorded the dates the trainee demonstrated each of the tasks in the *Training Plan and Log*.

Abbreviated Training Worksheet

The *Abbreviated Training Worksheet*, included as Attachment C, lists only the competencies and is an even shorter version of the worksheet just discussed.

The use of this worksheet is intended for experienced trainers with a strong working knowledge of the tasks that AFIs are expected to successfully demonstrate during joint field training inspections.

Association of American Feed Control Officials ABBREVIATED - TRAINING WORKSHEET <div style="display: flex; align-items: center; justify-content: center;"> <div style="width: 20px; height: 10px; background: black; margin-right: 5px;"></div> <div style="text-align: left;"> (Competencies Only) Animal Feed Facilities Animal Feed Inspector </div> </div>			
Establishment Name:		Establishment Address:	
Animal Feed Inspector's (AFI) Name:		Animal Feed Inspector's (AFI) Agency:	
Trainer's Name:		Trainer's Agency:	
Date of Inspection led by the Trainee:		Time IN:	Time OUT:
<u>I. Pre-Inspection</u> COMPETENCIES		Opportunity occurred for AFI to demonstrate competency during joint field training inspection	Competency demonstrated during joint field training inspection
		YES	NO
1. Reviews the feed facility's previous inspection report(s) and complaint(s).			

As an example, the abbreviated worksheet segment that lists the competencies pertaining to oral and written communication is displayed in the graphic below. All six (6) of the competencies for the 'Oral and Written Communication' inspection area is included. None of the job tasks, however, are listed for these competencies. The two-column format and comment section for documenting training observations is the same as for the longer *Training Worksheet*.

III. Oral and Written Communication COMPETENCIES		Opportunity occurred for AFI to demonstrate competency during joint field training inspection		Competency demonstrated during joint field training inspection	
		YES	NO	YES	NO
X	1. Uses effective interviewing techniques.	X		X	
X	2. Explains findings clearly and adequately throughout the inspection.	X		X	
X	3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.		X		
X	4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge.	X			X
X	5. Answers questions and provides information as appropriate.	X		X	
X	6. Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.	X		X	
	ADDITIONAL (State Program Specific Competencies)				
Comments: Reviewed techniques with the AFI for asking open ended questions when checking feed employees understanding of information presented during the inspection. Discussed the importance of asking open ended questions regarding a procedure when it appears that management or feed employees may not clearly understand it. I will continue to work with the AFI on this task during the field training inspections scheduled for next week. (Arnold Baker)					

A reference list of job tasks for each competency is provided at the end of the *Abbreviated Training Worksheet* for trainers to use during trainee-led inspections. The graphic that appears at the top of the next page displays tasks for some of the oral and written communication competencies used as examples throughout this discussion.

INSPECTION AREAS

III. Oral and Written Communication

1. Uses effective interviewing techniques.

- Requests for information are unambiguous and resulted in relevant information provided from the firm.
- Avoided using jargon and acronyms, without explanation.
- Was not confrontational.
- Did not ask pointed and directed questions in order to solicit a desired response.
- Was a good listener and did not interrupt the facility personnel in their responses.

2. Explains findings clearly and adequately throughout the inspection.

- Discussed significant deficiencies as they are observed throughout inspection with the agent in charge.
- Discussed deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the firm.
- At the conclusion of the inspection, all significant deficiencies observed during the inspection were discussed.

3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.

- Notified the firm manager when direct contamination of product or ingredients is witnessed.
- Notified the appropriate and most responsible person in the feed facility when an immediate corrective action is necessary.

4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provide a copy to the firm's owner, operator, or agent in charge.

- Listed significant inspectional observations.
- Provided further explanations with inspectional observations.

It is important to keep in mind that using either of the worksheets is a determination to be made by the regulatory State Program's management. These documents have been included with this manual to support a State Program's effort to ensure an AFI has received training and demonstrated all tasks needed to conduct effective independent animal feed facility inspections.

USING A SUPPLEMENTAL TRAINING WORKSHEET

In determining how to integrate a supplemental *Training Worksheet* into the training process, two approaches are generally considered:

- Using a worksheet during every trainee-led inspection; or
- Using a worksheet at set interval points during the trainee-led field training process.

These two approaches are only examples and are not intended to restrict the use of other formats by a State Program. The following summary of strengths and challenges for each approach provides some guidance to animal feed inspection programs on ways to integrate a *Training Worksheet* into their training process.

Approach #1: During every inspection led by a trainee

Strengths: This approach provides continual feedback to the trainee on the tasks they have demonstrated and those for which more focused training is still needed. In the initial stages of the training process, the *Training Worksheet* can be a valuable tool in determining whether more trainer-led inspections need to be performed.

In later stages, the worksheet will help focus training on tasks the trainee is having difficulty with.

In addition, using the *Training Worksheet* with every inspection will provide important feedback on the State Program's training and orientation program. The *Training Worksheet* can assist trainers with identifying potential gaps in the orientation/training program, coursework requirements, or administrative materials used to prepare staff to take the lead during joint field training inspections.

Challenges: Using the *Training Worksheet* during every inspection may cause trainers to focus too much on completing the form rather than on the training of the AFI. The *Training Worksheet* is simply a tool to assist the trainer to track tasks as demonstrated during inspections led by a trainee.

Competing program priorities and limited resources may impede a State Program's ability to use a *Training Worksheet* during every trainee-led inspection. State Programs will need to balance the need to track the training process and communicate results effectively with the time commitment associated with completing forms used to support the training process.

Approach #2: At set interval points.

Strengths: A trainer may choose to use the *Training Worksheet* at set interval points during trainee-led inspections. For example, a *Training Worksheet* could be completed after every fifth inspection (i.e., inspections 5, 10, 15, 20 and 25). This process provides set checkpoints for determining when training observations indicate the trainee has successfully demonstrated a task.

The trainer can set achievable objectives for the trainee using this interval process, working on a few tasks at a time. Trainee-led inspections conducted between each use of the *Training Worksheet* can enhance a trainee's knowledge and skills for tasks or provide additional training when needed.

Challenges: The interval process requires trainers to work from notes or inspection reports to determine tasks that have been observed and/or demonstrated over a period of time. The primary objective during trainee-led inspections is for the trainer to observe a consistent pattern of behavior in the trainee's ability to successfully demonstrate a task. Depending on the frequency a task is observed, an interval approach could reveal fluctuations in a trainee's ability to demonstrate a job task. The interval process may not provide as structured a method for providing continuous feedback to the trainee as that provided if the *Training Worksheet* is

used during every trainee-led inspection.

The ‘Joint Field Training Inspection – Establishment Log’ can be a valuable tool for documenting the use of the *Training Worksheet* when using the interval approach. The establishment log provides a means to note the point in time when the worksheet was completed, and the time frame covered during the training period. In the illustration below, the trainer completed a *Training Worksheet* after the inspection of Establishment #15 and Establishment #20.

