

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS

MODEL TRAINING MANUAL

ANIMAL FEED INSPECTOR (AFI)

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Table of Contents

I.	Introduction	1
	Background	1
	Training Collaboration Background	1
	Overview – Training Manual	2
	Disclaimer	2
II. C	Glossary of Terms	3
III.	State Program Training Policy (Model Example)	6
	Model Example	6
IV.	Training Curriculum and Coursework.	9
	Courses	9
	Basic Animal Feed Inspector Training	9
	Advanced Animal Feed Inspector Training	9
	Options for AFIs to Fulfill Training Coursework	10
	Field Training	10
	Continuing Education (CE)	10
	Additional Training	11
	Contract Inspections	11
V.	Training Plan and Log	13
	Training Plan and Log	13
	State Program's Training Methods	13
	Inspection Training Areas	13
	Competencies	14
VI.	Creating Your Training Plan	16
	Step 1 – Select Appropriate Coursework to be Included in Your Training Plan	16
	Step 2 – Identify Required Competencies of the AFI Job Performance to be Included in Your Training Plan	16
	Step 3 – Determine Tasks to be Successfully Demonstrated for Each Selected Competency	17
	Step 4 – Determine Need for Additional Competencies and Tasks	18
	Step 5 – Determine Appropriate Training Method for Each Competency and Task	18
VII.	Planning For and Conducting Joint Field Training Inspections	20
	Planning Your Joint Field Training	20
	Conducting Joint Field Training Inspections	20
VIII	I. Documenting Training Progress and Accomplishments	22
	Training Plan and Log Use as a Single-Source Document	22
	Optional Training Logs	
	Supplemental Field Training Worksheet for Trainers	

Reviewing Field Training	25
Documentation of Completion	26
Attachment A – Training Plan Log	27
Animal Feed Establishments Animal Feed Inspector	28
Placeholder	32
Basic Animal Feed Inspector Training	33
Advanced Animal Feed Inspector Training	34
Continuing Education	35
Inspection Training Areas	36
Weekly Planning Log	49
Joint Field Training Inspection – Establishment Log	52
Attachment B – Training Worksheet	54
Guidance for Using the Field Training Worksheet	69
Two Approaches for Using Training Worksheets	71
Approach #1: During Every Trainee-Led Inspection	71
Approach #2: At Set Interval Points	72
Attachment C – Reference Document: Tasks for Each Competency	74
Attachment D - Supplemental Guidance for Planning and Conducting Joint Field Inspections	82
Planning Your Joint Field Training	83
Conducting Joint Field Training Inspections	84

I. Introduction

Background

The <u>Association of Animal Feed Control Officials (AAFCO)</u> is a voluntary membership organization that comprises personnel representing state and federal animal food/feed regulatory agencies. The Association has been guiding state, federal and international feed regulators with ingredient definitions, label standards and laboratory standards for more than 110 years, while supporting the health and safety of people and animals. Our members are charged by their state or federal laws to regulate the manufacture, sale, and distribution of animal feeds and animal drug remedies. AAFCO's mission – "A collaborative association that supports members and stakeholders and promotes a safe feed supply through unified system-based regulation, feed ingredients standards, and laboratory operations."

The AAFCO Education and Training Committee (ETC) first released the final draft version of the Model Training Manual – Animal Feed Inspector, dated July 30, 2018. Using concepts within the retail human food regulatory programs developed by the Conference for Food Protection (CFP), AFFCO's ETC developed an initial version of the training model to assist animal feed regulatory programs with developing and implementing training programs to ensure regulatory inspectors have the knowledge, skills, and abilities to effectively inspect animal feed establishments in conducting their inspections and enforcement actions. In 2024, the AAFCO ETC was charged to review the model training manual and to provide recommendations for updates and necessary changes.

This *Training Manual* focuses on coursework and field training to prepare newly hired Animal Feed Inspectors (AFIs) or individuals newly assigned to the regulatory feed protection program to conduct independent animal feed inspections. The *Training Manual* consists of a Model Training Policy, training curriculum and coursework, trainer's worksheets, and procedures that may be used by *any* animal feed regulatory state program. State programs do *not* have to be enrolled in the *Animal Food Regulatory Program Standards (AFPRS)* to use, and benefit from, this *Training Manual* for preparing AFIs to conduct independent animal feed inspections. This *Training 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 model outlined in this *Training Manual* can be readily integrated into existing animal feed regulatory programs. The instructions and worksheets provided in this *Training Manual* and attachments constitute a training process, *not* a certification or audit process.

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

Training Collaboration Background

The <u>Partnership for Food Protection (PFP)</u> 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 U.S. Food and Drug Administration (FDA) and AAFCO began a partnership to develop the 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 Program, a model multi-tiered approach for training and standardizing Animal Feed Inspectors (AFIs) was developed.

Overview – Training Manual

All new employees or individuals new to the animal feed regulatory program should complete coursework and a field training process as recommended in this *Training Manual*. 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 *Training Manual* are based on these minimum competencies and tasks.

Flexibility is built into the training process to allow regulatory state programs the opportunity to customize training content and delivery methods to represent a state program's own administrative policies, procedures, and inspection protocol. As you read through this *Training Manual*, it is important to keep in mind that state programs are not obligated to use the forms referenced within this *Training Manual*. Equivalent forms or training processes may be developed, along with electronic training record programs. The ultimate objective of a state program developing and implementing their training program is to ensure AFIs are trained and provided an opportunity to successfully demonstrate the competencies and tasks that are a vital part of their job responsibilities.

Disclaimer

This *Training Manual* is designed to be used as a resource by state animal feed regulatory agencies. The guidance and recommendations in this *Training Manual* do not create or confer any rights for, or on, any person or regulatory agency, and do not operate to bind regulatory public health officials or the public. This *Training Manual* does not have the force and effect of law and thus is not subject to enforcement. The *Training Manual* encourages animal feed regulatory agencies to use the guidance herein to tailor AFI training practices appropriate to their state regulatory programs.

II. Glossary of Terms

Animal Feed Inspector (AFI): A regulatory employee responsible for conducting animal feed or pet food inspections:

Animal Food Regulatory Program Standards (AFRPS): Voluntary set of standards developed through the partnership of Association of American Feed Control Officials (AAFCO) and the US Food and Drug Administration (FDA) 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 Food Regulatory Program Standards*, *Standard 2 – Training Program* as the basis for required elements. Standard 2 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.

Animal Feed: The term used to represent the definitions for: (1) food and animal feed in the Federal Food, Drug, and Cosmetic Act (FD&C Act) sections 201(f) and 201(w), (2) for animal food in Title 21 of the Code of Federal Regulations (CFR) section 507.3 (21 CFR 507.3), and (3) for animal feed in the AAFCO Official Publication (AAFCO OP, Chapter Four – Model Bill and Regulations). NOTE: For state application, 'animal food' may include 'animal feed' and 'pet food.'

Association of American Feed Control Officials (AAFCO): 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: 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: The 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 QFIT observations which indicate that the trainee can successfully demonstrate the task correctly and repeatedly.

Contact Hour(s): One contact hour equals 60 minutes.

Establishment Risk Categories: Categorization of animal feed establishments based on risk factors. Standard 3 of the AFRPS requires that regulatory state programs use a procedure for risk categorization of animal feed establishments using three minimum required factors for defining risk categories: types of animal feed and animal food products, types of processing, and compliance history of the establishment. State programs may use their own procedure for risk categorization.

Joint Field Training Inspection: An inspection conducted jointly by a Qualified Field Inspection Trainer (QFIT) and inspector trainee for the purpose of training and/or enforcement. A joint inspection is used to provide training during an inspection of an establishment and may either be trainer-led or trainee-led.

Program(s): an operational unit(s) in a regulatory agency that is responsible for the regulatory oversight of animal feed.

Qualified Field Inspection Trainer (QFIT): An individual who is recognized by the state's program as having field experience and communication skills necessary to train inspectors/investigators.

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.

Trainee: 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: A joint field-training inspection that includes both the state program's designated QFIT and the trainee: where the <u>trainee</u> 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 QFIT 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: A method of joint field-training used by a Qualified Field Inspection Trainer (QFIT) 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: A structured approach for a regulatory animal feed protection program

to identify and document training content, determine training methods, and track an Animal Feed Inspector's (AFI's) progress in demonstrating tasks specific to their job responsibilities and essential for conducting independent animal feed inspections.

NOTE: An example of a Training Plan and Log is provided in <u>Attachment A</u> to this Training Manual.

Training Worksheet: An optional form that can be used by a QFIT to record their observations while a trainee is demonstrating the various competencies and 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*.

III. State Program Training Policy (Model Example)

This chapter of the *Training Manual* provides a model example of a 'State Program Training Policy' for consideration by state animal feed regulatory programs in developing their own training policies. States should evaluate their programs, training needs, existing training curriculums and courses, current and future inspection responsibilities, and available resources during the development of their training policies.

Model Example

1) Purpose

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

2) Policy Statement

To ensure AFIs 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 training plan that includes course curriculum for basic and advanced inspection training, and continuing education. Newly hired AFIs shall progress through all three phases of the ascribed training, and in the following order:

- a) Basic animal feed inspector training (as defined by your program) may contain both coursework and field training components.
 - i) The state program requires a basic inspector to complete both basic coursework and basic field training within 24 months of initial start date;
 - ii) Required subject areas for the basic animal feed inspector coursework shall include those basic subject areas as defined within the current <u>AFRPS</u>, Standard 2 Training Program;
 - iii) Basic animal feed field training shall be verified by a Qualified Field Inspection Trainer (QFIT) 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
 - (f) Basic evidence development

- iv) As determined by the state program, include a minimum number of joint field inspections at establishment 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 animal feed inspector training (as defined by your program) may contain both coursework and field training components.
 - i) The state program requires an advanced inspector to complete both advanced coursework and advanced field training:
 - (1) Prior to conducting independent advanced inspections; and
 - (2) Within 60 months of initial start date.
 - ii) Required subject areas for the advanced animal feed inspector coursework shall include those advanced subject areas as defined within the current <u>AFRPS</u>, Standard 2 Training Program;
 - iii) Advanced animal feed field training shall be verified by a QFIT following program procedures for joint field training inspections and shall include:
 - (1) Verification that the trainee has been found competent by demonstrating the skills and tasks of an advanced animal feed inspector in the following areas:
 - (a) Pre-Inspection
 - (b) Inspection Observations and Performance
 - (c) Oral Communication
 - (d) Written Communication
 - (e) Evidence Development
 - (f) Professionalism
 - (2) As determined by the state program, the minimum number of joint animal feed field inspections at establishment types representative of the type of inspections to be conducted by an advanced animal feed inspector as well as representative of the state animal feed program inventory.
 - c) Continuing Education (CE) for all inspectors shall begin upon completion of their required basic and advanced curriculum.

3) **Documentation Requirements**

- a) The state program shall maintain records documenting the training completed by all inspectors.
 - i) For state programs enrolled in the AFRPS, documentation shall be recorded and maintained in a manner compliant with the current AFRPS Training Standard.
- b) For inspectors with greater than five years of experience at the date of the initial 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 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; or
 - vi) Documentation approved by the Qualified Field Inspection Trainer (QFIT).

History Note: [ADD State Program's Effective Date]

IV. Training Curriculum and Coursework

Training as described in this *Training Manual* comprises of a **recognized** curriculum for AFIs, coursework for basic and advanced level animal feed inspections, field training, continuing education, and additional areas where specialized training is required, (e.g., US FDA contract work or specialized inspections). Each of these **training components** are discussed in this chapter of the *Training Manual* and should be considered as state programs develop their own animal feed inspector training plan.

NOTE: AAFCO collaborated with FDA to develop the 'AFRPS Job Aid; Standard 2 – Coursework Resources.' This job aid provides state programs with a comprehensive listing of available coursework from multiple resources for basic and advanced courses listed in this chapter, and is accessible for state regulatory programs on the AAFCO FeedBIN.

Courses

AAFCO has worked with the FDA to establish curriculums for basic and advanced animal feed inspectors, each with their own coursework and field training requirements. They were designed to ensure an AFI has the knowledge, skills, and abilities to competently inspect animal feed establishments, conduct investigations, gather evidence, collect samples, and take enforcement actions. Each level of training is described below.

Basic Animal Feed Inspector Training

Basic animal feed inspector training consists of coursework in the following subject areas¹:

- Animal and Public Health Principles
- Animal Food Defense
- Basic Animal Nutrition
- Basic Evidence Development
- Basic Ingredients, Processing, and Technology
- Basic National Incident Management System and Incident Command System (ICS)
- Communication
- Current Statutes, Regulations, and Policies
- Inspections, Compliance, and Enforcement
- Labeling
- Professionalism
- Risk Awareness
- Safety
- Sample Collection

Advanced Animal Feed Inspector Training

Advanced animal feed inspector training consists of coursework in the following subject areas¹:

¹ US FDA Animal Food Regulatory Program Standards (AFPRS), Standard 2 – Training Program.

- Advanced Ingredients, Processing, and Technology
- Advanced Inspections, Compliance, and Enforcement
- Advanced Labeling
- Animal Illness and Death Investigation
- Current Statutes, Regulations, and Policies
- Epidemiology
- Evidence Development
- Microbiological Pathogens
- Traceback and Traceforward Investigations

Options for AFIs to Fulfill Training Coursework

Option 1 – State Program/AAFCO/FDA Training

All basic and advanced coursework may be completed by attending classroom training administered by the state program and/or AAFCO Coursework may also be obtained through successful completion of <u>FDA Office of Education and Training Delivery</u> (OTED) LearnED web-based training.

OPTION 2 – Equivalent Coursework

A state program may allow credit for training coursework by providing documentation of course completion from any training or examination, including college or university courses that are deemed equivalent by the state program.

Field Training

Field training is 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 establishments in the state program's inventory and the type of routine or basic work that will be performed by the inspector. The QFIT will determine the minimum number of required joint field training inspections for each type of animal feed establishment and inspection type (e.g., Bovine spongiform encephalopathy (BSE), Veterinary Feed Directive (VFD), Animal Food Preventive Controls and/or Current Good Manufacturing Process (AF PC and/or CGMP), Medicated Feeds) 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 QFIT, designated manager, or animal feed administrator. Basic or advanced field training and coursework must be successfully completed within 24 or 60 months, respectively, from the start date.

Continuing Education (CE)

The coursework, training plan, and joint field training inspection process outlined in this *Training 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 as the first step in the development of AFIs staff in a regulatory animal

feed program. Additional training opportunities should be provided as continuing education (CE) to advance the development of an AFI's ability to implement a risk-based inspection approach, maintain knowledge and skills with evolving technology and processes, and communicate animal feed safety principles to the regulated industry and the public.

The state program shall establish the continuing education requirement for the program's AFI upon their completion of the required curriculum (basic and advanced). This should include:

- Minimum number of contacts hours per designated time period²;
- Designation when the CE period begins and intervals; and
- Documentation requirements that accompanies each activity included in the AFI's CE.

State programs may consider CEs from 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. The state program may also include but limit the amount of CEs from the following activities: attendance at professional seminars, symposiums, or technical conferences; delivery of presentations at professional conferences; providing classroom or field training to new hires; serving as a course instructor in animal feed safety; or publishing an original article in a peer-reviewed professional or trade association journal, periodical, or publication.

NOTE: Additional guidance for CEs may be found in the current AFRPS and the US FDA AFRPS Job Aid for Standard 2.

The *Continuing Education Record* (see Attachment A) provides an example for tracking continuing education activities. Documentation must accompany each activity submitted for continuing education credit.

Additional Training

State programs should also provide opportunities for AFIs to attend the AAFCO training seminars, such as the <u>Basic Inspector Training Seminar (BITS)</u> and/or <u>Advanced Inspector Training Seminar (AITS)</u>. These seminars address animal feed program inspection areas in which an AFI should receive training and provides an opportunity to demonstrate inspection techniques and procedures.

Contract Inspections

State programs may select to conduct contract work with US FDA of animal feed and/or medicated feed establishments, which may require specific training. These states should review the training requirements within the Statement of Work (SOW) of their FDA Animal Food Inspection Contract and incorporate these requirements as part of the state's training curriculum. Examples of these contract inspections include determining if animal feed establishments are in compliance with 21 CFR Part 225, the Federal Food, Drug and Cosmetic Act (FD&C Act), state feed law and regulations, or both; VFD regulations in 21 CFR 558.6; BSE Rule (21 CFR 589.2000 and 21 CFR 589.2001); and PC AF and CGMP regulations in 21 CFR Part 507.

² The current version of the AFRPS states that each inspector receive 20 contact hours of continuing education every 36 months.

Advanced coursework and field training must be successfully completed by the AFI prior to performing a contract inspection alone.

V. Training Plan and Log

The <u>Training Plan and Log</u> referenced in this <u>Training Manual</u> provides state programs with a structured approach for identifying the training content, competencies and associated tasks expected of AFIs, determining the training methods, documenting coursework training, and tracking the AFI's progress in successfully demonstrating competencies and tasks specific to their job responsibilities. Each of the key components within the <u>Training Plan and Log</u> are discussed in this chapter. Information and recommendations for "How to" state programs develop their <u>Training Plan and Log</u> is provided in the <u>Chapter VI – Creating Your Training Plan and Log</u>.

Training Plan and Log

The <u>Training Plan and Log</u> provides areas for documenting:

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

Optional areas are included in the *Training Plan and Log* for:

- Maintaining a weekly training log for tracking accomplishments and identifying future training goals;
- Tracking the number and type of animal feed establishments included as part of the field training inspections; and
- Documenting the AFI's full training curriculum (including basic, advanced and any additional training requirements).

State Program's Training Methods

The *Training Plan and Log* provided in this *Training Manual* is designed to incorporate a variety of training methods appropriate for each of the identified competencies and tasks required of an AFI. State programs are free to select the training methods most appropriate for their individual situation and training needs. Examples of training methods include, but are not limited to: classroom presentations or exercises, laboratory workshops, office demonstrations, and joint field training inspections. How to implement and document the training is discussed in *Chapter VI - Creating Your Training Plan and Log*.

Inspection Training Areas

The <u>Training Plan and Log</u> provided in this <u>Training Manual</u> is divided into the following 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 may add competencies and tasks not contained in the *Training Plan and Log*)

Competencies

As a reminder, competencies are defined as "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." Through collaboration with AAFCO and FDA, competencies within the four (4) inspection training areas have been identified for an AFI and are included in the *Training Plan and Log*. Each of them and their corresponding tasks are provided in greater detail in the *Training Plan and Log* and Attachment C. These competencies should be incorporated as foundation for AFI training programs (coursework, field training, and continuing education). The following competencies for an AFI are:

I. <u>Pre-Inspection</u>

- Reviews the animal feed establishment's history and determine the scope of the inspection.
- Uses the appropriate equipment and forms needed to conduct inspections.

II. <u>Inspection Observations and Performance</u>

- Presents appropriate credentials and written Notice of Inspection to the animal feed establishment's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspection; confirms inspection authority and establish FDA jurisdiction, if applicable.
- Follows the safety protocols required by the animal feed establishment and the state program.
- Follows the biosecurity protocols required by the animal feed establishment and state program.
- Recognizes the relative risk categorization of animal feed establishments based on the risk-based inspection program.
- Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on the establishment's products, and processes determined to be higher risk.
- Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.
- Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated, contaminated, or misbranded.
- Recognizes significant non-compliant conditions or practices, and documents findings consistent with state program procedure.
- Distinguishes between significant and insignificant observations, and isolated incidents versus trends.
- Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.

- Collects adequate evidence and documentation to support inspection observations in accordance with state program procedures.
- Verifies deficiencies identified during the previous inspections have been addressed.
- Conducts activities in a professional manner.

III. Oral and Written Communication

- Uses effective interviewing techniques.
- Explains findings clearly and adequately throughout the inspection.
- Alerts the animal feed establishment'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 animal feed establishment's owner, operator, or agent in charge.
- Answers questions and provides information as appropriate.
- Submits inspection report, samples, supporting evidence and documentation within designated timeframes consistent with state program procedures.

IV. Sample Collection

• Uses an animal feed sample collection method consistent with the criteria established by laboratory serving the state program.³

V. Additional Competencies – (State Program Specific)

• Other competencies identified by the State Program.

³ Additional sample collection resources are available in the <u>AAFCO Feed Inspector's Manual</u> and various <u>laboratory references and documents</u> are posted on the AAFCO website.

VI. Creating Your Training Plan

This chapter of the *Training Manual* addresses the five (5) basic steps a state programs should consider when developing a training plan for an animal feed regulatory training program. They include:

- **Step 1** Select appropriate coursework to be included in your training plan;
- Step 2 Identify required competencies of the AFI job performance to be included in your training plan;
- Step 3 Determine tasks to be successfully demonstrated for each competency;
- Step 4 Determine the need for additional competencies and tasks; and
- Step 5 Determine the appropriate training delivery method for each competency and task

<u>Step 1 – Select Appropriate Coursework to be Included in Your Training Plan</u>

A <u>blank page</u> has been inserted into this *Training Manual* to act as a placeholder for the trainer or designated manager to insert the state program's basic or advanced curriculum and 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 inspector coursework training. The state program may reference *Chapter IV* of this *Training Manual* for details on the subject areas and coursework for basic and advanced animal feed inspection training. The *Training Plan and Log* include training records for documenting completion of the *Basic Animal Feed Inspector Training* and *Advanced Animal Feed Inspector Training*.

NOTE: State programs enrolled in AFRPS should consult the current <u>AFRPS Training Standard</u> for the required subject areas to be covered during basic and advanced coursework training.

NOTE: State programs enrolled in the AFRPS are required to include in the documented state training plan descriptions and curriculum for each inspection type.

<u>Step 2 – Identify Required Competencies of the AFI Job Performance to be Included in</u> Your Training Plan

As defined in the glossary of this *Training Manual*, competencies are defined as "*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.*" They set the expectation of measurable patterns of knowledge, skills, abilities, behaviors, and other characteristics that an individual needs to perform work roles or occupational functions successfully. Competencies specify the "how" of performing job tasks, or what the person needs to do the job successfully. An individual competency may have one or more tasks that are specific actions or activities to perform as part of the required job.

The <u>Training Plan and Log</u> provide state programs with a training record template listing the competencies and corresponding tasks, and may be used for both basic and advanced feed inspector training. The state program should review and determine the competencies that are part

of the job responsibility of an AFI in their state program and include them within the state's developed *Training Plan and Log*. If a competency is required 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. In the following example illustration for the identified competency '*Pre-Inspection*' training area, the trainer indicated that this competency is part of the AFI's job responsibility as determined by the state program and an "X" is placed in the adjacent box.

I. Pre-Inspection

<u> </u>								
X	1. Reviews the animal feed establishment's history and determine the scope of inspection.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer			
(T)	aining method and selected tasks for this competency are to be i	ndicated below)						
	Reviews the previous inspection report(s) and complaint(s).							
	Reviews the response letter to the previous establishment inspe in which corrective actions were promised.	ction						
	Determines scope of inspection based on establishment type an history, and type of inspection (e.g., CGMP, BSE, VFD, medic feed, PCAF, comprehensive, or other).							
	ADDITIONAL (State program specific tasks)							
Co	mments:		III.					
	Trainee has demonstrated acceptable	performance for a	ll tasks listed					
		Trainer's Signature	::					

<u>Step 3 – Determine Tasks to be Successfully Demonstrated for Each Selected Competency</u>

Tasks are activities an individual performs on a regular basis in order to carry out the functions of a job. An individual competency may have one or more tasks. In addition to the competencies provided in the *Training Plan and Log*, corresponding tasks are listed. The state program should identify and determine the job tasks under each competency and document them in the state's developed *Training Plan and Log*. These tasks are intended to communicate job related tasks an AFI will be expected to successfully demonstrate during field training inspections. Similar to the competencies, the state program should place an 'X' in the box corresponding to each task the AFI is expected to perform as part of the AFI's job responsibility.

