

INSTRUCTIONS FOR DRAFTING NCIMS PROPOSALS

Updated October 2, 2024

The following instructions are provided to ensure the most efficient and satisfactory deliberation of proposals. Proposals may request actions, studies, pilot projects, or ideas that need thoughtful consideration for development as possible recommendations to the next NCIMS conference or as actions to be completed within a shorter time. The conference has several standing committees to which proposals may be assigned for action or *ad-hoc* committees may be established to work on a specific proposal.

TABLE OF CONTENTS

A. DRAFTING INSTRUCTIONS FOR CONFERENCE PROPOSALS.....	1
B. DRAFTING INSTRUCTIONS FOR PROPOSALS THAT DO NOT AMEND CONFERENCE DOCUMENTS; BUT SEEK ASSIGNMENT TO AN NCIMS COMMITTEE	3
C. NCIMS 2400 FORMS.....	3
D. 2025 PROPOSAL FORM WITH INSTRUCTIONS.....	4
E. EXAMPLE OF PROPERLY PREPARED PROPOSAL.....	6
F. PROPOSAL SUBMISSION CHECKLIST.....	8
G. PROPOSAL DEADLINE AND SUBMISSION.....	9

A. DRAFTING INSTRUCTIONS FOR CONFERENCE PROPOSALS

Please prepare your proposal using Microsoft Word and save your submission as a Word document with the file extension “.docx” only.

With each proposal, the text for the proposed solution should include enough or all of the required text for the reader to understand the proposed changes to the identified conference document without referring to the conference document being changed. Citing only the page number or a single sentence from the text of the conference document being changed is not enough text for the reader to be able to understand the issue in most cases. It is strongly recommended that the submitter incorporate the changes into all of the conference documents text, where applicable, for consideration by the conference delegates. It is vitally important for the text to include every section of all of the conference documents the change will affect. Conference documents may be downloaded from the NCIMS Website at www.ncims.org.

1. Use the following guidelines for the body of the text for citing all revisions to PMO provisions and NCIMS conference documents within the Proposed Solution Section of all submitted proposals:

- a. Type the documents in conventional uppercase and lowercase format. **Do not use colored font, underlining, or highlighting** as these will not appear in the printed versions.
- b. Underline all proposed new text using the single-line form of underlining. **Do not use “words only” underlining.**
- c. ~~Strike through language to be deleted.~~ Text proposed to be deleted is struck through.

d. Always insert proposed new text *after* stricken proposed deleted text.

EXAMPLES

Underline:

2. The owner shall install, calibrate, maintain, and operate a device to continuously measure the temperature of the flue gas stream at the inlet of each particulate matter control device.

Strikethrough:

~~3. 12 VAC 5-590-420—Treatment technique requirements.~~

Strikethrough, then underline:

~~7. 9. For any request application made under subdivision A 2 of this section, for a treatment technique variance, the applicant must also include a statement that the owner will perform monitoring and other reasonable requirements prescribed by the division commissioner as a condition to the variance; will be performed.~~

- e. **Do not use “revision mode” or “track changes” mode to create a document for submission.** Such word processing modes provide opportunities for accepting and rejecting revisions that allow language to be inadvertently deleted or changed without showing the changes.
- f. In **Microsoft Word**, use the “strikethrough” and “underline” features located under Format - Font.
2. **Do not use the automatic numbering feature when creating a list.** This occasionally inserts codes that are difficult to remove later and causes numbers or letters to disappear when applying paragraph styles.
- In **Microsoft Word**, the automatic numbering feature can be disabled at Tools – AutoCorrect Options - AutoFormat.
3. Use underlining for indicating new proposed text. **Do not use underlining or change font for emphasis, for the names of books, or foreign phrases.** Use quotation marks for the names of books, journals, articles, and similar items.
4. **Do not strike a part or portion of a word or number.** First, strike through the entire word or number, then insert the new proposed word or number and underline to indicate that it is new proposed text.