OPTIONAL
JOINT FIELD TRAINING INSPECTIONS - ESTABLISHMENT LOG

#	Date	Permit #	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection	Training Worksheet Completed	
								Yes	Training Period
1	9/29/15	07896	Dig These Dogs	6437 Oak Street, Marion, OH	1	X			
2	9/29/15	07912	Try R Feed	1919 Park Place, Monopoly, OH	1	X			
3	9/30/15	07485	Happy Paws	2100 3 rd Street, Marty, OH	2	X			
4	9/30/15	07020	Tractor Plus	739 Rick Street, Roll, OH	1	X			
5	10/01/15	08923	No Place Like Home	881 S. Prairie Lane, Marty, OH	2	X			
6	10/01/15	08237	Chicken Kitchen	23 N. Main Street, Marty, OH	1	X			
7	10/02/15	07654	Happy Hooves	34 Tender Care Road, Marty, OH	2	X			
8	10/02/15	07345	Claws in the City	421 W. Desert Avenue, Marty, OH	2	X			
9	10/05/15	08787	Zesty Delights	971 Center Lane, Marion, OH	2	X			
10	10/05/15	07001	Desert Pets	699 Desert Avenue, Marty, OH	1		X		
11	10/05/15	07492	Tasty Treats	567 Illinois Avenue, Monopoly, OH	1		X		
12	10/06/15	07113	Columbus Feed Mill	23 Pizza Place, Marion, OH	2		X		
13	10/06/15	07222	Farm & Feed Supply	1 Elm Street, Monopoly, OH	1		X		
14	10/05/15	07555	Sweet Tweets	7 Ocean Drive, Ocean Park, OH	1		X		
15	10/12/15	07639	Livestock Milling Co.	538 Broadway Blvd, Ocean Park, OH	1		X	X	10/05 – 10/12, 2015
16	10/15/15	07777	Midwestern States	679 W. Olive Avenue, Marion, OH	2		X		
17	10/23/15	07184	Hungry Horses	972 E. West Street, Ocean Park, OH	2		X		
18	10/23/15	07014	Pets Unleashed	871 W. Mushroom Blvd, Marty, OH	2		X		
19	10/24/15	07296	Twin Peaks Feed	43 N. Madison Street, Monopoly, OH	1		X		
20	10/24/15	07666	Shamrock Feed Mill	3030 Big Bucks Lane, Monopoly, OH	2		X	X	10/05 – 10/24, 2015

In the above example, the trainee-led inspections began with Establishment #10. The first *Training Worksheet* was completed after Establishment #15 and contains a collective set of observations of the trainee demonstrating tasks for Establishments 10 through 15, encompassing the period, October 5 through 12, 2015.

In this example, the State Program’s training staff completes a *Training Worksheet* using 5 establishment inspection intervals. The second *Training Worksheet* was completed after Establishment #20 and the trainer’s observations again represented observations over a cumulative period of time. The notes from one *Training Worksheet* build on observations made on previous documents. The observations on the second *Training Worksheet*, therefore, represents the period when the trainee began taking the lead during the training process on October 5, 2015 until the date the second *Training Worksheet* was completed on October 24, 2015.

The *Training Worksheet* is ***not*** intended to be used as a checklist during inspections nor should it drive the inspection approach used by the trainee. Continuous instruction is encouraged during each of the inspections led by a trainee. Trainers should take the opportunity to demonstrate and/or review correct procedures and skills for tasks that are not understood or properly performed by the trainee during each inspection.

REVIEWING FIELD TRAINING

Consistent and on-going feedback regarding inspection tasks is the cornerstone of the AFI field training process presented in this manual. The trainer should share his/her observations with the trainee during each of the inspections. Discussions should include tasks successfully demonstrated by the trainee as well as those where additional training is needed. Trainers should provide continuous positive reinforcement for tasks correctly demonstrated by the trainee.

For areas where additional training is needed, the trainer should demonstrate to the trainee the task during joint inspections and determine if other training methods may benefit the trainee's understanding and application of the task. Field training objectives should continually be reviewed with the trainee and updated as needed.

Equally as important, the field training process provides critical feedback to managers and trainers on the effectiveness of their animal feed training and orientation programs. Tasks (job tasks) that are not consistently performed well by trainees may be an indication that the regulatory State Program has significant gaps in their training program, coursework, or materials used to prepare staff for field inspections. Field training, where observations are made of a trainee demonstrating specific tasks, provides a framework for evaluating and enhancing the effectiveness of a State Program's existing animal feed training programs.

DOCUMENTATION OF COMPLETION

The trainer's and trainee's signature in the header of the *Training Plan and Log* indicates they both concur that all coursework has been completed and tasks listed on the State Program's training plan have been demonstrated.

Association of American Feed Control Officials

TRAINING PLAN and LOG

Animal Feed Facilities

Animal Feed Inspector

NOTE: The AAFCO Model Training Manual for Animal Feed Inspectors (AFIs) should be reviewed prior to using the Training Plan and Log. The manual provides State Programs with information that will be helpful in customizing an AFI training plan and implementing a training process that meets the specific needs of the State Program.

Animal Feed Inspector's (AFI) Name:		Start Date of the Training Process:	
Animal Feed Inspector's (AFI) Agency:		Curriculum Level: BASIC: <input type="checkbox"/> ADVANCED: <input type="checkbox"/>	
Trainer's Name (if multiple trainers list all):		Trainer's Agency:	
1.			
2.			
3.			
4.			
Signatures below indicate AFI has completed all coursework and field training elements and is ready to conduct independent animal feed facility inspections			
Completion Date & Option of Coursework: OPTION 1: <input type="checkbox"/> or OPTION 2: <input type="checkbox"/>			
Completion Date of Field Training - (Competencies & Tasks):			
Animal Feed Inspector's (AFI) Signature:		Trainer's or Feed Administrator's Signature:	

When an AFI has completed all the coursework and demonstrated all the tasks identified in the State Program's field training plan, the animal feed inspection program manager has a basis for determining the AFI's readiness to conduct independent animal feed inspections. The completed and signed *Training Plan and Log* should be placed in the AFI's training file and a copy of the completed document given to the AFI for their records.

IX. Continuous Training

The coursework, training plan, and joint field training inspection process presented in this manual are based on the minimum performance job tasks an AFI should be able to successfully demonstrate *prior* to conducting independent animal feed inspections. This process should be considered but a first step in the development of inspection staff in an animal feed program. Additional training opportunities ~~and standardization~~ should be provided on a continual basis to advance the development of an AFI's ability to implement a risk-based inspection approach and communicate feed safety principles to the regulated industry and the public.

Continuing Education (CE)

Upon completion of the required curriculum, each inspection will be required to receive 20 contact hours of continuing education every 36 months. An AFI may accrue one contact hour for each clock hour of participation in any of the following training sources: in-house training provided by a government agency; distance learning, for example, satellite downlinks or web-based training, or feed-related courses provided by colleges, schools, associations, and research centers.

NOTE: Of the accumulated 20 contact hours of CE, a maximum of ten (10) contacts hours may be accrued from the following activities: attendance at professional seminars, symposiums, or technical conferences and workshops; delivery of presentations at professional conferences; providing classroom or field training to new hires; being a course instructor in feed safety; or publishing an original article in a peer-reviewed professional or trade association journal, periodical, or publication.

