

United States  
Department of  
Agriculture

Animal and Plant  
Health Inspection  
Service

Plant Protection  
and Quarantine

4700 River Road  
Riverdale,  
Maryland 21737



# **Plant Inspection Station**

## **Strategic Plan**

**2007-2012**

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**USDA Mission**

We provide leadership on food, agriculture, natural resources, rural development and related issues based on sound public policy, and the best available science, and efficient management.

**APHIS Mission**

To protect the health and value of American Agriculture and natural resources.

**PPQ Mission**

APHIS-PPQ safeguards agriculture and natural resources from the risks associated with the entry, establishment, or spread of animal and plant pests and noxious weeds.

Fulfillment of its safeguarding role ensures an abundant, high quality, and varied food supply, strengthens the marketability of U.S. agriculture in domestic and international commerce, and contributes to the preservation of the global environment.

**Plant Inspection Station Mission**

Plant inspection stations inspect imported plants for planting, other regulated plant material, and live organisms to determine admissibility into the United States.

We identify plant material; detect and identify pests, noxious weeds, and other organisms; take appropriate regulatory actions; and enforce endangered species regulations.

We inspect plants for planting and other plant products for export, and certify that they meet the phytosanitary and endangered species requirements of the importing country, and comply with international standards.

We strengthen pest exclusion and endangered species protection measures by communicating our findings and regulatory actions to importers, exporters, and other stakeholders.

**Plant Inspection Station Vision**

We are a team of highly-skilled, motivated, and dedicated individuals that form a leading plant inspection organization in the global community.

We work in optimally-designed and equipped facilities that maximize our ability to accomplish our mission.

We actively work with industry and our counterparts to reduce and eliminate risks of pest introduction, and to protect bio-diversity. Proudly, we protect America's agriculture and natural resources.

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## Guiding Principles for Plant Inspection Stations

As employees of PPQ's plant inspection stations, we strive to follow these guiding principles.

We are proud of our service to the American Public, and are deeply committed to the critical role we play in safeguarding our nation's agriculture and natural resources from the risks associated with plant pests and diseases, and in protecting endangered and threatened plants.

We contribute to the credibility of our agency by making accurate, timely identifications, and sound decisions based on science, pest risk, and the regulations that we are charged to uphold.

We act responsibly and responsively to product perishability and to trade facilitation while maintaining the integrity of the plant inspection station mission.

We make equitable and consistent regulatory decisions free from personal bias to build and maintain the public's trust.

We treat our customers and stakeholders with fairness, dignity, and respect.

We provide timely, clear, and concise interpretations of Federal regulations for our customers and stakeholders so they understand the laws which apply to safeguarding agriculture and natural resources.

We share accurate, timely information regarding our findings and actions within PPQ, APHIS, and cooperating agencies, as appropriate, to further strengthen

our safeguarding and pest exclusion efforts.

We conduct our mission in an organized, efficient, and professional work environment.

We incorporate professional development, new technologies, and ideas to enhance our qualifications and competencies to effectively and efficiently perform our jobs.

We are cognizant of changes in industry trends and the potential impact on the accomplishment of our mission; and we adjust resources and adapt practices accordingly.

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## Strategic Program Goals and Management Initiatives

There are five program goals and three management initiatives that describe the plan of action for our plant inspection stations.

### Strategic Program Goals

The strategic program goals follow:

**Goal 1:** Ensure the plant inspection stations have the infrastructure and resources to clear shipments effectively in light of the increased volume and complexity of trade.

**Goal 2:** Ensure all shipments of permitted material are properly safeguarded and diverted to plant inspection stations for proper clearance.

**Goal 3:** Ensure the plant inspection stations have the most effective and efficient diagnostic, inspectional, and treatment technologies to meet industry and agency needs for timely and accurate inspections.

**Goal 4:** Ensure the plant inspection stations use data resources and intelligence for identifying and inspecting the highest-risk material and pathways.

**Goal 5:** Develop more active working relationships with other PPQ and APHIS work units, industry, and counterparts to reduce and eliminate risks of pest introduction.

### Strategic Management Initiatives

The strategic management initiatives follow:

**Management Initiative 1:** Strategically locate the plant inspection stations and ensure they meet the national plant inspection station standards.

**Management Initiative 2:** Enhance the plant inspection stations' capability to recruit, train and retain a highly qualified workforce.

**Management Initiative 3:** Increase the plant inspection stations' role in the development of new data systems and/or the enhancement of current system.

## **Program Goals**

**Program Goal 1:** Ensure plant inspection stations have the infrastructure and resources to clear shipments effectively in light of the increased volume and complexity of trade

**Strategic Issue:** *What should the plant inspection stations do to address the impact of the increased volume and additional complexity of trade (size and type of plants; true origin of plant material, etc.) on the plant inspection stations' capacity to conduct inspections effectively?*

Plant inspection stations are being affected by the increasing volume and size of shipments due to global trade and importers seeking authorization to import larger and different types of plants. In the past 5 years, the overall volume of imported plants that come through plant inspection stations has increased 50 percent. Larger and unfamiliar plants and plant pests are difficult and complex to inspect and identify.

Expanding global trade contributes to the increasing volume and presents new pest risks. New pests are establishing in our trading partners' countries; products are being imported from a country other than the country of origin; and the plant industry is moving quickly into developing countries for which we have little pest-risk information and no infrastructure or organized method of collecting the country of origin information to determine and report risk.