EXAMPLES

To change a word from plural to singular or vice versa:

INCORRECT
parking decks

CORRECT
parking ~~decks~~ deck

B. PROPOSALS THAT DO NOT AMEND CONFERENCE DOCUMENTS; BUT SEEK ASSIGNMENT TO AN NCIMS COMMITTEE:

For proposals that result in assignment to NCIMS committees, the Conference procedures require the Chair of the NCIMS Executive Board to assign those passed proposals to an NCIMS standing committee, special committee, or ad hoc committee as approved by the NCIMS Executive Board. The NCIMS Executive Board has requested that all proposals that will result in assignments to NCIMS committees be formatted to begin with the statement:

“(Insert the name of the Submitter, Council, Committee, Organization, etc. making the request) request the Chair to assign this proposal to an NCIMS standing committee, special committee, or *ad hoc* committee as approved by the NCIMS Executive Board.”

The request should also include what the expected outcome is, i.e., proposal to be developed for the next conference; report to Executive Board; etc. and timeline for completion, i.e., next conference or a specific date, etc.

C. NCIMS 2400 FORMS

All proposals for new laboratory test methods or changes to approved laboratory test methods will be assigned to the NCIMS Laboratory Committee for deliberation and recommendation to Council II. Council II will deliberate each proposal and make a recommendation to the voting delegate of either “no-action”; “passed as submitted”; or “passed as amended”. During the delegate voting session, the drafting of new NCIMS 2400 Forms or changes to existing NCIMS 2400 series forms will not be discussed. Conference procedures require that all of the NCIMS 2400 Forms be handled as a block. First, the NCIMS 2400 Forms recommended for “no-action” will be voted on; then the NCIMS 2400 Forms recommended to be “passed” will be voted on.

Changes to any NCIMS 2400 Form will be sent back to the NCIMS Laboratory Committee to work with the manufacturer and FDA until all parties agree on a finished NCIMS 2400 Form for each method that can be recommended to the NCIMS Executive Board. The NCIMS Laboratory Committee then recommends to the NCIMS Executive Board for their approval each NCIMS 2400 Form that has been finalized. After the NCIMS Executive Board approves individual NCIMS 2400 Forms they are officially accepted by FDA and published on the NCIMS website.

Note: A proposal for a new test method will follow normal Conference procedures.

D. PROPOSAL FORM WITH INSTRUCTIONS

This form is for INSTRUCTION ONLY. Please download the electronic Word version of the "Proposal Form" found on the website (www.ncims.org) to use to submit your Proposal. If you have problems, contact us at ncims.frye@outlook.com and we can e-mail you the Proposal Form.

38th NATIONAL CONFERENCE ON INTERSTATE MILK SHIPMENTS

Proposal #:	
Committee:	
New Procedure	
Procedure Change	
Const./Bylaws Change	

	No Action	Passed as Submitted	Passed as Amended
COUNCIL ACTION			
FINAL ACTION			

Information in shaded boxes above to be filled in by Program Committee and Councils

Submit ONLY ONE proposal per form and per file saved. Identify your proposal(s) by naming the file with your first name initial followed by last name, without periods—e.g., John Smith = "JSmith.docx". If you submit multiple proposals, add a number after your name, e.g., JSmith1, JSmith2, etc. **Typed, handwritten, or printed hard copy Proposals will not be accepted.**

Note: As you type, the entry area will automatically expand. Use as much space as needed in each section. Please do not type in the shaded areas. Arrows (►) indicate where text should be entered, as appropriate. Please be as specific as possible when completing the Proposal to assist the Program Committee in assigning your Proposal to the proper Council.

A. Summary of Proposal

Provide a brief, one or two-sentence description of your proposal. PLEASE DO NOT USE TRACK CHANGES FUNCTION or AUTO EDITING SOFTWARE FEATURES.