The *Continuing Education Record (Attachment E)* provides an example for tracking continuing education activities. Documentation must accompany each activity submitted for continuing education credit and follow the examples as established in the cAFRPS Training Standard.

Additional Training

The State Program should also provide an opportunity for AFIs to attend a *Basic Inspector Training Seminar* and/or *Advanced Inspector Training Seminar*. These seminars address feed program inspection areas in which an AFI should receive training and provides an opportunity to demonstrate inspection techniques and procedures.

FIELD TRAINING

Field training has been designed to complement the coursework for both basic and advanced field inspection training. AFIs are required to participate in joint field training inspections that represent the feed facilities in the State Program's inventory and the type of routine or basic work that will be performed by the inspector. The trainer will determine the minimum number of required joint field training inspections for each type of feed facility and inspection type (e.g. BSE, VFD, FSMA/cGMP, non-licensed medicated, or medicated) to fulfill that State Program's requirements for field training. A checklist of tasks to be mastered and verified during the joint field training inspections must be used to document the minimum number of inspections as determined by the State Program's trainer, designated manager, or feed administrator. Basic or advanced field training and coursework must be successfully completed within 24 or 60 months, respectively, from the start date.

CONTRACT INSPECTIONS

Some feed facility inspections are contracted through the FDA. Contract inspections are conducted by State inspectors who have completed the required training courses and any additional training courses listed in the related contract. These contract inspections are used to determine if animal feed establishments are in compliance with 21 CFR 225, the Federal FD&C Act, State feed law, or both; Veterinary Feed Directive (VFD) regulations in 21 CFR 558.6; BSE Rule (21 CFR 589.2000 and 21 CFR 589.2001); and **21 CFR 507 as it relates to cGMP provisions (subpart B and applicable parts of subparts A and F)**. Not all states participate in contract inspections. Advanced coursework and field training must be successfully completed by the Animal Feed Inspector prior to performing a contract inspection alone.

Some contract inspections require that the animal feed facility has a license. This depends on if the feed facility is manufacturing animal feeds containing medications. All animal drugs are classified into two categories, depending on the withdrawal time required and the cancer-causing potential of the drug. These animal drugs are further classified into one of three types (A, B, or C) based on the concentration of the drug in the animal feed product. Some types of animal drugs require licensure and registration to manufacture those types of medicated animal feeds. Most of these animal feed facilities will need to operate under cGMPs (Current Good Manufacturing Practices).

Veterinary Feed Directives (VFD) are medicated feeds that an appropriately licensed veterinarian has approved for treatment of food animals. The veterinarian issuing the VFD must be licensed to practice veterinary medicine and operate in compliance with appropriate State defined veterinarian-client-patient relationship (VCPR) requirements or Federally defined VCPR requirements where no applicable and appropriate State VCPR requirements exist.

Association of American Feed Control Officials
TRAINING PLAN and LOG
Animal Feed Facilities
Animal Feed Inspector

NOTE: The AAFCO Field Training Manual for Animal Feed Inspectors (AFIs) should be reviewed prior to using the Training Plan and Log. The manual provides State Programs with information that will be helpful in customizing an AFI training plan and implementing a training process that meets the specific needs of the State Program.

Animal Feed Inspector's (AFI) Name:		Start Date of the Training Process:	
Animal Feed Inspector's (AFI) Agency:		Curriculum Level: BASIC: <input type="checkbox"/> ADVANCED: <input type="checkbox"/>	
Trainer's Name (if multiple trainers list all):		Trainer's Agency:	
1.			
2.			
3.			
4.			
Signatures below indicate AFI has completed all coursework and field training elements and is ready to conduct independent animal feed facility inspections			
Completion Date & Option of Coursework: <div style="text-align: center;">OPTION 1: <input type="checkbox"/> or OPTION 2: <input type="checkbox"/></div>			
Completion Date of Field Training - (Competencies & Tasks):			
Animal Feed Inspector's (AFI) Signature:		Trainer's or Feed Administrator's Signature:	

The AAFCO Model Training Manual for Animal Feed Inspectors includes two components. One includes completion of coursework outlined in the cAFRPS Training Standard. The second component focuses on the AFI's ability to demonstrate competencies and tasks that are needed to conduct effective regulatory animal feed inspections outlined in the cAFRPS Inspection Program Standard. An AFI should successfully complete both components **prior** to conducting independent inspections.

COURSEWORK

The AAFCO Training Manual outlines the courses included and provides options for completing this component of the AAFCO training process. A State Program can begin the field training process with AFIs while they are still in the process of completing their coursework. The State Program's trainers and/or feed program managers are given the discretion to determine the appropriate time frame within which AFIs are to complete coursework during the field training process.

TRAINING METHODS

The Training Plan and Log is designed to incorporate a variety of training methods appropriate for each of the competencies and tasks. A sufficient number of field training inspections should be conducted to provide an opportunity for the AFI to successfully demonstrate the applicable competencies. The State Program's trainer can use the table below to identify the training methods that will be used.

STATE PROGRAM'S TRAINING METHODS	
Code	Training Method

INSPECTION TRAINING AREA FIELD COMPETENCIES

The AAFCO Training Plan and Log is divided into four (4) inspection training areas:

I. Pre-Inspection

1. Reviews the feed facility's previous inspection report(s) and complaints.
2. Uses appropriate equipment and forms needed to conduct inspections.

II. Inspection Observations and Performance

1. Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspection; and determine inspection authority.
2. Follows the safety protocols required by the feed facility and the State Program.
3. Follows the biosecurity protocols required by the feed facility and the State Program.
4. Establishes interstate jurisdiction for FDA inspections, if applicable.
5. Recognizes the relative risk (high to low) of feed facilities based on the State Program's risk-based inspection program and categorization assigned to a facility or product, the manufacturing processes, and the inspection history of the facility.
6. Conducts inspection activities, appropriate for the level of risk, focused on those firms, products, and processes determined to be high-risk.
7. Assesses employee activities critical to the safe manufacture, distribution, storage, handling, and disposition of feed.
8. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.
9. Recognizes significant non-compliant conditions or practices and documents findings consistent with Program procedures.
10. Distinguishes between significant and insignificant observations and isolated incidents versus trends.
11. Reviews and evaluates the appropriate feed facility records and procedures and verifies that the procedures are being followed.

Attachment A – Training Plan and Log

12. Collects adequate evidence to include samples and documentation to support inspection observations in accordance with Program procedures.
13. Verifies correction of deficiencies identified during the previous inspection(s).
14. Conducts activities in a professional manner.

III. Oral and Written Communication

1. Uses effective interviewing techniques.
2. Explains findings clearly and adequately throughout the inspection.
3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.
4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge.
5. Answers questions and provides information as appropriate.
6. Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.

IV. Sample Collection

1. Uses a feed sample collection method consistent with criteria established by laboratory serving State Program to avoid cross-contamination.

V. Additional Inspection Areas (State Program can add competencies and tasks not contained in the Training Plan and Log)

The Association of American Feed Control Officials (AAFCO) has identified the minimum competencies and tasks for each of the inspection training areas needed to perform animal feed inspections. The Training Plan and Log contains a national model that animal feed protection programs can readily integrate into their existing field training of Animal Feed Inspectors (AFIs).