The 7 CFR §319.37 (Q-37) regulation changes may potentially add to the already increasing number of products currently processed through the plant inspection stations. The increasing volume places pressure on the limited number of personnel performing inspections to keep up with current inspection-level standards. While the inspection-level requirements are the same, the number of plant inspection station staff has not increased.

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**Objective 1.1:** Understand the current and projected workload, the business trends, and the impact of proposed regulatory changes and other initiatives on the plant inspection station infrastructure and resources

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### **Actionable Strategies**

Future actions will include the following:

- 1.1.1. Assess the potential impact of Q37, CITES changes, Select Agent Program, and other initiatives;
- 1.1.2. Assess the current and projected shipping industry trends;
- 1.1.3. Assess the current and projected industry business trends affecting plant inspection stations (for example, agriculture/cut flower/nursery);
- 1.1.4. Assess the current and projected workloads by types of shipments (i.e., plants for planting, seeds, select agents, CITES, etc.) in relation to existing capacity; and
- 1.1.5. Project future plant inspection station staffing needs; and apply the plant inspection station staffing calculator to the results of the analysis conducted in the strategies above.

## Strategic Program Goal 1

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**Objective 1.2:** Develop a long-term plan to ensure plant inspection station infrastructure and resources are commensurate with increasing workloads

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### Actionable Strategies

Future actions will include the following:

1.2.1. Institutionalize (charter) the Plant Inspection Station Working Group (PISWG) with the PPQ Executive Team's approval, to maintain a national perspective and coordinated approach on infrastructure and resource issues;

1.2.2. Establish a cyclical schedule of plant inspection station staffing and workload reviews in each region (see *Objective 1.3, Actionable Strategy 1.3.8*);

1.2.3. Request local plant inspection station management utilize assessments and staffing reviews to determine staffing levels and the mix of scientific disciplines (for example, botanists, plant pathologists, entomologists, etc.);

1.2.4. Explore the possibility of establishing specialized PPQ containment and inspection facilities for select agents, soil, and other designated high-risk material; and

1.2.5. Utilize assessment results from *Program Goal 1, Objective 1.1*, to establish priorities for the plant inspection stations' physical infrastructure, equipment, and staffing improvements and increases as needed; and recommend strategic approaches to the PPQ Executive Team (see *Objective 1.3 below*).

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**Objective 1.3:** Establish a strategic approach for conducting plant inspection station activities and managing the workload

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### Actionable Strategies

Future actions will include the following:

1.3.1. Develop an active partnership with PPQ Permit Services to ensure permit conditions consider the plant inspection station's capacity (see also *Program Goal 5*); and routinely review permit conditions and make recommendations as needed;

1.3.2. Evaluate regulatory and other strategies for redirecting the flow of shipments within the plant inspection stations' system (i.e., routing shipments to a specific plant inspection station);

1.3.3. Partner with the Preclearance Program in PPQ Plant Health Programs (PHP), Emergency and Domestic Programs (EDP), International Services (IS), and others to explore offshore mitigation strategies (see also *Program Goal 4*);

1.3.4. Evaluate the alignment of tours of duty with business practices and other Federal inspectional services;

1.3.5. Utilize the risk-based inspection strategies developed under *Program Goal 4*; and

1.3.6. Develop and implement a quality assurance program for plant inspection station operations and ensure all plant inspection station facilities are reviewed within 5 years (see *Program Goal 1, Objective 1.2., Actionable Strategy 1.2.2*).



**Figure 1: Plant pest found during inspection**

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**Program Goal 2:** Ensure all shipments of permitted material are properly safeguarded and diverted to the plant inspection station for proper clearance

**Strategic Issue:** *What should plant inspection stations do to gain better control over the movement of permitted shipments through express carrier locations, mail, and shipments being transferred to plant inspection stations from CBP?*

Agreement on safeguarding protocols for the movement of plant shipments from CBP to the plant inspection stations need to be developed, standardized, and implemented consistently to ensure all permitted material is properly safeguarded and diverted to the plant inspection stations. Plant inspection station staffs do not have access to CBP's database to hold and release plant shipments. As a result, plant inspection stations need to coordinate closely with CBP to maintain control over shipments that should go to the plant inspection station, but are being released by CBP instead.

There is also an increasing risk that shipments could either bypass the plant inspection stations completely due to the increasing use of express carriers, often driven by Internet commerce. At times, shipments need to be safeguarded and transferred to a plant inspection station at another port for inspection and release; and then be sent back to the express carrier.

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**Objective 2.1:** Establish protocols and standardize procedures for holds, safeguarding, and control between PPQ and CBP for cargo at all locations: air, maritime, and land border.

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**Actionable Strategies**

Future actions will include the following:

2.1.1. Work with CBP to develop a mechanism to conceptually recognize the plant inspection stations as an extension of a Firms Code Site or the Customs Examination Sites (CES) to circumvent the conditional release of shipments destined for the plant inspection stations;

2.1.2. Obtain access to relevant CBP databases at all plant inspection stations to view holds and make provisions for plant inspection stations' staff to communicate releases back to CBP;

2.1.3. Obtain access to relevant CBP databases and consider assigning plant staff to view manifests to identify and request CBP to place holds on shipments destined for the plant inspection stations;

2.1.4. Strengthen the working relationship with CBP

- Designate a plant inspection station liaison and hold meetings with CBP at the local level; perhaps participate in the Port Risk Assessment Committee meetings to minimize crossover into other aspects of port and domestic work;
- Develop and communicate chain of custody procedures with CBP;
- Re-evaluate the use of CBP Form 523A with CBP; and
- Work with CBP-APL and QPAS to strengthen the relationship with CBP at the headquarters level

2.1.5. Develop, communicate, and maintain an updated key words list for CBP to identify material for holds;



## Strategic Program Goal 2

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2.1.6. Dedicate a plant inspection station data person to review the holds and communicate releases; and

2.1.7. Develop and uniformly communicate to PPQ and CBP field staff regarding the standard operating procedures on holds, safeguarding, and control.