The following illustration for 'IV. Sample Collection' includes three examples where tasks have been identified and documented by the state program as part of their training plan.

- The QFIT determined and marked existing tasks required of the AFI with an "X".
- Anything not applicable is not marked with an "X" and not required in the training plan.
- If a task is not listed under the competency then it can be added under "ADDITIONAL (state program specific tasks)".

IV. Sample Collection Training Method Training Officer 1. Uses an animal feed sample collection consistent with criteria nonstrated Trainee's By the established by the laboratory serving state program. (Training method and selected tasks for this competency are to be indicated below) X Follows safety precautions on the animal feed label Follows the state program's safety protocol for collecting samples. Uses appropriate sampling equipment for the selected product, as described in the <u>AAFCO Feed Inspector's Manual</u>. Uses appropriate sample containers as specified by the state program. Uses appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual Follows the state program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms). Follows the state program's procedure for documenting and maintaining sample integrity, security, and chain of custody Issues a receipt for sample(s). Ships sample to the appropriate laboratory within the timeframe specified by the state program. Follows the state program's procedures for handling, packaging, and shipping samples to maintain sample integrity. ADDITIONAL (State program specific task Uses 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:

NOTE: Tasks that are applicable to the AFI's job should <u>not</u> be arbitrarily removed or deleted from the Training Worksheet.

Step 4 – Determine Need for Additional Competencies and Tasks

The competencies and tasks that comprise the training plan in this *Training Manual* represent a national model, and the overwhelming majority of these apply to every state animal feed program. There will be instances, however, where a state program may need to add additional competencies and tasks that are not listed within the recommendations of this manual. Section V of Inspection Training Area Worksheet in Attachment A provides a template and allows for these additions. Just as with Step 1 and Step 2 in developing your training plan, an "X" is placed in the appropriate boxes for the added competency and task.

Step 5 - Determine Appropriate Training Method for Each Competency and Task

AFI training should be reflective of the environment they will be expected to perform their duties. The selection of establishments used for training should provide adequate opportunities to demonstrate all tasks.

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 QFIT to observe the trainee demonstrating these job tasks during joint field training inspections. The state program will determine which competencies are best to be covered through field training vs classroom training. The competencies can be found in <u>Chapter V</u>.

The following illustration provides an example for documenting alternative training methods using the *Training Plan and Log*. 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, thus the trainee demonstrated these tasks by incorporating a classroom exercise 'CE' as an alternative training method in addition to joint field training 'JFT' method.

III. Oral and Written Communication

х	1. Uses effective interviewing techniques.		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer		
(Tr	aining method and selected tasks for this competency a	re to be indicated	below)					
х	Requests for information are unambiguous and results information provided from the establishment.	JFT						
х	Avoids using jargon and acronyms, without explanati	on.	JFT					
х	Is not confrontational.		JET					
х	Does not ask pointed and directed questions in order t response.	CE and/or JFT						
х	Is a good listener and does not interrupt the establishment in their responses.	JFT						
	ADDITIONAL (State program specific tasks)							
_								
Co	mments:							
\vdash								
	Trainee has demonstrated a	cceptable perfori	nance for al	l tasks listed				
Da	te: Trainee's Initia	ls: Trainer	s Signature	:				

VII. Planning For and Conducting Joint Field Training Inspections

This chapter of the *Training Manual* will include steps and recommendations state programs should consider in planning for and conducting joint field training inspections as part of the training process for AFIs.

There are two types of joint field training inspections: Trainer-led and Trainee-led.

Joint field training will initially be comprised of <u>trainer-led</u> inspections conducted with a QFIT. Providing an opportunity for the AFI to observe experienced staff conducting animal feed establishment inspections is an essential step in preparing a trainee to take the lead during joint field training inspections.

<u>Trainee-led</u> inspections provide the opportunity for the QFIT or designated individual to observe the trainee, build their skills, provide feedback, and make corrections as needed for AFIs to successfully demonstrate competency.

A sufficient number of field training inspections led by the trainee are to be conducted to allow the demonstration of <u>all</u> 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 establishments.

Planning Your Joint Field Training

Planning for joint field training comprises of three key steps. QFITs should take time to ensure all preparation is made for the success of the AFI's training. The three step are:

- Step 1 Identify and ensure access to required documents for joint field training orientation as determined by the state program;
- Step 2 Review curriculum and list of course with trainee; and
- Step 3 Review training plan with trainee.

Conducting Joint Field Training Inspections

Conducting joint field trainings is the next step in the process of training phase. QFITs should take time to familiarize themselves with the following six steps and understand the roles and differences between a 'Trainer-led" vs. a "Trainee-led inspection. The six steps are:

- **Step 1** Selecting appropriate QFITs;
- Step 2 Conducting 'Trainer-led' inspections;
- Step 3 Preparing for 'Trainee-led inspections;
- Step 4 Selecting establishments for 'Trainee-led' inspections;
- Step 5 Determining the number of 'Trainee-led' inspections; and
- Step 6 Observing Trainees demonstrate task.

Attachment D provides supplemental guidance and recommendations for QFITs to consider in planning and conducting joint field training. When the trainee successfully demonstrates a task and competency, the state program's QFIT or designated staff person documents the completion of the skill on the animal feed inspector training plan. Some options and forms for tracking the trainee's progress and accomplishments are discussed in Chapter VIII, Documenting Training Progress and Accomplishments.

VIII. Documenting Training Progress and Accomplishments

This chapter discusses the framework and processes to assist state programs with developing a system to track an AFI's training progress and accomplishments. The <u>Training Plan and Log</u> and various forms provided in *Attachment* A - B are designed for documenting the training progress of an AFI. The state can determine the method of documenting the training process. It is suggested that the training documentation provide a method for:

- Identifying the AFI's coursework level;
- Recording completion of AFI's coursework and supporting documentation, such as certificate of completion;
- Recording competencies and tasks that have been successfully demonstrated by an AFI;
- Determining competencies and tasks an AFI has not yet demonstrated;
- Identifying the QFIT or designated individual's responsible for observing an AFI demonstrating a competency and task;
- Providing feedback to the AFI on training objectives; and
- Obtaining confirmation from both the AFI and QFIT or designated individual that tasks have been demonstrated correctly.

Training Plan and Log Use as a Single-Source Document

The <u>Training Plan and Log</u> may be used as a single-source document for recording an AFI's training progress and accomplishments.

Several record forms are provided within Attachment A for state programs to use to track completion of coursework subject areas for Basic Animal Feed Inspector Training, and Continuing Education. The illustration below provides an example of how an AFI's coursework can be identified, recorded, and tracked for completion with documentation.

	Subject Areas	Name and Location of Training	Completion Date	Documentation Verifying Completion
•	Animal and Public Health Principles	AAFCO BITS – Boise, ID	10/24/2024	Yes
	Animal Food Defense			
	Basic Animal Nutrition			

The program identifies and records the subject areas to be covered during the AFI's coursework training (indicated with the arrows in the illustration). For each of the subject areas, the QFIT records the name, location, and completion date of the AFI's training. The QFIT or designated manager confirms that the trainee has successfully completed coursework pertaining to that subject area as 'Yes' or 'No.' Documentation verifying completion of coursework should accompany the AFI's coursework training record.

Within Attachment A are <u>Training Plan and Logs</u> for use within a state program's training plan. The <u>Training Plan and Log</u> provides a listing of competencies and tasks required of an AFI and are used for tracking an AFI's training status for each task. The illustration below provides an example of how an AFI's training status can be tracked with documentation entered for the six tasks listed under this competency.

II. Inspection Observations and Performance

х	Presents appropriate credentia Inspection to the animal feed e operator, or agent in charge; n introductions; explains the pur inspection; confirms inspection FDA jurisdiction if applicable.	es	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer		
(Tr	aining method and selected tasks for t	his competency are to be it	ndicated	below)	200			
х	Presents credentials to the owner, op establishment.	of the	JFT	10/23/2024	CD	Arnold Baker		
х	Makes appropriate introductions, exp the inspection, and determines inspe-	ope of	JFT	10/23/2024	CD	Arnold Baker		
х	Enters the establishment through the Notice of Inspection prior to the beg	sues a	JFT	11/052024	CD	John Smith		
X	Issues a Notice of Inspection to the a	\neg	JFT	11/05/2024	CD	Arnold Baker		
X	Confirms the interstate movement of		JFT	11/05/2024	CD	Arnold Baker		
x	Determines if any products or ingredients have been received or				11/05/2024	CD	Arnold Baker	
	ADDITIONAL (State program spe	ecific tasks)						
111111111111111111111111111111111111111	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, 10/23/2024)							
	Trainee has	demonstrated acceptable	e perform	nance for a	ll tasks listed			
77.07	Trainee has demonstrated acceptable performance: Trainee's Initials: Trainee's Initials: Trainee's Initials: Trainee's Initials: Arnol							

For each of the tasks, the QFIT or designated individual records the date a determination was made that the trainee successfully demonstrated the task. The trainee's initials (represented by 'CD' in the graphic), indicate his/her agreement with the date recorded. The QFIT or designated individual's name or signature indicates confirmation that the trainee successfully demonstrated the task. When the trainee has demonstrated all the tasks required for a competency, the bottom row of the competency is completed.

Documentation on the *Training Plan and Log* does not have to follow this format exactly. For example, a state program that has only one QFIT may find it redundant to record the trainee's initials and QFIT's name for all tasks within each competency. In scenarios like this, a QFIT 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 and the QFIT signs confirming completion.

A 'comment' section is provided at the bottom of each of the competency tables. The comment section can be used to describe future training objectives or to provide a method of communicating training observations among multiple QFITs. 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. See the previous illustration for an example of a comment added by the QFIT.

Optional Training Logs

Two optional training logs are included at the end of the *Training Plan and Log*. They may 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 QFITs.

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.

Optional Weekly Planning Log

Trainee's Name:	Connor Davis	

Week: <u>4</u> Date Ending: <u>10/30/2024</u>						
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	1				

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. A 'Risk Category' column provides a quick reference as to the complexity of the animal feed establishment'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. In addition, the establishment log provides a quick method for distinguishing trainer-led inspections from those which were trainee-led.

Optional

Joint Field Training Inspection – Establishment Log

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

Supplemental Field Training Worksheet for Trainers

The <u>Training Worksheet</u> provides a means for identifying tasks that the trainee has not had the opportunity to successfully demonstrate. This worksheet is a distilled version of the <u>Training Plan and Log</u> and can be used in conjunction with the <u>Training Plan and Log</u> to track an AFI's progress and accomplishments. Additional information on how to use and complete the <u>Training Worksheet</u> is available in <u>Attachment C</u>, <u>Guidance for Using the Field Training Worksheet</u>.

Reviewing Field Training

Consistent and on-going feedback regarding inspection tasks is the cornerstone of the AFI field training process presented in this *Training Manual*. The QFIT 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. QFITs should provide continuous positive reinforcement for tasks correctly demonstrated by the trainee.

For areas where additional training is needed, the QFIT or designated individual 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 QFITs 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 QFIT'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.

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.

Attachment A – Training Plan and Log

Attachment A – Training Plan Log

Association of American Feed Control Officials TRAINING PLAN and LOG

Animal Feed Establishments 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:		
A * 1E 17 / A (AED A		G 1 1 T 1	
Animal Feed Inspector's (AFI) Agency:		Curriculum Level:	
		BASIC: □	ADVANCED: \square
Trainer's Name (if multiple trainers list all):	Trainer's Agency:		
1.			
2.			
3.			
4.			
Signatures below indicate AFI has completed	l all coursework and f	ield training elements ar	nd
is ready to conduct independent an	imal feed establishme	nt inspections	
Completion Date & Option of Coursework:			
OPTION 1: 🗆 or	OPTION 2: \square		
Completion Date of Field Training - (Competencies & Tasks):			
Animal Feed Inspector's (AFI) Signature:	Trainer's or Feed A	dministrator's Signatur	e:
	I		

The AAFCO Model Training Manual for Animal Feed Inspectors (AFIs) includes two components. One includes completion of coursework outlined in the current AFRPS Training Standard – 2. 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 current AFRPS Inspection Program Standard – 3. An AFI should successfully complete both components prior to conducting independent inspections.

COURSEWORK

<u>Chapter IV</u> of 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 animal 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						

Examples of Codes and Training Methods:

- CE: Classroom Exercise
- OD: Office Demonstration
- LE: Laboratory Exercise
- JFT: Joint Field Training Inspection
- O: Other (described in Training Plan)

INSPECTION TRAINING AREA FIELD COMPENTENCIES

The AAFCO Training Plan and Log is divided into the following inspection training areas:

- I. Pre-Inspection
 - 1. Reviews the animal feed establishment's history and determine the scope of the inspection.
 - 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 animal feed establishment's owner, operator, or agent in charge; make appropriate introductions; explains the purpose and scope of the inspection; confirms inspection authority and establishes FDA jurisdiction, if applicable.
 - 2. Follows the safety protocols required by the animal feed establishment and the state program.
 - 3. Follows the biosecurity protocols required by the animal feed establishment and the state program.
 - 4. Recognizes the relative risk categorization of the animal feed establishment based on the risk-based inspection program.
 - 5. Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on those establishments, products, and processes determined to be high-risk.

Attachment A – Training Plan and Log

6. Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.

Attachment A – Training Plan and Log

- 7. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.
- 8. Recognizes significant non-compliant conditions or practices, and documents findings consistent with state program procedures.
- 9. Distinguishes between significant and insignificant observations, and isolated incidents versus trends.
- 10. Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.
- 11. Collects adequate evidence to include samples and documentation to support inspection observations in accordance with state program procedures.
- 12. Verifies correction of deficiencies identified during the previous inspection(s).
- 13. 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 animal feed establishment'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 establishment'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 an animal feed sample collection method consistent with criteria established by laboratory serving state program.
- V. Additional Inspection Areas (state program can add competencies and tasks not contained in the Training Plan and Log)

ът	T 1	CIODIT	TITI D T	DIMINIO	INSPECTI	ONIGD	. 1	
Wiinimiim	Niimher	OT ICHIN I	FIELL) L	RAINING	INSPECTI	UNNER	eamrea.	
11111111111111	1 tulliou	01 3 0 11 1 1		14 111 111 10	11 101 110 11		quii ca.	

Placeholder THIS PAGE IS INTENTIONALLY LEFT BLANK

DISCARD THIS PAGE AND INSERT BASIC <u>OR</u> ADVANCED COURSEWORK

Attachment A – Training Plan and Log

Basic Animal Feed Inspector Training Inspector Name:

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."

Employment Start Date:

Subject Areas	Name and Location of Training	Completion Date	Documentation Verifying Completion
Animal and Public Health Principles			
Animal Food Defense			
Basic Animal Nutrition			
Basic Feed Ingredients, Processing, and Technology Basic Evidence			
Development			
Basic National Incident Management System and Incident Command System (ICS)			
Communication			
Current Statues, Regulations, and Policies			
Inspections, Compliance, and Enforcement			
Labeling			
Professionalism			
Risk Awareness			
Safety			
Sample Collection			

Attachment A – Training Plan and Log

Advanced Animal Feed Inspector Training

Inspector Name:	Employment Start Date:
previous perform	the inspector has greater than five years of experience and an evaluation of the inspector's nance and experience has found that no additional training for a subject area is needed, mark ocation of Training Column, with "Met via Evaluation."
	· · · · · · · · · · · · · · · · · · ·

Subject Areas	Name and Location of Training	Completion Date	Documentation Verifying Completion
Advanced Ingredients,			vernying completion
Processing, and Technology			
Advanced Inspections,			
Compliance, and Enforcement			
Advanced Labeling			
Animal Illness and Death Investigation			
Current Statues, Regulations, and Policies			
Epidemiology			
Evidence Development			
Microbiological Pathogens			
Traceback and Traceforward Investigations			

Continuing Education

Inspector Name:	Employment Start Date:
Instructions: Record the continuing education activity as well	l as the name and location of the activity.

Type of Activity	Name and Location of Activity	Completion Date	Contact Hours Earned

Inspection Training Areas

		<u>I. Pre-Inspe</u>	<u>ction</u>							
	Reviews the animal feed es determine the scope of insp	_		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer			
(Tr	(Training method and selected tasks for this competency are to be indicated below)									
	Reviews the previous inspection	report(s) and complaint(s).								
	Reviews the response letter to the in which corrective actions were		pection							
	Determines scope of inspection history, and type of inspection (effeed, PCAF, comprehensive, or	e.g., CGMP, BSE, VFD, med								
	ADDITIONAL (State program									
Co	mments:									
	Trainee	has demonstrated acceptab	le perfo	rmance for a	ll tasks listed					
Da		Trainee's Initials:		r's Signature						
	2. Uses appropriate equipment inspections.	nt and forms needed to cond	luct	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer			
(Tr	raining method and selected tasks	for this competency are to be	indicate	d below)						
	Has a copy or had electronic acc	cess to the pertinent laws and								

	2. Uses appropriate equipment and forms nee inspections.	ded to condu	ect	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for this competer	ndicated	below)				
	Has a copy or had electronic access to the pertine regulations.	nt laws and					
	Has appropriate personal protective equipment (erespirator).	g. hard hat,					
	Has appropriate inspection equipment (e.g. calcucamera).	lator, flashlig	ht,				
	Has appropriate samples equipment (e.g. probe, protein containers/bags).		ample				
	Uses up to date, proper, or appropriate forms for inspection conducted.	the type of					
	ADDITIONAL (State program specific tasks)						
Co	mments:						
	m				1 1 1 1 1 1		
	Trainee has demonstrat						
Dat	re: Trainee's I	nitials:	Trainer'	s Signature	:		

II. Inspection Observations and Performance

	1. Presents appropriate credentia Inspection to the animal feed e operator, or agent in charge; n introductions; explains the pur inspection; confirms inspection FDA jurisdiction if applicable.	stablishment's owner, nakes appropriate pose and scope of the	es	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicatea	l below)			
	Presents credentials to the owner, or establishment.	perator, or agent in charge	of the				
	Make appropriate introductions, exp the inspection, and determines inspe		ope of				
	Enters the establishment through the Notice of Inspection prior to the beg	front/main entrance and i	issues a				
	Issues a Notice of Inspection to the						
	Confirms the interstate movement of	** * *					
	Determines if any products or ingred shipped in interstate commerce by the inspection.	lients have been received					
	ADDITIONAL (State program sp	ecific tasks)					
Co	mmonts.				II		
Co	mments:						
	Trainee has	demonstrated acceptab	le perfor	mance for a	ll tasks listed		
Da	te:	Trainee's Initials:	Trainer	's Signature	: :		
	2. Follows the safety protocols requestablishment and the state pro		I	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicatea	l below)			
	Asks if any particular safety protoco establishment.	ls are mandated at the					
	Follows the state program's safety p protective equipment appropriately.	rotocol or used personal					
	Follows the safety protocols mandat	ed by the establishment.					
	ADDITIONAL (State program sp	ecific tasks)					
Со	mments:						
	Trainee has	demonstrated acceptab	le perfor	mance for a	ll tasks listed		
Da		Trainee's Initials:		's Signatur			

	3. Follows the biosecurity protocol establishment and the state pro		al feed	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	caining method and selected tasks for	this competency are to be	indicated	below)			
	Inquires if any particular biosecurity establishment.	protocols are mandated	at the				
	Follows the state program's biosecu	rity protocol.					
	Follows the biosecurity protocols mestablishment.	andated by the animal fee	ed				
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
		s demonstrated acceptab	_				
Da	te:	Trainee's Initials:	Trainer'	s Signature	:		
	4. Recognizes the relative risk cate establishment based on the risk		l feed	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr		-based inspection.		Method	Demonstrated By the		8
(Tr	establishment based on the risk	-based inspection. this competency are to be stablishment based on the	e indicated e	Method	Demonstrated By the		8
(Tr	establishment based on the risk raining method and selected tasks for Recognizes the relative risk of the ended to be feed establishment or product, types	this competency are to be stablishment based on the of processing, and comp	e indicated a e animal liance	Method	Demonstrated By the		8
(Tr	establishment based on the risk raining method and selected tasks for Recognizes the relative risk of the effeed establishment or product, types history of the establishment. Organizes inspection activities focus	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated a e animal liance	Method	Demonstrated By the		8
(Tr	raining method and selected tasks for Recognizes the relative risk of the ended establishment or product, types history of the establishment. Organizes inspection activities focus high-risk products and processes.	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated a e animal liance	Method	Demonstrated By the		8
(Tr	raining method and selected tasks for Recognizes the relative risk of the ended establishment or product, types history of the establishment. Organizes inspection activities focus high-risk products and processes.	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated a e animal liance	Method	Demonstrated By the		8
	raining method and selected tasks for Recognizes the relative risk of the ended establishment or product, types history of the establishment. Organizes inspection activities focus high-risk products and processes.	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated a e animal liance	Method	Demonstrated By the		8
	establishment based on the risk raining method and selected tasks for Recognizes the relative risk of the effeed establishment or product, types history of the establishment. Organizes inspection activities focus high-risk products and processes. ADDITIONAL (State program sp	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated a e animal liance	Method	Demonstrated By the		8
	establishment based on the risk raining method and selected tasks for Recognizes the relative risk of the effeed establishment or product, types history of the establishment. Organizes inspection activities focus high-risk products and processes. ADDITIONAL (State program sp	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated a e animal liance	Method	Demonstrated By the		8
	establishment based on the risk raining method and selected tasks for Recognizes the relative risk of the ended establishment or product, types history of the establishment. Organizes inspection activities focus high-risk products and processes. ADDITIONAL (State program spontage)	this competency are to be stablishment based on the of processing, and compsing on high-risk items su	e indicated animal liance ach as	Method below)	Demonstrated By the Trainee		8

Date:

II. Inspection Observations and Performance (continued) Date 5. Conducts comprehensive inspection activities, appropriate for Demonstrated Trainee's **Training Training** the level of risk, focusing on those establishments, products, and Method By the **Initials** Officer processes determined to be high-risk. Trainee (Training method and selected tasks for this competency are to be indicated below) Prioritizes high-risk inspection activities. Does not concentrate inspection activities on low-risk items but on high-risk products and processes. ADDITIONAL (State program specific tasks) **Comments:** Trainee has demonstrated acceptable performance for all tasks listed Date: Trainee's Initials: Trainer's Signature: Date 6. Assesses employee activities critical to the safe manufacturing, Training Demonstrated Trainee's Training processing, packaging, handling, holding, and distribution of Method By the **Initials** Officer animal feed. Trainee (Training method and selected tasks for this competency are to be indicated below) Conducts inspection with input from employees responsible for critical activities. Reviews records required by regulation that document employee training. Evaluates employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow. ADDITIONAL (State program specific tasks) Comments:

Trainee has demonstrated acceptable performance for all tasks listed

Trainer's Signature:

Trainee's Initials:

	7. Properly evaluates the likelihoo processes, components, or label become adulterated or misbran	ing could cause the prod		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated l	below)			
	Observes critical activities during the procedures in place to prevent distripunctured.	e inspection and discusses bution when an error has	5				
	Reviews labeling protocols and veri proper labeling.						
	Recognizes possible adulterants that animal feed or ingredients.	are stored above or near b	bagged				
	Reviews products for proper labeling	g and identification.					
	Reviews animal feed components to						
	accordance with their labeling, and/components, with their new animal	drug approvals.	d 				
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
	Trainee has	demonstrated acceptable	le nerform	nance for a	ll tasks listed		
Da		Trainee's Initials:		s Signature			
<i>D</i>		Traince 5 Initials.	Trainer .	s signatur t	•		
	8. Recognizes significant non-com practices, and documents findin procedures.		am	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	practices, and documents findir	ngs consistent with progr		Method	Demonstrated By the		Ü
(Tr	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant	this competency are to be t non-compliant condition	<i>indicated l</i>	Method	Demonstrated By the		Ü
(Tr	practices, and documents finding procedures. aining method and selected tasks for	this competency are to be t non-compliant condition nt non-compliant condition pliant products and adequa	indicated bas, but	Method	Demonstrated By the		Ü
(Tr	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant not to the exclusion of less signification. When present, recognizes non-compaddresses them at the time of the observable.	this competency are to be t non-compliant condition nt non-compliant condition pliant products and adequate servation or at the conclustic components not being us	indicated bas, but as. ttely sion of	Method	Demonstrated By the		Ü
(Tr	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant not to the exclusion of less significated. When present, recognizes non-compaddresses them at the time of the obtate inspection. When present, recognizes medicated.	this competency are to be to non-compliant condition on non-compliant condition of the products and adequate servation or at the conclust of components not being using approvals.	indicated bas, but ns. ately sion of sed in	Method	Demonstrated By the		Ü
(Tr	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant not to the exclusion of less significated. When present, recognizes non-compaddresses them at the time of the obtain the inspection. When present, recognizes medicated accordance with their new animal definition. When present, recognizes the significant practices to prevent contamination of the procedure.	this competency are to be to non-compliant condition on to non-compliant condition of the products and adequate servation or at the conclust decomponents not being using approvals. I cance of sanitary transport with substances prohibited	indicated bas, but ns. ately sion of sed in	Method	Demonstrated By the		Ü
(Tr	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significan not to the exclusion of less significal when present, recognizes non-compaddresses them at the time of the obthe inspection. When present, recognizes medicated accordance with their new animal drawn practices to prevent contamination was in animal feed.	this competency are to be to non-compliant condition on to non-compliant condition of the products and adequate servation or at the conclust decomponents not being using approvals. I cance of sanitary transport with substances prohibited	indicated bas, but ns. ately sion of sed in	Method	Demonstrated By the		- C
	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significan not to the exclusion of less significal when present, recognizes non-compaddresses them at the time of the obthe inspection. When present, recognizes medicated accordance with their new animal drawn practices to prevent contamination was in animal feed.	this competency are to be to non-compliant condition on to non-compliant condition of the products and adequate servation or at the conclust decomponents not being using approvals. I cance of sanitary transport with substances prohibited	indicated bas, but ns. ately sion of sed in	Method	Demonstrated By the		- C
	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant not to the exclusion of less significated. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal definition. When present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program sp.	this competency are to be to non-compliant condition on to non-compliant condition of the products and adequate servation or at the conclust decomponents not being using approvals. I cance of sanitary transport with substances prohibited	indicated bas, but ns. ately sion of sed in	Method	Demonstrated By the		- C
	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant not to the exclusion of less significated. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal definition. When present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program sp.	this competency are to be to non-compliant condition on to non-compliant condition of the products and adequate servation or at the conclust decomponents not being using approvals. I cance of sanitary transport with substances prohibited	indicated bas, but ns. ately sion of sed in	Method	Demonstrated By the		- C
	practices, and documents finding procedures. aining method and selected tasks for When present, recognizes significant not to the exclusion of less significated. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawthen present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program specific procedure)	this competency are to be to non-compliant condition on to non-compliant condition of the products and adequate servation or at the conclust decomponents not being using approvals. I cance of sanitary transport with substances prohibited	indicated bas, but ns. ately sion of sed in from	Method below)	Demonstrated By the Trainee		Ü

Attachment A – Training Plan and Log

	9. Distinguishes between significe observations, and isolated inci			Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tre	aining method and selected tasks for	this competency are to be	indicated	below)			
	When present, distinguishes approprinting insignificant observations.	riately between significan	t and				
	When present, distinguishes appropincidents and trends.	riately between isolated					
	Discusses patterns or trends that we	re observed.					
	Emphasizes the severity or outcome need for immediate action.	of significant observation	ns and the				
	Identifies record keeping deficiencie corrective action plans may have be establishment and the deficiency has	en implemented by the	that				
	ADDITIONAL (State program sp	ecific tasks)					
Coı	nments:						
	Trainag ha	s demonstrated acceptab	do norfor	nanca for a	I toeke lietod		
Dat		Trainee's Initials:		's Signature			
Dat		Tranice s initials.	Trainci	s Signature	•		
	10. Reviews, evaluates, and verific establishment records, plans, pare established, maintained an	orograms, and/or proced		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tre	aining method and selected tasks for	this competency are to be	indicated	below)			
	Reviews appropriate establishment	records.					
	Questions alarm notifications and the	<u> </u>					
	When deficiencies are noted, invest the establishment are reviewed.	igations and corrective ac	tions by				
	Reviews equipment cleanout record are not completed according to the		are or				
	ADDITIONAL (State program sp	ecific tasks)					
Coı	nments:						
	Trainaa haa	s demonstrated acceptab	de nerfor	nance for a	I tacke lietad		
Dat		Trainee's Initials:		's Signature			

	evidence and documentation to suppations in accordance with program	port	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selec	cted tasks for this competency are to be	e indicated be	low)			
	ciencies are noted in establishment record to support the findings.	ords,				
	compliant conditions are observed, supographs, detailed narrative, or affidavit					
ADDITIONAL (State	e program specific tasks)					
Comments:		<u> </u>		III		
						_
	Trainee has demonstrated acceptal	ble performa	nce for a	ll tasks listed		
Date:	Trainee's Initials:	Trainer's S	Signature	:		
12. Verifies correctio previous inspection	n of deficiencies identified during the on(s).	e	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selec	cted tasks for this competency are to be	e indicated be	low)			
Verifies correction of identified during the p	out of compliance observations revious inspection(s).					
ADDITIONAL (State	e program specific tasks)					
Comments:				III		
	Trainee has demonstrated acceptal	ble performa	nce for a	ll tasks listed		
Date:	Trainee's Initials:	Trainer's S	Signature	:		

	13. Conducts activities in a professional manner.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for this competency are to be in	ndicated below)			
	Dresses appropriately for the inspection with clean and present clothing.	able			
	Wears protective safety equipment that is required by the establishment of the state program.				
	Abides by establishment's request regarding specific establishment safety and biosecurity practices at the establishment.	nent			
	Is polite and flexible.				
	ADDITIONAL (State program specific tasks)				
Co	mments:				
	Trainee has demonstrated acceptable	performance for al	l tasks listed		
Da	Trainee's Initials:	Trainer's Signature	•		

III. Oral and Written Communication

	1. Uses effective interviewing techniques.				Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
	Requests for information are unambiguous and results in relevant information provided from the establishment.						
	Avoids using jargon and acronyms,						
	Is not confrontational.						
	Does not ask pointed and directed q response.	uestions in order to solicit	t a desired				
	Is a good listener and does not interning their responses.	rupt the establishment per	rsonnel				
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
	Trainaa ha	domonstrated accontab	olo norfor	nanca for al	l tacke listed		
Date: Trainee has demonstrated acceptable perform Trainee's Initials: Trainee's				s Signature			
	2. Explains findings clearly and ac inspection.	dequately throughout the	e	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	raining method and selected tasks for	this competency are to be	indicated	below)			
	Discusses significant deficiencies as inspection with the agent in charge.	they are observed throug	shout the				
	Discusses deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the establishment.						
	At the conclusion of the inspection, all significant deficiencies observed during the inspection are discussed.						
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:				ı		
	Trainee has	demonstrated acceptab	ole perform	nance for al	l tasks listed		
Da	Date: Trainee's Initials: Trainer				:		

III. Oral and Written Communication (continued)

	3. Alerts the animal feed establishment's owner, operator, or agent in charge when an immediate corrective action is necessary.				Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
	Notifies the establishment manager product or ingredients is witnessed.	when direct contaminatio	on of				
	Notifies the appropriate and most refeed establishment when an immedi						
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
	Tusinas ka		.l£	fa al	l tanka Katad		
D.		s demonstrated acceptable Trainee's Initials:					
Da	te:	Trainee's Initials:	1 rainer	's Signature			
	4. Documents findings accurately.	clearly, legibly, and			Date		
	concisely on the applicable form the establishment's owner, open	n(s) and provides a copy		Training Method	Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
	Lists significant inspectional observ	ations.					
	Provides further explanation with in						
	Completes the legible report without	1 0 0					
	Provides the establishment's owner a summary of inspectional observat		rge with				
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
			1 0				
		s demonstrated acceptab					
Date: Trainee's Initials: Trainer's Signature:							

III. Oral and Written Communication (continued)

5. Answers questions and pro	ovides information as appropriate.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected task	s for this competency are to be indicate	ed below)			
Does not reveal any specific in action(s) against a competitor.	formation about pending compliance				
<u> </u>	nformation to the establishment. rately to elicit appropriate correction				
ADDITIONAL (State progra	m specific tasks)				
Comments:		<u> </u>			
Traine	ee has demonstrated acceptable perfo	ormance for a	ll tasks listed		
Date:	Trainee's Initials: Train	er's Signature	::		
	t, sample(s), supporting evidence and signated timeframes consistent with	Training	Date Demonstrated	Trainee's	Training
state program procedure		Method	By the Trainee	Initials	Officer
				Initials	2.3
(Training method and selected task Reference attached documents Reference documents are legible	s. s for this competency are to be indicate are in inspection report. le.			Initials	.,
(Training method and selected task Reference attached documents Reference documents are legib Reference documents are accurduring the inspection.	s. as for this competency are to be indicated are in inspection report. le. rate and reflect observations made			Initials	.,
(Training method and selected task Reference attached documents Reference documents are legib Reference documents are accurduring the inspection. Attaches referenced documents state program's administrative	s. s for this competency are to be indicated are in inspection report. le. rate and reflect observations made (s) to the inspection report per procedures.			Initials	
(Training method and selected task Reference attached documents Reference documents are legib Reference documents are accurduring the inspection. Attaches referenced documents	s. s for this competency are to be indicated are in inspection report. le. rate and reflect observations made (s) to the inspection report per procedures.			Initials	
(Training method and selected task Reference attached documents Reference documents are legib Reference documents are accurduring the inspection. Attaches referenced documents state program's administrative	s. s for this competency are to be indicated are in inspection report. le. rate and reflect observations made (s) to the inspection report per procedures.			Initials	
(Training method and selected task Reference attached documents Reference documents are legib Reference documents are accurduring the inspection. Attaches referenced documents state program's administrative ADDITIONAL (State program) Comments:	s. s for this competency are to be indicated are in inspection report. le. rate and reflect observations made (s) to the inspection report per procedures.	ed below)	Trainee	Initials	.,

IV. Sample Collection

1. Uses an animal feed sample collection consistent with cri established by the laboratory serving state program.	teria 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)			
Follows safety precautions on the animal feed label.				
Follows the state program's safety protocol for collecting samp				
Uses appropriate sampling equipment for the selected product, described in the <u>AAFCO Feed Inspector's Manual</u> .	as			
Uses appropriate sample containers as specified by the state pr	ogram.			
Uses appropriate sampling methods for the selected product, a described in the <u>AAFCO Feed Inspector's Manual</u> .	S			
Follows the state program's procedure for marking and sealing samples (corresponding sample information also noted on inspreport or laboratory forms).				
Follows the state program's procedure for documenting and maintaining sample integrity, security, and chain of custody.				
Issues a receipt for sample(s).				
Ships sample to the appropriate laboratory within the timefram specified by the state program.	ne			
Follows the state program's procedures for handling, packagin shipping samples to maintain sample integrity.	g, and			
ADDITIONAL (State program specific tasks)				
Uses infrared thermometer in accordance with manufacturer's instructions.				
Comments:				
Trainee has demonstrated acceptabl	e performance for a	ll 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
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
Co	mments:						
	Trainee has	demonstrated acceptab	ole perfort	nance for al	l tasks listed		
Da	te:	Trainee's Initials:	Trainer'	s Signature	:		
					Date		
				Training Method	Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
Co	mments:						
		demonstrated acceptab	1				
Da	te:	Trainee's Initials:	Trainer ³	s Signature	:		
				Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
,		- *		, 			
Co	mments:	_					
			1 0				
		demonstrated acceptab					
Da	te:	Trainee's Initials:	Trainer'	s Signature	:		

Trainee's Initials:

Optional Weekly Planning Log

Frainee's Name:		
Week: 1 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
Week: 2 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
	•	
Week: 3 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments

Trainer's Signature:

Optional Weekly Planning Log

Trainee's Name:		
Week: 4 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Traince's Initials:	Trainer's Signature:	
Week: 5 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
Week: 6 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:	<u> </u>	
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
	T. 1 C.	
Trainee's Initials:	Trainer's Signature:	
Week:Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Tuoinasia Initiala.	Trainar's Signatures	

Optional Joint Field Training Inspection – Establishment Log

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

Optional Joint Field Training Inspections – Establishment Log

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

Attachment B – Training Worksheet

Attachment B – Training Worksheet

Association of American Feed Control Officials

TRAINING WORKSHEET

(Competencies and Tasks)

Animal Feed Establishments 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:	Tine IN: Tine 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.

QFITs 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

Reviews the animal feed establishment's history and determine the scope of inspection.	occurred to demo task duri field tra	for AFI onstrate ing joint raining	Opportunity occurred for AFI to demonstrate task during joint field training inspection		sk strated g joint raining ction
	YES	NO	YES	NO	
Reviews the previous inspection report(s) and complaint(s).					
Reviews the response letter to the previous establishment inspection in which corrective actions were promised.					
Determines scope of inspection based on establishment type and history, and type of inspection (e.g., CGMP, BSE, VFD, medicated feed, PCAF, comprehensive, or other).					
ADDITIONAL (State program specific job tasks)					
Comments:					

2. Uses appropriate equipment and forms needed to conduct inspections.	Opport occurred to demoi task durii field tra inspec	for AFI nstrate ng joint nining		strated g joint raining
	YES	NO	YES	NO
Has a copy or had electronic access to the pertinent laws and regulations.				
Has appropriate personal protective equipment (e.g., hard hat, respirator).				
Has appropriate inspection equipment (e.g., calculator, flashlight, camera).				
Has appropriate sampling equipment (e.g., probe, probe wipes, sample containers/bags).				
Uses up to date, proper, or appropriate forms for the type of inspection conducted.				
ADDITIONAL (State program specific job tasks)				
Comments:		'	'	

II. Inspection Observations and Performance

	1. Presents appropriate credentials and written Notice of Inspection to the animal feed establishment's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspection; confirms inspection authority and established FDA jurisdiction, if applicable.	Opport occurred to demor task durin field tra inspec	for AFI istrate ig joint ining	Ta demon during field tr inspe	strated g joint raining
	uniformly and established 1 2/1 jurisdiction, if appreciate	YES	NO	YES	NO
	Presents credentials to the owner, operator, or agent in charge of the				
	Makes appropriate introductions, explains the purpose and scope of the inspection, and determines inspection authority.				
	Enters the establishment through the front/main entrance and issues a Notice of Inspection prior to the beginning of the inspection.				
	Issues the Notice of Inspection to the appropriate person.				
	Confirms the interstate movement of product or ingredients.				
	Determines if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.				
	ADDITIONAL (State program specific job tasks)				
Cor	nments:				

2. Follows the safety protocols required by the animal feed establishment and the state program.	Opport occurred to demor task durin field tra inspec	for AFI istrate ig joint ining	demon during field to	ask strated g joint raining ection
	YES	NO	YES	NO
Asks if any particular safety protocols are mandated at the establishment.				
Follows the state program's safety protocol and/or used personal protective equipment appropriately.				
Follows the safety protocols mandated by the establishment.				
ADDITIONAL (State program specific tasks)				
Comments:				

$Attachment \ B-Training \ Worksheet$

3. Follows the biosecurity protocols required by the feed establishment and the state program.	to demoi task duri field tra	occurred for AFI to demonstrate task during joint field training inspection YES NO		ask astrated g joint raining ection
	YES	NO	YES	NO
Inquires if any particular biosecurity protocols are mandated at the establishment.				
Follows the state program's biosecurity protocol.				
Follows the biosecurity protocols mandated by the feed establishment.				
ADDITIONAL (State program specific job tasks)				
4. Recognizes the relative categorization of the animal feed establishment based on the risk-based inspection program.	Opport occurred to demo task duri field tra inspec	for AFI onstrate ing joint aining	demon durin field to	ask strated g joint raining ection
Pagagnizes the relative rick of the establishment based on the animal feed establishment or	+			

4. Recognizes the relative categorization of the animal feed establishment based on the risk-based inspection program.	Opport occurred to demo task duri field tra inspec	for AFI nstrate ng joint aining	demon during field tr	ask strated g joint raining ection
	YES	NO	YES	NO
Recognizes the relative risk of the establishment based on the animal feed establishment or product, processing, and compliance history of the establishment.				
Organizes inspection activities focusing on high-risk items such as high-risk products and processes.				
ADDITIONAL (State program specific tasks)				
Comments:				

	5. Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on those establishments, products, and processes determined to be high-risk.	Opport occurred to to demon task durin field tra inspec	for AFI astrate ag joint ining	demon during field to	sk strated g joint raining ection
		YES	NO	YES	NO
	Prioritized high-risk inspection activities.				
	Does not concentrate inspection activities on low-risk items but on high-risk products and processes.				
	ADDITIONAL (State program specific tasks)				
Co	mments:				

6. Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.	Opport occurred to demo task duri field tra inspec	for AFI nstrate ng joint aining	demon	g joint raining
	YES	NO	YES	NO
Conducts inspection with input from employees responsible for critical activities.				
Reviews records required by regulation that document employee training.				
Evaluates employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow.				
ADDITIONAL (State program specific tasks)				
Comments:				

occurred to demoi task duri field tra	for AFI nstrate ng joint nining	demon during field tr	strated g joint raining
YES	NO	YES	NO
	occurred to demoi task durii field tra inspec	Opportunity occurred for AFI to demonstrate task during joint field training inspection YES NO	occurred for AFI to demonstrate task during joint field training inspection

	8. Recognizes significant non-compliant conditions or practices, and documents findings consistent with program procedures.	Opport occurred to demor task durin field tra inspec	for ÅFI nstrate ng joint nining	demon during field to	ask estrated g joint raining ection
		YES	NO	YES	NO
	When present, recognizes significant non-compliant conditions, but not to the exclusion of less significant non-compliant conditions.				
	When present, recognizes non-compliant products and adequately addressed them at the time of the observation or at the conclusion of the inspection.				
	When present, recognizes medicated components not being used in accordance with their new animal drug approvals.				
	When present, recognizes the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal feed.				
	ADDITIONAL (State program specific tasks)				
Со	mments:				

$Attachment \ B-Training \ Worksheet$

9. Distinguishes between significant and insignificant observations, and isolated incidents versus trends.	Opport occurred to demo task duri field tra inspec	for ÅFI nstrate ng joint nining	Task demonstra during joi field train inspectio	
	YES	NO	YES	NO
When present, distinguishes appropriately between significant and insignificant observations.				
When present, distinguishes appropriately between isolated incidents and trends.				
Discusses patterns or trends that were observed.				
Emphasizes the severity or outcome of significant observations and the need for immediate action.				
Identifies record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the establishment and the deficiency has not reoccurred.				
ADDITIONAL (State program specific tasks)				
Comments:				

Reviews appropriate establishment records. Questions alarm notifications and the resulting required procedures. When deficiencies are noted, investigations and corrective actions by the establishment are	NO
Questions alarm notifications and the resulting required procedures.	
	1 -
When deficiencies are noted, investigations and corrective actions by the establishment are	
reviewed.	
Reviews equipment cleanout records and notes that cleanouts were/were not completed according to the establishment's SOP.	
ADDITIONAL (State program specific tasks)	
omments:	
Comments:	

	11. 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		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		Ta demons during field tr inspe	strated g joint aining
		YES NO		YES	NO														
	When significant deficiencies are noted in establishment records, documents are collected to support the findings.																		
	When significant non-compliant conditions are observed, supporting evidence such as photographs, detailed narrative, or affidavits are collected.																		
	ADDITIONAL (State program specific tasks)																		
Co	mments:																		

12. Verifies correction of deficiencies identified during the previous inspection(s).	Opportunity occurred for AFI to demonstrate task during joint field training inspection		occurred for AFI to demonstrate task during joint field training		demon during field to	nsk strated g joint raining ection
	YES	NO	YES	NO		
Verifies correction of out of compliance observations identified during the previous inspection(s). ADDITIONAL (State program specific tasks)						
Comments:						

13. Conducts activities in a professional manner.	Opportunity occurred for AFI to demonstrate task during joint field training inspection YES NO		ccurred for AFI to demonstrate task during joint field training	
			YES	NO
Dresses appropriately for the inspection with clean and presentable clothing.				
Wears protective safety equipment that is required by the establishment or the state program.				
Abides by establishment's request regarding specific establishment safety and biosecurity practices at the establishment.				
Is polite and flexible.				
ADDITIONAL (State program specific tasks)				
Comments:				

III. Oral and Written Communication

1. Uses effective interviewing techniques.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Ta demons during field tr inspe	strated g joint raining
	YES	YES NO		NO
Requests for information are unambiguous and results in relevant information provided from the establishment.				
Avoids using jargon and acronyms, without explanation.				
Is not confrontational.				
Does not ask pointed and directed questions to solicit a desired response.				
Is a good listener and does not interrupt the establishment personnel in their responses.				
ADDITIONAL (State program specific tasks)				
Comments:				

2. Explains findings clearly and adequately throughout the inspection.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon during field to	ask strated g joint raining ection
	YES	NO	YES	NO																								
Discusses significant deficiencies as they are observed throughout the inspection with the agent in charge.																												
Discusses deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the establishment.																												
At the conclusion of the inspection, all significant deficiencies observed during the inspection are discussed.																												
ADDITIONAL (State program specific tasks)																												
mments:																												
	Discusses significant deficiencies as they are observed throughout the inspection with the agent in charge. Discusses deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the establishment. At the conclusion of the inspection, all significant deficiencies observed during the inspection are discussed. ADDITIONAL (State program specific tasks)	2. Explains findings clearly and adequately throughout the inspection. Discusses significant deficiencies as they are observed throughout the inspection with the agent in charge. Discusses deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the establishment. At the conclusion of the inspection, all significant deficiencies observed during the inspection are discussed. ADDITIONAL (State program specific tasks)	2. Explains findings clearly and adequately throughout the inspection. Coccurred for AFI to demonstrate task during joint field training inspection	2. Explains findings clearly and adequately throughout the inspection. Coccurred for AFI to demonstrate task during joint field training inspection																								

III. Oral and Written Communication (continued)

3.	Alerts the animal feed establishment'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 YES NO		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon during j trai	nsk strated oint field ning ection
				YES	NO												
	otifies the establishment's manager when direct contamination of product or ingredients is itnessed.																
	otifies the appropriate and most responsible person in the animal feed establishment when an immediate corrective action is necessary.																
<u>A</u> l	DDITIONAL (State program specific tasks)																
Comm	nents:																

	4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the establishment's owner, operator, or agent in charge.	Opportunity occurred for AFI to demonstrate task during joint field training inspection YES NO		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon durin field to	Fask onstrated ing joint training pection	
				YES	NO																											
	Lists significant inspectional observations.																															
	Provides further explanations with inspectional observations.																															
	Completes legible report without spelling or grammatical errors.																															
	Provides the establishment's owner, operator, or agent in charge with a summary of inspectional observations.																															
	ADDITIONAL (State program specific tasks)																															
Co	omments:																															

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		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demons during field tr	ask estrated g joint raining ection
	YES	YES NO		NO						
Does not reveal any specific information about pending compliance action(s) against a competitor.										
Does not provide competitor information on the establishment.										
Answers policy questions accurately to elicit appropriate corrective action by the establishment.										
ADDITIONAL (State program specific tasks)										
Comments:										

6. Submits inspection report, sample(s), supporting evidence and documentation within designated timeframes consistent with state program procedures.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon durin field to	ask strated g joint raining ection
	YES NO		YES	NO				
Reference attached documents are in inspection report.								
Reference documents are legible.								
Reference documents are accurate and reflect observations made during the inspection.								
Attaches referenced document(s) to the inspection report per state program's administrative procedures.								
ADDITIONAL (State program specific tasks)								
Comments:								

VI. Sample Collection

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

ADDITIONAL (State Program Specific Competence	<u>y)</u>	Opportunity occurred for AFI to demonstrate task during joint field training inspection		dem durin	Task onstrated g joint fid g inspect	eld	
		YES		NO	YES	NO)
(State program specific tasks for competency listed above)							
Comments:							

ADDITIONAL (State Program Specific Competency	occu to d task fie	Opportunity occurred for AFI to demonstrate task during joint field training inspection		demo during	Fask onstrated joint field g inspection
	YE	ES	NO	YES	NO
(State program specific tasks for competency listed above)					
Comments:					

Guidance for Using the Field Training Worksheet

As described in Chapter VIII, the <u>Training Worksheet</u> (a distilled version of the <u>Training Plan and Log</u>) provides a means for identifying tasks that the trainee has not had the opportunity to successfully demonstrate. The guidance provided in this attachment is designed to assist QFITs to track an AFI's progress and accomplishments.