*The Training Plan lists the competencies (in **BOLD** font in the shaded areas of the Worksheet). Under each competency is a list of tasks provided as examples of job tasks that a State Program should ensure the AFI receives training on to perform their job responsibilities effectively. The State Program's trainer should identify those competencies and tasks that are applicable to the AFI's job responsibilities within their State Program. A small box appears adjacent to each of the competencies and tasks on the worksheet. If the competency and/or task is applicable to the State Program it is to be checked and included as part of the training process.*

Minimum Number of JOINT FIELD TRAINING INSPECTIONS Required: _____

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**DISCARD THIS PAGE AND INSERT
BASIC OR ADVANCED COURSEWORK**

Inspector Name: _____

Employment START DATE: _____

A. Basic Feed Inspector Training

Instructions: If the inspector has greater than five years of experience and an evaluation of the inspector's previous performance and experience shows adequate training has been completed, mark the Name and Location of Training Column, with "Met via Evaluation."

Subject Areas	Name and Location of Training	Completion Date	Inspector Initials	Supervisor Initials	Documentation Verifying Completion (Y/N)
Animal and Public Health Principles					
Basic Animal Nutrition					
Basic Feed Ingredients, Processing, and Technology					
Basic National Incident Management System and Incident Command System					
Communication					
Current Statues, Regulations, and Policies					
Feed Defense					
Inspections, Compliance, and Enforcement					
Labeling					
Professionalism					
Risk Awareness					
Safety					
Sampling					

Inspector Name: _____

Employment START DATE: _____

B. Advanced Feed Inspector Training

Instructions: If the inspector has greater than five years of experience and an evaluation of the inspector's previous performance and experience has found that no additional training for a subject area is needed, mark the Name and Location of Training Column, with "Met via Evaluation."

Subject Areas	Name and Location of Training	Completion Date	Inspector Initials	Supervisor Initials	Documentation Verifying Completion (Y/N)
Advanced Feed Ingredients, Processing, and Technology					
Advanced Labeling					
Animal Sickness and Death Investigation					
Current Statues, Regulations, and Policies					
Epidemiology					
Microbiological Pathogens					
Traceback and Traceforward Investigations					
Specialized Advanced					
Advanced National Incident Management System and Incident Command Systems					
BSE and Ruminant Feeding Ban					
Medicated Feed Good Manufacturing Practices Regulations					

INSPECTION TRAINING AREAS**I. Pre-Inspection**

1. Reviews the feed facility's previous inspection report(s) and complaint(s).	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Reviewed the previous inspection report and complaints.				
Reviewed the response letter to the previous establishment inspection in which corrective actions were promised.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

2. Uses appropriate equipment and forms needed to conduct inspections.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Had a copy or had electronic access to the pertinent laws and regulations.				
Had appropriate personal protective equipment (e.g. hard hat, respirator).				
Had appropriate inspection equipment (e.g. calculator, flashlight, camera).				
Sampling equipment (e.g. probe, probe wipes, sample containers/bags).				
Used up to date, proper, or appropriate forms for the type of inspection conducted.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

II. Inspection Observations and Performance

1. Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspection; and determine inspection authority.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Presented credentials to the owner, operator, or agent in charge of the establishment.				
Made appropriate introductions, explained the purpose and scope of the inspection, and determined inspection authority.				
Entered the firm through the front/main entrance and issued a Notice of Inspection prior to the beginning of the inspection.				
Issued a Notice of Inspection to the appropriate person.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

2. Follows the safety protocols required by the feed facility and the State Program.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Asked if any particular safety protocols are mandated at the facility.				
Followed the State Program's safety protocol or used personal protective equipment appropriately.				
Followed the safety protocols mandated by the facility.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

II. Inspection Observations and Performance (continued)

3. Follows the biosecurity protocols required by the feed facility and the State Program.		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Inquired if any particular biosecurity protocols are mandated at the facility.					
Followed the State Program's biosecurity protocol.					
Followed the biosecurity protocols mandated by the feed facility.					
<u>ADDITIONAL (State Program specific tasks)</u>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

4. Establishes interstate jurisdiction for FDA inspections, if applicable.		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Confirmed the interstate movement of product or ingredients.					
Determined if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.					
<u>ADDITIONAL (State Program specific tasks)</u>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

II. Inspection Observations and Performance (continued)

5. Recognizes the relative risk (high to low) of feed facilities based on the State Program's risk-based inspection program and categorization assigned to a facility or product, the manufacturing processes, and the inspection history of the facility.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Recognized the relative risk of the facility based on the manufacturing processes involved at the facility and its personnel.				
Organized inspection activities focusing on high-risk items such as high-risk products and processes.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

6. Conducts inspection activities, appropriate for the level of risk, focused on those firms, products, and processes determined to be high-risk.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Prioritized high-risk inspection activities.				
Did not concentrate inspection activities on low-risk items but on high-risk products and processes.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

II. Inspection Observations and Performance (continued)

7. Assesses employee activities critical to the safe manufacture, distribution, storage, handling, and disposition of feed.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Conducted inspection with input from employees responsible for critical activities.				
Reviewed records required by regulation that document employee training.				
Evaluated employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

8. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Observed critical activities during the inspection and discussed procedures in place to prevent distribution when an error has occurred.				
Reviewed labeling protocols and verified a system was in place to assure proper labeling.				
Recognized possible adulterants that are stored above or near bagged feed.				
Reviewed products for proper labeling and identification.				
Reviewed feed components to ensure they are used in accordance with their labeling, and/or in the case of medicated components, with their new animal drug approvals.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

II. Inspection Observations and Performance (continued)

9. Recognizes significant non-compliant conditions or practices and documents findings consistent with Program procedures.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
When present, recognized significant non-compliant conditions, but not to the exclusion of less significant non-compliant conditions.				
When present, recognized non-compliant products and adequately addressed them at the time of the observation or at the conclusion of the inspection.				
When present, recognized medicated components not being used in accordance with their new animal drug approvals.				
When present, recognized the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal food or feed.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

10. Distinguishes between significant and insignificant observations and isolated incidents versus trends.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
When present, distinguished appropriately between significant and insignificant observations.				
When present, distinguished appropriately between isolated incidents and trends.				
Discussed patterns or trends that were observed.				
Emphasized the severity or outcome of significant observations and the need for immediate action.				
Identified record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the firm and the deficiency has not reoccurred.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

II. Inspection Observations and Performance (continued)

11. Reviews and evaluates the appropriate feed facility records and procedures and verifies that the procedures are being followed.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Reviewed appropriate facility records.				
Questioned alarm notifications and the resulting required procedures.				
When deficiencies were noted, investigations and corrective actions by the facility were reviewed.				
Reviewed equipment cleanout records and noted that cleanouts were/were not completed according to the facility's SOP.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

12. Collects adequate evidence and documentation to support inspection observations in accordance with Program procedures.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
When significant deficiencies were noted in facility records, documents were collected to support the findings.				
When significant non-compliant conditions were observed, supporting evidence such as photographs, detailed narrative, or affidavits were collected.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