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**Objective 2.2:** Address the issues regarding routing of packages to plant inspection stations

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### Actionable Strategies

Future actions will include the following:

2.2.1. Analyze what is working and being done properly; what is not working well; and develop strategies to make improvements;

2.2.2. Pursue the development of a well-coordinated routing system with carriers, using technologies such as a uniform bar-coding or a radio frequency system that will allow carriers to track and segregate packages destined to the plant inspection stations and ensure speedy delivery directly to the plant inspection stations:

- Work with carriers and USPS to develop guidelines; and
- Meet with carriers and USPS to implement the guidelines

2.2.3. Develop and communicate uniform requirements for routing shipments to the plant inspection stations with all carriers and port personnel;

2.2.4. Partner with the PRIM permit staff<sup>1</sup> to specify transit conditions and labeling of materials destined to the plant inspection stations and ports of entry without a plant inspection station;

2.2.5. Request carriers provide a manifest summary of all incoming packages destined for the plant inspection stations and CBP; and

2.2.6. Work with Permit Services, QPAS, and CBP-APL to develop and implement a new package routing program.

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**Objective 2.3:** Develop and implement control procedures for baggage interceptions that need to go to plant inspection stations

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### Actionable Strategies

Future actions will include the following:

2.3.1. Become informed about the handling of plant inspection station destined material in air passenger baggage, across all ports of entry;

2.3.2. Work with CBP to develop standard operating procedures for handling air passenger baggage containing plant inspection station destined materials; and utilize the CBP postentry system for referral and control;

2.3.3. Evaluate the use of CITES rescue center documentation and tracking methods (transfer between agencies) as a potential model to perfect and build on for processing Q-37 inspections from CBP to plant inspection stations;

2.3.4. Establish protocols for obtaining identifying information about the carrier, privately owned vehicle (POV), or pedestrian from whom plant materials are seized and held for identification and destruction (in case a pathogen is identified); and

2.3.5. Communicate SOPs uniformly to the field (PPQ and CBP) for implementation.

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**Program Goal 3:** Ensure the plant inspection stations have the most effective and efficient diagnostic, inspectional, and treatment technologies to meet industry and agency needs for timely and accurate inspections

**Strategic Issue:** *What should plant inspection stations do to plan for implementing new diagnostic, inspectional, and treatment technologies to meet industry and agency needs for timely and accurate inspections?*

There has been a significant increase in the number of plant health emergencies in the past 5-to-7 years, with an increasing percentage caused by plant pathogens. The advent of bioterrorism concerns (Select Agents) since 9/11 has increased the complexity of work. Importers in the U.S. are requesting authorization to import larger and larger plants; and inspection of such plants is difficult and complex. Given these challenges, plant inspection stations must continuously seek more efficient and effective inspectional tools and technologies to address the risk.

Plant inspection stations need to evaluate and determine the full range of approaching risks (pests and pathways). PPQ needs to explore the feasibility of building capacity at the plant inspection stations designated for conducting molecular diagnostic testing on-site. If feasible, then the appropriate diagnostic tools and equipment will need to be put in place. Staff will need training to be able to conduct accurate, efficient, and timely

molecular diagnostic testing. New standards and a minimum capability requirement for every plant inspection station will need to be established. Use of molecular diagnostics in the plant inspection stations will add to the workload; and shipments tested using this method could potentially result in materials being held at the plant inspection station longer. Importers and brokers will need to be educated about the new risks and the additional tools personnel are using to manage the testing.

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**Objective 3.1:** Develop and implement risk-based inspection technologies

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**Actionable Strategies**

Future actions will include the following:

3.1.1. Review and determine the primary gaps, if any, in the inspection system at the plant inspection station;

3.1.2. Ascertain the plant inspection stations' need for risk-based inspection technology; establish priority needs; and determine if technologies exist that are not being used by the plant inspection stations, but could be;

3.1.3. Identify inspection technologies relevant to plant inspection station needs as follows:

- Determine what is needed for plant inspection station personnel to do their jobs and what can be done more effectively with the current system;
- Ascertain if there are lists of organisms of plant quarantine interest for which technologies might exist or could be developed;
- Encourage plant inspection station personnel to develop innovative inspection techniques that achieve effective and efficient results, and could possibly become standardized; and

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- Explore alternate inspection strategies (for example, possible use of an offshore plant inspection station, pre-clearance programs, PHP and EDP staffs, etc.)