The following illustration is an example of the *Training Worksheet* cover page with completed information.

Association of American Feed Control Officials

TRAINING WORKSHEET

(Competencies and Tasks)

Animal Feed Establishments 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:	
Livestock Milling Co.	538 Broadway Blvd, Ocean Park, OH	
Animal Feed Inspector's (AFI) Name:	Animal Feed Inspector's (AFI) Agency:	
John Smith	XYZ State Department of Ag, Div. of Animal Feed	
Trainer's Name: Arnold Baker	Trainer's Agency: XYZ State Department of Ag, Div. of Animal Feed	
Date of Inspection led by Trainee: 10/12/2024	Tine IN: 8:30 am	Tine OUT: 2:30 pm

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.

The next illustration provides a *Training Worksheet* example using 'III. Oral and Written Communication' competency and corresponding tasks. For each of the tasks included in the state program's *Training Worksheet*, the QFIT:

- Determines whether or not there was an opportunity to demonstrate a task; and
- Determines when an AFI consistently demonstrates a task correctly and documents the observations.

III. Oral and Written Communication

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			
х	Requests for information are unambiguous and results in relevant information provided from the establishment.		х					
Х	Avoids using jargon and acronyms, without explanation.	X		X				
Х	Is not confrontational.	X		X				
Х	Does not ask pointed and directed questions to solicit a desired response.	X			X			
Х	Is a good listener and does not interrupt the establishment personnel in their responses.	X		X				
	ADDITIONAL (State program specific tasks)							
inf	Comments: Reviewed techniques with the AFI for asking open ended questions when checking feed employee understandi information presented during the inspection. Discussed the importance of asking open ended questions regarding a procedur appears that management or feed employees may not clearly understand it. I will continue to work with the AFI on this task field training inspections scheduled for next week (Arnold Baker)							

The <u>Training Worksheet</u> contains two major columns for recording observations:

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

 Indicate YES or NO if the opportunity to demonstrate the task occurred.
- *Task demonstrated during joint field training inspections.*

Indicate YES or NO if the task was performed.

The 'Comments' portion at the bottom of each competency allows the QFIT to provide objective descriptions of observations made during joint training inspections, as well as additional training provided and future training objectives. In the previous illustration example used for this discussion, the QFIT 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* provides a method for QFITs to organize and record their notes from observations made of the trainee demonstrating tasks during training inspections. Once a trainee has demonstrated a task, the QFIT may transfers the information from the *Training Worksheet* to the *Training Plan and Log*. The following illustration is example of training results transferred to the *Training Plan and Log* from the *Training Worksheet* information for the first competency of 'II, Inspection Observations and Performance.'

		II. Inspection O	bserv	ations an	d Perform	ance			
х	Presents appropriate credentia Inspection to the animal feed e operator, or agent in charge; n introductions; explains the pur inspection; confirms inspection FDA jurisdiction if applicable.	stablishment's owner, nakes appropriate pose and scope of the nauthority and establish		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer		
(Ti	Training method and selected tasks for this competency are to be indicated below)								
х	Presents credentials to the owner, operator, or agent in charge of the establishment.			ЛFT	10/23/2024	CD	Arnold Baker		
х	Makes appropriate introductions, explained the purpose and scope of			JFT	10/23/2024	CD	Amold Baker		
х	Enters the establishment through the front/main entrance and issues a Notice of Inspection prior to the beginning of the inspection.			JFT	11/052024	CD	John Smith		
X				JFT	11/05/2024	CD	Arnold Baker		
X				JFT	11/05/2024	CD	Arnold Baker		
X	Determines if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.			JFT	11/05/2024	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, 10/23/2024)								
	Trainee has	demonstrated acceptab	le perfor	mance for a	ll tasks listed				
	ite:		r's Signature:						
11	11/05/2024 CD Arnold				l Baker				

Two Approaches for Using Training Worksheets

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 <u>set interval points</u> during the trainee-led field training process.

These two approaches are only examples and are <u>not</u> 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 Trainee-Led Inspection

<u>Strengths</u>: 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 QFITs 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.

<u>Challenges:</u> Using the *Training Worksheet* during every inspection may cause QFITs 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 QFIT 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

<u>Strengths</u>: A QFIT 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 QFIT 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.

<u>Challenges</u>: The interval process requires QFITs 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 QFIT 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 <u>Joint Field Training Inspection – Establishment Log</u> can be a valuable tool for documenting the use of the <u>Training Worksheet</u> 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 following example illustration, the QFIT completed a <u>Training Worksheet</u> after the inspections of Establishment #15 and Establishment #20.

Optional
Joint Field Training Inspection – Establishment Log

#	Date	Permit	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection	Training Worksheet Completed		
								Yes	Training Period	
1	9/29/24	07896	Dig These Dogs	6437 Oak Street, Marion, OH	1	х				
2	9/29/24	07912	Try R Feed	1919 Park Place, Monopoly, OH	1	х				
3	9/30/24	07485	Happy Paws	2100 3 rd Street, Marty, OH	2	х				
4	10/01/24	07020	Tractor Plus	739 Rick Street. Roll, OH	1	х				
5	10/01/24	08923	No Place Like Home	881 S. Prairie Lane, Marty, OH	2	Х				
6	10/01/24	08237	Chicken Kitchen	23 N. Main Street, Marty, OH	1	х				
7	10/02/24	07345	Claws in the City	421 W. Desert Avenue, Marty, OH	2	х				
8	10/05/24	08787	Zesty Delights	971 Center Lane, Marion, OH	2	х				
9	10/05/24	07492	Tasty Treats	567 Illinois Avenue, Monopoly, OH	1	х				
10	10/05/24	07001	Desert Pets	699 Desert Avenue, Marty, OH	1		х			
11	10/05/24	07492	Tasty Treats	567 Illinois Avenue, Monopoly, OH	1		х			
12	10/06/24	07113	Columbus Feed Mill	23 Pizza Place, Marion, OH	2		х			
13	10/06//24	07222	Farm & Feed Supply	1 Elm Street, Monopoly, OH	1		х			
14	10/05/24	07555	Sweet Tweets	7 Ocean Drive, Ocean Park, OH	1		X			
15	10/12/24	07639	Livestock Milling Co.	538 Broadway Blvd, Ocean Park, OH	1		х	(X	10/05-10/12, 2024	
16	10/15/24	07777	Midwestern States	679 W. Olive Avenue, Marion, OH	2		X			
17	10/23/24	07184	Hungry Horses	972 E. West Street, Ocean Park, OH	2		X		·	
18	10/23/24	07014	Pets Unleashed	871 W. Mushroom Blvd, Marty, OH	2		X			
19	10/24/24	07296	Twin Peaks Feed	43 N. Madison Street, Monopoly, OH	1		X			
20	10/24/24	07666	Shamrock Feed Mill	3030 Big Bucks Lane, Monopoly, OH	2		X	X	10/05-10/24, 2024	

In the above illustration 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 5-12, 2024.

In this same example, the QFIT completes a *Training Worksheet* using 5 establishment inspection intervals. The second *Training Worksheet* was completed after Establishment #20 and the QFIT'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, 2024 until the date the second *Training Worksheet* was completed on October 24, 2024.

NOTE: 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. QFITs 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.

Attachment C – Reference Document: Task for Each Competency
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Association of American Feed Control Officials REFERENCE DOCUMENTTasks for Each Competency TRAINING COURSEWORK

Animal Feed Inspector (AFI) has successfully completed training coursework as specified in <u>FDA Animal Feed Regulatory</u>

<u>Program Standards</u>: 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 <u>FDA Office of Education and Training Delivery (OTED) LearnED</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 <u>FDA's OTED LearnED</u>.
- 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 <u>prior</u> to conducting any independent inspections of animal feed facilities.

INSPECTION AREAS

The Animal Feed Inspector *Training Worksheet* is divided into the following 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. Competency or task that are part of the AFI's job responsibility should be included in the training plan. Tasks that are applicable to the AFI's job should <u>not</u> be arbitrarily removed or deleted from the *Training Worksheet*.

The tasks listed under each competency are intended to serve as <u>examples</u> 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.

I. Pre-Inspection

1. Reviews the animal feed establishment's history and determine the scope of inspection.

- Reviews the previous inspection report(s) and complaint(s).
- Reviews the response letter to the previous establishment inspection in which corrective actions were promised.
- Determines scope of inspection based on establishment type and history, and type of inspection (e.g., CGMP, BSE, VFD, medicated feed, PCAF, comprehensive, or other)

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

- Has a copy or had electronic access to the pertinent laws and regulations.
- Has appropriate personal protective equipment (e.g., hard hat, respirator).
- Has appropriate inspection equipment (e.g., calculator, flashlight, camera).
- Has appropriate sampling equipment (e.g., probe, probe wipes, sample containers/bags).
- Uses up to date, proper, or appropriate forms for the type of inspection conducted.

II. Inspection Observations and Performance

- 1. Presents appropriate credentials and written Notice of Inspection to the animal feed establishment's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspections; and confirms inspection authority and establishes FDA jurisdiction, if applicable.
- Presents credentials to the owner, operator, or agent in charge of the establishment.
- Makes appropriate introductions, explains the purpose and scope of the inspection, and determines inspection authority.
- Enters the establishment through the front/main entrance and issues a Notice of Inspection prior to beginning the inspection.
- Issues the Notice of Inspection to the appropriate person.
- Confirms the interstate movement of product or ingredients.
- Determines if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.
- 2. Follows the safety protocols required by the animal feed establishment and the state program.
- Asks if any particular safety protocols are mandated at the establishment.
- Follows the state program's safety protocol or used personal protective equipment appropriately.
- Follows the safety protocols mandated by the establishment.
 - 3. Follows the biosecurity protocols required by the animal feed establishment and the state program.
- Inquires if any particular bio-security protocols are mandated at the establishment.
- Follows the state program's bio-security protocol.
- Follows the bio-security protocols mandated by the animal feed establishment.
 - 4. Recognizes the relative risk categorization of the animal food establishment based on the risk-based inspection program.
- Recognizes the relative risk of the establishment based on the animal feed establishment or product, types of processing, and compliance history of the establishment.
- Organizes inspection activities focusing on high-risk items such as high-risk products and processes.
 - 5. Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on establishments, products, and processes determined to be high-risk.
- Prioritizes high-risk inspection activities.
- Does not concentrate inspection activities on low-risk items and not high-risk products and processes.
- 6. Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.
- Conducts inspection with input from employees responsible for critical activities.
- Reviews records required by regulation that document employee training.
- Evaluates employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow.

II. Inspection Observations and Performance (continued)

- 7. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.
- Observes critical activities during the inspection and discusses procedures in place to prevent distribution when an error has occurred.
- Reviews labeling protocols and verifies a system is in place to assure proper labeling.
- Recognizes possible adulterants that are stored above or near bagged animal feed or ingredients.
- Reviews products for proper labeling and identification.
- Reviews animal 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.
 - 8. Recognizes significant non-compliant conditions or practices, and documents findings consistent with state program procedures.
- When present, recognizes significant non-compliant conditions, but not to the exclusion of less significant non-compliant conditions.
- When present, recognizes non-compliant products and adequately addresses them at the time of the observation or at the conclusion of the inspection.
- When present, recognizes medicated components not being used in accordance with their new animal drug approvals.
- When present, recognizes the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal feed.
- 9. Distinguishes between significant and insignificant observations, and isolated incidents versus trends.
- When present, distinguishes appropriately between significant and insignificant observations.
- When present, distinguishes appropriately between isolated incidents and trends.
- Discusses patterns or trends that were observed.
- Emphasizes the severity or outcome of significant observations and the need for immediate action.
- Identifies record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the establishment and the deficiency has not reoccurred.
- 10. Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.
- Reviews appropriate establishment records.
- Questions alarm notifications and the resulting required procedures.
- When deficiencies are noted, investigations and corrective actions by the establishment are reviewed.
- Reviews equipment cleanout records and notes that cleanouts are or are not completed according to the establishment's SOP.
 - 11. Collects adequate evidence to include samples and documentation to support inspection observations in accordance with state program procedures.
- When significant deficiencies are noted in establishment records, documents are collected to support the findings.
- When significant non-compliant conditions are observed, supporting evidence such as photographs, detailed narrative, or affidavits are collected.

II. Inspection Observations and Performance (continued)

12. Verifies deficiencies identified during the previous inspections have been addressed.

• Verifies correction of out of compliance observations identified during previous inspection.

13. Conducts activities in a professional manner.

- Dresses appropriately for the inspection with clean and presentable clothing.
- Wears protective safety equipment that is required by the establishment or the state program.
- Abides by establishment's request regarding specific safety and bio-security practices at the establishment.
- Was polite and flexible.

III. Oral and Written Communication

1. Uses effective interviewing techniques.

- Requests for information are unambiguous and results in relevant information provided from the establishment.
- Avoids using jargon and acronyms, without explanation.
- Is not confrontational.
- Does not ask pointed and directed questions to solicit a desired response.
- Is a good listener and does not interrupt the establishment personnel in their responses.

2. Explains findings clearly and adequately throughout the inspection.

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

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

- Notifies the establishment's manager when direct contamination of product or ingredients is witnessed.
- Notifies the appropriate and most responsible person in the animal feed establishment 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 establishment's owner, operator, or agent in charge.

- Lists significant inspectional observations.
- Provides further explanations with inspectional observations.
- Completes legible report without spelling or grammatical errors.
- Provides the establishment's owner, operator, or agent in charge with a summary of inspectional observations.

5. Answers questions and provides information as appropriate.

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

6. Submits inspection report, sample(s), supporting evidence and documentation within the designated timeframes consistent with state program procedures.

- Reference attached documents are in inspection report.
- Reference documents are legible.
- Reference documents are accurate and reflect observations made during the inspection.
- Attaches referenced document(s) to the inspection report per state program's administrative procedures.

IV. Sample Collection

1. Uses an animal feed sample collection method consistent with criteria established by laboratory serving state program.

- Follows safety precautions on the animal feed label.
- Follows the state program's safety protocol for collecting samples.
- Uses appropriate sampling equipment for the selected product, as described in the <u>AAFCO Feed Inspector's Manual</u>.
- Uses appropriate sample containers as specified by the state program.
- Uses appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual.
- Follows the state program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).
- Follows the state program's procedure for documenting and maintaining sample integrity, security, and chain of custody.
- Issues a receipt for sample(s).
- Ships sample to the appropriate laboratory within the timeframe specified by the state program.
- Follows the state program's procedures for handling, packaging, and shipping samples to maintain sample integrity.

Attachment D – Supplemental Guidance for Planning and Conducting Joint Field Inspections
Attachment D – Supplemental Guidance for Planning and Conducting Join
Field Inspections

Supplemental Guidance for Planning and Conducting Joint Field Inspections

<u>Chapter VII</u> of this *Training* Manual provides the basic steps and recommendations state programs should consider in planning for and conducting joint field training inspections as part of the training process for AFIS. This attachment provides supplemental guidance and recommendations for Qualified Feed Inspector Trainers (QFITs) to consider in planning and conducting joint field training.

Planning Your Joint Field Training

As mentioned in Chapter VII, planning for joint field training comprises of three key steps. QFITs should take time to ensure all preparation is made for the success of the AFI's training. The three step are:

- Step 1 Identify and ensure access to required documents for joint field training orientation as determined by the state program;
- Step 2 Review curriculum and list of course with trainee; and
- Step 3 Review training plan with trainee

<u>Step 1 – Identify and Ensure Access to Required Documents for Joint Field Training Orientation</u>

The program should identify information that a state program review as part of the AFI's joint field training orientation, to include but 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 provided by <u>FDA OTED</u>'s <u>LearnED</u>; 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 QFIT will likely need to review with the AFI over the first weeks of employment or assignment to the state's animal feed inspection program.

Step 2 – Review Curriculum and List of Coursework with Trainee

The curriculum and courses listed as required state program coursework (see <u>Chapter IV</u>) should be reviewed with the AFI. The QFIT, designated manager, or animal feed program administrator is to decide whether a candidate has met any or all the coursework requirements <u>and</u> has documentation indicating successful completion. If the AFI needs to complete coursework, the QFIT should assist him/her with obtaining an access password to the <u>FDA OTED's LearnED</u> or other training websites, 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

The QFIT should conduct a review of the state program's animal feed inspector training plan with the trainee, to include a discussions of:

- The level of training, associated coursework with the 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 QFIT 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 state program's animal feed inspector training plan; and
- The state program's criteria for determining a trainee's readiness to conduct independent inspections of animal feed establishments.

Conducting Joint Field Training Inspections

Conducting joint field trainings is the next step in the process of training phase. QFITs should familiarize themselves with the following six steps and understand the roles and differences between a 'Trainer-led" vs. a "Trainee-led inspection.

- **Step 1** Selecting appropriate QFITs;
- Step 2 Conducting 'Trainer-led" inspections;
- Step 3 Preparing for 'Trainee-led inspections;
- Step 4 Selecting establishments for 'Trainee-led' inspections;
- Step 5 Determining the number of 'Trainee-led' inspections; and
- Step 6 Observing Trainees demonstrate task

Step 1 – Selecting Appropriate QFITs

The administrator of the animal feed program or designated manager has the discretion of deciding who will serve as QFITs. In making this decision, available training resources (e.g., personnel, time, equipment, and funding) and overall program objectives 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 establishment 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 QFITs will eventually oversee animal feed establishment inspections. This allows the trainee to gain confidence learning competencies and demonstrating job tasks without the added stress of their territory's animal feed establishment 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 QFITs to demonstrate tasks and provide feedback.

Step 3 – Preparing for Trainee-Led Inspections

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

- The **trainer (QFIT)** 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 QFIT, 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.

OFIT's Role

During trainee-led inspections, the QFIT observes the trainee conducting the inspection and demonstrating the tasks. The QFIT participates <u>only</u> 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 QFIT 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 QFIT may note that the selection of establishments may not provide the trainee an opportunity to demonstrate some tasks. The QFIT 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 QFIT 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 QFIT 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 Trainee-Led Inspections

The ideal establishment for conducting an animal feed 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 inventory 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 <u>FDA AFRPS</u> can be also be used as a reference for assigning risk categories.

Step 5 – Determining the Number of Trainee-Led Inspections

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 <u>FDA AFRPS</u>, 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 processes highlighted in this *Training Manual* are *not* intended to be part of an audit or evaluation process, therefore a 'scoring system' has not been included. The primary objective of the joint field inspection training 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 QFITs as the standard of measurement; the state program's QFITs 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 QFIT will observe the trainee demonstrate many tasks. For some tasks, the QFIT 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 QFIT should observe the trainee successfully demonstrate a consistent pattern of behavior for each task. As defined in this *Training Manual*, 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 QFIT 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 establishment to another should be expected. QFITs 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 QFITs to recognize that during the training process, trainees are not only learning tasks but are also becoming acclimated to their working environment. QFIT'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.



ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS

MODEL TRAINING MANUAL

ANIMAL FEED INSPECTOR (AFI)

Table of Contents

I.	Introduction	1
	Background	1
	Training Collaboration Background	1
	Overview – Training Manual	2
	Disclaimer	2
II.	Glossary of Terms	3
III.	State Program Training Policy (Model Example)	6
	Model Example	6
IV.	Training Curriculum and Coursework	9
	Courses	9
	Basic Animal Feed Inspector Training	9
	Advanced Animal Feed Inspector Training	9
	Options for AFIs to Fulfill Training Coursework	10
	Field Training	10
	Continuing Education (CE)	10
	Additional Training	11
	Contract Inspections	11
V.	Training Plan and Log	13
	Training Plan and Log	13
	State Program's Training Methods	13
	Inspection Training Areas	13
	Competencies	14
VI.	Creating Your Training Plan	16
	Step 1 – Select Appropriate Coursework to be Included in Your Training Plan	16
	Step 2 – Identify Required Competencies of the AFI Job Performance to be Included in Your Training Plan	
	Step 3 – Determine Tasks to be Successfully Demonstrated for Each Selected Competer	•
	Step 4 – Determine Need for Additional Competencies and Tasks	18
	Step 5 – Determine Appropriate Training Method for Each Competency and Task	18
VII.	Planning For and Conducting Joint Field Training Inspections	20
	Planning Your Joint Field Training	20
	Conducting Joint Field Training Inspections	20
VIII	. Documenting Training Progress and Accomplishments	
	Training Plan and Log Use as a Single-Source Document	22
	Optional Training Logs	24

AAFCO Field Training Manual, Regulatory AFI

Supplemental Field Training Worksheet for Trainers	25
Reviewing Field Training	25
Documentation of Completion	26
Attachment A – Training Plan Log	27
Animal Feed Establishments Animal Feed Inspector	28
Placeholder	31
Basic Animal Feed Inspector Training	32
Advanced Animal Feed Inspector Training	33
Continuing Education	34
Inspection Training Areas	35
Weekly Planning Log	
Joint Field Training Inspection – Establishment Log	
Attachment B – Training Worksheet	53
Guidance for Using the Field Training Worksheet	68
Two Approaches for Using Training Worksheets	70
Approach #1: During Every Trainee-Led Inspection	70
Approach #2: At Set Interval Points	71
Attachment C – Reference Document: Tasks for Each Competency	73
$Attachment\ D-Supplemental\ Guidance\ for\ Planning\ and\ Conducting\ Joint\ Field\ Inspections$	81
Planning Your Joint Field Training	
Conducting Joint Field Training Inspections	83

I. Introduction

Background

The <u>Association of Animal Feed Control Officials (AAFCO)</u> is a voluntary membership organization that comprises personnel representing state and federal animal food/feed regulatory agencies. The Association has been guiding state, federal and international feed regulators with ingredient definitions, label standards and laboratory standards for more than 110 years, while supporting the health and safety of people and animals. Our members are charged by their state or federal laws to regulate the manufacture, sale, and distribution of animal feeds and animal drug remedies. AAFCO's mission – "A collaborative association that supports members and stakeholders and promotes a safe feed supply through unified system-based regulation, feed ingredients standards, and laboratory operations."

