

FSIS Strategic Implementation Plan for Strengthening Small and Very Small Plant Outreach

2006

Executive Summary

FSIS Strategic Implementation Plan for Strengthening Small and Very Small Plant Outreach

Background

In December 2005, the International HACCP Alliance hosted a strategic planning meeting of its members to consider the needs of small and very small plants. Government Agency personnel, including the FSIS Administrator, also participated in this meeting. The International HACCP Alliance includes over 120 members from nine countries representing industry associations, professional associations, educational foundations, universities, third party/private companies, and government cooperators. The members have worked to standardize industry's HACCP training efforts, develop uniform position on implementing HACCP, and working cooperatively with FSIS and other regulatory agencies. As a result of the December meeting, the following needs were shared with the FSIS Administrator and Executive Management Team.

- Acceptable supporting documentation for HACCP and other food safety programs
- Summary of questions and answers and Agency information
- Development of additional guidance documents
- Provide educational opportunities for both Agency and industry personnel
- Ensure a consistent message is being delivered
- To ensure that small and very small plants understand the appeal process and their right to appeal

The FSIS Administrator charged an ad hoc task force with responsibility to examine the needs identified by the International HACCP Alliance and develop strategic recommendations to strengthen FSIS outreach to small and very small plants. The task force also considered information gathered at recent FSIS listening sessions.

Recommendations

Guiding strategies

The task force recommended that the Agency implement the following eight guiding strategies to respond to the needs of small and very small plants and to strengthen outreach efforts.

One stop customer service: Develop a coordinated, easily accessible, consistent, and customer-oriented outreach program that provides small and very small plants with “one stop” service for obtaining information (technical, grant of inspection, validation, etc.), technical assistance, and answers to achieve compliance and promote food safety and food defense.

Technical resources: Provide a full range of technical resources targeted to meet key needs of small and very small plants to help improve the quality of food safety and food defense plans. These technical resources are clear, easily understood, continually reviewed and updated, meet rigorous scientific standards, and are accessible through the “one stop” service.

Education/training: Provide access and resources to support ongoing teaching/education for small and very small plants, and ensure that employees and partners have training that equips them to effectively assist in outreach activities.

Partnerships: Develop and expand active partnerships with industry, academia, consumers, federal, State, and international public health partners to support our outreach strategies.

Needs assessment: Use multiple strategies to conduct ongoing, regular activities to determine the needs of small and very small plants, and modify efforts to target the needs identified.

Evaluation: Establish performance measures for small and very small plant outreach that will be used for short- and long-term planning and develop methods to identify and evaluate outcomes of outreach activities.

Resource/budget: Leverage existing resources so that they are used efficiently and effectively, and demonstrate Agency commitment to support small and very small plant outreach efforts.

Efforts will be made to communicate with FSIS employees and to ensure they are involved and understand the importance of their role in outreach to small plants, realize the potential benefit, and actively participate in Agency activities.

Implementation Plan

In order to implement these recommendations, the task force developed a strategic implementation plan, which is attached. The implementation plan outlines action steps and proposed timelines for implementing the guiding strategies recommended to strengthen FSIS outreach for small and very small plants.

Communication Plan

The task force also recommends that FSIS develop and implement a communications plan to announce the actions FSIS will take to strengthen its outreach efforts. The communication plan will cover the types of activities and messages that need to be delivered to internal and external stakeholders to raise awareness of FSIS outreach activities. It is proposed that a communications plan be developed for FY 2006 by May 1, 2006.

OBJECTIVE: One-stop service, easy access. FSIS provides small and very small plants with coordinated, one-stop service for obtaining consistent information, technical assistance, and answers, in order to enhance regulatory compliance and promote food safety and food defense. The customer-oriented service is fully accessible.