3.1.4. Determine the plant inspection stations' capacity to utilize the technologies identified.

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**Objective 3.2:** Develop the capacity for using the identified inspection technologies in those plant inspection stations that are not yet capable

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#### Actionable Strategies

Future actions will include the following:

3.2.1. Develop or procure the inspection technologies in a timely manner;

3.2.2. Continue to work with the PPQ Digital Imaging Group in the use of cutting-edge, digital imaging technology used by identifiers to communicate their questions regarding botanicals, pests, etc.;

3.2.3. Train plant inspection station staff in inspection technology use;

3.2.4. Develop and implement a quality assurance/quality control program as part of the plant inspection stations' standard inspection protocols; and ensure the inspectors' individual techniques align with technology; and

3.2.5. Develop sampling procedures as needed.

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**Objective 3.3:** Work with CPHST to explore the feasibility, development, and implementation of diagnostics technologies suitable for the plant inspection stations

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#### Actionable Strategies

Future actions will include the following:

3.3.1. Assess the feasibility of implementing molecular diagnostics at the plant inspection stations:

- Determine the turn-round time required to conduct a statistically and scientifically sound diagnostic test at the plant inspection station;
- Agree on an acceptable and realistic turnaround time frame, given the perishability of the product;
- Determine the appropriate level and/or type of molecular diagnostics that could be performed by personnel at the plant inspection station (given the conditions of a plant inspection station); and that can be conducted within the acceptable turnaround time (for example, initial test to detect the presence of a pathogen versus confirmatory testing); and
- If needed, explore alternate scenarios for conducting molecular tests (for example, at post-entry quarantine facilities or other facilities)

3.3.2. Work with CPHST to establish plant inspection stations' technology priority needs;

3.3.3. Work with CPHST to identify molecular diagnostic technology relevant to plant inspection stations' needs:

- Work with CPHST and National Identification Service (NIS) staff to ascertain if there are lists of organisms of plant quarantine interest for which technologies might exist or could be developed;
- Work with CPHST and NIS staff to create an inventory of the diagnostic technology that is already available or is in the process of being obtained; and
- Consult with NIS to determine if there are technologies that exist and are not being used by plant inspection stations, but could be

3.3.4 Determine the capacity of plant inspection stations to utilize diagnostic technologies identified for the plant inspection stations' use

### Strategic Program Goal 3

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- If not capable, can the capacity be developed;
- If not capable, are there alternate diagnostic tools that can be used in field conditions of the plant inspection stations;
- Determine the role of external labs (for example, NPDN, State labs, etc.) for confirmatory testing; and if appropriate, develop protocols for closer coordination;
- Explore the possibility of enlisting local State agriculture or land grant universities to hire students or faculty as cooperators to conduct molecular tests (could also serve as a recruitment strategy)

3.3.5. If capable, work with CPHST to develop or procure the appropriate diagnostic technologies; and increase efforts in the development of generic level tests and customize the tests to meet the needs of the plant inspection stations;

3.3.6. Train plant inspection station staff in technology use, including the ability to detect plant diseases; and

3.3.7. Develop a communication strategy to educate industry about the length of time required for commodities that are held for confirmatory testing to diagnose plant diseases.

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**Objective 3.4:** Develop and implement treatment technologies

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#### Actionable Strategies

Future actions will include the following:

3.4.1. Ascertain plant inspection stations' priority treatment needs;

3.4.2. Determine technology that is relevant to plant inspection stations' needs; and determine if technologies exist that are not being used by the plant inspection stations, but could be;

3.4.3. Determine the capacity of plant inspection stations to utilize the

technologies identified; and if not capable, determine whether the capacity is to be developed;

3.4.4. Develop or procure the technologies; and determine whether PPQ should regain treatment technology development capabilities;

3.4.5. Train plant inspection station staff in technology use; and

3.4.6. Partner with CPHST to develop and implement a quality assurance/quality control program as part of the overall treatment protocols developed; and develop and use sampling methodology.



**Figure 2: Molecular diagnostic equipment (left) Device used for DNA analysis to identify plant pathogens and pests in several stages of development (right) Antibody-based tests suitable for field deployment to test for plant pathogens**

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**Program Goal 4:** Ensure the plant inspection stations use data resources and intelligence for identifying and inspecting the highest-risk material and pathways

**Strategic Issue:** *What should plant inspection stations do to ensure we are more effectively inspecting the demonstrated highest-risk material and pathways (for example: e-commerce) and allocating resources accordingly?*

Globalized trade has created new routes for imported goods. We are seeing products from other countries coming through our traditional trading partners; and we are receiving imports that have a country of origin that is different from the country of export/import. We have little pest risk information for plants and seeds from these developing economies. We must gather more accurate information regarding the country of origin for the shipments presented for inspection. This information will allow us to determine and communicate the true risks of the materials we inspect.

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**Objective 4.1:** Develop the capacity within the plant inspection station system to gather and analyze information to determine risk and set inspectional priorities

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**Actionable Strategies**

Future actions will include the following:

4.1.1. Establish a data/analytical team and determine the location (within Plant Health Programs (PHP), Plant Safeguarding & Pest ID (PSPI) or within each plant inspection station) to gather

information to analyze risks, and to determine high-risk materials or pathways to set inspectional priorities;

4.1.2. Identify the competencies needed for the data/analytical team;

4.1.3. Assess current competencies in the plant inspection station workforce;

4.1.4. Identify gaps to fill human resource needs and/or provide training to build a cadre of data analysts; and

4.1.5. Ensure access to all relevant sources of information.

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**Objective 4.2:** Establish and implement procedures to identify, gather, and analyze relevant information needed to determine risk and to set inspectional priorities

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**Actionable Strategies**

Future actions will include the following:

4.2.1. Identify and gather data elements about importation histories and relevant background information about countries of origin for imported plants;