The AAFCO Education and Training Committee (ETC) first released the final draft version of the Model Training Manual – Animal Feed Inspector, dated July 30, 2018. Using concepts within the retail human food regulatory programs developed by the Conference for Food Protection (CFP), AFFCO's ETC developed an initial version of the training model to assist animal feed regulatory programs with developing and implementing training programs to ensure regulatory inspectors have the knowledge, skills, and abilities to effectively inspect animal feed establishments in conducting their inspections and enforcement actions. In 2024, the AAFCO ETC was charged to review the model training manual and to provide recommendations for updates and necessary changes.

This *Training Manual* focuses on coursework and field training to prepare newly hired Animal Feed Inspectors (AFIs) or individuals newly assigned to the regulatory feed protection program to conduct independent animal feed inspections. The *Training Manual* consists of a Model Training Policy, training curriculum and coursework, trainer's worksheets, and procedures that may be used by *any* animal feed regulatory state program. State programs do *not* have to be enrolled in the *Animal Food Regulatory Program Standards (AFPRS)* to use, and benefit from, this *Training Manual* for preparing AFIs to conduct independent animal feed inspections. This *Training 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 model outlined in this *Training Manual* can be readily integrated into existing animal feed regulatory programs. The instructions and worksheets provided in this *Training Manual* and attachments constitute a training process, *not* a certification or audit process.

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

Training Collaboration Background

The Partnership for Food Protection (PFP) 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 U.S. Food and Drug Administration (FDA) and AAFCO began a partnership to develop the 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 Program, a model multi-tiered approach for training and standardizing Animal Feed Inspectors (AFIs) was developed.

Overview - Training Manual

All new employees or individuals new to the animal feed regulatory program should complete coursework and a field training process as recommended in this *Training Manual*. 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 *Training Manual* are based on these minimum competencies and tasks.

Flexibility is built into the training process to allow regulatory state programs the opportunity to customize training content and delivery methods to represent a state program's own administrative policies, procedures, and inspection protocol. As you read through this *Training Manual*, it is important to keep in mind that state programs are not obligated to use the forms referenced within this *Training Manual*. Equivalent forms or training processes may be developed, along with electronic training record programs. The ultimate objective of a state program developing and implementing their training program is to ensure AFIs are trained and provided an opportunity to successfully demonstrate the competencies and tasks that are a vital part of their job responsibilities.

Disclaimer

This *Training Manual* is designed to be used as a resource by state animal feed regulatory agencies. The guidance and recommendations in this *Training Manual* do not create or confer any rights for, or on, any person or regulatory agency, and do not operate to bind regulatory public health officials or the public. This *Training Manual* does not have the force and effect of law and thus is not subject to enforcement. The *Training Manual* encourages animal feed regulatory agencies to use the guidance herein to tailor AFI training practices appropriate to their state regulatory programs.

II. Glossary of Terms

Animal Feed Inspector (AFI): A regulatory employee responsible for conducting animal feed or pet food inspections.

Animal Food Regulatory Program Standards (AFRPS): Voluntary set of standards developed through the partnership of Association of American Feed Control Officials (AAFCO) and the US Food and Drug Administration (FDA) 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 Food Regulatory Program Standards*, *Standard 2 – Training Program* as the basis for required elements. Standard 2 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.

Animal Feed: The term used to represent the definitions for: (1) food and animal feed in the Federal Food, Drug, and Cosmetic Act (FD&C Act) sections 201(f) and 201(w), (2) for animal food in Title 21 of the Code of Federal Regulations (CFR) section 507.3 (21 CFR 507.3), and (3) for animal feed in the AAFCO Official Publication (AAFCO OP, Chapter Four – Model Bill and Regulations). NOTE: For state application, 'animal food' may include 'animal feed' and 'pet food.'

Association of American Feed Control Officials (AAFCO): 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: 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: The 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 QFIT observations which indicate that the trainee can successfully demonstrate the task correctly and repeatedly.

Contact Hour(s): One contact hour equals 60 minutes.

Establishment Risk Categories: Categorization of animal feed establishments based on risk factors. Standard 3 of the AFRPS requires that regulatory state programs use a procedure for risk categorization of animal feed establishments using three minimum required factors for defining risk categories: types of animal feed and animal food products, types of processing, and compliance history of the establishment. State programs may use their own procedure for risk categorization.

Joint Field Training Inspection: An inspection conducted jointly by a Qualified Field Inspection Trainer (QFIT) and inspector trainee for the purpose of training and/or enforcement. A joint inspection is used to provide training during an inspection of an establishment and may either be trainer-led or trainee-led.

Program(s): An operational unit(s) in a regulatory agency that is responsible for the regulatory oversight of animal feed.

Qualified Field Inspection Trainer (QFIT): An individual who is recognized by the state's program as having field experience and communication skills necessary to train inspectors/investigators.

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.

Trainee: 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: A joint field-training inspection that includes both the state program's designated QFIT and the trainee: where the <u>trainee</u> 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 QFIT 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: A method of joint field-training used by a Qualified Field Inspection Trainer (QFIT) 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: A structured approach for a regulatory animal feed protection program to identify and document training content, determine training methods, and track an Animal Feed Inspector's (AFI's) progress in demonstrating tasks specific to their job responsibilities and essential for conducting independent animal feed inspections.

NOTE: An example of a Training Plan and Log is provided in <u>Attachment A</u> to this Training Manual.

Training Worksheet: An optional form that can be used by a QFIT to record their observations while a trainee is demonstrating the various competencies and 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*.



III. State Program Training Policy (Model Example)

This chapter of the *Training Manual* provides a model example of a 'State Program Training Policy' for consideration by state animal feed regulatory programs in developing their own training policies. States should evaluate their programs, training needs, existing training curriculums and courses, current and future inspection responsibilities, and available resources during the development of their training policies.

Model Example

1) Purpose

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

2) Policy Statement

To ensure AFIs 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 training plan that includes course curriculum for basic and advanced inspection training, and continuing education. Newly hired AFIs shall progress through all three phases of the ascribed training, and in the following order:

- a) Basic animal feed inspector training (as defined by your program) may contain both coursework and field training components.
 - i) The state program requires a basic inspector to complete both basic coursework and basic field training within 24 months of initial start date;
 - ii) Required subject areas for the basic animal feed inspector coursework shall include those basic subject areas as defined within the current <u>AFRPS</u>, Standard 2 Training Program;
 - iii) Basic animal feed field training shall be verified by a Qualified Field Inspection Trainer (QFIT) 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
 - (f) Basic evidence development
 - iv) As determined by the state program, include a minimum number of joint field inspections at establishment 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 animal feed inspector training (as defined by your program) may contain both coursework and field training components.
 - i) The state program requires an advanced inspector to complete both advanced coursework and advanced field training:
 - (1) Prior to conducting independent advanced inspections; and
 - (2) Within 60 months of initial start date.
 - ii) Required subject areas for the advanced animal feed inspector coursework shall include those advanced subject areas as defined within the current <u>AFRPS</u>, Standard 2 Training Program;
 - iii) Advanced animal feed field training shall be verified by a QFIT following program procedures for joint field training inspections and shall include:
 - (1) Verification that the trainee has been found competent by demonstrating the skills and tasks of an advanced animal feed inspector in the following areas:
 - (a) Pre-Inspection
 - (b) Inspection Observations and Performance
 - (c) Oral Communication
 - (d) Written Communication
 - (e) Evidence Development
 - (f) Professionalism
 - (2) As determined by the state program, the minimum number of joint animal feed field inspections at establishment type's representative of the type of inspections to be conducted by an advanced animal feed inspector as well as representative of the state animal feed program inventory.
 - iv) Continuing Education (CE) for all inspectors shall begin upon completion of their required basic and advanced curriculum.

3) Documentation Requirements

- a) The state program shall maintain records documenting the training completed by all inspectors.
 - i) For state programs enrolled in the <u>AFRPS</u>, documentation shall be recorded and maintained in a manner compliant with the current <u>AFRPS</u> Training Standard.
- b) For inspectors with greater than five years of experience at the date of the initial 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 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; or
- vi) Documentation approved by the Qualified Field Inspection Trainer (QFIT).

History Note: [ADD State Program's Effective Date]



IV. Training Curriculum and Coursework

Training as described in this *Training Manual* comprises of a **recognized** curriculum for AFIs, coursework for basic and advanced level animal feed inspections, field training, continuing education, and additional areas where specialized training is required, (e.g., US FDA contract work or specialized inspections). Each of these **training components** are discussed in this chapter of the *Training Manual* and should be considered as state programs develop their own animal feed inspector training plan.

NOTE: AAFCO collaborated with FDA to develop the 'AFRPS Job Aid; Standard 2 – Coursework Resources.' This job aid provides state programs with a comprehensive listing of available coursework from multiple resources for basic and advanced courses listed in this chapter, and is accessible for state regulatory programs on the AAFCO FeedBIN.

Courses

AAFCO has worked with the FDA to establish curriculums for basic and advanced animal feed inspectors, each with their own coursework and field training requirements. They were designed to ensure an AFI has the knowledge, skills, and abilities to competently inspect animal feed establishments, conduct investigations, gather evidence, collect samples, and take enforcement actions. Each level of training is described below.

Basic Animal Feed Inspector Training

Basic animal feed inspector training consists of coursework in the following subject areas¹:

- Animal and Public Health Principles
- Animal Food Defense
- Basic Animal Nutrition
- Basic Evidence Development
- Basic Ingredients, Processing, and Technology
- Basic National Incident Management System and Incident Command System (ICS)
- Communication
- Current Statutes, Regulations, and Policies
- Inspections, Compliance, and Enforcement
- Labeling
- Professionalism
- Risk Awareness
- Safety
- Sample Collection

Advanced Animal Feed Inspector Training

Advanced animal feed inspector training consists of coursework in the following subject areas¹:

¹ US FDA Animal Food Regulatory Program Standards (<u>AFPRS</u>), Standard 2 – Training Program.

- Advanced Ingredients, Processing, and Technology
- Advanced Inspections, Compliance, and Enforcement
- Advanced Labeling
- Animal Illness and Death Investigation
- Current Statutes, Regulations, and Policies
- Epidemiology
- Evidence Development
- Microbiological Pathogens
- Traceback and Traceforward Investigations

Options for AFIs to Fulfill Training Coursework

Option 1 – State Program/AAFCO/FDA Training

All basic and advanced coursework may be completed by attending classroom training administered by the state program and/or AAFCO Coursework may also be obtained through successful completion of <u>FDA Office of Education and Training Delivery</u> (OTED) LearnED web-based training.

OPTION 2 – Equivalent Coursework

A state program may allow credit for training coursework by providing documentation of course completion from any training or examination, including college or university courses that are deemed equivalent by the state program.

Field Training

Field training is 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 establishments in the state program's inventory and the type of routine or basic work that will be performed by the inspector. The QFIT will determine the minimum number of required joint field training inspections for each type of animal feed establishment and inspection type (e.g., Bovine spongiform encephalopathy (BSE), Veterinary Feed Directive (VFD), Animal Food Preventive Controls and/or Current Good Manufacturing Process (AF PC and/or CGMP), Medicated Feeds) 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 QFIT, designated manager, or animal feed administrator. Basic or advanced field training and coursework must be successfully completed within 24 or 60 months, respectively, from the start date.

Continuing Education (CE)

The coursework, training plan, and joint field training inspection process outlined in this *Training 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 as the first step in the development of AFIs staff in a regulatory animal

feed program. Additional training opportunities should be provided as continuing education (CE) to advance the development of an AFI's ability to implement a risk-based inspection approach, maintain knowledge and skills with evolving technology and processes, and communicate animal feed safety principles to the regulated industry and the public.

The state program shall establish the continuing education requirement for the program's AFI upon their completion of the required curriculum (basic and advanced). This should include:

- Minimum number of contacts hours per designated time period²;
- Designation when the CE period begins and intervals; and
- Documentation requirements that accompanies each activity included in the AFI's CE.

State programs may consider CEs from 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. The state program may also include but limit the amount of CEs from the following activities: attendance at professional seminars, symposiums, or technical conferences; delivery of presentations at professional conferences; providing classroom or field training to new hires; serving as a course instructor in animal feed safety; or publishing an original article in a peer-reviewed professional or trade association journal, periodical, or publication.

NOTE: Additional guidance for CEs may be found in the current AFRPS and the US FDA AFRPS Job Aid for Standard 2.

The *Continuing Education Record* (see Attachment A) provides an example for tracking continuing education activities. Documentation must accompany each activity submitted for continuing education credit.

Additional Training

State programs should also provide opportunities for AFIs to attend the AAFCO training seminars, such as the <u>Basic Inspector Training Seminar (BITS)</u> and/or <u>Advanced Inspector Training Seminar (AITS)</u>. These seminars address animal feed program inspection areas in which an AFI should receive training and provides an opportunity to demonstrate inspection techniques and procedures.

Contract Inspections

State programs may select to conduct contract work with US FDA of animal feed and/or medicated feed establishments, which may require specific training. These states should review the training requirements within the Statement of Work (SOW) of their FDA Animal Food Inspection Contract and incorporate these requirements as part of the state's training curriculum. Examples of these contract inspections include determining if animal feed establishments are in compliance with 21 CFR Part 225, the Federal Food, Drug and Cosmetic Act (FD&C Act), state feed law and regulations, or both; VFD regulations in 21 CFR 558.6; BSE Rule (21 CFR

² The current version of the AFRPS states that each inspector receive 20 contact hours of continuing education every 36 months.

589.2000 and 21 CFR 589.2001); and PC AF and CGMP regulations in 21 CFR Part 507. Advanced coursework and field training must be successfully completed by the AFI prior to performing a contract inspection alone.



V. Training Plan and Log

The <u>Training Plan and Log</u> referenced in this <u>Training Manual</u> provides state programs with a structured approach for identifying the training content, competencies and associated tasks expected of AFIs, determining the training methods, documenting coursework training, and tracking the AFI's progress in successfully demonstrating competencies and tasks specific to their job responsibilities. Each of the key components within the <u>Training Plan and Log</u> are discussed in this chapter. Information and recommendations for "<u>How to</u>" state programs develop their <u>Training Plan and Log</u> is provided in the <u>Chapter VI – Creating Your Training Plan and Log</u>.

Training Plan and Log

The <u>Training Plan and Log</u> provides areas for documenting:

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

Optional areas are included in the *Training Plan and Log* for:

- Maintaining a weekly training log for tracking accomplishments and identifying future training goals;
- Tracking the number and type of animal feed establishments included as part of the field training inspections; and
- Documenting the AFI's full training curriculum (including basic, advanced and any additional training requirements).

State Program's Training Methods

The *Training Plan and Log* provided in this *Training Manual* is designed to incorporate a variety of training methods appropriate for each of the identified competencies and tasks required of an AFI. State programs are free to select the training methods most appropriate for their individual situation and training needs. Examples of training methods include, but are not limited to: classroom presentations or exercises, laboratory workshops, office demonstrations, and joint field training inspections. How to implement and document the training is discussed in *Chapter VI - Creating Your Training Plan and Log*.

Inspection Training Areas

The <u>Training Plan and Log</u> provided in this <u>Training Manual</u> is divided into the following 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 may add competencies and tasks not contained in the *Training Plan and Log*)

Competencies

As a reminder, competencies are defined as "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." Through collaboration with AAFCO and FDA, competencies within the four (4) inspection training areas have been identified for an AFI and are included in the *Training Plan and Log*. Each of them and their corresponding tasks are provided in greater detail in the *Training Plan and Log* and Attachment C. These competencies should be incorporated as foundation for AFI training programs (coursework, field training, and continuing education). The following competencies for an AFI are:

I. Pre-Inspection

- Reviews the animal feed establishment's history and determine the scope of the inspection.
- Uses the appropriate equipment and forms needed to conduct inspections.

II. <u>Inspection Observations and Performance</u>

- Presents appropriate credentials and written Notice of Inspection to the animal feed establishment's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspection; confirms inspection authority and establish FDA jurisdiction, if applicable.
- Follows the safety protocols required by the animal feed establishment and the state program.
- Follows the biosecurity protocols required by the animal feed establishment and state program.
- Recognizes the relative risk categorization of animal feed establishments based on the risk-based inspection program.
- Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on the establishment's products, and processes determined to be higher risk.
- Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.
- Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated, contaminated, or misbranded.
- Recognizes significant non-compliant conditions or practices, and documents findings consistent with state program procedure.
- Distinguishes between significant and insignificant observations, and isolated incidents versus trends.
- Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.

- Collects adequate evidence and documentation to support inspection observations in accordance with state program procedures.
- Verifies deficiencies identified during the previous inspections have been addressed.
- Conducts activities in a professional manner.

III. Oral and Written Communication

- Uses effective interviewing techniques.
- Explains findings clearly and adequately throughout the inspection.
- Alerts the animal feed establishment'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 animal feed establishment's owner, operator, or agent in charge.
- Answers questions and provides information as appropriate.
- Submits inspection report, samples, supporting evidence and documentation within designated timeframes consistent with state program procedures.

IV. Sample Collection

• Uses an animal feed sample collection method consistent with the criteria established by laboratory serving the state program.³

V. Additional Competencies – (State Program Specific)

• Other competencies identified by the State Program.

³ Additional sample collection resources are available in the <u>AAFCO Feed Inspector's Manual</u> and various <u>laboratory references and documents</u> are posted on the AAFCO website.

VI. Creating Your Training Plan

This chapter of the *Training Manual* addresses the five (5) basic steps a state programs should consider when developing a training plan for an animal feed regulatory training program. They include:

- **Step 1** Select appropriate coursework to be included in your training plan;
- Step 2 Identify required competencies of the AFI job performance to be included in your training plan;
- Step 3 Determine tasks to be successfully demonstrated for each competency;
- Step 4 Determine the need for additional competencies and tasks; and
- Step 5 Determine the appropriate training delivery method for each competency and task.

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

A <u>blank page</u> has been inserted into this *Training Manual* to act as a placeholder for the trainer or designated manager to insert the state program's basic or advanced curriculum and 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 inspector coursework training. The state program may reference <u>Chapter IV</u> of this *Training Manual* for details on the subject areas and coursework for basic and advanced animal feed inspection training. The *Training Plan and Log* include training records for documenting completion of the *Basic Animal Feed Inspector Training* and *Advanced Animal Feed Inspector Training*.

NOTE: State programs enrolled in AFRPS should consult the current <u>AFRPS Training Standard</u> for the required subject areas to be covered during basic and advanced coursework training.

NOTE: State programs enrolled in the AFRPS are required to include in the documented state training plan descriptions and curriculum for each inspection type.

<u>Step 2 – Identify Required Competencies of the AFI Job Performance to be Included in Your Training Plan</u>

As defined in the glossary of this *Training Manual*, competencies are defined as "*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.*" They set the expectation of measurable patterns of knowledge, skills, abilities, behaviors, and other characteristics that an individual needs to perform work roles or occupational functions successfully. Competencies specify the "how" of performing job tasks, or what the person needs to do the job successfully. An individual competency may have one or more tasks that are specific actions or activities to perform as part of the required job.

The <u>Training Plan and Log</u> provide state programs with a training record template listing the competencies and corresponding tasks, and may be used for both basic and advanced feed

inspector training. The state program should review and determine the competencies that are part of the job responsibility of an AFI in their state program and include them within the state's developed *Training Plan and Log*. If a competency is required 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. In the following example illustration for the identified competency '*Pre-Inspection*' training area, the trainer indicated that this competency is part of the AFI's job responsibility as determined by the state program and an "X" is placed in the adjacent box.

	<u> </u>						
$\widehat{\mathbf{x}}$	1. Reviews the animal feed establishment's history and determine the scope of inspection.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer		
(Tr	aining method and selected tasks for this competency are to be indi	cated below)					
	Reviews the previous inspection report(s) and complaint(s).						
	Reviews the response letter to the previous establishment inspection which corrective actions were promised.	n					
	Determines scope of inspection based on establishment type and history, and type of inspection (e.g., CGMP, BSE, VFD, medicate feed, PCAF, comprehensive, or other).	i					
	ADDITIONAL (State program specific tasks)						
Co	mments:						
	Trainee has demonstrated acceptable performance for all tasks listed						
Da	Date: Trainee's Initials: Trainer's Signature:						

I. Pre-Inspection

Step 3 – Determine Tasks to be Successfully Demonstrated for Each Selected Competency

Tasks are activities an individual performs on a regular basis in order to carry out the functions of a job. An individual competency may have one or more tasks. In addition to the competencies provided in the *Training Plan and Log*, corresponding tasks are listed. The state program should identify and determine the job tasks under each competency and document them in the state's developed *Training Plan and Log*. These tasks are intended to communicate job related tasks an AFI will be expected to successfully demonstrate during field training inspections. Similar to the competencies, the state program should place an 'X' in the box corresponding to each task the AFI is expected to perform as part of the AFI's job responsibility.

The following illustration for 'IV. Sample Collection' includes three examples where tasks have been identified and documented by the state program as part of their training plan.

- The QFIT determined and marked existing tasks required of the AFI with an "X".
- Anything not applicable is not marked with an "X" and not required in the training plan.
- If a task is not listed under the competency then it can be added under "ADDITIONAL (state program specific tasks)".

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

IV. Sample Collection

NOTE: Tasks that are applicable to the AFI's job should <u>not</u> be arbitrarily removed or deleted from the Training Worksheet.

Step 4 – Determine Need for Additional Competencies and Tasks

The competencies and tasks that comprise the training plan in this *Training Manual* represent a national model, and the overwhelming majority of these apply to every state animal feed program. There will be instances, however, where a state program may need to add additional competencies and tasks that are not listed within the recommendations of this manual. Section V of Inspection Training Area Worksheet in Attachment A provides a template and allows for these additions. Just as with Step 1 and Step 2 in developing your training plan, an "X" is placed in the appropriate boxes for the added competency and task.

