



UNIVERSITY  
of HAWAII®  
MĀNOA

College of Tropical Agriculture and Human Resources  
Department of Tropical Plant and Soil Sciences

**Is the *Hazard Analysis and Risk-based Preventive Controls for Human Food* course the same as a HARPC course?**

By simply deducing from the name, one could see that the acronym is a fit and one might even conclude that it stands for the name. Many use the acronym HARPC when inquiring if I teach that specific course that they think or heard they need. I kindly advise them that I only teach the U.S. FDA recognized curriculum of FSPCA and that is not HARPC.

Food facilities in the U.S. and abroad that are registered with the U.S. FDA and distribute their products in the U.S. are required to develop and use a working **FSMA Food Safety Plan**—this is not a HACCP plan, not a HARPC plan, or other food safety plans.

The *Hazard Analysis and Risk-based Preventive Controls for Human Food* course is, to date, the **only** standardized curriculum recognized by the U.S. FDA to meet the FSMA training requirements on food safety. The curriculum was developed by the Food Safety Preventive Controls Alliance (FSPCA), a team of private, public, academic individuals including the U.S. FDA, and teaches how to develop and implement a **FSMA Food Safety Plan**. The full name of the course using the FSPCA curriculum is *FSPCA Hazard Analysis and Risk-based Preventive Controls for Human Food* Participant course. The acronym is **FSPCA PCHF**, not HARPC or PCQI that are wrongly and widely used.

Only FSPCA Lead Instructors may teach the FSPCA curriculum on Hazard Analysis and Risk-based Preventive Controls for Human Food and authorize the issuance of the FSPCA certificate to those who qualify. An FSPCA Lead Instructor has completed an FSPCA Lead Instructor training course and was assigned a Lead Instructor number that must be entered when registering a course to have it approved before it can be conducted. I am an FSPCA Lead Instructor and all the PCHF courses that I conduct are approved. Upon completion of all course requirements, participants will receive an email from the alliance's Learning Management System (LMS) with instructions on how to download their FSPCA certificate. The certificate will identify me as the FSPCA Lead Instructor and provides evidence that the participant has taken the U.S. FDA recognized course and has qualified to be a Preventive Controls Qualified Individual (PCQI). Only courses associated with the FSPCA can award the FSPCA certificate.

HARPC is the acronym used by HARPC.com, not the FSPCA. According to their website (<https://www.harpc.com/about-us/>), HARPC.com "is a project of Maryland-based consulting firm FDAImports.com" and conducts training sessions to develop a HARPC plan. HARPC.com is not a part of the U.S. FDA.

Please be aware that there are individuals and units that conduct courses with similar names but are not recognized by the U.S. FDA. It is important to look for a course associated with the FSPCA.

Aurora A. Saulo, Ph.D.  
Professor & Extension Specialist in Food Technology, University of Hawaii  
[aurora@hawaii.edu](mailto:aurora@hawaii.edu)

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3190 Maile Way, St. John Plant Sciences Laboratory 102  
Honolulu, Hawai'i 96822  
Telephone: (808) 956-8351 Fax: (808) 956-3894  
Email: [tpss@ctahr.hawaii.edu](mailto:tpss@ctahr.hawaii.edu)  
Website: <http://manoa.hawaii.edu/ctahr/tpss/>  
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