Major Activity	Key Action Items
<p>A team at the Technical Service Center provides support to respond to calls, faxes, and e-mails from small and very small plants.</p>	<p>Identify ad hoc team, considering interpersonal communication skills and technical knowledge.</p> <p>Define the functions of the ad hoc team including linkages to SIPO and other staffs.</p> <p>Establish and implement a system to route small and very small plants to the TSC 1-800 toll free telephone number using the new phone system, and to the TSC email address for technical assistance.</p> <p>Draft initial standard operating procedures for workflow describing how FSIS will respond to and track inquiries.</p> <p>Draft initial customer service standards for the ad hoc team.</p> <p>Collaborate with the Meat and Poultry Hotline to benchmark best practices for call-in centers.</p> <p>Announce and pilot the ad hoc team approach to serve the needs of small and very small plants.</p> <p>Modify SOPs and customer service standards based on an analysis of pilot results.</p> <p>Develop recommendations and a plan for the Management Council decision on long-term implementation covering staffing and resource issues.</p> <p>Officially designate a section of the TSC to better serve the needs of small and very small plants.</p>

OBJECTIVE: One-stop service, easy access. FSIS provides small and very small plants with coordinated, one-stop service for obtaining consistent information, technical assistance, and answers, in order to enhance regulatory compliance and promote food safety and food defense. The customer-oriented service is fully accessible. (continued)

Major Activity	Key Action Items
<p>A web gateway enhances small and very small plants with internet access to information and guidance on regulatory compliance, public health safety and food defense.</p>	<p>Designate an “owner” of the small/very small plant web pages to ensure there is a link to all existing resources that serve the needs of small/very small plants.</p> <p>Review the existing site and prepare it for the roll out announcement of the resource.</p> <p>Develop a rotating ad for the FSIS homepage signifying the small/very small plant outreach web gateway.</p> <p>Utilize the existing web user’s survey to allow small and very small plants to provide feedback about their needs.</p> <p>Develop and roll out a communications plan that announces the web page and email address.</p> <p>Develop a plan for building and implementing an extranet, PartnerNet, which allows small/very small plants to customize their FSIS web services.</p> <p>Announce and implement PartnerNet.</p> <p>Establish a reporting mechanism with OCIO that tracks comments and feedback, as well as provides a count of the number of hits to the web page on specific topics of interest to small and very small plants.</p> <p>Design and implement a contributor/editor network using the Intranet model to maintain all web resources so that they are current and accurate and easily understood.</p> <p>Provide a section of the web site devoted to providing assistance to small and very small plant operators throughout the Western Hemisphere by translating materials into Spanish.</p>

OBJECTIVE: One-stop service, easy access. FSIS provides small and very small plants with coordinated, one-stop service for obtaining consistent information, technical assistance, and answers, in order to enhance regulatory compliance and promote food safety and food defense. The customer-oriented service is fully accessible. (continued)

Major Activity	Key Action Items
<p>A web gateway enhances small and very small plants with internet access to information and guidance on regulatory compliance, public health safety and food defense.</p>	<p>Gather user input on ease of accessing needed information and understandability/plain language of resources through cooperation with International HACCP Alliance and/or USDA study.</p> <p>Develop and implement an “Ask Harry HACCP” search and respond feature.</p> <p>Develop and implement web-based methods to allow small/very small plants and other stakeholders to request and receive resource materials, apply for a grant of inspection, register as a food handler, etc.</p> <p>Identify existing resources and develop new additional materials for small and very small plants including small business resources, technical background information on foodborne pathogens, food safety issues, emerging issues, food defense, and sources for validation references and post them to the web page.</p>

OBJECTIVE : Technical assistance: FSIS will provide a full range of technical resources targeted to meet key needs of small and very small plants to help improve the quality of food safety and food defense plans.