Step 5 – Determine Appropriate Training Method for Each Competency and Task

AFI training should be reflective of the environment they will be expected to perform their duties. The selection of establishments used for training should provide adequate opportunities to demonstrate all tasks.

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 QFIT to observe the trainee demonstrating these job tasks during joint field training inspections. The state program will determine which competencies are best to be covered through field training vs classroom training. The competencies can be found in <u>Chapter V</u>.

The following illustration provides an example for documenting alternative training methods using the *Training Plan and Log*. 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, thus the trainee demonstrated these tasks by incorporating a classroom exercise 'CE' as an alternative training method in addition to joint field training 'JFT' method.

III. Oral and Written Communication

х	1. Uses effective interviewing techniques.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer	
(Tr	aining method and selected tasks for this competency are to be it	ndicated below)				
х	Requests for information are unambiguous and results in releva information provided from the establishment.	nt JFT				
х	Avoids using jargon and acronyms, without explanation.	JFT				
х	Is not confrontational.	JET				
х	Does not ask pointed and directed questions in order to solicit a response.	desired CE and/or JFT				
x	Is a good listener and does not interrupt the establishment person in their responses.	nnel				
	ADDITIONAL (State program specific tasks)					
Co	Comments:					
	Trainee has demonstrated acceptable	performance for al	ll tasks listed			
Date: Trainee's Initials: Trainer's Signature:						

VII. Planning For and Conducting Joint Field Training Inspections

This chapter of the *Training Manual* will include steps and recommendations state programs should consider in planning for and conducting joint field training inspections as part of the training process for AFIs.

There are two types of joint field training inspections: Trainer-led and Trainee-led.

Joint field training will initially be comprised of <u>trainer-led</u> inspections conducted with a QFIT. Providing an opportunity for the AFI to observe experienced staff conducting animal feed establishment inspections is an essential step in preparing a trainee to take the lead during joint field training inspections.

<u>Trainee-led</u> inspections provide the opportunity for the QFIT or designated individual to observe the trainee, build their skills, provide feedback, and make corrections as needed for AFIs to successfully demonstrate competency.

A sufficient number of field training inspections led by the trainee are to be conducted to allow the demonstration of <u>all</u> 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 establishments.

Planning Your Joint Field Training

Planning for joint field training comprises of three key steps. QFITs should take time to ensure all preparation is made for the success of the AFI's training. The three step are:

- Step 1 Identify and ensure access to required documents for joint field training orientation as determined by the state program;
- Step 2 Review curriculum and list of course with trainee; and
- Step 3 Review training plan with trainee.

Conducting Joint Field Training Inspections

Conducting joint field trainings is the next step in the process of training phase. QFITs should take time to familiarize themselves with the following six steps and understand the roles and differences between a 'Trainer-led" vs. a "Trainee-led inspection. The six steps are:

- **Step 1** Selecting appropriate QFITs;
- Step 2 Conducting 'Trainer-led' inspections;
- Step 3 Preparing for 'Trainee-led inspections;
- Step 4 Selecting establishments for 'Trainee-led' inspections;
- Step 5 Determining the number of 'Trainee-led' inspections; and
- Step 6 Observing Trainees demonstrate task.

Attachment D provides supplemental guidance and recommendations for QFITs to consider in planning and conducting joint field training. When the trainee successfully demonstrates a task and competency, the state program's QFIT or designated staff person documents the completion of the skill on the animal feed inspector training plan. Some options and forms for tracking the trainee's progress and accomplishments are discussed in Chapter VIII, Documenting Training Progress and Accomplishments.



VIII. Documenting Training Progress and Accomplishments

This chapter discusses the framework and processes to assist state programs with developing a system to track an AFI's training progress and accomplishments. The <u>Training Plan and Log</u> and various forms provided in *Attachment* A - B are designed for documenting the training progress of an AFI. The state can determine the method of documenting the training process. It is suggested that the training documentation provide a method for:

- Identifying the AFI's coursework level;
- Recording completion of AFI's coursework and supporting documentation, such as certificate of completion;
- Recording competencies and tasks that have been successfully demonstrated by an AFI;
- Determining competencies and tasks an AFI has not yet demonstrated;
- Identifying the QFIT or designated individual's responsible for observing an AFI demonstrating a competency and task;
- Providing feedback to the AFI on training objectives; and
- Obtaining confirmation from both the AFI and QFIT or designated individual that tasks have been demonstrated correctly.

Training Plan and Log Use as a Single-Source Document

The <u>Training Plan and Log</u> may be used as a single-source document for recording an AFI's training progress and accomplishments.

Several record forms are provided within Attachment A for state programs to use to track completion of coursework subject areas for Basic Animal Feed Inspector Training, and Continuing Education. The illustration below provides an example of how an AFI's coursework can be identified, recorded, and tracked for completion with documentation.

Subject Areas	Name and Location of Training	Completion Date	Documentation Verifying Completion
Animal and Public Health Principles	AAFCO BITS – Boise, ID	10/24/2024	Yes
Animal Food Defense			
Basic Animal Nutrition			

The program identifies and records the subject areas to be covered during the AFI's coursework training (indicated with the arrows in the illustration). For each of the subject areas, the QFIT records the name, location, and completion date of the AFI's training. The QFIT or designated manager confirms that the trainee has successfully completed coursework pertaining to that subject area as 'Yes' or 'No.' Documentation verifying completion of coursework should accompany the AFI's coursework training record.

Within Attachment A are <u>Training Plan and Logs</u> for use within a state program's training plan. The *Training Plan and Log* provides a listing of competencies and tasks required of an AFI and are used for tracking an AFI's training status for each task. The illustration below provides an example of how an AFI's training status can be tracked with documentation entered for the six tasks listed under this competency.

II. Inspection Observations and Performance

х	Inspection to the animal feed es operator, or agent in charge; m introductions; explains the purp	priate credentials and written Notice of e animal feed establishment's owner, ent in charge; makes appropriate explains the purpose and scope of the firms inspection authority and establishes n if applicable.			Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Ti	aining method and selected tasks for th	his competency are to be	indicated	below)			
x	Presents credentials to the owner, ope establishment.	erator, or agent in charge	of the	ЛFT	10/23/2024	CD	Amold Baker
х	Makes appropriate introductions, exp the inspection, and determines inspec		cope of	ЛFT	10/23/2024	CD	Arnold Baker
х	Enters the establishment through the front/main entrance and issues a			ЛFT	11/052024	CD	John Smith
X	Issues a Notice of Inspection to the appropriate person.			JFT	11/05/2024	CD	Arnold Baker
X				JFT	11/05/2024	CD	Arnold Baker
х	Determines if any products or ingredients have been received or			ЛFT	11/05/2024	CD	Arnold Baker
	ADDITIONAL (State program specific tasks)						
Co	mments: Trainee did not make approp	riate introductions at the	beginning	g of the insp	ection. Further d	liscussion a	nd
de	monstration will be provided prior to th	e next inspection. (John	Smith, 10	/23/2024)			
	Trainee has	demonstrated acceptabl	le perfori	nance for a	ll tasks listed		
Date: Trainee's Initials: Trainer's Signature: Arnold Baker							

For each of the tasks, the QFIT or designated individual records the date a determination was made that the trainee successfully demonstrated the task. The trainee's initials (represented by 'CD' in the graphic), indicate his/her agreement with the date recorded. The QFIT or designated individual's name or signature indicates confirmation that the trainee successfully demonstrated the task. When the trainee has demonstrated all the tasks required for a competency, the bottom row of the competency is completed.

Documentation on the *Training Plan and Log* does not have to follow this format exactly. For example, a state program that has only one QFIT may find it redundant to record the trainee's initials and QFIT's name for all tasks within each competency. In scenarios like this, a QFIT 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 and the QFIT signs confirming completion.

A 'comment' section is provided at the bottom of each of the competency tables. The comment section can be used to describe future training objectives or to provide a method of communicating training observations among multiple QFITs. 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. See the previous illustration for an example of a comment added by the QFIT.

Optional Training Logs

Two optional training logs are included at the end of the *Training Plan and Log*. They may 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 <u>before</u> initiating joint field training so their intended use and purpose can be communicated to AFIs in training and QFITs.

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.

Optional Weekly Planning Log

Trainee's Name: Connor Davis

Week: 4 Date Ending: 10/30/2024				
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				

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. A 'Risk Category' column provides a quick reference as to the complexity of the animal feed establishment'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. In addition, the establishment log provides a quick method for distinguishing trainer-led inspections from those which were trainee-led.

Optional
Joint Field Training Inspection – Establishment Log

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

Supplemental Field Training Worksheet for Trainers

The <u>Training Worksheet</u> provides a means for identifying tasks that the trainee has not had the opportunity to successfully demonstrate. This worksheet is a distilled version of the <u>Training Plan and Log</u> and can be used in conjunction with the <u>Training Plan and Log</u> to track an AFI's progress and accomplishments. Additional information on how to use and complete the <u>Training Worksheet</u> is available in <u>Attachment B</u>, <u>Guidance for Using the Field Training Worksheet</u>.

Reviewing Field Training

Consistent and on-going feedback regarding inspection tasks is the cornerstone of the AFI field training process presented in this *Training Manual*. The QFIT 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. QFITs should

provide continuous positive reinforcement for tasks correctly demonstrated by the trainee.

For areas where additional training is needed, the QFIT or designated individual 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 QFITs 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 QFIT'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.

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.

Attachment A – Training Plan and Log

Attachment A – Training Plan Log

Association of American Feed Control Officials TRAINING PLAN and LOG

Animal Feed Establishments 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.

		T	
Animal Feed Inspector's (AFI) Name:	Start Date of the Training Process:		
Animal Feed Inspector's (AFI) Agency:		Curriculum Level:	
		BASIC: □	ADVANCED: □
		Dasie.	TROVINCED:
Trainer's Name (if multiple trainers list all):	Trainer's Agency:		
1.			
2.			
3.			
3.			
4.			
Signatures below indicate AFI has completed	l all coursework and f	ield training elements a	nd
is ready to conduct independent an	imal feed establishme	nt inspections	
·		•	
Completion Date & Option of Coursework:			
OPTION 1: O	OPTION 2:		
	OPTION 2:		
Completion Date of Field Training - (Competencies & Tasks):			
	T		
Animal Feed Inspector's (AFI) Signature:	Trainer's or Feed A	dministrator's Signatu	re:
	1		

The AAFCO Model Training Manual for Animal Feed Inspectors (AFIs) includes two components. One includes completion of coursework outlined in the current AFRPS Training Standard – 2. 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 current AFRPS Inspection Program Standard – 3. An AFI should successfully complete both components prior to conducting independent inspections.

COURSEWORK

<u>Chapter IV</u> of 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 animal 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	Code Training Method				

Examples of Codes and Training Methods:

- CE: Classroom Exercise
- OD: Office Demonstration
- LE: Laboratory Exercise
- JFT: Joint Field Training Inspection
- O: Other (described in Training Plan)

INSPECTION TRAINING AREA FIELD COMPENTENCIES

The AAFCO Training Plan and Log is divided into the following inspection training areas:

- I. Pre-Inspection
 - 1. Reviews the animal feed establishment's history and determine the scope of the inspection.
 - 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 animal feed establishment's owner, operator, or agent in charge; make appropriate introductions; explains the purpose and scope of the inspection; confirms inspection authority and establishes FDA jurisdiction, if applicable.
 - 2. Follows the safety protocols required by the animal feed establishment and the state program.
 - 3. Follows the biosecurity protocols required by the animal feed establishment and the state program.
 - 4. Recognizes the relative risk categorization of the animal feed establishment based on the risk-based inspection program.
 - 5. Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on those establishments, products, and processes determined to be high-risk.

- 6. Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.
- 7. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.
- 8. Recognizes significant non-compliant conditions or practices, and documents findings consistent with state program procedures.
- 9. Distinguishes between significant and insignificant observations, and isolated incidents versus trends.
- 10. Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.
- 11. Collects adequate evidence to include samples and documentation to support inspection observations in accordance with state program procedures.
- 12. Verifies correction of deficiencies identified during the previous inspection(s).
- 13. 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 animal feed establishment'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 establishment'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 an animal feed sample collection method consistent with criteria established by laboratory serving state program.
- V. Additional Inspection Areas (state program can add competencies and tasks not contained in the Training Plan and Log)

Minimum Number of JOINT	FIELD TRAINING INSPECTIONS F	Required:

Placeholder THIS PAGE IS INTENTIONALLY LEFT BLANK

DISCARD THIS PAGE AND INSERT BASIC OR ADVANCED COURSEWORK

Attachment A – Training Plan and Log

Basic Animal Feed Inspector Training	
Inspector Name:	Employment Start Date:

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	Documentation Verifying Completion
Animal and Public Health Principles			
Animal Food Defense			
Basic Animal Nutrition			
Basic Evidence Development			
Basic Feed Ingredients, Processing, and Technology			
Basic National Incident Management System and Incident Command System (ICS)			
Communication			
Current Statues, Regulations, and Policies			
Inspections, Compliance, and Enforcement			
Labeling			
Professionalism			
Risk Awareness			
Safety			
Sample Collection			

Attachment A – Training Plan and Log

Advanced Animal Feed Inspector Training

Inspector Name: Em	ployment Start Date:
Instructions: If the inspector has greater than five years of previous performance and experience has found that no add the Name and Location of Training Column, with "Met via E	litional training for a subject area is needed, mark

Subject Areas	Name and Location of Training	Completion Date	Documentation Verifying Completion
Advanced Ingredients,			
Processing, and Technology			
Advanced Inspections,			
Compliance, and Enforcement			
Advanced Labeling			
Animal Illness and Death			
Investigation			
Current Statues, Regulations, and Policies			
Epidemiology			
Evidence Development			
Microbiological Pathogens			
Traceback and Traceforward Investigations			

Continuing Education	

Inspector Name:	Employment Start Date:
Instructions: Record the continuing education activity as v	vell as the name and location of the activity.

Type of Activity	Name and Location of Activity	Completion Date	Contact Hours Earned

Inspection Training Areas

I. Pre-Inspection

							
	Reviews the animal feed es determine the scope of insp	·		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)							
	Reviews the previous inspection	report(s) and complaint(s).					
	Reviews the response letter to the in which corrective actions were		pection				
	Determines scope of inspection based on establishment type and history, and type of inspection (e.g., CGMP, BSE, VFD, medicated feed, PCAF, comprehensive, or other).						
	ADDITIONAL (State program	a specific tasks)					
Co	mments:						
	Trainee	has demonstrated acceptab	le perfo	rmance for al	l tasks listed		
Da				r's Signature			
							_
	2 Uses annronriate equinme	nt and forms needed to cond	luct	Training	Date Demonstrated	Trainee's	Training

	2. Uses appropriate equipment a inspections.	nd forms needed to cond	ıct Trainir Metho	0	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer	
(Tr	(Training method and selected tasks for this competency are to be indicated below)							
	Has a copy or had electronic access regulations.	to the pertinent laws and						
	Has appropriate personal protective respirator).	equipment (e.g., hard hat,						
	Has appropriate inspection equipment (e.g., calculator, flashlight, camera).							
	Has appropriate samples equipment (e.g. probe, probe wipes, sample containers/bags).		sample					
	Uses up to date, proper, or appropring inspection conducted.	ate forms for the type of						
	ADDITIONAL (State program sp	oecific tasks)						
Co	mments:							
	Trainee ha	demonstrated acceptabl	e performance f	or al	ll tasks listed			
Da	te:	Trainee's Initials:	Trainer's Signa	ture	:			

II. Inspection Observations and Performance

	1. Presents appropriate credentia Inspection to the animal feed exoperator, or agent in charge; mintroductions; explains the pur inspection; confirms inspection FDA jurisdiction if applicable.	stablishment's owner, nakes appropriate pose and scope of the	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer	
(Tr	aining method and selected tasks for t	his competency are to be indi	cated below)				
	Presents credentials to the owner, op	erator, or agent in charge of the	he				
	establishment. Make appropriate introductions, expl	lained the nurnose and scope	of				
	the inspection, and determines inspec		01				
	Enters the establishment through the		es a				
	Notice of Inspection prior to the beginning a Notice of Inspection to the a						
	Confirms the interstate movement of						
	Determines if any products or ingred						
	shipped in interstate commerce by th inspection.	e manufacturer since the last					
	ADDITIONAL (State program spe	ecific tasks)					
Co	mments:		•				
	Trainee has demonstrated acceptable performance for all tasks listed						
Da			ainer's Signature				
Da							
Da							
Da		Trainee's Initials: Trainee's Initials: Trainee's Initials:			Trainee's Initials	Training Officer	
	2. Follows the safety protocols requ	Trainee's Initials: Traine	ainer's Signature Training Method	Date Demonstrated By the			
	2. Follows the safety protocols requestablishment and the state prog	Trainee's Initials: Traine	ainer's Signature Training Method	Date Demonstrated By the			
	2. Follows the safety protocols requestablishment and the state prograining method and selected tasks for the Asks if any particular safety protocol.	Trainee's Initials:	ainer's Signature Training Method	Date Demonstrated By the			
	2. Follows the safety protocols requestablishment and the state prograining method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protocol protective equipment appropriately. Follows the safety protocols mandates	Trainee's Initials: Trainee's	ainer's Signature Training Method	Date Demonstrated By the			
	2. Follows the safety protocols requestablishment and the state programing method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protective equipment appropriately.	Trainee's Initials: Trainee's	ainer's Signature Training Method	Date Demonstrated By the			
	2. Follows the safety protocols requestablishment and the state prograining method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protocol protective equipment appropriately. Follows the safety protocols mandates	Trainee's Initials: Trainee's	ainer's Signature Training Method	Date Demonstrated By the			
(Tr	2. Follows the safety protocols requestablishment and the state programing method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protocolic equipment appropriately. Follows the safety protocols mandate ADDITIONAL (State program specific protocols)	Trainee's Initials: Trainee's	ainer's Signature Training Method	Date Demonstrated By the			
(Tr	2. Follows the safety protocols requestablishment and the state prograining method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protocol protective equipment appropriately. Follows the safety protocols mandates	Trainee's Initials: Trainee's	ainer's Signature Training Method	Date Demonstrated By the			
(Tr	2. Follows the safety protocols requestablishment and the state programing method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protocolic equipment appropriately. Follows the safety protocols mandate ADDITIONAL (State program specific protocols)	Trainee's Initials: Trainee's	ainer's Signature Training Method	Date Demonstrated By the			
(Tr	2. Follows the safety protocols requestablishment and the state programing method and selected tasks for the Asks if any particular safety protocol establishment. Follows the state program's safety protocolism and the safety protocols mandated ADDITIONAL (State program speciments:	Trainee's Initials: Trainee's	Training Method	Date Demonstrated By the Trainee			

3. Follows the biosecurity protoco establishment and the state pro		al feed 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)			
Inquires if any particular biosecurit establishment.		at the			
Follows the state program's biosec	urity protocol.				
Follows the biosecurity protocols nestablishment.	<u> </u>	ed			
ADDITIONAL (State program s	pecific tasks)				
Comments:					
Trainaa ha	s demonstrated acceptal	ala narformanca for	all tacks listed		
Date:	Trainee's Initials:	Trainer's Signatur			
4. Recognizes the relative risk car establishment based on the risk		I feed 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)	-111	•	
Recognizes the relative risk of the feed establishment or product, type history of the establishment.					
Organizes inspection activities focularly high-risk products and processes.	ısing on high-risk items su	ich as			
ADDITIONAL (State program s	pecific tasks)				
Comments:			<u>III</u>		
Trainee ha	s demonstrated acceptab	ole performance for :	all tasks listed		
Date:	Trainee's Initials:	Trainer's Signatur	e:		

	5. Conducts comprehensive inspect the level of risk, focusing on thos processes determined to be high-	e establishments, products, a		Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	raining method and selected tasks for	this competency are to be indic	cated below)			
	Prioritizes high-risk inspection activ	rities.				
	Does not concentrate inspection actinigh-risk products and processes.	vities on low-risk items but on				
	ADDITIONAL (State program sp	ecific tasks)				
Co	omments:					
	Trainee has	s demonstrated acceptable pe	rformance for al	ll tasks listed		
Da	nte:	Trainee's Initials: Tra	iner's Signature	:		
	6. Assesses employee activities crit	tical to the safe manufacturir	G	Date		
	processing, packaging, handling animal feed.			Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	processing, packaging, handling	g, holding, and distribution o	f Method	By the		
(Tr	processing, packaging, handling animal feed.	g, holding, and distribution o	f Method	By the		
(Tr	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from	this competency are to be indicated as the competency are the competen	f Method	By the		
(Tr	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/improper	this competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees.	f Method	By the		
(Tr	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic	this competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the complex in the competency are to be indicated in the competency are the competency	f Method	By the		
(Tr	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/impropsubsequently re-enters the process for the	this competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the complex in the competency are to be indicated in the competency are the competency	f Method	By the		
(Tr	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/impropsubsequently re-enters the process for the	this competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the complex in the competency are to be indicated in the competency are the competency	f Method	By the		
	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/impropsubsequently re-enters the process for the	this competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the complex in the competency are to be indicated in the competency are the competency	f Method	By the		
	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/impropesubsequently re-enters the process fit ADDITIONAL (State program sp	this competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the competency are to be indicated in employees responsible for the complex in the competency are to be indicated in the competency are the competency	f Method	By the		
	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/impropsubsequently re-enters the process fit ADDITIONAL (State program spomments:	this competency are to be indicated an employees responsible for the cion that document employee itently to identify if a product for employee practice low.	f Training Method	By the Trainee		
Co	processing, packaging, handling animal feed. raining method and selected tasks for Conducts inspection with input from critical activities. Reviews records required by regular training. Evaluates employee practices suffic contaminated by an adverse/impropsubsequently re-enters the process fit ADDITIONAL (State program spomments:	this competency are to be indicated an employees responsible for a cion that document employee itently to identify if a product er employee practice low. Secific tasks)	f Training Method	By the Trainee		