4.2.2 Identify and gather pest information needed (utilizing OPIS information to the fullest extent possible);

4.2.3. Identify and gather data elements needed regarding exporters;

4.2.4. Identify and gather data elements needed from manifests on Customs systems (access to ACE-ITDS);

4.2.5. Establish and use a standardized analytical framework for determining risk to set inspectional priorities (high risk materials and/or pathways):

- Determine what is coming in (genus, species, and cultivar) and the pathway (how entering);
- Determine where the material/shipment is coming from (true country of origin and transit country); and

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- Establish a record to catalog the pests that are found

4.2.6. Explore the possibility of establishing a policy to inspect new introductions more intensively until PPQ can be assured that the negotiated mitigation measures are effective and the risk is low; and

4.2.7. Work with CBP to evaluate and modify current PPQ forms as needed (for example, *PPQ Form 309, Pest Interception Record*), to supply accurate information about each shipment's true country of origin (in addition to the name of the exporting (transit) country), and to support an accurate assessment of risk.

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**Objective 4.3:** Identify all relevant information sources that could be used to conduct analyses for setting inspectional priorities

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### Actionable Strategies

Future actions will include the following:

- 4.3.1 Compile a list of PPQ sources;
- 4.3.2 Compile a list of external sources (other government sources, foreign sources, international scientific organizations, professional organizations/journals); and
- 4.3.3 Identify grey literature (non-peer reviewed information, list-serves, etc.).

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**Objective 4.4:** Expand the availability of needed information (including SITC reports)

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### Actionable Strategies

Future actions will include the following:

- 4.4.1. Identify gaps in information and information sources;
- 4.4.2. Fill the information gaps (for example: pests, pathways, commodities, trends, etc.); and

4.4.2. Address access issues to needed information sources.

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**Objective 4.5:** Establish procedures to communicate and utilize information collected and analyses completed (see also *Program Goal 5*)

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### Actionable Strategies

Future actions will include the following:

- 4.5.1. Communicate the information responses to data managers to ensure the quality of data;
  - 4.5.2. Utilize all the information gathered to inform plant inspection station personnel about the risks associated with the material coming into the United States from new importing countries;
  - 4.5.3. Communicate inspection outcomes to other PPQ and APHIS units (SITC, IES, etc.) and to cooperators;
  - 4.5.4. Communicate results of pest risk analyses to other PPQ and APHIS units and cooperators; and share the results with the States to build on their needs;
  - 4.5.5. Work with PIM and CIAO to establish communication procedures with plant inspection stations' staff regarding PIM Trade Directors or CIAO Program Managers monitoring and follow-up activities with exporting countries; and to ensure remedial actions are taken and are effective; and
  - 4.5.6. Target high-risk shipments for inspection.
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**Program Goal 5:** Ensure the plant inspection stations develop more active working relationships with other PPQ and APHIS work units, industry, and counterparts to reduce and eliminate risks of pest introduction

**Strategic Issue:** *What can the plant inspection stations do to more actively work with other PPQ and APHIS work units (SITC, PRIM<sup>1</sup>), industry, and our counterparts to reduce and eliminate risks of pest introduction, and to protect bio-diversity?*

Communication and coordination between plant inspection stations, PPQ Permit Services, and internal and external stakeholders need strengthening. Some PPQ import permits are being issued that allow items requiring mandatory fumigation to go through a plant inspection station that does not have fumigation capability. Some ports are more heavily used than others, resulting in uneven workloads among plant inspection stations. Specifying the port of entry on permits issued by PPQ could help balance some of the workload between inspection stations. We need to investigate whether PPQ has the authority to specify the port of entry on the permits issued by the Permits, Registration, and Manuals Unit (PRIM)<sup>1</sup>.

Results of plant inspection station inspections, pest detection information, violations, and regulatory non-compliance issues need to be relayed quickly to national plant protection organizations in exporting countries.

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**Objective 5.1:** Educate and build confidence with industry and other concerned parties

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**Actionable Strategies**

Future actions will include the following:

- 5.1.1. Coordinate with NIS to communicate the results of plant inspection station inspections, especially notable interceptions and other relevant non-proprietary information, and build on the current communication tools (for example, the monthly newsletter, *Notes of Interest*, which is posted on the CBP Web site and shared with other inspection stations);
- 5.1.2. Attend industry trade shows; set up booths at trade shows; and conduct educational seminars to share what the plant inspection stations do; how to work with the plant inspection station staff, etc.;
- 5.1.3. Create educational materials (pamphlets, posters, displays) to inform the public about the risks associated with bringing plants into the U.S. from high risk countries; and involve all the major international airlines;
- 5.1.4. Create a plant inspection station Web site with easy to reach FAQ pages;
- 5.1.5. Hold plant inspection station open houses for brokers in our optimally-designed and equipped facilities; and
- 5.1.6. If needed, revitalize, update, and reinforce existing PPQ communication protocols for communicating with industry and stakeholders.