Major Activity	Key Action Items
Develop IKEs to clarify agency policy.	<p>Develop IKEs for appropriate situations that require more than a simple question and answer for food safety and food defense issues.</p> <p>Publicize IKE comment page in internal newsletters, work unit meetings, etc.</p> <p>Develop IKEs on small and very small plant topics including the availability and range of existing resources.</p>
Develop materials to explain and clarify the appeals process.	<p>Develop IKEs on the appeals process.</p> <p>Develop FSIS guidance in easily understandable language explaining the step-by-step process for appeals. This guidance will have a flow chart attached depicting the chain that should be followed.</p> <p>Develop a process for assessing overturned appeals and develop training for FSIS personnel using that data.</p> <p>Publicize where information on the appeals process can be found on the web.</p>
Existing resources for small and very small plants.	<p>FSIS will establish a peer review panel to conduct a review of the FSIS documents and identify gaps or areas where additional information is needed.</p> <p>Identify FSIS documents used for supporting documentation e.g., guidance documents, technical information, regulations, etc.</p> <p>As indicated by the panel, documents will be revised in plain language.</p> <p>Create an inventory of current and appropriately written documents for use as supporting documentation available for distribution.</p> <p>Establish a process to raise awareness of availability of these resources through communication with FSIS employees and external constituents, partners, and by posting information on the web page.</p>

OBJECTIVE : Technical assistance: FSIS will provide a full range of technical resources targeted to meet key needs of small and very small plants to help improve the quality of food safety and food defense plans. (continued)

Major Activity	Key Action Items
Develop new materials to meet unmet needs	<p>Develop a new plant start up package and template for the small and very small plant seeking a grant of inspection.</p> <p>Issue the electronic HACCP plan development tool that will assist small and very small plants in developing a HACCP plan.</p> <p>Establish a central clearinghouse to coordinate Q&A responses.</p> <p>Regularly distribute and post new materials and commonly asked questions and Q&As to FSIS website, and make them available in a written format when requested.</p>

OBJECTIVE : Training/education: Access and resources are provided to support ongoing teaching/education for small and very small plants and to ensure that employees and partners have training to effectively equip them to assist in outreach activities.

Major Activity	Key Action Items
Provide education/training for FSIS employees on small and very small plant outreach resources	A short course is available in AgLearn to train FSIS personnel on the resources and technical information available to assist small and very small plants. Post information in <i>Inside FSIS</i> to tell employees about resources available to assist small and very small plants and provide information about when and how they should be accessed. Provide a course in AgLearn on the appeals process when the guidance on appeals is issued.
Conduct food safety regulatory walk through teaching seminars on nights and weekends for small and very small plants (e.g., sanitation performance standards, sanitary operating procedures, HACCP plan design, HACCP implementation, food safety testing, food defense)	Develop seminar material (including train the trainer materials, instructor materials, and participant materials). Conduct train-the-trainer sessions to prepare CFL regional trainers and EIAOs to conduct the seminars. Post a schedule of the seminars on the web and announce the dates, times, and locations through a variety of methods. Conduct the first seminar.
Provide training to help ensure accurate and consistent answers to technical questions	Conduct training for FSIS employees who answer phone calls from small and very small plants including the use of a standard method of answering questions, interviewing skills, and dealing with challenging callers.
Provide training resources to university partners to strengthen their ability to provide services to assist small and very small plants	Conduct a walk through of workforce training (e.g., FSRE). Provide university partners with a catalog of FSIS resources available for them to use in assisting small and very small plants.

OBJECTIVE : Training/education: Access and resources are provided to support ongoing teaching/education for small and very small plants and to ensure that employees and partners have training to effectively equip them to assist in outreach activities. (continued)

Major Activity	Key Action Items
Provide training resources to university partners to strengthen their ability to provide services to assist small and very small plants (continued)	Provide a resource to pair round table leaders from universities with EIAO's who can assist them in conducting round table sessions. Conduct a walk through of FSRE training for State trainers.
Conduct public workshops on new policies similar to ones that have been conducted for new policies on <i>Listeria monocytogenes</i> , BSE, food defense, and <i>E. coli</i> O157:H7	Develop workshop material (including train the trainer materials, instructor materials, and participant materials) for the agency's new policies on food defense, risk based inspection, and HACCP for egg products Post a schedule of workshops on the web and announce the dates, times, and locations through a variety of methods. Conduct the first risk based inspection workshop using a variety of methods, including net cast, web cast, or other interactive teaching methods as well as classroom-based workshops. Distribute materials from the workshops to small and very small plants.
Training for FSIS on clear and plain writing	Provide training to FSIS employees who develop written materials and guidance for small and very small plants on how to write in a clear and plain manner that is easily understood by a variety of audiences.
Provide training on food safety regulations to small and very small plants operating throughout the Western hemisphere	Translate the training materials used in the regulatory walk thru sessions into Spanish for use by the Food Safety Institute of the Americas

