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The FSIS Workforce of the Future Steering Committee, established by Tom Billy comments the task force for a very comprehensive report that provides many good suggestions on how the FSIS VMO could be utilized. The Committee has only a few comments on the report.

One general comment is that the report was originally written before HACCP implementation was completed in the very small plants. Since HACCP has now been implemented in all plants, the some portions of the report may need to be updated to reflect that. E.g., see the discussion in the 2<sup>nd</sup> paragraph on page 11 on how HACCP "is being" implemented in three stages.

- Part I., Discussion. It should be clarified "that the historic role of FSIS veterinarians in plants" means in "slaughter or combination operations".
- The following recommendations for VMO's in FSIS field inspection program activities over U.S. Federally inspected establishments overlap with FSIS projected GS-11 in-plant Consumer Safety Officer (CSO) duties:

-Serve as the only government official who is responsible and technically accountable for assessing and making a scientific judgment, as a result of analysis of available data, as to whether or not the plant is operating under a sufficient and appropriate food safety control and monitoring system. *The report does not distinguish between the VMO being the "only government official" in plants where VMO's are currently assigned, or if the recommendation is to branch out into processing plants as well. The recommendation appears to conflict somewhat with paragraph two on page 11 where it states that representatives from various professions "should work together to design effective HACCP oversight to encourage innovation and progress."*

-Oversee the entire process of verifying plant HACCP compliance.

-Serve as a systems manager with overall responsibility for assessing data on incoming materials and plant activities using multiple data sources and visual observations, for performing or assuring appropriate performance of oversight and verification, and for making professional judgments about the adequacy of HACCP systems. This includes:

-Making informed judgments to prioritize inspection actions in order to verify control processes within the HACCP systems.

-Performing trend analyses regarding plants' meeting food safety performance standards, and overseeing the implementation and interaction of plant system controls, as opposed to merely verifying their application, so that the VMO can better critique their appropriateness and adequacy

-Evaluating scientific literature, monitoring processing controls, examining in-plant data, and verifying, for example, that a new, unique method proposed by a plant to meet a performance standard for reducing *Salmonella* in cooked beef will in fact allow the product to meet the performance standard, and deciding if independent laboratory verification of end product is needed.

*All of the above duties are included to some extent in the projected CSO position description.*

- On page 12, 1<sup>st</sup> paragraph, it may be helpful to provide examples of the types of administrative duties that could be delegated, and those for which the veterinarian in charge would still be responsible.
- Recommendations 7 and 8 under Part I. appear to be rather similar. Should they be combined?
- It is unclear whether the last paragraph on page 17 refers to many veterinarian employees with advance degrees, etc. or many Agency employees in various occupations.
- The same comment is true for recommendation 5, Part II. Is the recommendation for a skills survey of all FSIS employees or veterinarians only?

We hope that these comments are helpful to you in developing the final report.