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**Objective 5.2:** Improve internal communication within APHIS

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**Actionable Strategies**

Future actions will include the following:

- 5.2.1. Draft, implement, and monitor an internal communication plan specifically for the Q-37 Revision Team, PRIM<sup>1</sup>, Manuals Unit, National Association of



## Strategic Program Goal 5

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Agriculture Employees (NAAE), National Association of Plant Protection Quarantine Managers (NAPPQM), Smuggling Interdiction and Trade Compliance (SITC), Center for Plant Health Science and Technology, (CPHST), Emergency & Domestic Programs (EDP), and Investigative & Enforcement Services (IES):

- Identify communication and coordination disconnects;
- Identify information relevant to each group (listed above); and
- Develop standard operating procedures with PRIM<sup>1</sup> to address the disconnects

5.2.2. Communicate and coordinate continuously with the Q-37 Revision Team;

5.2.3. Coordinate with NIS to report and share data and information regarding significant or notable interceptions among other plant inspection stations, SITC, SPHDs, and SPROs;

5.2.4. Create an internal network among all plant inspection stations for easier and faster communication of information and data;

5.2.5. Establish and implement communication protocols with PIM and CIAO regarding infractions of risk-management measures established with our trading partners (for example, soil on cobble stones, etc.);

5.2.6. Establish an annual meeting or communication forum for sharing quality initiatives;

5.2.7 Invite permit specialists from PRIM<sup>1</sup> to visit plant inspection stations; and

5.2.8 Revitalize, update, and reinforce, as needed, existing PPQ communication protocols for communicating internally.

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**Objective 5.3:** Improve external communications with other government regulatory agencies and non-governmental organizations (NGO)

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### Actionable Strategies

Future actions will include the following:

5.3.1. Identify key government regulatory agencies and NGOs;

5.3.2. Draft, implement, and monitor an external communication plan with key government regulatory agencies and NGOs;

5.3.3. Explore the possibility of data sharing with our trading partners; and

5.3.3. Report and share information regarding significant or notable interceptions as appropriate.



**Figure 3 Plant inspection station staff meeting with USDA-ARS**

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## Management Initiatives

### **Management Initiative 1:**

Strategically locate plant inspection stations and ensure they meet the national plant inspection stations standards

**Strategic Issue:** *What can PPQ do to ensure the plant inspection stations are strategically located and meet the optimum and/or minimum standards?*

Many of our plant inspection station facilities are deteriorating due to age. Many have inadequate, small, cluttered working spaces; electrical systems and wiring are inadequate, out-of-date; pose safety and health hazards; and present an unprofessional image to our stakeholders, customers, and the public. Many plant inspection stations are not able to handle the increased volume, to conduct the required treatments, or to be adapted to meet molecular diagnostic needs. Differential/selective culture and other diagnostic testing raises critical containment issues, time issues, and cost factors. Equipment needs upgrading to allow for more diagnostics on site. Botany, entomology, and pathology disciplines are not represented at every inspection station.

Industry has a preference for using certain ports of entry, which puts a strain on personnel and facilities at those locations. Due to the increasing number of shipments via express carriers (FedEx, UPS, DHL, etc.), some carriers are challenging

PPQ to set up plant inspection stations at their facilities.

The recently-established plant inspection station facility standards can serve as an effective guide in the development and building of new facilities.

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**Objective 1.1:** Conduct a comprehensive assessment of the current plant inspection station network (see *Program Goal 1, Objective 1.1*)

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### **Actionable Strategies**

Future actions will include the following:

- 1.1.1. Analyze the current volume, type, and risk of imported material for each plant inspection station;
- 1.1.2. Analyze the current interception volume and risk;
- 1.1.3. Analyze the utilization the each plant inspection station and determine if there is over-utilization or under-utilization;
- 1.1.4. Analyze the current plant inspection station inspection and clearance time frames:
  - Measure the current inspection and clearance time frames;
  - Compare the time frames for comparable shipments at all plant inspection stations and results achieved;
  - Compare the time frames for various host material;
  - Identify the practices that contribute to significant differences; and
  - Make recommendations for improvements
- 1.1.5. Assess the carriers' and airlines' ability to move cargo to and from the plant inspection station locations;
- 1.1.6. Identify which plant inspection stations do not meet the national infrastructure standards, and use port review reports to identify when possible:

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- Use the identified plant inspection stations to establish priorities for making improvements; and
- Follow-up on the recommendations

1.1.7. Factor-in future increases in volume, type, and risk of imported materials.

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**Objective 1.2:** Conduct a trend analysis to determine future plant inspection station infrastructure needs

(see *Program Goal 1, Objective 1.1*)

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### Actionable Strategies

Future actions will include the following:

1.2.1. Assess the carriers' (airlines, maritime, land border, packages, and inter-modal) ability to move cargo to and from new plant inspection station locations;

1.2.2. Evaluate the inspection needs at U.S.P.S. facilities to determine if plant inspection stations should be established there;

1.2.3. Consult with economists and industry to predict future growth and locations where new plant inspection stations may be needed;

1.2.4. Assess funding sources and develop a strategy to respond to external offers to cost share;

1.2.5. Be more proactive in determining future needs by establishing and maintaining contact with port authorities and Government Services Administration (GSA) at land borders, to include plant inspection stations in any discussions of plans for future expansion that could create a need for additional plant inspection station capability;

1.2.6. Use the information from other PPQ and APHIS groups (for example, IES, SITC) to assess possible locations;

1.2.7. Assess northern border needs; and

1.2.8. Establish a joint plant inspection station and PRIM<sup>1</sup> working group to explore and consider how and where inspections for 526 Permit packages should occur, as an alternate to plant inspection stations including pre-clearance under CBP supervision. (see *Program Goal 5, Objective 5.2*)

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**Objective 1.3:** Conduct a trend analysis to determine possible plant inspection station locations at express carrier hubs (for example: DHL, FedEx, UPS), at mail facilities, and at land borders