OBJECTIVE: Partnerships: FSIS educational partnerships with academia, industry, consumers, Federal, State, and international partners support and enhance the effectiveness of outreach strategies for small and very small plants.

Major Activity	Key Action Items
<p>Re-energize existing partnerships</p>	<p>Develop a list outlining the expertise of university contacts (e.g., validation, sanitation) and make the expertise list available as a resource to assist small and very small plants who are looking for specialized advice and technical assistance.</p> <p>Coordinate with Districts/universities conducting round table sessions and provide resources (e.g., speakers, information sharing) to the round table leaders.</p> <p>Provide a contact for universities to use to identify round table dates and scheduling information. Use university coordinator to gather feedback through roundtables and university led classes.</p> <p>Collaborate with the International HACCP Alliance, AFDO, and NASDA to communicate the round table schedule.</p> <p>Coordinate with CSREES/ARS and university Deans to make them aware of key educational needs of small and very small plant needs so that these needs are considered for grants.</p> <p>Recreate large/small and very small plant mentoring on supporting documentation and other areas of interest.</p> <p>Continue to provide and expand updates and training materials to extension, university, and other interested partners nationally and internationally.</p>

OBJECTIVE: Partnerships: FSIS educational partnerships with academia, industry, consumers, Federal, State, and international partners support and enhance the effectiveness of outreach strategies for small and very small plants. (continued)

Major Activity	Key Action Items
Build new partnerships.	Partner with the International HACCP Alliance to create a working group of industry representatives willing to share expertise and other technical resources and assistance with small and very small plants.
Support and maintain partnerships.	<p>Sponsor an annual meeting of university contacts and other partners to share resources, develop plans, gather feedback, and network.</p> <p>Obtain input from partners to find out what support they need, and actively work with them to ensure that they have adequate resources to assist small and very small plants.</p>
Establish partnerships to assist small and very small plants throughout the Western Hemisphere	Develop partnerships that can enhance food safety training delivery mechanisms that overcome difficulties associated with local cultural, language and geographical isolation issues.

OBJECTIVE: Needs assessment: Small and very small plant outreach needs are identified through ongoing and regular needs assessment process that enables FSIS to better understand the needs of small and very small plants and target agency outreach programs and services more efficiently and effectively.

Major Activity	Key Action Items
Gather formal public comment on small/very small plant and other stakeholder needs through issuance of a Federal Register Notice	Draft a Federal Register Notice that identifies and explains current and future outreach programs and services, and develop key questions and/or topic areas for receiving public input on Agency outreach programs and services. Issue the Federal Register Notice. Assess and compile input from FRN and develop a paper describing key needs to drive outreach.
Hold additional listening sessions/town hall meetings with industry and other stakeholders to determine and document key needs.	Announce intent to hold six additional listening sessions, meeting schedule, and locations at weekly stakeholder meetings and in Constituent Updates. Develop discussion topics, questions, and other materials to enhance dialogue and feedback collected. Document the input. Develop correlation paper that identifies key needs to drive outreach. Post the needs on the FSIS web site and use the needs for selecting Cooperative Agreements in FY 2007.

