Aspect of Inspection	Traditional Approach	Using Risk-Based Approach	Role of Data
1.) Purpose of Inspection	Designed to find problems if they occur.	Designed to find problems that occur but also designed to anticipate problems thereby minimizing risk	
2.) Deployment of resources	Based on consideration of what needs to be done Slaughter – Inspecting carcasses Processing – Making inspection once per plant per shift.	Attempt to align resources not only with what needs to be done (e.g. appraisal of each carcass at slaughter; visiting establishments once per shift in processing) but also level of risk based on consideration of: - Hazards presented by type of product and production process -Consideration of how likely it is that hazard will be manifested in a plant. -Significance of effects of hazard if realized. -On-going assessment of establishment's food safety system, including interventions and testing.	Data to assess risk- -Data on public health risks posed by different types of products plant produces, including data on significance of risks. -Data on plant performance history. -Data on approximate volume of various types of products produced.
3.) Work to be done	Perform assigned procedures. Under HACCP, assignments 70% food safety and 30% other procedures designed to protect consumers.	Work will vary based on evidence of risk. While there are basic procedures that will need to be done with some regularity, system will be designed to be responsive to inspectional findings through use of decision criteria that will be designed to help inspectors	Data to guide how to appropriately assess performance. - Data to guide development of decision criteria.

Aspect of Inspection	Traditional Approach	Using Risk-Based Approach	Role of Data
		to determine how to react.	
4.) Design of activities of inspection personnel.	Procedures designed to find non-compliance. The operational imperative is to perform assigned procedures.	Design verification activities to focus on those aspects of process where loss of control is more likely to occur or where a loss of control would have serious public health consequences and to intensify inspection if there is evidence that the plant is losing, or has lost, control -Use of performance standards to measure control. -Use of verification sampling. -Use of consumer complaint and other data from outside plant to guide in-plant verification activities. -Use of EIAOs to assess situation and to develop verification plan.	Data on results of sampling and other inspection activities. Data and other information on how to identify plants where problems may be developing (e.g., guidance from June 16, 2005, meeting of NACMPI on factors that could signify emerging problems). Data to develop performance standards and to keep them current.
5.) Response to inspection findings.	Evidence of compliance, or non-compliance, has no effect on intensity of inspection. Evidence of non-compliance could lead to enforcement action.	Evidence of non-compliance can lead to enforcement action, but intensity of inspection activities will vary based on findings. -Evidence of good control will result in less intense inspection. -Evidence that plant lacks control or may be losing control would result in	Data on results needs to be available to inspection personnel on a timely basis. Develop tools to help in analysis of data

Aspect of Inspection	Traditional Approach	Using Risk-Based Approach	Role of Data
		intensified inspection. -Move inspector resources. -Intensified sampling. -EIAO visit.	
6.) Ability to respond to emerging problem.	Not designed to have inspectors make a judgment about risk of non-compliance.	Inspection personnel would have flexibility, data, responsibility, and training to be able to focus on what appears to be an emerging problem.	- Data that inspection personnel can consider and that district analysts, or other data analysts, can analyze to identify plant trends and potential emerging public health issues. -Data that would help Agency to identify parameters that will signal a trend.
7.) Factoring in food defense.	Food defense procedures are performed with specified frequency.	Food defense procedures are performed at a frequency commensurate with national security situation and security situation in establishment.	Data on extent of plant's attention to food security matters. -Results of FSIS verification activities.
8.) Attention to product in commerce	Random visits to facilities (warehouses, distribution points, retail) that handle meat poultry and egg products to ensure that products are being held under sanitary conditions.	Use findings and other information for scheduling visits to facilities and for ensuring that products held under sanitary conditions and in appropriate manner.	Data on risks that products subject to in commerce. Data on conditions and regulatory history of facilities that handle products.