	7. Properly evaluates the likelihoo processes, components, or labeli become adulterated or misbran	ing could cause the produ	uct to	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tre	aining method and selected tasks for i	this competency are to be i	indicated bel	elow)			
	Observes critical activities during the procedures in place to prevent distribuccurred.						
	Reviews labeling protocols and verigoroper labeling.	fies a system is in place to	assure				
	Recognizes possible adulterants that animal feed or ingredients.	are stored above or near b	pagged				
	Reviews products for proper labeling	g and identification.					
	Reviews animal feed components to accordance with their labeling, and/o components, with their new animal of	or in the case of medicated	1				
	ADDITIONAL (State program sp	<u>ecific tasks)</u>					
	`						
-							
Co	mments:						
	Trainag has	demonstrated acceptable	a narfarmai	nee for all	l toeke lietod		
Dat	te:	Trainee's Initials:	Trainer's S	Signature	•		
	8. Recognizes significant non-compractices, and documents findin procedures.		am .	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tre	practices, and documents finding	gs consistent with progra	am	Method	Demonstrated By the		2.5
(Tre	practices, and documents finding procedures. aining method and selected tasks for a When present, recognizes significan	this competency are to be it non-compliant conditions	indicated bel	Method	Demonstrated By the		
(Tr	practices, and documents finding procedures. aining method and selected tasks for the selected tasks for the selected tasks.	this competency are to be it non-compliant conditions in non-compliant conditions in products and adequat	indicated belows, but as.	Method	Demonstrated By the		2.5
(Tro	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the observable.	this competency are to be in the non-compliant conditions in non-compliant conditions of the products and adequate the servation or at the conclusion of the non-compliant products and adequate the non-compliant products and the non-compliant products are non-compliant products and adequate products are non-compliant products and adequate products are non-compliant products are non-compliant products and adequate products are non-compliant products.	indicated below, but as. tely ion of	Method	Demonstrated By the		2.5
(Tro	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated.	this competency are to be in the non-compliant conditions in non-compliant conditions in non-compliant conditions in the non-compliant conditions in the non-compliant conditions in the non-compliant conditions in the non-compliant conclusion or at the conclusion of the non-components not being used in the non-compliant conditions in the non	indicated belt s, but ans. tely ion of ed in tation	Method	Demonstrated By the		2.5
(Tro	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant when present, recognizes non-compaddresses them at the time of the obsthe inspection. When present, recognizes medicated accordance with their new animal drawthen present, recognizes the significant practices to prevent contamination when the present is the significant of the present in the present is the present in the	this competency are to be in the non-compliant conditions in non-compliant conditions of the n	indicated belt s, but ans. tely ion of ed in tation	Method	Demonstrated By the		
(Tro	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawhen present, recognizes the significant practices to prevent contamination was in animal feed.	this competency are to be in the non-compliant conditions in non-compliant conditions of the n	indicated belt s, but ans. tely ion of ed in tation	Method	Demonstrated By the		
	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawthen present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program sp.	this competency are to be in the non-compliant conditions in non-compliant conditions of the n	indicated belt s, but ans. tely ion of ed in tation	Method	Demonstrated By the		
	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawhen present, recognizes the significant practices to prevent contamination was in animal feed.	this competency are to be in the non-compliant conditions in non-compliant conditions of the n	indicated belt s, but ans. tely ion of ed in tation	Method	Demonstrated By the		
	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawthen present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program sp.	this competency are to be in the non-compliant conditions in non-compliant conditions of the n	indicated belt s, but ans. tely ion of ed in tation	Method	Demonstrated By the		
	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant when present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawthen present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program sperments:	this competency are to be interest to the inte	indicated below, but his. Itely his	Method Plow)	Demonstrated By the Trainee		
	practices, and documents finding procedures. aining method and selected tasks for a when present, recognizes significant not to the exclusion of less significant. When present, recognizes non-compaddresses them at the time of the obstitute inspection. When present, recognizes medicated accordance with their new animal drawhen present, recognizes the significant practices to prevent contamination was in animal feed. ADDITIONAL (State program sport memory)	this competency are to be interpretation of the competency are to be interpretation of the condition of the condition of the conclusion of	indicated below, but his. Itely his	Method elow)	Demonstrated By the Trainee		

	_						
	9. Distinguishes between significations, and isolated inci-			Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	raining method and selected tasks for	this competency are to be	indicated	below)			
	When present, distinguishes approprints insignificant observations.	riately between significan	t and				
	When present, distinguishes approprincidents and trends.	riately between isolated					
	Discusses patterns or trends that we	re observed.					
	Emphasizes the severity or outcome need for immediate action.	of significant observation	ns and the				
	Identifies record keeping deficiencies corrective action plans may have be establishment and the deficiency has	en implemented by the	that				
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
CO	mments.						
	Trainee has	demonstrated acceptab	le perforn	nance for al	l tasks listed		
Da	te:	Trainee's Initials:	Trainer'	s Signature	:		
	10. Reviews, evaluates, and verifice establishment records, plans, pare established, maintained an	orograms, and/or proced		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	raining method and selected tasks for	this competency are to be	indicated	below)			
	Reviews appropriate establishment	ecords.					
	Questions alarm notifications and th	e resulting required proce	edures.				
	When deficiencies are noted, investi the establishment are reviewed.	gations and corrective act	tions by				
	Reviews equipment cleanout record are not completed according to the		are or				
	ADDITIONAL (State program sp	ogifia tagles)					
	TIDDITION WIE (State program sp	ecilic tasks)					
	STATE (State program sp	ecinc tasks)					
	TEDET TO SECULE PROGRAM SP	eeine tasksj					
Со	mments:	eeme tasksj					
Со		ecinc tasks)					
Со	mments:						
Со	mments:	demonstrated acceptab	-	nance for al			

	11. Collects adequate evidence and inspection observations in according procedures.		port	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	e indicated	below)			
	When significant deficiencies are no documents are collected to support		ords,				
	When significant non-compliant conditions are observed, supporting evidence such as photographs, detailed narrative, or affidavits are collected.						
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
	Trainee has	s demonstrated acceptal	ble nerforr	nance for al	l tasks listed		
Da		Trainee's Initials:		's Signature			
				8			
	12. Verifies correction of deficience previous inspection(s).	cies identified during the	e	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	e indicated	below)			
	Verifies correction of out of complication identified during the previous inspection.						
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
	Traince has	s demonstrated acceptal	nle nerfor	nance for al	l tacks listed		
Da		Trainee's Initials:		's Signature			

	13. Conducts activities in a professional manner.	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer		
(Tr	aining method and selected tasks for this competency are to be in	ndicated below)					
	Dresses appropriately for the inspection with clean and presenta clothing.	able					
	Wears protective safety equipment that is required by the establishment of the state program.						
	Abides by establishment's request regarding specific establishment safety and biosecurity practices at the establishment.	nent					
	Is polite and flexible. ADDITIONAL (State program specific tasks)						
Co	Comments:						
	Trainee has demonstrated acceptable	performance for al	l tasks listed		_		
Date: Trainee's Initials: Trainer's Signature:							

III. Oral and Written Communication

Training

Date Demonstrated

Trainee's

Training

	1. Uses effective interviewing tech	Method	By the Trainee	I rainee's Initials	Officer	
(Tr	aining method and selected tasks for	this competency are to be	indicated below)			
	Requests for information are unambiguous and results in relevant information provided from the establishment.					
	Avoids using jargon and acronyms, without explanation.					
	Is not confrontational.					
	Does not ask pointed and directed quesponse.					
	Is a good listener and does not interning their responses.	rupt the establishment per	rsonnel			
	ADDITIONAL (State program sp	<u>ecific tasks)</u>				
Co	mments:					
	Trainaa has	s demonstrated acceptab	lo norformanco for a	II toeke lietod		
Da		Trainee's Initials:	Trainer's Signature			
2		2 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	arminer of Signment	•		
	2. Explains findings clearly and ac inspection.	lequately throughout th	e Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr			Method	Demonstrated By the		Ö
(Tr	inspection. aining method and selected tasks for a Discusses significant deficiencies as	this competency are to be	Method indicated below)	Demonstrated By the		Ö
(Tr	inspection. aining method and selected tasks for a	this competency are to be they are observed throug they are observed throug they are that management on(s) and that corrective ac	method indicated below) shout the is clear	Demonstrated By the		Ö
(Tr	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation	this competency are to be they are observed through they are observed through the ensure that management on(s) and that corrective act. all significant deficiencie	tindicated below) thout the tis clear ctions	Demonstrated By the		Ö
(Tr	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen At the conclusion of the inspection,	this competency are to be they are observed througo ensure that management n(s) and that corrective act. all significant deficiencie liscussed.	tindicated below) thout the tis clear ctions	Demonstrated By the		Ö
(Tr	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen. At the conclusion of the inspection, observed during the inspection are defined.	this competency are to be they are observed througo ensure that management n(s) and that corrective act. all significant deficiencie liscussed.	tindicated below) thout the tis clear ctions	Demonstrated By the		O
(Tr	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen. At the conclusion of the inspection, observed during the inspection are defined.	this competency are to be they are observed througo ensure that management n(s) and that corrective act. all significant deficiencie liscussed.	tindicated below) thout the tis clear ctions	Demonstrated By the		O
	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen. At the conclusion of the inspection, observed during the inspection are defined.	this competency are to be they are observed througo ensure that management n(s) and that corrective act. all significant deficiencie liscussed.	tindicated below) thout the tis clear ctions	Demonstrated By the		O
	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen At the conclusion of the inspection, observed during the inspection are default. (State program sp	this competency are to be they are observed througo ensure that management n(s) and that corrective act. all significant deficiencie liscussed.	tindicated below) thout the tis clear ctions	Demonstrated By the		O
	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen At the conclusion of the inspection, observed during the inspection are described to the significance of the observation of the inspection are described to the significance of the observation of the inspection are described to the significance of the observation of the inspection are described to the significant deficiencies as inspection with the agent in charge.	this competency are to be they are observed through they are observed through the ensure that management in(s) and that corrective act. all significant deficiencie iscussed. ecific tasks)	tindicated below) thout the tis clear ctions	Demonstrated By the Trainee		O
	inspection. aining method and selected tasks for a Discusses significant deficiencies as inspection with the agent in charge. Discusses deficiencies thoroughly to of the significance of the observation should be taken by the establishmen At the conclusion of the inspection, observed during the inspection are default. (State program specific memory) Manual	this competency are to be they are observed througo ensure that management n(s) and that corrective act. all significant deficiencie liscussed.	tindicated below) thout the tis clear ctions	Demonstrated By the Trainee		O

III. Oral and Written Communication (continued)

	3. Alerts the animal feed establishment'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
(Tr	raining method and selected tasks for	this competency are to be	e indicated	below)			
	Notifies the establishment manager when direct contamination of product or ingredients is witnessed.						
	Notifies the appropriate and most re feed establishment when an immedi						
	ADDITIONAL (State program sp	ecific tasks)					
Co	mments:						
	Twainaa ha	domonstrated accontak	alo nonfonn	nanga fan al	l tasks listed		
Da		s demonstrated acceptable Trainee's Initials:		s Signature			
Da	ic.	Trainee's finitials.	Trainer	s Signature	•		
	4. Documents findings accurately, concisely on the applicable form the establishment's owner, open	n(s) and provides a copy		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	caining method and selected tasks for	this competency are to be	indicated	below)			
	Lists significant inspectional observ	ations.					
	Provides further explanation with in	<u> </u>					
	Completes the legible report withou	1 0 0					
	Provides the establishment's owner a summary of inspectional observation		rge with				
	ADDITIONAL (State program sp						
	ADDITIONAL (State program sp	eeme tasksj					
~							
Co	mments:						
	Trainee has	s demonstrated acceptab	ole perforn	nance for al	l tasks listed		
Date: Trainee's Initials: Trainer'							

III. Oral and Written Communication (continued)

5. Answers questions and prov	ides information as appropri	Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected tasks	for this competency are to be i	ndicated below)			
Does not reveal any specific info	ormation about pending compli	ance			
action(s) against a competitor.					
•	Does not provide competitor information to the establishment. Answers policy questions accurately to elicit appropriate correction				
action by the establishment.	Ction				
ADDITIONAL (State program	specific tasks)				
Comments:			III		
Trainee	has demonstrated acceptable	e performance for a	ll tasks listed		
Date:	Trainee's Initials:	Trainer's Signature	::		
6. Submits inspection report, documentation within desi state program procedures.	sample(s), supporting eviden gnated timeframes consistent		Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
documentation within desi state program procedures.	gnated timeframes consistent	with Training Method	Demonstrated By the		
documentation within desi state program procedures.	gnated timeframes consistent for this competency are to be in	with Training Method	Demonstrated By the		
documentation within desi state program procedures. Training method and selected tasks	gnated timeframes consistent for this competency are to be in the in inspection report.	with Training Method	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents at Reference documents are legible Reference documents are accurate.	for this competency are to be in re in inspection report.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents at Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s	for this competency are to be in re in inspection report. te and reflect observations made to the inspection report per	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents as Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s state program's administrative	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents at Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents as Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s state program's administrative	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents as Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s state program's administrative p ADDITIONAL (State program)	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents as Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s state program's administrative p ADDITIONAL (State program)	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents as Reference documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s state program's administrative p ADDITIONAL (State program)	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the		
documentation within desi state program procedures. (Training method and selected tasks) Reference attached documents are legible Reference documents are accuraduring the inspection. Attaches referenced document(s state program's administrative p ADDITIONAL (State program) Comments:	for this competency are to be in the initial inspection report. It is and reflect observations made to the inspection report per recedures.	mdicated below)	Demonstrated By the Trainee		

IV. Sample Collection

1. Uses an animal feed sample collection consistent with criter established by the laboratory serving state program.	ia Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Training method and selected tasks for this competency are to be indi	cated below)			
Follows safety precautions on the animal feed label.				
Follows the state program's safety protocol for collecting samples	s.			
Uses appropriate sampling equipment for the selected product, as described in the <u>AAFCO Feed Inspector's Manual</u> .				
Uses appropriate sample containers as specified by the state progr	am.			
Uses appropriate sampling methods for the selected product, as described in the <u>AAFCO Feed Inspector's Manual</u> .				
Follows the state program's procedure for marking and sealing all samples (corresponding sample information also noted on inspect report or laboratory forms).				
Follows the state program's procedure for documenting and maintaining sample integrity, security, and chain of custody.				
Issues a receipt for sample(s).				
Ships sample to the appropriate laboratory within the timeframe specified by the state program.				
Follows the state program's procedures for handling, packaging, a shipping samples to maintain sample integrity.	and			
ADDITIONAL (State program specific tasks)				
Uses infrared thermometer in accordance with manufacturer's instructions.				
Comments:				
Trainee has demonstrated acceptable p	erformance for al	l tasks listed		
Date: Trainee's Initials: Tr	ainer's Signature	•		

V. Additional Competencies – State Program Specific

		_					
				Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
·	· ·						
Co	mments:				•		
	Trainee has	s demonstrated acceptab	de nerforr	nance for al	l tacks listed		
Da		1	1				
Da	ie:	Trainee's Initials:	1 rainer	s Signature	•		
				Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
Co	mments:						
	Trainee has	s demonstrated acceptab	ole perforr	nance for al	l tasks listed		
Da	te:	Trainee's Initials:	Trainer'	s Signature	:		
					Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for	this competency are to be	indicated	below)			
Co	mments:						
		s demonstrated acceptab					
Da	te:	Trainee's Initials:	Trainer'	s Signature	:		

Trainee's Initials:

Optional Weekly Planning Log

rainee's Name:		
Week: 1 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
Week: 2 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
Week: 3 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments

Trainer's Signature:

Trainee's Initials:

Optional Weekly Planning Log

Trainee's Name:		
Week: 4 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
Week: 5 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments
Trainee's Initials:	Trainer's Signature:	
Week: 6 Date Ending:		
Training Areas Demonstrated	Planned Training Areas for Upcoming Week	Additional Comments

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
Tuningala Initiala.	Tuoineule Signatuues	

Optional Joint Field Training Inspection – Establishment Log

#	Date	Permit #	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection	Т	raining Worksheet Completed
								Yes	Training Period
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									

Optional Joint Field Training Inspections – Establishment Log

#	Date	Permit	Establishment Name	Establishment Address	Risk	Trainer-led	Trainee-led	Т	raining Worksheet Completed
π	Date	#	Establishment Ivame	Establishment Address	Category	Inspection	Inspection	Yes	Training Period
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									
32									
33									
34									
35									
36									
37									
38									
39									
40									

 $Attachment \ B-Training \ Worksheet$

Attachment B – Training Worksheet

Association of American Feed Control Officials TRAINING WORKSHEET

(Competencies and Tasks)

Animal Feed Establishments 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	y:
Trainer's Name:	Trainer's Agency:	
Date of Inspection led by Trainee:	Tine IN:	Tine 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.

QFITs 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

Reviews the animal feed establishment's history and determine the scope of inspection.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Reviews the previous inspection report(s) and complaint(s).				
Reviews the response letter to the previous establishment inspection in which corrective actions were promised.				
Determines scope of inspection based on establishment type and history, and type of inspection (e.g., CGMP, BSE, VFD, medicated feed, PCAF, comprehensive, or other).				
ADDITIONAL (State program specific job tasks)				
Comments:				

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

I. Inspection Observations and Performance

1. Presents appropriate credentials and written Notice of Inspection to the animal feed establishment's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspection; confirms inspection authority and established FDA jurisdiction, if applicable.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrate during join field trainin inspection	
authority and established PDA jurisdiction, if applicable.	YES	NO	YES	NO
Presents credentials to the owner, operator, or agent in charge of the				
Makes appropriate introductions, explains the purpose and scope of the inspection, and determines inspection authority.				
Enters the establishment through the front/main entrance and issues a Notice of Inspection prior to the beginning of the inspection.				
Issues the Notice of Inspection to the appropriate person.				
Confirms the interstate movement of product or ingredients.				
Determines if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.				
ADDITIONAL (State program specific job tasks)				
Comments:				

Follows the safety protocols required by the animal feed establishment and the state program.	occurred to demo task duri field tr	Opportunity occurred for AFI to demonstrate task during joint field training inspection		ask astrated g joint raining ection
	YES	NO	YES	NO
Asks if any particular safety protocols are mandated at the establishment.				
Follows the state program's safety protocol and/or used personal protective equipment appropriately.				
Follows the safety protocols mandated by the establishment.				
ADDITIONAL (State program specific tasks)				
omments:				

$Attachment \ B-Training \ Worksheet$

3. Follows the biosecurity protocols required by the feed establishment and the state program.	occurred to demon task duri field tra	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO	
Inquires if any particular biosecurity protocols are mandated at the establishment.					
Follows the state program's biosecurity protocol.					
Follows the biosecurity protocols mandated by the feed establishment.					
ADDITIONAL (State program specific job tasks)					
	Opport occurred			ask	
4. Recognizes the relative categorization of the animal feed establishment based on the risk-based inspection program.	to demo task duri field tra inspec	ing joint aining	during field to	nstrated g joint raining ection	
	YES	NO	YES	NO	
Recognizes the relative risk of the establishment based on the animal feed establishment or			4		

4. Recognizes the relative categorization of the animal feed establishment based on the risk-based inspection program.	inspection		demon during field to	nstrated og joint raining ection
	YES	NO	YES	NO
Recognizes the relative risk of the establishment based on the animal feed establishment or product, processing, and compliance history of the establishment.				
Organizes inspection activities focusing on high-risk items such as high-risk products and processes.				
ADDITIONAL (State program specific tasks)				
Comments:				

	5. Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on those establishments, products, and processes determined to be high-risk.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		demon during field to	nsk strated g joint raining ection
		YES	NO	YES	NO
	Prioritized high-risk inspection activities.				
	Does not concentrate inspection activities on low-risk items but on high-risk products and processes.				
	ADDITIONAL (State program specific tasks)				
Со	mments:				
<u> </u>					

YES	NO		
		YES	NO
	1		

	Opportunity occurred for AFI to demonstrate task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Observes critical activities during the inspection and discusses procedures in place to prevent distribution when an error has occurred.				
Reviews labeling protocols and verifies a system is in place to assure proper labeling.				
Recognizes possible adulterants that are stored above or near bagged animal feed or ingredients.				
Reviews products for proper labeling and identification.				
Reviews animal 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.				
ADDITIONAL (State program specific tasks)				
omments:				

8. 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 demonstrate during joint field training inspection		
	YES	NO	YES	NO	
When present, recognizes significant non-compliant conditions, but not to the exclusion of lesignificant non-compliant conditions.	ess				
When present, recognizes non-compliant products and adequately addressed them at the time the observation or at the conclusion of the inspection.	of				
When present, recognizes medicated components not being used in accordance with their neranimal drug approvals.	N				
When present, recognizes the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal feed.					
ADDITIONAL (State program specific tasks)					
mments:					

9. 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, distinguishes appropriately between significant and insignificant observations.					
When present, distinguishes appropriately between isolated incidents and trends.					
Discusses patterns or trends that were observed.					
Emphasizes the severity or outcome of significant observations and the need for immediate action.					
Identifies record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the establishment and the deficiency has not reoccurred.					
ADDITIONAL (State program specific tasks)					
Comments:					

10. Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		Task demonstra during joi field traini inspectio	
	YES	NO	YES	NO				
Reviews appropriate establishment records.								
Questions alarm notifications and the resulting required procedures.								
When deficiencies are noted, investigations and corrective actions by the establishment are reviewed.								
Reviews equipment cleanout records and notes that cleanouts were/were not completed according to the establishment's SOP.								
ADDITIONAL (State program specific tasks)								
omments:								
minents.								

	11. 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		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon during field to	nsk strated g joint raining ection
		YES	YES NO		NO																		
	When significant deficiencies are noted in establishment records, documents are collected to support the findings.																						
	When significant non-compliant conditions are observed, supporting evidence such as photographs, detailed narrative, or affidavits are collected.																						
	ADDITIONAL (State program specific tasks)																						
Coı	nments:																						

	12. Verifies correction of deficiencies identified during the previous inspection(s).	Opportunity occurred for AFI to demonstrate task during joint field training inspection		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon during field to	ask astrated g joint raining ection
		YES	NO	YES	NO												
	Verifies correction of out of compliance observations identified during the previous inspection(s).																
	ADDITIONAL (State program specific tasks)	1															
Со	mments:	•															

13. Conducts activities in a professional manner.	Opportunity occurred for AFI to demonstrate task during joint field training inspection		occurred for AFI to demonstrate task during joint field training	
	YES	NO	YES	NO
Dresses appropriately for the inspection with clean and presentable clothing.				
Wears protective safety equipment that is required by the establishment or the state program.				
Abides by establishment's request regarding specific establishment safety and biosecurity practices at the establishment.				
Is polite and flexible.				
ADDITIONAL (State program specific tasks)				
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 results in relevant information provided from the establishment.				
Avoids using jargon and acronyms, without explanation.				
Is not confrontational.				
Does not ask pointed and directed questions to solicit a desired response.				
Is a good listener and does not interrupt the establishment personnel in their responses.				
ADDITIONAL (State program specific tasks)				
Comments:				

	2. Explains findings clearly and adequately throughout the inspection.		unity for AFI strate ig joint ining tion	demon durin field to	ask strated g joint raining ection			
		YES NO		YES	NO			
	Discusses significant deficiencies as they are observed throughout the inspection with the agent in charge.							
	Discusses deficiencies thoroughly to ensure that management is clear of the significance of the observation(s) and that corrective actions should be taken by the establishment.							
	At the conclusion of the inspection, all significant deficiencies observed during the inspection are discussed.							
	ADDITIONAL (State program specific tasks)							
Co	mments:		l l	l				

III. Oral and Written Communication (continued)

	3. Alerts the animal feed establishment'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 YES NO		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		occurred for AFI to demonstrate task during joint field training		demon during j trai	ask estrated oint field ning ection
				YES	NO														
	Notifies the establishment's manager when direct contamination of product or ingredients is witnessed.																		
	Notifies the appropriate and most responsible person in the animal feed establishment when an immediate corrective action is necessary.																		
	ADDITIONAL (State program specific tasks)																		
Со	mments:																		

4. Documents findings accurately, clearly, legibly, and concisely on the applicable form(s) and provides a copy to the establishment's owner, operator, or agent in charge.	Opport occurred to demoi task duri field tra inspec	for AFI nstrate ng joint aining	demon durin field to	ask astrated g joint raining ection
	YES	NO	YES	NO
Lists significant inspectional observations.				
Provides further explanations with inspectional observations.				
Completes legible report without spelling or grammatical errors.				
Provides the establishment's owner, operator, or agent in charge with a summary of inspectional observations.				
ADDITIONAL (State program specific tasks)				
Comments:				

III. Oral and Written Communication (continued)

5. Answers questions and provides information as appropriate.		cunity for AFI nstrate ng joint nining	demon during field to	nsk strated g joint raining ection
	YES	NO	YES	NO
Does not reveal any specific information about pending compliance action(s) against a competitor.				
Does not provide competitor information on the establishment.				
Answers policy questions accurately to elicit appropriate corrective action by the establishment.				
ADDITIONAL (State program specific tasks)				
Comments:				

Reference attached documents are in inspection report.	YES	NO		
• • •			YES	NO
D. C 1				
Reference documents are legible.				
Reference documents are accurate and reflect observations made during the inspection.				
Attaches referenced document(s) to the inspection report per state program's administrative procedures.				Ì
ADDITIONAL (State program specific tasks)				
mments:				

IV. Sample Collection

Uses an animal feed sample collection method consistent with criteria established by laboratory serving state program.	hed by task during joint field training inspection		Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
Follows safety precautions on the animal feed label.				
Follows the state program's safety protocol for collecting samples.				
Uses appropriate sampling equipment for the selected product, as described in the <u>AAFCO Feed</u> <u>Inspector's Manual</u> .				
Uses appropriate sample containers as specified by the state program.				
Uses appropriate sampling methods for the selected product, as described in the <u>AAFCO Feed Inspector's Manual</u> .				
Follows the state program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).				
Follows the state program's procedure for documenting and maintaining sample integrity, security, and chain of custody.				
Issues a receipt for sample(s).				
Ships sample to the appropriate laboratory within the timeframe specified by the state program.				
Follows the state program's procedures for handling, packaging, and shipping samples to maintain sample integrity.				
ADDITIONAL (State program specific tasks)				
omments:		•	'	
Jiments.				