OBJECTIVE: Needs assessment: Small and very small plant outreach needs are identified through ongoing and regular needs assessment process that enables FSIS to better understand the needs of small and very small plants and target agency outreach programs and services more efficiently and effectively. (continued)

Major Activity	Key Action Items
Collaborate with industry associations to obtain information on key outreach needs.	Collaborate with the International HACCP Alliance to gather information about small and very small plant needs.
Utilize existing agency data to determine key needs.	<p>Analyze existing data and information (e.g., Food Safety Assessments, recalls, enforcement actions, testing, food security MOIs, etc.) to identify gaps in technical materials.</p> <p>Develop a plan to address the gaps to develop materials and make them available to small/very small plants.</p> <p>Conduct focused public correlation sessions with industry and inspection program personnel jointly to cover key needs identified.</p> <p>Survey EIAO's to gather input on key areas of small and very small plant need (potential areas of technical weaknesses).</p>

OBJECTIVE : Evaluation: Conduct regular evaluations of the impact of outreach activities to determine short and long-term results and to demonstrate the value added by outreach activities.

Major Activity	Key Action Items
<p>Develop methods and tools to routinely evaluate resources for small and very small establishments</p>	<p>Establish credible, quality methods and tools to routinely evaluate information and resources available to small and very small establishments</p> <p>Design studies to evaluate the impact of outreach activities on small and very small establishments (e.g., changes in behavior, compliance rate, results).</p> <p>Design a system to track evaluation results over time</p>
<p>Conduct studies to evaluate new and existing FSIS materials and services available for small and very small facilities</p>	<p>Establish a user’s group consisting of small and very small plant owners, operators, and representatives (e.g., modeled after the NACMPI) to provide feedback about the usefulness of existing tools and services, to pilot new activities or materials, and to make recommendations on how to improve the outreach function to better meet needs</p> <p>Conduct studies to evaluate the impact of outreach activities on small and very small establishments (e.g., changes in behavior, compliance rate, results).</p> <p>Track evaluation results over time</p> <p>Conduct an audit of the effectiveness of the major components of outreach activities (web gateway, TSC team, training, partnerships).</p>

OBJECTIVE : Leverage resources: Existing resources are leveraged so they are used efficiently and effectively, demonstrating the Agency’s commitment to support small and very small plant outreach efforts.

Major Activity	Key Action Items
<p>Ensure Cooperative Agreements are targeted to meet small and very small plant needs.</p>	<p>Establish a lead point for managing the FY 2006 Cooperative Agreements.</p> <p>Track the implementation and results of the 2006 Cooperative Agreements.</p> <p>Develop a communication plan to share results of the FY 2006 Cooperative Agreements with small and very small plants.</p> <p>Establish a clear process for announcing, selecting, evaluating, and using the results of the 2007 Cooperative Agreements</p> <p>Announce the FY 2007 Cooperative Agreements so that proposals will address priority needs.</p> <p>Select FY 2007 proposals based on their ability to meet small and very small plant needs. Require that cooperators provide an evaluation of their activities, and some needs assessment information.</p> <p>Conduct periodic audits of training events, workshops, or other funded activities.</p> <p>Track the implementation and results of the 2007 Cooperative Agreements.</p>

OBJECTIVE : Leverage resources: Existing resources are leveraged so they are used efficiently and effectively, demonstrating the Agency’s commitment to support small and very small plant outreach efforts. (continued)

Major Activity	Key Action Items
Cross utilize non-bargaining unit employees to provide outreach to small and very small plants	<p>Establish plans for EIAOs to meet proactively with small/very small plants to explain what to expect from an FSA and to distribute outreach materials.</p> <p>Include more detail on the outreach role of the EIAO in EIAO training.</p> <p>Provide EIAOs with resource materials to conduct workshops to meet small/very small plant needs</p>
Explore extra-Agency partnerships to leverage resources	<p>Conduct meetings with external groups (e.g., industry associations) to explore ways to leverage resources (e.g., ways to provide tuition assistance or funding to offset costs to small/very small plants).</p> <p>Establish at least one mechanism to leverage resources (e.g., a foundation to provide financial assistance for small/very small plants).</p>
Resource distribution	Coordinate the warehousing and distribution of resources for small and very small plants.