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### Actionable Strategies

Future actions will include the following:

1.3.1. Analyze how much material is coming through hubs and mail facilities, both permitted and not permitted;

1.3.2. Analyze the potential utilization of central hubs and satellite hubs to determine optimal locations for plant inspection stations;

1.3.3. Assess coverage needs at the northern border;

1.3.4. Communicate findings and seek feedback from cooperators; and

1.3.5. Participate in an express carrier summit to learn about carriers' needs.

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**Objective 1.4:** Develop and prioritize recommendations for new plant inspection stations to the PPQ Executive Team

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### Actionable Strategies

Future actionable strategies include:

1.4.1. Review the analyses from the first three objectives (see *Management Initiative 1: Objectives 1.1, 1.2, and 1.3*);

1.4.2. Rank and prioritize needs;

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1.4.3. Make recommendations for new locations for plant inspection stations and upgrades to existing plant inspection stations:

- Continue to use the Plant Inspection Station Working Group (PISWG) as a neutral party to evaluate the efficiency and utilization of existing space and facilities; and to make cost-effective recommendations for improvement; and
- Where appropriate, work with the Regions to explore ways the regions can secure professional help in planning and using existing space more efficiently until new space can be acquired.



**Figure 4: Many facilities are aging and lack space for the volume of inspections**



**Figure 5: Plant inspections are conducted in the loading area due to the lack of space in the plant inspection station**

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**Management Initiative 2:** Enhance the plant inspection stations' capability to recruit, train, and retain a highly-qualified work force

**Strategic Issue:** *What can the plant inspection stations do to recruit, train, and retain a highly-qualified work force to replenish the retiring work force?*

Succession planning is needed for plant inspection station staff. Currently, many plant inspection stations lack enough staff; the overall Plant Protection and Quarantine (PPQ) staff is aging and many retirements are expected over the next 5 years; CBP will not likely serve as a source for recruitment.

Temporary duty (TDY) assignments afford plant inspection station personnel the opportunity to broaden their knowledge outside the inspection station. Unfortunately, the absence personnel on TDY places a burden on remaining staff the inspection station, especially when the TDY is extended.

Recruitment is needed for highly-skilled people from universities, professional societies, and within PPQ people. The candidates need to know taxonomy. If the knowledge is not readily available, then we need to provide the training (for example, entomologists and plant pathologists must be able to key out pests to genus and species and prepare slides).

Training for Plant Health Safety Specialists (PHSS) and Identifiers is sporadic. Training and up-to-date reference material (hard copy, CD, databases) is needed for current employees as well as for future plant inspection station staff.

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**Objective 2.1:** Work with the PPQ Professional Development Center (PDC) to develop a work force plan (3-to-5 years)

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**Actionable Strategies**

Future actionable strategies include:

2.1.1. Review PPQ strategic goals and plant inspection station strategic goals and assess their impact on plant inspection stations' work over the next 3-to-5 years:

- Determine the work that will increase or decrease;
- Determine the changes that will occur in how the work is accomplished;
- Determine how technology will change the way we work;
- Conduct a workload assessment (see *Management Initiative 1*);
- Identify partners for sharing work; and identify opportunities for sharing resources (partnering with other PPQ programs such as NIS, EDP; other Federal or State agencies; and universities); and
- Explore a certification process for inspectors as a way to ensure quality inspections and efficiencies;

2.1.2. Forecast future human resource needs (3- to-5 years): types and numbers of new positions and competencies needed:

- Identify new positions (both the type of positions and numbers); and
- Identify new skills needed (scientific, technical, and leadership)

2.1.3. Forecast the future human resource supply:

- Identify the types (for example, taxonomists, entomologists) and numbers of employees who are eligible to retire during the next 3-to-5 years;
- Conduct an assessment of current skills and reference the skill inventory built by CPHST (to represent the supply of skills plant inspection stations should have in the future);

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2.1.4. Identify the gaps between human resource needs and supply;

2.1.5. Develop strategies for closing the gaps between human resource needs and supply:

- Identify and partner with other Federal agencies, and colleges and universities (such as those that teach regulatory science; for example, NC State, FL State) that have similar needs and/or talent for which we are searching; and develop joint recruitment plans;
- Assess the plant inspection station leadership issue; and establish a plan to select the correct person for the specific assignment (someone who understands both the mission and leadership issues);
- Identify retention issues and strategies; and
- Build career ladders within the plant inspection stations and develop individual advancement plans.

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**Objective 2.2:** Work with the PDC to develop a succession plan

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### Actionable Strategies

Future actionable strategies include:

2.2.1. Forecast plant inspection station leadership needs: positions and competencies

- Identify key leadership positions;
- Use the PPQ/OPM leadership competency model to identify leadership competencies needed for each key position; and
- Identify scientific and technical competencies

2.2.2. Forecast the plant inspection station leadership supply (people and competencies)

- Identify the number of employees who are eligible to retire during the next 3-to-5 years;
- Conduct an assessment of current skills (to represent the supply of skills

plant inspection station staff should have in the future)

2.2.3. Identify the gaps between leadership needs and supply;

2.2.4. Develop strategies for closing the gaps between leadership needs and supply:

- Set a goal to develop 3 replacements for every key leadership vacancy;
- Develop strategies for closing the skills and numbers gap;
- Develop a career ladder for plant inspection stations; and develop individual advancement plans (also fits with retention);
- Establish a back-up identifier scenario:
  - Identify those incentives that keep people on the job;
  - Identify and use staff selection tools and processes with a view toward placing good leaders in key positions; and
  - Develop mentoring, coaching, and on-the-job training (in formal training as well); specialized support is required due to the different nature of the job.