II. Inspection Observations and Performance (continued)

13. Verifies correction of deficiencies identified during the previous inspection(s).	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Verified correction of out of compliance observations identified during the previous inspection(s).				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

14. Conducts activities in a professional manner.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Dressed appropriately for the inspection with clean and presentable clothing.				
Wore protective safety equipment that is required by the firm of the State Program.				
Abided by firm's request regarding specific firm safety and biosecurity practices at the facility.				
Was polite and flexible.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

III. Oral and Written Communication

1. Uses effective interviewing techniques.		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Requests for information are unambiguous and resulted in relevant information provided from the firm.					
Avoided using jargon and acronyms, without explanation.					
Was not confrontational.					
Did not ask pointed and directed questions in order to solicit a desired response.					
Was a good listener and did not interrupt the facility personnel in their responses.					
<u>ADDITIONAL (State Program specific tasks)</u>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

2. Explains findings clearly and adequately throughout the inspection.		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Discussed significant deficiencies as they are observed throughout the inspection with the agent in charge.					
Discussed deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the firm.					
At the conclusion of the inspection, all significant deficiencies observed during the inspection were discussed.					
<u>ADDITIONAL (State Program specific tasks)</u>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

III. Oral and Written Communication (continued)

3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Notified the firm manager when direct contamination of product or ingredients is witnessed.				
Notified the appropriate and most responsible person in the feed facility when an immediate corrective action is necessary.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Listed significant inspectional observations.				
Provided further explanation with inspectional observations.				
Completed the legible report without spelling or grammatical errors.				
Provided the firm's owner, operator, or agent in charge with a summary of inspectional observations.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

III. Oral and Written Communication (continued)

5. Answers questions and provides information as appropriate.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Did not reveal any specific information about pending compliance action(s) against a competitor.				
Did not provide competitor information to the firm.				
Answered policy questions accurately to elicit appropriate correction action by the firm.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

6. Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Referenced attached documents in inspection report.				
Referenced documents are legible.				
Referenced documents are accurate and reflect observations made during the inspection.				
Attached referenced document(s) to the inspection report per State Program's administrative procedures.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

IV. Sample Collection

1. Uses a feed sample collection method to avoid cross-contamination consistent with criteria established by the laboratory serving State Program.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>				
Followed safety precautions on the feed label.				
Followed the State Program's safety protocol for collecting samples.				
Used appropriate sampling equipment for the selected product, as described in the AAFCO Feed Inspector's Manual.				
Used appropriate sample containers as specified by the State Program.				
Used appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual.				
Followed the State Program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).				
Followed the State Program's procedure for documenting and maintaining sample integrity, security, and chain of custody.				
Issued a receipt for sample(s).				
Shipped sample to the appropriate laboratory within the timeframe specified by the State Program.				
Followed the State Program's procedures for handling, packaging, and shipping samples to maintain sample integrity.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Used infrared thermometer in accordance with manufacturer's instructions.				
Comments:				
Trainee has demonstrated acceptable performance for all tasks listed				
Date:	Trainee's Initials:	Trainer's Signature:		

V. Additional Competencies – State Program Specific

		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
<i>(Training method and selected tasks for this competency are to be indicated below)</i>					
Comments:					
Trainee has demonstrated acceptable performance for all tasks listed					
Date:		Trainee's Initials:		Trainer's Signature:	

OPTIONAL - WEEKLY PLANNING LOG

Trainee's Name: _____

Week: <u>1</u> Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

Week: <u>2</u> Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

Week: <u>3</u> Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

OPTIONAL - WEEKLY PLANNING LOG

Trainee's Name: _____

Week: <u>4</u> Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

Week: <u>5</u> Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

Week: <u>6</u> Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

OPTIONAL - WEEKLY PLANNING LOG

Trainee's Name: _____

Week: _____ Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

Week: _____ Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

Week: _____ Date Ending: _____		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:		Trainer's Signature:

OPTIONAL
JOINT FIELD TRAINING INSPECTIONS - ESTABLISHMENT LOG

#	Date	Permit #	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection	Training Worksheet Completed	
								Yes	Training Period
1						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

OPTIONAL
JOINT FIELD TRAINING INSPECTIONS – ESTABLISHMENT LOG

#	Date	Permit #	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection	Training Worksheet Completed	
								Yes	Training Period
21						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
31						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
36						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
39						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
40						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Association of American Feed Control Officials

TRAINING WORKSHEET

(Competencies and Tasks)

Animal Feed Facilities

Animal Feed Inspector

NOTE: *The Training Manual for Animal Feed Inspectors (AFIs) should be reviewed prior to using the Training Worksheet. The manual provides State Programs with information that will be helpful in customizing the Field Training Worksheet and implementing a training process that meets the specific needs of the State Program.*

Establishment Name:	Establishment Address:	
Animal Feed Inspector's (AFI) Name:	Animal Feed Inspector's (AFI) Agency:	
Trainer's Name:	Trainer's Agency:	
Date of Inspection led by Trainee:	Time IN:	Time OUT:

The Association of American Feed Control Officials (AAFCO) has identified the basic minimum tasks needed to perform effective regulatory animal feed inspections. The Training Worksheet has been designed as a trainer's tool to be used in conjunction with the Training Plan and Log. It provides a method for tracking an AFI's progress and accomplishments in successfully demonstrating competencies and tasks during field training inspections.

There is no single correct way to use the worksheet. The Training Manual provides examples of ways to incorporate the worksheet into existing feed protection training programs.

The Training Worksheet lists the competencies (in BOLD font in the shaded areas of the Worksheet). Under each competency is a list of tasks provided as examples of job tasks that a State Program should ensure an AFI has received adequate training on to perform their job responsibilities effectively. The State Program's trainer should identify those competencies and/or tasks that are applicable to the AFIs job responsibilities within their State Program. A small box appears adjacent to each of the competencies and tasks on the worksheet; if the competency and/or task is applicable to the State Program, it is to be checked and included as part of the training process.

*Trainers should review with the AFI the tasks that will be included as part of the field training inspections. AFIs are expected to successfully demonstrate these minimum tasks correctly **prior** to conducting independent animal feed inspections.*

I. Pre-Inspection

	1. Reviews the feed facility's previous inspection report(s) and complaint(s).	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Reviewed the previous inspection report and complaints.				
	Reviewed the response letter to the previous establishment inspection in which corrective actions were promised.				
	<u>ADDITIONAL (State Program specific job tasks)</u>				
Comments:					

	2. Uses appropriate equipment and forms needed to conduct inspections.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Had a copy or had electronic access to the pertinent laws and regulations.				
	Had appropriate personal protective equipment (e.g., hard hat, respirator).				
	Had appropriate inspection equipment (e.g., calculator, flashlight, camera).				
	Sampling equipment (e.g., probe, probe wipes, sample containers/bags).				
	Used up to date, proper, or appropriate forms for the type of inspection conducted.				
	<u>ADDITIONAL (State Program specific job tasks)</u>				
Comments:					