**B. Reason for the Submission and
Public Health Significance and/or Rationale Supporting the Submission**

Provide a detailed description of the background and purpose of your proposal. PLEASE DO NOT USE TRACK CHANGES FUNCTIONS or AUTO EDITING SOFTWARE FEATURES



C. Proposed Solution

Changes to be made on the following NCIMS Documents:

Page Number(s)	Document	Page Numbers(s)	Document
▶	2023 PMO <i>Section(s):</i> ▶ <i>Appendix:</i> ▶	▶	2023 EML
▶	2023 MMSR	▶	Forms <i>Form Number:</i> ▶
▶	2023 Procedures	▶	2023 Constitution and Bylaws

Write in page number(s) in all instances where changes are proposed. For the PMO, also write in Section number(s) and/or Appendix Letter(s), e.g., Section(s) (1-18), Appendix (A-T). If changes are for a Form, also write the Form number.

Copy section(s) of the document to be changed below. Strike out text to be deleted and underline text to be added. DO NOT USE TRACK CHANGES FUNCTION or AUTO EDITING SOFTWARE FEATURES. **Please refer to INSTRUCTIONS FOR THE DRAFTING OF PROPOSALS to ensure proper formatting.**

Proposed Change:



Name:	▶
Agency/Organization:	▶
Address:	▶
City/State/Zip:	▶
Telephone No.:	▶
E-mail Address:	▶

E. EXAMPLE OF PROPERLY PREPARED PROPOSAL

38th NATIONAL CONFERENCE ON
INTERSTATE MILK SHIPMENTS

Proposal #:	
Committee:	
New Procedure	
Procedure Change	
Const./Bylaws Change	

	No Action	Passed as Submitted	Passed as Amended
COUNCIL ACTION			
FINAL ACTION			

Information in shaded boxes above to be filled in by Program Committee and Councils

A. Summary of Proposal

This proposal adds language to the PMO to clarify that food manufacturing facilities that are only receiving Grade “A” milk products for use as an ingredient in another food that is not a Grade “A” milk product defined in the *Ordinance* may be exempt from the permit requirements of Section 3.

B. Reason for the Submission and Public Health Significance and/or Rationale Supporting the Submission

Grade “A” milk and milk products produced and processed under the requirements of the PMO at Interstate Milk Shipper-Listed facilities are routinely distributed to other food plants for use in the manufacture of a wide variety of foods that are not Grade “A” milk products. Examples include, but are not limited to, the use of Grade “A” dry milk powders in bakery products and mixes, and the use of Grade “A”-milk, -cream or -yogurt in the manufacture of soups, dips, puddings, confections, and other foods. This proposal adds language to clarify that the requirements of the PMO do not extend to food manufacturing facilities that are only receiving Grade “A” milk products for use as ingredients in foods that are not defined as Grade “A” milk products in the *Ordinance*. Use of the words “may be exempt” in the language proposed below is consistent with the exemption already specified in Section 3 for grocery stores, restaurants, soda fountain, etc., and would continue to allow for those states that choose to adopt the requirements of the PMO for broader purposes under their jurisdiction,

such as the processing of manufacturing grade dairy products.

C. Proposed Solution

Proposed changes:

PMO, Section 3 (Page 16)

SECTION 3. PERMITS

The term “permit”, whenever it appears in this *Ordinance* shall also mean a MC operating under the ICP possessing a valid Memorandum of Agreement (MOA) with a Third Party Certifier (TPC).

It shall be unlawful for any person who does not possess a permit from the Regulatory Agency of the ... of ...1 to manufacture, bring into, send into or receive into the ... of ...1 or its jurisdiction, for sale, or to sell, or offer for sale therein or to have in storage any milk and/or milk products, defined in this *Ordinance*. Provided, that grocery stores, restaurants, soda fountains and similar establishments where milk and/or milk products are served or sold at retail, but not processed may be exempt from the requirements of this Section. Provided further, that brokers, agents, and distributors representing, buying from, and/or selling condensed and dry milk products from or to a milk plant having a valid permit are not required to have a permit.

