



204 E Street NE
Washington, DC 20002
Phone: 202-547-0899
Fax: 202-547-6348
www.theCIAA.org

February 22, 2017

Mr. William Correll, Director
Office of Compliance
Room 3B066
Center for Food Safety and Applied Nutrition
Food and Drug Administration
College Park, MD 20740

Dear Mr. Correll:

We have heard from several members of the Cheese Importers Association of America who have had problems renewing their Biennial Food Facility Registration online, both at the time of renewal at the end of last year, and since that time when importing product. We want to work with you to offer these observations so that there is an open opportunity to improve the online system and related communications prior to the next renewal period.

First, some of our members encountered situations in which they renewed their registration, received a confirmation of their renewal, and then subsequently – sometimes after several weeks – received another email saying “To date, FDA has not received your facility’s registration renewal for period 2016.” In one case in communications with Glen Bass we understand that there may have been an issue with the need to identify the US Agent. However, Section 7 asks for the identification of a US Agent and explicitly says “(To be completed by facilities located outside any state or territory of the United States, District of Columbia, or the Commonwealth of Puerto Rico)”. This language is confusing and risks giving the impression that the need to identify a US agent is limited only by those registrants outside of the referenced United States areas.

Second, as you know, some registrants needed assistance from the help line, but often encountered extremely long wait times. We understand that some of the delays were caused by a new requirement that passwords be updated every 90 days, a requirement that understandably some registrants did not know about since they do not access the system that frequently. They then had to go through a lengthy process via phone with the help line that took time from your help personnel, and slowed the response to others waiting for help.

Third, another member recently advised us of being told that they had an invalid registration number, despite the fact that they had properly renewed registration. During the Biennial Registration Renewal process they renewed received the confirmation emails from FURLS that required them to input their confirmation Receipt Codes. However, the email sent to them to confirm that they were the US Agent stated that they should click on the link provided and enter the receipt code "when prompted." The link took them back to the homepage of FURLS and was automatically logging them in under the facility user ID (last account used). They received no prompt to input the confirmation Receipt Code. So from FDA’s end, you did not receive confirmation that they were the US agent, and therefore their foreign facilities registrations became invalid.

We want to offer some preliminary suggestions for your consideration moving forward.

First, it would be most helpful if a simple checklist was provided with each renewal indicating what steps registrants should follow. Given how significant the agent issue became, there should be an explicit check box for the identification of the required agent.



204 E Street NE
Washington, DC 20002
Phone: 202-547-0899
Fax: 202-547-6348
www.theciaa.org

Second, registration renewal should not be confirmed until all steps are completed. If someone receives a receipt for registration then they are likely to believe that they have completed all required steps.

Third, perhaps the renewal system can be modified so that final submission is not possible until all required steps are completed. We have all seen a variety of online applications that are self-correcting, immediately identify missing information, and refuses submission until the outstanding item is corrected.

Another option might be to provide clear instructions in the FDA confirmation email that the US Agent must:

1. Click on the link to FURLS.
2. Login under the US agent's FDA account
3. Go to the tab on the left "Confirmation Receipt Code"
4. Enter the Receipt code provided in the email
5. Respond to the prompt question regarding authorization as US agent

Finally, if it is time to renew passwords, a reminder email should be sent to the registrant, and perhaps this should be done ten days in advance, five days in advance, and with a note "your password has expired" within five days of the expiration date if the renewal had not been completed. In this way those who don't routinely use the system will have their attention called to this matter before renewal time.

We do appreciate all that you and your colleagues at CSFSAN do to assist us, and we look at this past experience as an opportunity for us to work together to make the system easier for our members, and less demanding on your team. CIAA stands ready to work with you.

Sincerely,

Ken Olsson, President