II. Inspection Observations and Performance

	1. Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspection; and determines inspection authority.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Presented credentials to the owner, operator, or agent in charge of the				
	Made appropriate introductions, explained the purpose and scope of the inspection, and determined inspection authority.				
	Entered the firm through the front/main entrance and issued a Notice of Inspection prior to the beginning of the inspection.				
	Issued the Notice of Inspection to the appropriate person.				
	<u>ADDITIONAL (State Program specific job tasks)</u>				
Comments:					

	2. Follows the safety protocols required by the feed facility and the State Program.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Asked if any particular safety protocols are mandated at the facility.				
	Followed the State Program's safety protocol or use personal protective equipment appropriately.				
	Followed the safety protocols mandated by the facility.				
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:					

II. Inspection Observations and Performance (continued)

	3. Follows the biosecurity protocols required by the feed facility and the State Program.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint training inspection	
		YES	NO	YES	NO
	Inquired if any particular biosecurity protocols are mandated at the facility.				
	Followed the State Program's biosecurity protocol.				
	Followed the biosecurity protocols mandated by the feed facility.				
	<u>ADDITIONAL (State Program specific job tasks)</u>				
Comments:					

	4. Establishes interstate jurisdiction for FDA inspections, if applicable.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Confirmed the interstate movement of product or ingredients.				
	Determined if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.				
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:					

II. Inspection Observations and Performance (continued)

	5. Recognizes the relative risk (high to low) of feed facilities based on the State Program's risk-based inspection program and categorization assigned to a feed facility or product, the manufacturing processes, and the inspection history of the facility.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Recognized the relative risk of the facility based on the manufacturing processes involved at the facility and its personnel.				
	Organized inspection activities focusing on high-risk items such as high-risk products and processes.				
	<u>ADDITIONAL (State Program specific competencies)</u>				
Comments:					

	6. Conducts inspection activities, appropriate for the level of risk, focused on those firms, products, and processes determined to be high-risk.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Prioritized high-risk inspection activities.				
	Did not concentrate inspection activities on low-risk items but on high-risk products and processes.				
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:					

II. Inspection Observations and Performance (continued)

7. Assesses employee activities critical to the safe manufacture, distribution, storage, handling, and disposition of feed.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Conducted inspection with input from employees responsible for critical activities.				
Reviewed records required by regulation that document employee training.				
Evaluated employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

8. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterate or misbranded.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Observed critical activities during the inspection and discussed procedures in place to prevent distribution when an error has occurred.				
Reviewed labeling protocols and verified a system was in place to assure proper labeling.				
Recognized possible adulterants that are stored above or near bagged feed.				
Reviewed products for proper labeling and identification.				
Reviewed feed components to ensure they are used in accordance with their labeling, and/or in the case of medicated components, with their new animal drug approvals.				
<u>ADDITIONAL (State Program specific competencies)</u>				
Comments:				

II. Inspection Observations and Performance (continued)

9. Recognizes significant non-compliant conditions or practices and documents findings consistent with Program procedures.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
When present, recognized significant non-compliant conditions, but not to the exclusion of less significant non-compliant conditions.				
When present, recognized non-compliant products and adequately addressed them at the time of the observation or at the conclusion of the inspection.				
When present, recognized medicated components not being used in accordance with their new animal drug approvals.				
When present, recognized the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal food or feed.				
<u>ADDITIONAL (State Program specific competencies)</u>				
Comments:				

10. Distinguishes between significant and insignificant observations and isolated incidents versus trends.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
When present, distinguished appropriately between significant and insignificant observations.				
When present, distinguished appropriately between isolated incidents and trends.				
Discussed patterns or trends that were observed.				
Emphasized the severity or outcome of significant observations and the need for immediate action.				
Identified record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the firm and the deficiency has not reoccurred.				
<u>ADDITIONAL (State Program specific competencies)</u>				
Comments:				

II. Inspection Observations and Performance (continued)

11. Reviews and evaluates the appropriate feed facility records and procedures and verifies that the procedures are being followed.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Reviewed appropriate facility records.				
Questioned alarm notifications and the resulting required procedures.				
When deficiencies were noted, investigations and corrective actions by the facility were reviewed.				
Reviewed equipment cleanout records and noted that cleanouts were/were not completed according to the facility's SOP.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

12. Collects adequate evidence and documentation to support inspection observations in accordance with Program procedures.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
When significant deficiencies were noted in facility records, documents were collected to support the findings.				
When significant non-compliant conditions were observed, supporting evidence such as photographs, detailed narrative, or affidavits were collected.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

II. Inspection Observations and Performance (continued)

13. Verifies correction of deficiencies identified during the previous inspection(s).	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Verified correction of out of compliance observations identified during the previous inspection(s).				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

14. Conducts activities in a professional manner.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Dressed appropriately for the inspection with clean and presentable clothing.				
Wore protective safety equipment that is required by the firm or the State Program.				
Abided by firm's request regarding specific firm safety and biosecurity practices at the facility.				
Was polite and flexible.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

III. Oral and Written Communication

1. Uses effective interviewing techniques.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Requests for information are unambiguous and resulted in relevant information provided from the firm.				
Avoided using jargon and acronyms, without explanation.				
Was not confrontational.				
Did not ask pointed and directed questions to solicit a desired response.				
Was a good listener and did not interrupt the facility personnel in their responses.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

2. Explains findings clearly and adequately throughout the inspection.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Discussed significant deficiencies as they are observed throughout the inspection with the agent in charge.				
Discussed deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the firm.				
At the conclusion of the inspection, all significant deficiencies observed during the inspection were discussed.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

III. Oral and Written Communication

	3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Notified the firm manager when direct contamination of product or ingredients is witnessed.				
	Notified the appropriate and most responsible person in the feed facility when an immediate corrective action is necessary.				
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:					

	4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Listed significant inspectional observations.				
	Provided further explanations with inspectional observations.				
	Completed legible report without spelling or grammatical errors.				
	Provided the firm's owner, operator, or agent in charge with a summary of inspectional observations.				
	<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:					

III. Oral and Written Communication (continued)

5. Answers questions and provides information as appropriate.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Did not reveal any specific information about pending compliance action(s) against a competitor.				
Did not provide competitor information on the firm.				
Answered policy questions accurately to elicit appropriate corrective action by the firm.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

6. Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Referenced attached documents in inspection report.				
Referenced documents are legible.				
Referenced documents are accurate and reflect observations made during the inspection.				
Attached referenced document(s) to the inspection report per State Program's administrative procedures.				
<u>ADDITIONAL (State Program specific tasks)</u>				
Comments:				

VI. Sample Collection

	1. Uses a feed sample collection method to avoid cross-contamination consistent with criteria established by laboratory serving State Program.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	Followed safety precautions on the feed label.				
	Followed the State Program's safety protocol for collecting samples.				
	Used appropriate sampling equipment for the selected product, as described in the AAFCO Feed Inspector's Manual.				
	Used appropriate sample containers as specified by the State Program.				
	Used appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual.				
	Followed the State Program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).				
	Followed the State Program's procedure for documenting and maintaining sample integrity, security, and chain of custody.				
	Issued a receipt for sample(s).				
	Shipped sample to the appropriate laboratory within the timeframe specified by the State Program.				
	Followed the State Program's procedures for handling, packaging, and shipping samples to maintain sample integrity.				
	<u>ADDITIONAL (State Program specific competencies)</u>				
Comments:					

V. Additional Competencies – State Program Specific

	<u>ADDITIONAL (State Program Specific Competency)</u>	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	<u>(State Program specific tasks for Competency listed above)</u>				

Comments:

	<u>ADDITIONAL (State Program Specific Competency)</u>	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
		YES	NO	YES	NO
	<u>(State Program specific tasks for Competency listed above)</u>				

Comments:

Conference for Feed Protection
ABBREVIATED - TRAINING WORKSHEET
(Competencies Only)
Animal Feed Inspector

The AAFCO Training Manual for Animal Feed Inspectors (AFIs) should be reviewed prior to using the Abbreviated Training Log & Worksheet. The manual provides State Programs with information that will be helpful in customizing the Training Log & Worksheet and implementing a training process that meets the specific needs of the State Program.

