

Risk Control Measure

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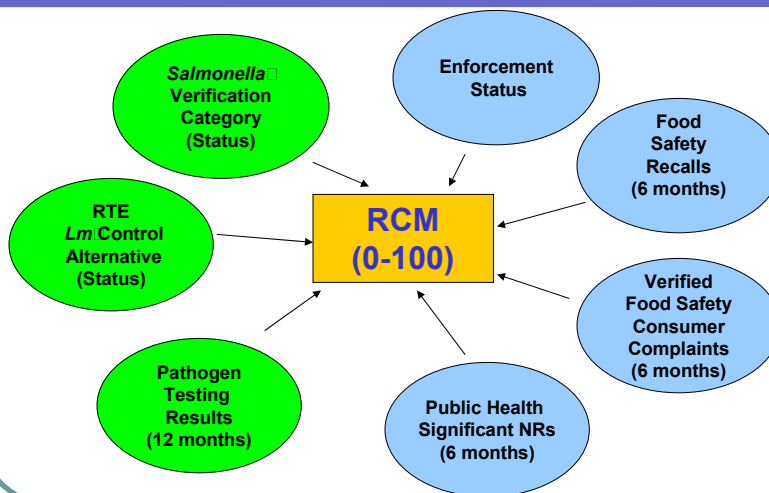
Office of Program Evaluation,
Enforcement & Review



RBI Public Meeting April 2, 2007



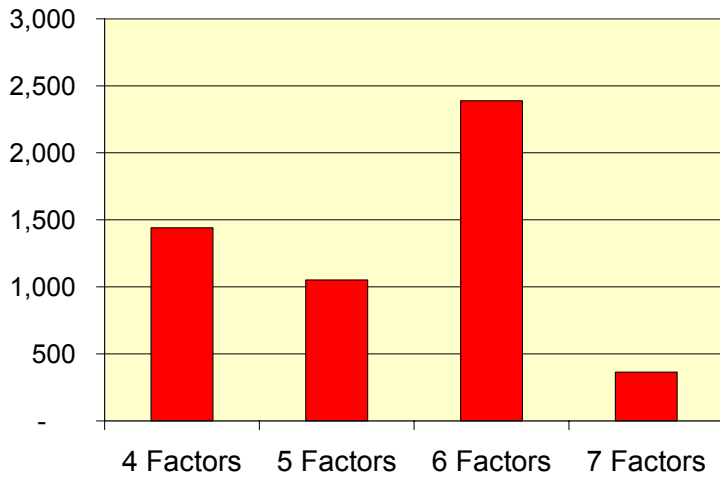
Factors in Risk Control Measure



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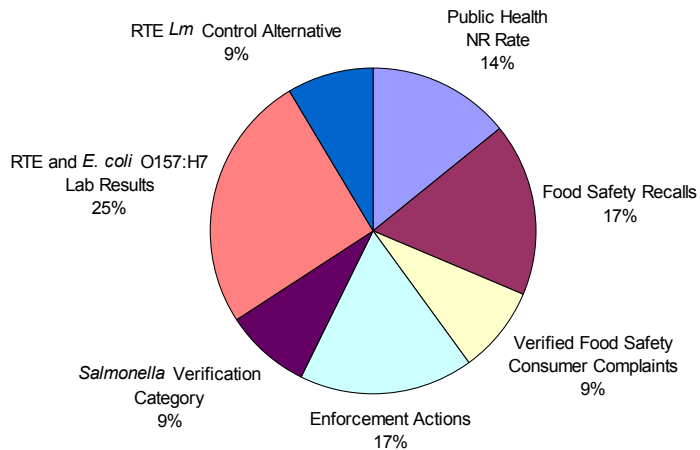
RCM Data Availability



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Contribution of Risk Control Factors



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Public Health NRs

- First, 564 *regulatory requirements* are weighted based on how strongly they indicate a loss of food safety system process control
- Next, *NRs* are weighted based on the regulatory requirement(s) cited
- Then, a 6-month public health NR rate is computed by dividing the weighted NRs by the number of inspection procedures performed

Public Health NR Rates

Public Health NR Range < 0.35%	= 0 points
Public Health NR Range \geq 0.35% but < 0.89%	= 1 point
Public Health NR Range \geq 0.89% but < 1.57%	= 2 points
Public Health NR Range \geq 1.57% but < 2.55%	= 3 points
Public Health NR Range \geq 2.55% but < 4.60%	= 4 points
Public Health NR Range \geq 4.60	= 5 points

In-Commerce Findings

- Class I recall (3 points)
- Class II recall (2 points)
- Not-to-exceed 6 points in a 6-month window

- 1 point per verified food safety consumer complaint
- Not-to-exceed 3 points in a 6-month window

Enforcement Actions

- | | |
|------------------------------------|----------|
| • NOIE Under Deferral | 2 points |
| • Notice of Intended Enforcement | 3 points |
| • Suspension Held in Abeyance | 3 points |
| • Reinstatement Held in Abeyance | 3 points |
| • Suspension | 4 points |
| • Inspection under Consent Order | 5 points |
| • Reinstatement of Suspension | 6 points |
| • Complaint to Withdraw Inspection | 6 points |

Salmonella Verification Category

- Last 2 sets prevalence \leq 50% of performance std. (SVC 1) = 0 points
- Last set prevalence $>$ performance standard (SVC 3) = 3 points
- All others (SVC 2) = 1 point

Pathogen Control

- **Pathogen Control in Ready-to-Eat and Certain Raw Beef Products**
 - *Lm*, *Salmonella*, and *E. coli* O157:H7 RTE testing program results
 - *E. coli* O157:H7 testing program results
 - 3 points per positive pathogen finding not-to-exceed 9 points in a 12-month window

RTE *Lm* Control Alternative

- Sanitation + Anti-Microbial Agent + Post-Lethality Treatment (0 points)
- Sanitation + Post-Lethality Treatment (1 point)
- Sanitation + Anti-Microbial Agent (2 points)
- Sanitation Only (3 points)

Example RCM Calculation

Establishment Produces Raw Intact Beef

	Actual	Possible
Public Health NR Rate	3	5
Verified Food Safety Consumer Complaints	2	3
Food Safety Recalls	0	6
Enforcement	0	6
<i>Salmonella</i> Verification Category	NA	NA
<i>E. coli</i> O157:H7 and/or RTE Pathogen Testing	NA	NA
RTE <i>Lm</i> Control Alternative	NA	NA
Total	5	20
Risk Control Measure	25.0	

Example RCM Calculation

Establishment Produces Fully-Cooked Beef Patties

	<u>Actual</u>	<u>Possible</u>
Public Health NR Rate	2	5
Verified Food Safety Consumer Complaints	0	3
Food Safety Recalls	0	6
Enforcement	0	6
<i>Salmonella</i> Verification Category	NA	NA
<i>E. coli</i> O157:H7 and/or RTE Pathogen Testing	0	9
RTE Lm Control Alternative	1	3
Total	3	32
Risk Control Measure		9.4