Only a person who complies with the requirements of this *Ordinance* shall be entitled to receive and retain such a permit. Milk plants, receiving stations and transfer stations permitted under the NCIMS voluntary Hazard Analysis Critical Control Point (HACCP) Program shall meet the applicable provisions of this *Ordinance*, including Appendix K. of this *Ordinance*. Permits shall not be transferable with respect to persons and/or locations. Provided, that the manufacture of condensed and dry milk products, which do not meet the requirements of this *Ordinance* for Grade “A” condensed or dry milk products and which are intended for other uses, shall not be construed to violate the terms of this *Ordinance*, if such products are processed, packaged and stored separately and are plainly identified. Provided further that a facility that only receives Grade “A” milk and/or milk products for the sole purpose of their use as an ingredient in the manufacture of foods that are not Grade “A” milk and/or milk products defined in this *Ordinance*, and are not labeled as Grade “A”, may be exempt from the requirements of this Section.

Name: Stephen Beam, Ph.D.

Agency/Organization: California Department of Food and Agriculture

Address: 1220 N Street


City/State/Zip: Sacramento, CA 95814

Telephone No.: 916-900-5008

E-mail Address: Stephen.Beam@cdfa.ca.gov

F. PROPOSAL SUBMISSION CHECKLIST

Before submitting your proposal, read the “Instructions for Drafting and Submission Of NCIMS Proposals” above, then answer the following questions:

- _____ Did you include the name and contact info for the person/group submitting the proposal? Proposals that are submitted jointly by multiple groups should include the names of all submitters.
- _____ Did you include a summary and reason for submitting the proposal in Sections A and B, respectively?
- _____ Did you indicate *all* the pages of Conference documents that will be impacted by the proposal? Some proposals may impact multiple Conference documents.
- _____ If the proposal passes, will there also need to be a change to an NCIMS Form? If so, include the proposed changes to the appropriate Form.
- _____ Did you show all the proposed changes in Section C? Proposals that are submitted without a complete solution in Section C will not be accepted by the NCIMS Program Committee.
- _____ Did you follow the formatting directions in the instructions for drafting proposals?
- _____ Did you turn OFF Track Changes in Word?
 - _____ Did you turn OFF automatic numbering/automatic outlining in Word?
 - _____ Did you underline text proposed to be inserted?
 - _____ Did you strikethrough text proposed to be deleted?
 - _____ Did you change the font or font size of the text in Section C? Do NOT change the font/size of the text in the proposal; use the default font/size that is in the submission form. (Times New Roman, 12 pt)
 - _____ Did you change the margins of the text in Section C? Do NOT change the margins of the text in the proposal; use the default margins that are in the submission form.
 - _____ Did you NOT insert page breaks within the text of your proposal in Section C?
 - _____ Did you remove any hidden characters within the text of your proposal? Click the ‘show/hide characters’ button  in Word and remove any unusual coding.
- _____ If your proposal includes the formation of a study committee, did you include the required language to assign the proposal to a committee? See page 3 of the instructions for drafting proposals.
- _____ Do you want an effective date for your proposal *different from* one year after publication of the IMS-a? If so, cite the desired effective date at the conclusion of the proposal (not earlier than the meeting of the NCIMS Board to discuss FDA’s concurrence with Conference actions). See page 3 of the instructions for drafting proposals.
- _____ Does your proposal consist only of changes that are editorial (for example, typos, misspellings, etc.)? FDA has the authority to make editorial changes to Conference documents, with the approval of the NCIMS Executive Board, outside of the proposal process. Contact CFSANDairy@fda.hhs.gov to discuss suggested editorial changes.

G. PROPOSAL DEADLINE AND SUBMISSION

The deadline for Proposals submitted to the 2025 NCIMS Conference is January 17, 2025, at 11:59 pm EST. Proposals should be emailed to Wendy Landry, Program Chair at Wendy.Landry@hphood.com