V. Additional Competencies – State Program Specific

ADDITIONAL (State Program Specific Competency)	Opport occurred to demo task duri field tra inspec	for AFI nstrate ng joint aining	Task demonstrated during joint field training inspection	
	YES	NO	YES	NO
(State program specific tasks for competency listed above)				
Comments:				

	ADDITIONAL (State Program Specific Competency)	Opport occurred to demon task durin field tra inspec	for AFI nstrate ng joint nining	demon during field to	ask strated g joint raining ection
		YES	NO	YES	NO
	(State program specific tasks for competency listed above)				
Co	mments:				

Guidance for Using the Field Training Worksheet

As described in Chapter VIII, the <u>Training Worksheet</u> (a distilled version of the <u>Training Plan and Log</u>) provides a means for identifying tasks that the trainee has not had the opportunity to successfully demonstrate. The guidance provided in this attachment is designed to assist QFITs to track an AFI's progress and accomplishments.

The following illustration is an example of the *Training Worksheet* cover page with completed information.

Association of American Feed Control Officials

TRAINING WORKSHEET

(Competencies and Tasks)

Animal Feed Establishments 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: Livestock Milling Co.	Establishment Address: 538 Broadway Blvd, Ocea	an Park, OH
Animal Feed Inspector's (AFI) Name:	Animal Feed Inspector's (AFI) Agenc	
John Smith	XYZ State Department of	Ag, Div. of Animal Feed
Trainer's Name:	Trainer's Agency:	
Arnold Baker	XYZ State Department of	Ag, Div. of Animal Feed
Date of Inspection led by Trainee:	Tine IN:	Tine OUT:
10/12/2024	8:30 am	2:30 pm

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.

The next illustration provides a *Training Worksheet* example using 'III. Oral and Written Communication' competency and corresponding tasks. For each of the tasks included in the state program's *Training Worksheet*, the QFIT:

- Determines whether or not there was an opportunity to demonstrate a task; and
- Determines when an AFI consistently demonstrates a task correctly and documents the observations.

III. Oral and Written Communication

х	1. Uses effective interviewing techniques.	Opport occurred to demon task duri field tra inspec	nstrate ng joint nining	demon durin field to	ask strated g joint raining ection
		YES	NO	YES	NO
х	Requests for information are unambiguous and results in relevant information provided from the establishment.		Х		
Х	Avoids using jargon and acronyms, without explanation.	X		X	
Х	Is not confrontational.	X		X	
Χ	Does not ask pointed and directed questions to solicit a desired response.	X			X
Х	Is a good listener and does not interrupt the establishment personnel in their responses.	X		X	
	ADDITIONAL (State program specific tasks)				
inf	mments: Reviewed techniques with the AFI for asking open ended questions when checking feed formation presented during the inspection. Discussed the importance of asking open ended questions bears that management or feed employees may not clearly understand it. I will continue to work wit determining inspections scheduled for next week (Arnold Baker)	s regarding	a proced	ure when	it the

The <u>Training Worksheet</u> contains two major columns for recording observations:

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

 Indicate YES or NO if the opportunity to demonstrate the task occurred.
- *Task demonstrated during joint field training inspections.*

Indicate YES or NO if the task was performed.

The 'Comments' portion at the bottom of each competency allows the QFIT to provide objective descriptions of observations made during joint training inspections, as well as additional training provided and future training objectives. In the previous illustration example used for this discussion, the QFIT 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* provides a method for QFITs to organize and record their notes from observations made of the trainee demonstrating tasks during training inspections. Once a trainee has demonstrated a task, the QFIT may transfers the information from the *Training Worksheet* to the *Training Plan and Log*. The following illustration is example of training results transferred to the *Training Plan and Log* from the *Training Worksheet* information for the first competency of 'II, Inspection Observations and Performance.'

II Inspection Observations and Performance

	<u> 11</u>	i. inspection O	DSCIVA	иноно ап	u i ci ioi ma	ince	
x	Presents appropriate credentials Inspection to the animal feed est operator, or agent in charge; ma introductions; explains the purp inspection; confirms inspection a FDA jurisdiction if applicable.	ablishment's owner, kes appropriate ose and scope of the		Training Method	Date Demonstrated By the Trainee	Trainee's Initials	Training Officer
(Tr	aining method and selected tasks for thi	is competency are to be	indicatea	l below)			
х	Presents credentials to the owner, oper establishment.	rator, or agent in charge	of the	ЛFT	10/23/2024	CD	Arnold Baker
x	Makes appropriate introductions, expli the inspection, and determines inspect	ion authority.		ЛFT	10/23/2024	CD	Arnold Baker
х	Enters the establishment through the fi Notice of Inspection prior to the begin		ssues a	ЛFT	11/052024	CD	John Smith
X	Issues a Notice of Inspection to the ap	propriate person.		JFT	11/05/2024	CD	Arnold Baker
X	Confirms the interstate movement of p			JFT	11/05/2024	CD	Amold Baker
x	Determines if any products or ingredie shipped in interstate commerce by the inspection.	ents have been received manufacturer since the	or last	ЛFT	11/05/2024	CD	Amold Baker
	ADDITIONAL (State program spec	ific tasks)					
Co	mments: Trainee did not make appropri	iate introductions at the	beginnin	g of the inspe	ection. Further d	iscussion a	nd
	monstration will be provided prior to the						
	· · · · · · · · · · · · · · · · · · ·		,				
	Trainee has d	emonstrated acceptabl	le perfor	mance for a	ll tasks listed		
Da	ite:	Trainee's Initials:	Trainer	's Signature	:		
11/	/05/2024	CD	Arnold	Baker			

Two Approaches for Using Training Worksheets

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 <u>set interval points</u> during the trainee-led field training process.

These two approaches are only examples and are <u>not</u> 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 Trainee-Led Inspection

<u>Strengths</u>: 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 QFITs 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.

<u>Challenges:</u> Using the *Training Worksheet* during every inspection may cause QFITs 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 QFIT 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

<u>Strengths</u>: A QFIT 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 QFIT 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.

<u>Challenges</u>: The interval process requires QFITs 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 QFIT 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 <u>Joint Field Training Inspection – Establishment Log</u> can be a valuable tool for documenting the use of the <u>Training Worksheet</u> 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 following example illustration, the QFIT completed a <u>Training Worksheet</u> after the inspections of Establishment #15 and Establishment #20.

Optional
Joint Field Training Inspection – Establishment Log

#	Date	Permit #	Establishment Name	Establishment Address	Risk Category	Trainer-led Inspection	Trainee-led Inspection	Т	raining Worksheet Completed
						173		Yes	Training Period
1	9/29/24	07896	Dig These Dogs	6437 Oak Street, Marion, OH	1	х			
2	9/29/24	07912	Try R Feed	1919 Park Place, Monopoly, OH	1	Х			
3	9/30/24	07485	Happy Paws	2100 3 rd Street, Marty, OH	2	Х			
4	10/01/24	07020	Tractor Plus	739 Rick Street. Roll, OH	1	Х			
5	10/01/24	08923	No Place Like Home	881 S. Prairie Lane, Marty, OH	2	х			
6	10/01/24	08237	Chicken Kitchen	23 N. Main Street, Marty, OH	1	х			
7	10/02/24	07345	Claws in the City	421 W. Desert Avenue, Marty, OH	2	х			
8	10/05/24	08787	Zesty Delights	971 Center Lane, Marion, OH	2	Х			
9	10/05/24	07492	Tasty Treats	567 Illinois Avenue, Monopoly, OH	1	х			
10	10/05/24	07001	Desert Pets	699 Desert Avenue, Marty, OH	1		Х		
11	10/05/24	07492	Tasty Treats	567 Illinois Avenue, Monopoly, OH	1		X		
12	10/06/24	07113	Columbus Feed Mill	23 Pizza Place, Marion, OH	2		х		
13	10/06//24	07222	Farm & Feed Supply	l Elm Street, Monopoly, OH	1		х		
14	10/05/24	07555	Sweet Tweets	7 Ocean Drive, Ocean Park, OH	1		х		
15	10/12/24	07639	Livestock Milling Co.	538 Broadway Blvd, Ocean Park, OH	1		Х	Œ	10/05-10/12, 2024
16	10/15/24	07777	Midwestern States	679 W. Olive Avenue, Marion, OH	2		X		
17	10/23/24	07184	Hungry Horses	972 E. West Street, Ocean Park, OH	2		X		
18	10/23/24	07014	Pets Unleashed	871 W. Mushroom Blvd, Marty, OH	2		X		
19	10/24/24	07296	Twin Peaks Feed	43 N. Madison Street, Monopoly, OH	1		X		
20	10/24/24	07666	Shamrock Feed Mill	3030 Big Bucks Lane, Monopoly, OH	2		X	X	10/05-10/24, 2024

In the above illustration 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 5-12, 2024.

In this same example, the QFIT completes a *Training Worksheet* using 5 establishment inspection intervals. The second *Training Worksheet* was completed after Establishment #20 and the QFIT'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, 2024 until the date the second *Training Worksheet* was completed on October 24, 2024.

NOTE: The Training Worksheet is <u>not</u> 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. QFITs 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.

attachment C – Reference Document: Task for Each Competency	
Attachment C – Reference Document: Tasks for Each Competency	
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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 <u>FDA Animal</u> <u>Feed Regulatory Program Standards</u>: 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 <u>FDA Office of Education and Training Delivery (OTED) LearnED</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 <u>FDA's OTED LearnED</u>.
- 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 <u>prior</u> to conducting any independent inspections of animal feed facilities.

INSPECTION AREAS

The Animal Feed Inspector *Training Worksheet* is divided into the following 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. Competency or task that are part of the AFI's job responsibility should be included in the training plan. Tasks that are applicable to the AFI's job should <u>not</u> be arbitrarily removed or deleted from the *Training Worksheet*.

The tasks listed under each competency are intended to serve as <u>examples</u> 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.

I. Pre-Inspection

- 1. Reviews the animal feed establishment's history and determine the scope of inspection.
- Reviews the previous inspection report(s) and complaint(s).
- Reviews the response letter to the previous establishment inspection in which corrective actions were promised.
- Determines scope of inspection based on establishment type and history, and type of inspection (e.g., CGMP, BSE, VFD, medicated feed, PCAF, comprehensive, or other)
- 2. Uses appropriate equipment and forms needed to conduct inspections.
- Has a copy or had electronic access to the pertinent laws and regulations.
- Has appropriate personal protective equipment (e.g., hard hat, respirator).
- Has appropriate inspection equipment (e.g., calculator, flashlight, camera).
- Has appropriate sampling equipment (e.g., probe, probe wipes, sample containers/bags).
- Uses up to date, proper, or appropriate forms for the type of inspection conducted.

II. Inspection Observations and Performance

- 1. Presents appropriate credentials and written Notice of Inspection to the animal feed establishment's owner, operator, or agent in charge; makes appropriate introductions; explains the purpose and scope of the inspections; and confirms inspection authority and establishes FDA jurisdiction, if applicable.
- Presents credentials to the owner, operator, or agent in charge of the establishment.
- Makes appropriate introductions, explains the purpose and scope of the inspection, and determines inspection authority.
- Enters the establishment through the front/main entrance and issues a Notice of Inspection prior to beginning the inspection.
- Issues the Notice of Inspection to the appropriate person.
- Confirms the interstate movement of product or ingredients.
- Determines if any products or ingredients have been received or shipped in interstate commerce by the manufacturer since the last inspection.
- 2. Follows the safety protocols required by the animal feed establishment and the state program.
- Asks if any particular safety protocols are mandated at the establishment.
- Follows the state program's safety protocol or used personal protective equipment appropriately.
- Follows the safety protocols mandated by the establishment.
 - 3. Follows the biosecurity protocols required by the animal feed establishment and the state program.
- Inquires if any particular bio-security protocols are mandated at the establishment.
- Follows the state program's bio-security protocol.
- Follows the bio-security protocols mandated by the animal feed establishment.
 - 4. Recognizes the relative risk categorization of the animal feed establishment based on the risk-based inspection program.
- Recognizes the relative risk of the establishment based on the animal feed establishment or product, types of processing, and compliance history of the establishment.
- Organizes inspection activities focusing on high-risk items such as high-risk products and processes.
 - 5. Conducts comprehensive inspection activities, appropriate for the level of risk, focusing on establishments, products, and processes determined to be high-risk.
- Prioritizes high-risk inspection activities.
- Does not concentrate inspection activities on low-risk items and not high-risk products and processes.
 - 6. Assesses employee activities critical to the safe manufacturing, processing, packaging, handling, holding, and distribution of animal feed.
- Conducts inspection with input from employees responsible for critical activities.
- Reviews records required by regulation that document employee training.
- Evaluates employee practices sufficiently to identify if a product contaminated by an adverse/improper employee practice subsequently re-enters the process flow.

- 7. Properly evaluates the likelihood that conditions, practices, processes, components, or labeling could cause the product to become adulterated or misbranded.
- Observes critical activities during the inspection and discusses procedures in place to prevent distribution when an error has occurred.
- Reviews labeling protocols and verifies a system is in place to assure proper labeling.
- Recognizes possible adulterants that are stored above or near bagged animal feed or ingredients.
- Reviews products for proper labeling and identification.
- Reviews animal 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.
- 8. Recognizes significant non-compliant conditions or practices, and documents findings consistent with state program procedures.
- When present, recognizes significant non-compliant conditions, but not to the exclusion of less significant non-compliant conditions.
- When present, recognizes non-compliant products and adequately addresses them at the time of the observation or at the conclusion of the inspection.
- When present, recognizes medicated components not being used in accordance with their new animal drug approvals.
- When present, recognizes the significance of sanitary transportation practices to prevent contamination with substances prohibited from use in animal feed.
- 9. Distinguishes between significant and insignificant observations, and isolated incidents versus trends.
- When present, distinguishes appropriately between significant and insignificant observations.
- When present, distinguishes appropriately between isolated incidents and trends.
- Discusses patterns or trends that were observed.
- Emphasizes the severity or outcome of significant observations and the need for immediate action.
- Identifies record keeping deficiencies, with the consideration that corrective action plans may have been implemented by the establishment and the deficiency has not reoccurred.
- 10. Reviews, evaluates, and verifies the appropriate animal feed establishment records, plans, programs, and/or procedures are established, maintained and/or implemented.
- Reviews appropriate establishment records.
- Questions alarm notifications and the resulting required procedures.
- When deficiencies are noted, investigations and corrective actions by the establishment are reviewed.
- Reviews equipment cleanout records and notes that cleanouts are or are not completed according to the establishment's SOP.
 - 11. Collects adequate evidence to include samples and documentation to support inspection observations in accordance with state program procedures.
- When significant deficiencies are noted in establishment records, documents are collected to support the findings.
- When significant non-compliant conditions are observed, supporting evidence such as photographs, detailed narrative, or affidavits are collected.

II. Inspection Observations and Performance (continued)

12. Verifies deficiencies identified during the previous inspections have been addressed.

• Verifies correction of out of compliance observations identified during previous inspection.

13. Conducts activities in a professional manner.

- Dresses appropriately for the inspection with clean and presentable clothing.
- Wears protective safety equipment that is required by the establishment or the state program.
- Abides by establishment's request regarding specific safety and bio-security practices at the establishment.
- Was polite and flexible.

III. Oral and Written Communication

1. Uses effective interviewing techniques.

- Requests for information are unambiguous and results in relevant information provided from the establishment.
- Avoids using jargon and acronyms, without explanation.
- Is not confrontational.
- Does not ask pointed and directed questions to solicit a desired response.
- Is a good listener and does not interrupt the establishment personnel in their responses.

2. Explains findings clearly and adequately throughout the inspection.

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

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

- Notifies the establishment's manager when direct contamination of product or ingredients is witnessed.
- Notifies the appropriate and most responsible person in the animal feed establishment 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 establishment's owner, operator, or agent in charge.

- Lists significant inspectional observations.
- Provides further explanations with inspectional observations.
- Completes legible report without spelling or grammatical errors.
- Provides the establishment's owner, operator, or agent in charge with a summary of inspectional observations.

5. Answers questions and provides information as appropriate.

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

6. Submits inspection report, sample(s), supporting evidence and documentation within the designated timeframes consistent with state program procedures.

- Reference attached documents are in inspection report.
- Reference documents are legible.
- Reference documents are accurate and reflect observations made during the inspection.
- Attaches referenced document(s) to the inspection report per state program's administrative procedures.

IV. Sample Collection

1. Uses an animal feed sample collection method consistent with criteria established by laboratory serving state program.

- Follows safety precautions on the animal feed label.
- Follows the state program's safety protocol for collecting samples.
- Uses appropriate sampling equipment for the selected product, as described in the <u>AAFCO Feed Inspector's Manual</u>.
- Uses appropriate sample containers as specified by the state program.
- Uses appropriate sampling methods for the selected product, as described in the AAFCO Feed Inspector's Manual.
- Follows the state program's procedure for marking and sealing all samples (corresponding sample information also noted on inspection report or laboratory forms).
- Follows the state program's procedure for documenting and maintaining sample integrity, security, and chain of custody.
- Issues a receipt for sample(s).
- Ships sample to the appropriate laboratory within the timeframe specified by the state program.
- Follows the state program's procedures for handling, packaging, and shipping samples to maintain sample integrity.

Attachment D – Supplemental Guidance for Flamming and Conducting John Fleid hispections
Attachment D - Supplemental Guidance for Planning and Conducting Joint
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Supplemental Guidance for Planning and Conducting Joint Field Inspections

<u>Chapter VII</u> of this *Training* Manual provides the basic steps and recommendations state programs should consider in planning for and conducting joint field training inspections as part of the training process for AFIS. This attachment provides supplemental guidance and recommendations for Qualified Feed Inspector Trainers (QFITs) to consider in planning and conducting joint field training.

Planning Your Joint Field Training

As mentioned in Chapter VII, planning for joint field training comprises of three key steps. QFITs should take time to ensure all preparation is made for the success of the AFI's training. The three step are:

- Step 1 Identify and ensure access to required documents for joint field training orientation as determined by the state program;
- Step 2 Review curriculum and list of course with trainee; and
- Step 3 Review training plan with trainee

<u>Step 1 – Identify and Ensure Access to Required Documents for Joint Field Training Orientation</u>

The program should identify information that a state program review as part of the AFI's joint field training orientation, to include but 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 provided by <u>FDA OTED</u>'s <u>LearnED</u>; 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 QFIT will likely need to review with the AFI over the first weeks of employment or assignment to the state's animal feed inspection program.

Step 2 – Review Curriculum and List of Coursework with Trainee

The curriculum and courses listed as required state program coursework (see <u>Chapter IV</u>) should be reviewed with the AFI. The QFIT, designated manager, or animal feed program administrator is to decide whether a candidate has met any or all the coursework requirements <u>and</u> has documentation indicating successful completion. If the AFI needs to complete coursework, the QFIT should assist him/her with obtaining an access password to the <u>FDA OTED's LearnED</u> or other training websites, 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

The QFIT should conduct a review of the state program's animal feed inspector training plan with the trainee, to include a discussions of:

- The level of training, associated coursework with the 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 QFIT 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 state program's animal feed inspector training plan; and
- The state program's criteria for determining a trainee's readiness to conduct independent inspections of animal feed establishments.

Conducting Joint Field Training Inspections

Conducting joint field trainings is the next step in the process of training phase. QFITs should familiarize themselves with the following six steps and understand the roles and differences between a 'Trainer-led" vs. a "Trainee-led inspection.

- **Step 1** Selecting appropriate QFITs;
- Step 2 Conducting 'Trainer-led" inspections;
- Step 3 Preparing for 'Trainee-led inspections;
- Step 4 Selecting establishments for 'Trainee-led' inspections;
- Step 5 Determining the number of 'Trainee-led' inspections; and
- Step 6 Observing Trainees demonstrate task

Step 1 – Selecting Appropriate QFITs

The administrator of the animal feed program or designated manager has the discretion of deciding who will serve as QFITs. In making this decision, available training resources (e.g., personnel, time, equipment, and funding) and overall program objectives 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 establishment 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 QFITs will eventually oversee animal feed establishment inspections. This allows the trainee to gain confidence learning competencies and demonstrating job tasks without the added stress of their territory's animal feed establishment 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 QFITs to demonstrate tasks and provide feedback.

Step 3 – Preparing for Trainee-Led Inspections

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

- The **trainer (QFIT)** 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 QFIT, 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.

QFIT's Role

During trainee-led inspections, the QFIT observes the trainee conducting the inspection and demonstrating the tasks. The QFIT participates <u>only</u> 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 QFIT should allow the inspection process to unfold as it normally would; in other words, the state program's animal feed inspector training plan should <u>not</u> 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 QFIT may note that the selection of establishments may not provide the trainee an opportunity to demonstrate some tasks. The QFIT 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 QFIT 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 QFIT 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 Trainee-Led Inspections

The ideal establishment for conducting an animal feed 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 inventory 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 <u>FDA AFRPS</u> can be also be used as a reference for assigning risk categories.

Step 5 – Determining the Number of Trainee-Led Inspections

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 <u>FDA AFRPS</u>, 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 processes highlighted in this *Training Manual* are <u>not</u> intended to be part of an audit or evaluation process, therefore a 'scoring system' has not been included. The primary objective of the joint field inspection training 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 QFITs as the standard of measurement; the state program's QFITs 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 QFIT will observe the trainee demonstrate many tasks. For some tasks, the QFIT 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 QFIT should observe the trainee successfully demonstrate a consistent pattern of behavior for each task. As defined in this *Training Manual*, 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 QFIT 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 establishment to another should be expected. QFITs 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 QFITs to recognize that during the training process, trainees are not only learning tasks but are also becoming acclimated to their working environment. QFIT'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.