ISSUE 1: Within Establishment Inspection System

1. What recommendation does the committee have regarding how to better use and identify the prompts identified for the within establishment inspection system?

2. What recommendations does the committee have with the design of the vulnerable points identified for the within establishment system?

The subcommittee recommends that the prompts be externally reviewed by subject matter experts and results released for review. FSIS must test this system in exercises, which includes in-plant inspection staff, before it its implemented and in a number of different plants to make sure that flexibility is built into the system. By having more options, you have more flexibility in the plan. However, there are some concerns with the current time constraints on inspection personnel and whether or not these duties can be accomplished within those limitations. FSIS must ensure that human resources are adequate to efficiently perform these tasks.

The subcommittee recognizes that the questions may not resolve the cause of the prompt; therefore the additional questions may need to be asked by the inspectors. Conversely, some questions may not apply. Testing the same scenario in multiple plants, under operational conditions and comparing whether the inspection staff obtains similar results will allow the agency to refine the questions and answers to ensure consistency in results. Further, it may assist in determining whether certain prompts are more applicable to certain vulnerable points than others rather than applying all prompts in all circumstances.

Education and training are critical to making sure the inspectors have the knowledge and authority to ensure the success of the program. The inspectors must have the ability to use critical thinking to carry out this system. Inspectors must understand the food safety principles, how to apply these questions properly and involve people at other levels of the Agency if necessary. This must also act as a management control system so FSIS management can ensure that inspectors are applying the methods properly. Under the current inspection system, there are multiple levels of inspection and many times those responsibilities overlap. In order to provide uniformity, it must be clear once these prompt questions are answered that decisions are made by one group within FSIS.

Since FSIS is seeking to create a system that is science based, the terms such as "appropriate," "adequate" and "proper" need to be removed since these are hard words to interpret and instead use more definitive terminology.

The application of HACCP in a slaughter plant is an imperfect system because there is no assured method of completely eliminating, or preventing the hazards associated with slaughter. The subcommittee strongly recommends that the questions should not be used in a manner that dictates the mechanism for establishments to control the process; rather they should be used as "critical thinking" guide.. Once again directions to the inspection personnel making these decisions must be made clear to prevent disagreements within the agency inspection staff.

As an inspector responds to a prompt using the vulnerable point and questions, it is advisable that a systematic approach is utilized as the questions are addressed. First look at the previous process step where the prompt was generated. The issue may be addressed by working backwards in the process until a stop point is reached.

The subcommittee recommends that the Agency prioritize the vulnerable points within product categories. FSIS should put a priority on vulnerable points based on public health concerns and to better utilize resources. For example, sanitation in cooked processes should be given higher priority and post-lethality even higher.

Since we are addressing very different processes , the subcommittee would like time to fully look at each prompt specifically and make comments.

Neither prompts nor process control can be expected alone to protect public health. The agency must be able to demonstrate that the system is based on public health data and actually results in products with less microbial contamination. It appears that the ability to have the entire agency data integrated in one place and data mined for flags is an important step forward. Creating flags or prompts is an important step, but should be just that, a flag and a helpful tool to assist guiding inspection personnel as to what points in the process should be evaluated more closely based on data that has been entered into all of the different data systems the agency has tied together. In addition the prompt system and questions related should be reviewed by the NACMCF.

These recommendations are made with the understanding that FSIS will have an IT system that is capable of responding to this system. Quite frankly FSIS has not had a good track record in the development of IT inspection systems. If this system is going to truly be instrumental in providing additional safeguards in the food supply, the effectiveness of the IT system is imperative.