

From: Grems, Jim
Sent: Monday, October 16, 2006 8:06 AM
To: Risk Based Inspection
Subject: FW: MNDO/industry comments

Below comments are a follow-up to the RBI workshop
James L Grems, District Manager
Minneapolis District Office
Phone: 612-370-2400 Ext. 230
Fax- 612-370-2411 or 2412
Jim.Grems@fsis.usda.gov

"Leadership begins with influencing people....And to develop the ability to influence people, leaders must start by acting the way they want others to see them."-- Lt. Gen. Russel Honore

-----Original Message-----

From: Grems, Jim
Sent: Wednesday, October 11, 2006 3:46 PM
To: 'bspangler@resolv.org'
Subject: MNDO/industry comments

- 1) We heard some one say that the PBIS scheduler would be turned off. Consider not turning it off but instead have the risk data control the scheduling of which tasks are most important from a food safety stand point. This would improve uniformity across districts and from plant to plant. Of course the inspector would have the ability to change the scheduled tasks based on their observations when in the plant performing tasks, but would be require to justify the changes. The industry already knows each inspector has their favorite tasks and can predict when they are going to be performed. From an inspection stand point it would be less of a change to the work force, the inspectors would not have to become analysis. Also this would be easier for supervisors and managers to manage and evaluate (MC).
- 2) Plant audits, whether internal or third party are scored, so why does the agency not use this methodology to score FSAs?
- 3) Concern about the agencies current data quality- some inspector's write all non-compliances and others do not. Also all EIAOs do not analysis food safety systems the same and do not document the same (FSA).

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