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**Objective 2.3:** Work with the PDC to develop a recruitment plan

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### Actionable Strategies

Future actions will include the following:

2.3.1. Use a gap analysis to identify current and future recruitment needs;

2.3.2. Identify recruitment strategies and sources for closing the gap;

2.3.3. Develop marketing strategies and recruitment tools;

2.3.4. Explore special skills scholarships;

2.3.5. Position plant inspection stations' staff to be involved in the recruitment process;

2.3.6. Establish and maintain professional relationships with colleges and professional

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associations that have the skills plant inspection stations need:

- Include outreach to primary and secondary grades; and
- Utilize Identifiers attending national professional meetings to help with recruitment

2.3.7. Identify retention issues and strategies (career ladder for plant inspection stations and individual advancement plans);

2.3.8. Share recruitment resources; and partner with other parts of PPQ, other agencies, universities, and professional associations; and

2.3.9. Create a roster of PPQ plant inspection station retirees and identify their skills and knowledge to tap as needed.

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**Objective 2.4:** Develop a training plan

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### Actionable Strategies

Future actionable strategies include:

2.4.1. Evaluate future skill needs and existing skills to identify and close the gaps:

- Leadership, scientific, and technical; and
- Mentoring and coaching

2.4.2. Establish developmental opportunities and learning activities:

- Short-term details (2-to-3 months);
- E-learning, classroom, self-directed learning, etc.; and
- On-the-job training and mentoring specific to and targeted to plant inspection stations

2.4.3. Develop individual learning contracts or individual development plans that are linked back to the gaps we need to close; and ensure these plans are implemented;

2.4.4. Identify areas where plant inspection station staff need refresher or periodic training; and work with NIS to offer training in the specific disciplines of botany, plant pathology, etc., to plant inspection station personnel; and

2.4.5. Assess and identify the most-qualified people (based on OPM leadership competencies) for promotion and leadership development opportunities.



**Figure 6: Plant Health Safety Specialists (PHSS) inspecting a shipment**

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**Management Initiative 3:** Increase the plant inspection stations role in the development of new data systems and/or the enhancement of current systems

**Strategic Issue:** *What can the plant inspection stations do to influence the development of new data systems and/or to enhance the interface of current systems to ensure quality data is collected while minimizing redundant data entry?*

End-users and data entry personnel at the plant inspection stations are not adequately involved with IT in the development of new systems. Changes and programs are placed into action without sufficient plant inspection station end-users' input or training; and IT support for constantly recurring problems is slow. IT experts must provide a supportive role and talk directly with the end-users and data entry personnel at the plant inspection stations.

There is much redundancy in data entry. Databases and database fields should be linked so that subsequent forms and documents can be generated from the original database entry. (For example, an import shipment could have as many as 5 forms generated: 264, 236, Pest ID, EAN, and 429.) Many databases have been developed to record the work of the individual inspection stations, but the results and intercepted pest data is not organized system-wide to provide real-time pest risk assessments and information sharing with customers and stakeholders.

In addition, the current volume of data collection and entry will increase with the introduction and implementation of AQI monitoring at the plant inspection stations and the revision of 7 CFR §319.37 (Q-37).

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**Objective 3.1:** Eliminate redundant data entry at the plant inspection stations

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**Actionable Strategies**

Future actionable strategies include:

- 3.1.1. Conduct a plant inspection stations business process assessment;
- 3.1.2. Make improvements to the plant inspection stations business process as needed;
- 3.1.3. Conduct a data needs assessment;
- 3.1.4. Conduct a systems assessment of current and existing programs;
- 3.1.5. Ensure PPQ systems interface with ACE-ITDS (import entry information) and other existing and/or new systems;
- 3.1.6. Ensure PPQ plant inspection stations requirements are included in ACE-ITDS (or other Customs systems) to meet plant inspection station program needs; and
- 3.1.7. Maximize automated data entry and new technology to minimize the data entry burden.

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**Objective 3.2:** Ensure plant inspection station participation on the configuration control boards for systems used by the plant inspection stations

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**Actionable Strategies**

Future actionable strategies include:

- 3.2.1. Work with Executive Steering Committees for AQAS, e-Permits, PCIT, and the CPHST database (treatments) to

### **Strategic Management Initiative 3**

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identify plant inspection stations and Regional representatives for these committees;

3.2.2. Communicate to all plant inspection stations, a list of Control Board representatives and their roles and responsibilities;

3.2.3. Ensure plant inspection stations personnel participate in user acceptance testing; and

3.2.4. Ensure plant inspection stations data and information reporting needs are fully met.

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**Objective 3.3:** Ensure data quality at the local and the national levels

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#### **Actionable Strategies**

Future actionable strategies include:

3.3.1. Develop a quality assurance/quality control program for data entry, and include local data correction processes;

3.3.2. Provide training on the proper use of systems utilized; and

3.3.3. Ensure all personnel (including CBP-AI) that are responsible for entering data understand the purpose of the database, the meaning of the data, the correct value, etc.

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<sup>1</sup> Due to reorganization, permits formerly issued by Permit Services are now issued by the CIAO and EPROS branches PRIM. Certain biological research permits are issued by BRS.