

# Implementing a joint (federal/state/local/tribal/territorial) inspection process and protocol

Tim Hanosh

New Mexico Department of Agriculture Veterinary Diagnostic  
Services

Ali Kashani

Washington State Department of Agriculture

# Goal

- Obtain consensus on the steps of a joint inspection process
- We exercised our right to modify the charge

# Charge

- *Group Charge*: Identify specific steps of a joint inspection process & an approach for implementation (2012-2013)

# Session Outcomes

- Overarching principle: The purpose and scope of the inspection will influence all aspects of the joint inspection process
- Identified 5 buckets of a joint inspection
  - Communication
  - Planning
  - Operational Process
    - Report
  - Compliance
  - After Action

# Joint Inspections

- Potential reasons for a joint inspections
  - Training
  - Compliance
  - Workplan
  - For cause

# Communication

- Relationship building is the foundation
  - Work on a common terminology & language
  - Understand where all partners are coming from
- Recognized that communication is threaded throughout **ALL** of the buckets

# Planning for Joint Inspection

- Identify Purpose & Scope
- Coordination at the agency level
  - Identify Participants: Agencies & Jurisdictions
  - Identify Roles and Responsibilities
  - Identify an approach for coordination of possible compliance/regulatory/administrative actions
  - Identify any issues that need to be addressed during the operational process
  - Discuss the final report
  - Identify resources: people, SMEs, materials
    - Specific participants
    - Must select the right people (MOUs/IAGs and confidentiality agreements/commissioning will play a role here)

# Planning for Joint Inspection

- Determine approach (a game plan for doing an inspection)
  - Related to the operational process
  - Identify timeframes and expectations: including re-evaluating, submitting report, etc.
- Logistics in support of the approach/operational process
- Case Review
  - Firm history
  - Other information as relevant to the purpose and scope of the inspection **(all parties contribute)**



# Operational Process

- Initiation of Inspection
  - Fulfilling all administrative and legal requirements
  - Communicate the purpose and scope of the inspection to the firm
- Data Collection & Assessment (Process Review/Evaluation)
- Documentation & Communication of Observations
  - Coordinate the findings among inspectors prior to discussion with firm management
    - Be sure to discuss any potential desired compliance/regulatory/administrative action

# Operational Process

- Documentation & Communication of Observations (con't)
  - Conduct exit interview
    - Submission of Inspectional findings/observations to the firm
- Take compliance/regulatory/administrative action when necessary or needed (and as appropriate), and communicate the risk and reason for taking action with the firm

# Inspection Report

- Vital stats of firm & inspection
  - Tie in to Breakout Session on Data Elements
- Official signatures
- Relevant observations & objectionable conditions
  - Regulatory basis for objectionable conditions
- Process Description
- Promised corrective actions & timeframes
- Next regulatory steps (follow up)
  - Including possible inspection outcomes, as appropriate
- Standard report format

# Compliance & After Action

- Our session acknowledged that an inspection is not concluded until all parties have reached a resolution
  - Breakout Session 2 addressed long term compliance approaches
- Our session acknowledged the importance and need for an after action review
  - Breakout Session 3 addressed after action reviews

# Operationalization

- Our session reached consensus on the process
- We recommend making the process available nationally and allowing voluntary implementation
  - Potential tie-in with joint workplanning?
- Future needs/gaps:
  - Timeline prior to evaluation
  - Feedback mechanism to aid the evaluation process
  - Responsible parties & distribution mechanism

# Obstacles

- Final Inspection Reports
  - Done at different times, different contents, different formats.
- Differing legal authority or regulatory approaches
- Lack of buy-in and commitment
- Lack of resources
- Shifting priorities
- Poor or no relationship with some or all regulatory counterparts

# Solutions

- Build relationships
  - Trust & Acceptance
  - Know who to contact (SMEs)
  - Buy-in and commitment
- Training
- Resources
- Comparability of inspections
- ***Implementation of a joint inspection process!!***

# Conclusion

- Accomplished our charge
  - Consensus on a joint inspection process
- Realize that there are gaps still remaining in the implementation & evaluation process
- Success is dependent on wide-spread use and feedback