The Conference for Feed Protection (AAFCO) has identified the basic minimum tasks that are needed to perform effective regulatory animal feed inspections. The Abbreviated Training Log & Worksheet has been designed to be used in conjunction with the Training Plan and Log as a trainer's tool during field training inspections. It provides a method for tracking an AFI's progress and accomplishments in successfully demonstrating competencies and tasks specific to their job responsibilities.

There is no single correct way to use the worksheet. The Training Manual provides examples of ways to incorporate the worksheet into existing retail feed protection training programs.

This abbreviated version of the Training Worksheet provides another option for animal feed protection program trainers. It simply lists the competencies for each of the inspection areas. It is intended to be used in conjunction with the AAFCO reference document – “Tasks for Each Competency” included at the end of this Attachment. It is intended for experienced trainers who have a solid command of the AFI tasks that comprise each of the competencies. The State Program should determine the specific competencies that apply to the AFIs within their State Program prior to initiating the field training process.

*Included with this Abbreviated Training Worksheet is a reference document that lists examples of tasks for each competency. Trainers should review with the AFI the tasks that will be included as part of the field training inspections. AFIs are expected to successfully demonstrate these minimum tasks correctly **prior** to conducting independent animal feed inspections.*

Association of American Feed Control Officials
ABBREVIATED - TRAINING WORKSHEET
(Competencies Only)

Animal Feed Facilities
Animal Feed Inspector

Establishment Name:	Establishment Address:	
Animal Feed Inspector's (AFI) Name:	Animal Feed Inspector's (AFI) Agency:	
Trainer's Name:	Trainer's Agency:	
Date of Inspection led by the Trainee:	Time IN:	Time OUT:

<u>I. Pre-Inspection</u> COMPETENCIES		Opportunity occurred for AFI to demonstrate competency during joint field training inspection		Competency demonstrated during joint field training inspection	
		YES	NO	YES	NO
	1. Reviews the feed facility's previous inspection report(s) and complaint(s).				
	2. Uses appropriate equipment and forms needed to conduct inspections.				
	<u>ADDITIONAL (State Program Specific Competencies)</u>				
Comments:					

[illegible]

<u>III. Oral and Written Communication</u> COMPETENCIES		Opportunity occurred for AFI to demonstrate competency during joint field training inspection		Competency demonstrated during joint field training inspection	
		YES	NO	YES	NO
	1. Uses effective interviewing techniques.				
	2. Explains findings clearly and adequately throughout the inspection.				
	3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.				
	4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the firm's owner, operator, or agent in charge.				
	5. Answers questions and provides information as appropriate.				
	6. Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.				
	<u>ADDITIONAL (State Program Specific Competencies)</u>				
Comments:					

<u>VI. Sample Collection</u> COMPETENCIES		Opportunity occurred for AFI to demonstrate competency during joint field training inspection		Competency demonstrated during joint field training inspection	
		YES	NO	YES	NO
	1. Uses a feed sample collection method to avoid cross-contamination consistent with criteria established by laboratory serving State Program.				
	<u>ADDITIONAL (State Program Specific Competencies)</u>				
Comments:					

<div>V. Additional Inspection Area</div> <div>COMPETENCIES</div>		Opportunity occurred for AFI to demonstrate competency during joint field training inspection		Competency demonstrated during joint field training inspection	
		YES	NO	YES	NO
	<u>ADDITIONAL (State Program Specific Competencies)</u>				
Comments:					

DRAFT

Association of American Feed Control Officials
REFERENCE DOCUMENT
Tasks for Each Competency
TRAINING COURSEWORK

Animal Feed Inspector (AFI) has successfully completed training coursework as specified in *FDA Animal Feed Regulatory Program Standards: Standard #2 – Training.*

- **OPTION 1:** Completed all basic or advanced coursework by attending classroom training administered by the State Program and/or AAFCO (or a combination of FDA ORA U Web-based Training and classroom training) AND training on the State Program's prevailing statutes, regulations, and/or ordinances. *Only some coursework can be completed via web-based training that is available through FDA's ORA University.
- **OPTION 2:** Submitted documentation of completing coursework equivalent to the basic or advanced coursework, AND training on the State Program's prevailing statutes, regulations, and/or ordinances, AND has certificate or documentation of successful completion.

NOTE: A State Program can begin the field training process with AFIs while they are still in the process of completing their basic or advanced coursework. However, the curriculum should be completed prior to conducting any independent inspections of animal feed facilities.

INSPECTION AREAS

The Animal Feed Inspector *Training Worksheet* is divided into (four) 4 inspection areas:

- I. Pre-Inspection;
- II. Inspection Observations and Performance;
- III. Oral and Written Communication;
- IV. Sample Collection; and
- V. Additional Inspection Areas (*The Training Worksheet includes an additional area for State Programs.*)

Flexibility has been built into the training process to allow regulatory State Programs the ability to customize training so that it reflects a State Program's administrative policies, procedures, and inspection protocol. If a competency or task is part of the AFI's job responsibility it should be included in the training plan. Tasks that are applicable to the AFI's job should not be arbitrarily removed or deleted from the *Training Worksheet*.

The tasks listed under each competency are intended to serve as examples of job tasks that should be successfully demonstrated by the AFI during field training inspections. Some of the tasks listed for a competency may not be applicable to an AFI within a given State Program. For example, infrared thermometers may not be part of the standard issued equipment for inspection staff. The AFI would not, therefore, be responsible for using this type of equipment. In such cases this task is not included as part of the training.

Conversely, there may be tasks not listed under the competency that are important for a State Program to include. The trainer should review these additional tasks with the AFI and include him/her as part of the field training process.

INSPECTION AREAS

I. Pre-Inspection

1. Reviews the feed facility's previous inspection report(s) and complaint(s).

- Reviewed the previous inspection report and complaints.
- Reviewed a firm's response letter to the previous establishment inspection in which corrective actions were promised.

