

TIMELINE FOR RISK-BASED INSPECTION IN PROCESSING ESTABLISHMENTS

With the implementation of the Pathogen Reduction/Hazard Analysis Critical Control Point (HACCP) systems rule, USDA made significant advances in implementing a risk-based inspection system. FSIS will further enhance and strengthen that system to anticipate and quickly respond to food safety challenges before they negatively affect public health. A more robust risk-based inspection system (RBI) offers us this ability.

FSIS will use measures of inherent product risk, exposure, and establishment risk control (factored together in a risk algorithm) to better allocate resources for protecting the public health. Inspection, microbiological, enforcement, and other types of data will be continually collected and analyzed to better target higher risk operations through inspection.

An improved public health data infrastructure will allow critical food safety information to flow in real-time and in a form that allows it to be continually analyzed so that potential problems can be detected quickly and resources redirected as necessary to protect public health. Future technical meetings are planned on data, including ranking the public health implications of various types of regulatory non-compliances, better attributing foodborne illnesses to their sources, expert elicitation on inherent product risk, use of production volume data as a proxy for exposure, and the use of industry data in the risk algorithm.

The Agency also will seek input on various public health data that might be used to evaluate the progress and success of RBI, such as information from CDC on foodborne illness rates, FSIS product sampling rates and results, product recall rates, and the risk control scores plants achieve.

Since November 2005, FSIS has sought input from the National Advisory Committee on Meat and Poultry Inspection on additional steps to enhance risk-based inspection and on how best to gather stakeholder input, to address the issues of inherent risk and establishment risk control, and to implement these concepts.

In addition to the specific items below, the RBI timeline will be marked by ongoing interactive communication with stakeholders and the public through:

- Monthly Agency meetings with industry and consumer representatives,
- Quarterly joint industry and consumer meetings with the Agency and Office of Food Safety,
- National Advisory Committee on Meat and Poultry Inspection meetings twice per year,
- Periodic updates in a variety of employee publications and constituent newsletters,
- Continued regular calls by the Under Secretary and Administrator with the Chairman of the National Joint Council, and
- Frequent Agency town hall meetings with employees.

FSIS is implementing RBI for processing establishments using its existing statutory authority.

November 2005

- Presented risk-based inspection system concepts to National Advisory Committee on Meat and Poultry Inspection (NACMPI) and Committee recommended that FSIS utilize a third party to facilitate input from stakeholders

May 2006

- Began work with Resolve, a third party facilitator
- Solicited input from NACMPI on establishment risk control in a risk-based inspection system for processing establishments

October 2006

- Held two day public meeting to gather stakeholder input on inherent risk of product and establishment risk control and implementation of RBI in processing establishments
- Sought input from NACMPI on implementation of RBI in processing establishments

December 2006

- Posted report from third party, Resolve, summarizing stakeholder input for RBI in processing establishments on FSIS' Web site and solicited comments from stakeholders

January 2007

- Held joint meeting with representatives from National Joint Council, employee associations, industry and consumers to gather feedback on the Resolve report

February 2007

- Initiate obligations under the parties' Labor-Management Agreement
- Announce 30 prototype processing locations
- Begin peer review of the expert elicitation instruments and instructions on inherent risk of product asking public health experts to rank categories of processed products according to both the *probability* of illness per serving and the *severity* of possible illness

March 2007

- Begin holding technical summits on the use of public health significant non-compliance records, the use of production volume in making inspection decisions, the use of industry data to supplement FSIS inspection findings, and the design and use of expert elicitations and their outcomes.

April 2007

- Proposed training for inspection program personnel at 30 prototype processing locations based on completion of bargaining obligations.
- Begin using food safety verification procedures based on the risk algorithm in 30 prototype processing locations (20 processing teams and 10 processing single patrol assignments)
- Begin ongoing assessment and evaluation of progress and development of further improvements in RBI for processing establishments
- Begin conducting another expert elicitation on inherent risk of product asking public health experts to rank categories of processed products according to both the *probability* of illness per serving and the *severity* of possible illness

- With CDC and FDA, FSIS will hold a data attribution summit with scientific experts, consumer groups, industry representatives, employees, and other stakeholders to determine *what* attribution data exists, how to *improve* attribution data, how to *use* attribution data more effectively, and how to best *share* attribution data.

June 2007

- Continuation of policy development for RBI in processing establishments
- Programming begins for revised risk algorithm

November 2007

- Programming for revised risk algorithm completed

December 2007

- The end of calendar year 2007 target is 150 prototype processing locations using food safety verification procedures based on the risk algorithm
- Develop and finalize a revised risk algorithm for processing establishments after evaluation of the implementation and effectiveness in prototype processing locations
- Complete evaluation of risk-based inspection in prototype processing locations and use findings to adjust inspection activity in order to more effectively protect public health

January 2008

- Monitoring and continuous review of the risk algorithm with adjustments as needed based on evaluation of data and input from stakeholders

February 2008

- Evaluation of revised risk algorithm in prototype processing locations

June 2008

- Begin implementation of full nationwide use of the revised risk algorithm.