2. Uses appropriate equipment and forms needed to conduct inspections.

- Had a copy or had electronic access to the pertinent laws and regulations.
- Had a calculator.
- Had a camera to document violations.
- Had a flashlight to examine poorly lit raw material storage areas.
- Used up to date, proper, or appropriate forms for the type of inspection conducted

INSPECTION AREAS

II. Inspection Observations and Performance

1. Presents appropriate credentials and written Notice of Inspection to the feed facility's owner, operator, or agent in charge; make appropriate introductions; explain the purpose and scope of the inspections; and determine inspection authority.

- Presented credentials to the owner, operator, or agent in charge of the establishment.
- Made appropriate introductions, explained the purpose and scope of the inspection, and determined inspection authority.
- Entered the firm through the front/main entrance and issued a Notice of Inspection prior to beginning the inspection.
- Issued the Notice of Inspection to the appropriate person.

2. Follows the safety protocols required by the feed facility and the State Program.

- Asked if any particular safety protocols are mandated at the facility.
- Followed the State Program's safety protocol or use personal protective equipment appropriately.
- Followed the safety protocols mandated by the facility.

3. Follows the biosecurity protocols required by the feed facility and the State Program.

- Inquired if any particular bio-security protocols are mandated at the facility.
- Followed the State Program's bio-security protocol.
- Followed the bio-security protocols mandated by the feed facility.

4. Establishes interstate jurisdiction for FDA inspections, if applicable.

- Confirmed the interstate movement of product or ingredients.
- Determined if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.

5. Recognizes the relative risk (high to low) of feed facilities based on the State Program's risk-based inspection program and categorization assigned to a facility or product, the manufacturing processes, and the inspection history of the facility.

- Recognized the relative risk of the facility based on the manufacturing processes involved at the facility and its personnel.
- Organized inspection activities focusing on high-risk items such as high-risk products and processes.

INSPECTION AREAS

II. Inspection Observations and Performance (continued)

6. Conducts inspection activities focused on those firms, products, and processes determined to be high-risk.

- Prioritized high-risk inspection activities.
- Did not concentrate inspection activities on low-risk items and not high-risk products and processes.

7. Assesses employee activities critical to the safe manufacture, distribution, storage, handling, and disposition of feed.

- Conducted inspection with input from employees responsible for critical activities.
- Reviewed records required by regulation that document employee training.
- Evaluated employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow.

8. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.

- Observed critical activities during the inspection and discussed procedures in place to prevent distribution when an error has occurred.
- Reviewed labeling protocols and verified a system was in place to assure proper labeling.
- Recognized possible adulterants that are stored above or near bagged feed.
- Reviewed products for proper labeling and identification.
- Reviewed feed components to ensure they are used in accordance with their labeling, and/or in the case of medicated components, with their new animal drug approvals.

9. Recognizes significant non-compliant conditions or practices and documents findings consistent with Program procedures.

- When present, recognized significant non-compliant conditions, but not to the exclusion of less significant non-compliant conditions.
- When present, recognized non-compliant products and adequately addressed them at the time of the observation or at the conclusion of the inspection.
- When present, recognized medicated components not being used in accordance with their new animal drug approvals.
- When present, recognized the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal food or feed.

10. Distinguishes between significant and insignificant observations and isolated incidents versus trends.

- When present, distinguished appropriately between significant and insignificant observations.
- When present, distinguished appropriately between isolated incidents and trends.
- Discussed patterns or trends that were observed.
- Emphasized the severity or outcome of significant observations and the need for immediate action.
- Identified record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the firm and the deficiency has not reoccurred.

INSPECTION AREAS

II. Inspection Observations and Performance (continued)

11. Reviews and evaluates the appropriate feed facility records and procedures and verify that the procedures are being followed.

- Reviewed appropriate facility records.
- Questioned alarm notifications and the resulting required procedures.
- When deficiencies were noted, investigations and corrective actions by the facility were reviewed.
- Reviewed equipment cleanout records and noted that cleanouts were/were not completed according to the facility's SOP.

12. Collects adequate evidence to include samples and documentation to support inspection observations in accordance with Program procedures.

- When significant deficiencies were noted in facility records, documents were collected to support the findings.
- When significant non-compliant conditions were observed, supporting evidence such as photographs, detailed narrative, or affidavits were collected.

13. Verifies correction of deficiencies identified during the previous inspection(s).

- Verified correction of out of compliance observations identified during previous inspection.

14. Conducts activities in a professional manner.

- Dressed appropriately for the inspection with clean and presentable clothing.
- Wore protective safety equipment that is required by the firm or the State.
- Abided by firm's request regarding specific firm safety and bio-security practices at the facility.
- Was polite and flexible.

INSPECTION AREAS

III. Oral and Written Communication

1. Uses effective interviewing techniques.

- Requests for information are unambiguous and resulted in relevant information provided from the firm.
- Avoided using jargon and acronyms, without explanation.
- Was not confrontational.
- Did not ask pointed and directed questions to solicit a desired response.
- Was a good listener and did not interrupt the facility personnel in their responses.

2. Explains findings clearly and adequately throughout the inspection.

- Discussed significant deficiencies as they are observed throughout inspection with the agent in charge.
- Discussed deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the firm.
- At the conclusion of the inspection, all significant deficiencies observed during the inspection were discussed.

3. Alerts the feed facility's owner, operator, or agent in charge when an immediate corrective action is necessary.

- Notified the firm manager when direct contamination of product or ingredients is witnessed.
- Notified the appropriate and most responsible person in the feed facility when an immediate corrective action is necessary.

4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provide a copy to the firm's owner, operator, or agent in charge.

- Listed significant inspectional observations.
- Provided further explanations with inspectional observations.
- Completed legible report without spelling or grammatical errors.
- Provided the firm's owner, operator, or agent in charge with a summary of inspectional observations.

5. Answers questions and provides information as appropriate.

- Did not reveal any specific information about a pending compliance action against a competitor.
- Did not provide competitor information to the firm.
- Answered policy questions accurately to elicit appropriate corrective action by the firm.

6. Submits inspection report, sample(s), and supporting documents to headquarters or supervisor in a timely manner.

- Referenced attached documents in inspection report.
- Referenced documents are legible.
- Referenced documents are accurate and reflect observations made during the inspection.
- Attached referenced document(s) to the inspection report per State Program's administrative procedures.

ADDITIONAL INSPECTION AREAS

IV. Sample Collection

1. Uses a feed sample collection method consistent with criteria established by laboratory serving State Program to avoid cross-contamination.

- Followed safety precautions on the feed label.
- Followed the State Program's safety protocol for collecting samples.
- Used appropriate sampling equipment for the selected product, as described in the AAFCO Feed Inspector's Manual.
- Used appropriate sample containers as specified by the State Program.
- Used appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual.
- Followed the State Program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).
- Followed the State Program's procedure for documenting and maintaining sample integrity, security, and chain of custody.
- Issued a receipt for sample(s).
- Shipped sample to the appropriate laboratory within the timeframe specified by the State Program.
- Followed the State Program's procedures for handling, packaging, and shipping samples to maintain sample integrity.

Inspector Name: _____

Employment START DATE: _____

*Instructions: Record the continuing education activity as well as the name and location of the activity.***C. Continuing Education**

Type of Activity	Name and Location of Activity	Completion Date	Inspectors Initials	Supervisor Initials	CONTACT HOURS Earned