

MEMORANDUM

From: Gary Jay Kushner
Brian D. Eyink
Christine Forgues

Date: December 11, 2017

Re: FSIS Releases Fiscal Year 2018 Annual Plan

On December 1, 2017, the United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS or the agency) issued its Fiscal Year 2018 Annual Plan.^{1/} The Annual Plan, which is directly aligned with the agency's 2017 - 2021 Strategic Plan,^{2/} outlines the ways FSIS plans to achieve its strategic goals over the next fiscal year. It serves as an operational guide for FSIS, where the agency explains the progression of activities from the key milestones the agency achieved in FY 2017, outlines what it plans to achieve in FY 2018 and why, and describes how it will assess progress by using Strategic and Annual Plan measures and targets.

Overall, the agency anticipates focusing on prevention of product contamination and foodborne illness, modernizing systems and approaches, and streamlining to enhance business. Continuing priorities for FY 2018 include further implementation of the New Poultry Inspection System (NPIS) and Siluriformes fish inspection, effectively using Public Health Risk Evaluations (PHREs) and pathogen reduction performance standards for *Salmonella* and *Campylobacter* in poultry, and modernizing swine and egg products inspection systems. The agency plans to continue increasing use of whole genome sequencing, further develop key informational tools and resources for inspection personnel, and work with public health partners to prevent *Listeria monocytogenes* in retail delicatessens. The agency will also encourage industry continued adoption of food defense and humane handling practices, and consumer adoption of safe food-handling practices.

The Annual Plan addresses the following:

- Goal 1 – Prevent Foodborne Illness and Protect Public Health
- Goal 2 – Modernize Inspection Systems, Policies, and the Use of Scientific Approaches
- Goal 3 – Achieve Operational Excellence
- Cross Cutting

^{1/} Fiscal Year 2018 Annual Plan U.S. Department of Agriculture, Food Safety and Inspection Service (Dec 1, 2017) <https://www.fsis.usda.gov/wps/wcm/connect/88c7a056-3f26-41e1-8f03-d18bc9e0fb05/Annual-Plan-FY2018.pdf?MOD=AJPERES> [hereinafter "Annual Plan"].

^{2/} FSIS Strategic Plan, 2017-2021, <https://www.fsis.usda.gov/wps/wcm/connect/317d14d6-1759-448e-941a-de3cbff289e5/Strategic-Plan-2017-2021.pdf?MOD=AJPERES>.

We provide below a high-level overview of each Goal addressed in the plan and identify the agency's focuses for each.

1. Goal 1 – Prevent Foodborne Illness and Protect Public Health

The two main strategies for Goal 1 are to prevent contamination, and limit illness from regulated products. The agency expects to achieve these outcomes through the following:

- Drive Compliance With Food Safety Statutes and Regulations – Agency activities will address both imported and domestically imported food products, with key focus on driving compliance and reducing the risks of contamination. Efforts will include continuing to perform PHREs and Food Safety Assessments (FSAs) to ensure regulated establishments have developed and implemented food safety systems that reduce food safety hazards or prevent them from occurring. Effective international equivalence process development will occur by leveraging the Self-Reporting Tool (SRT) for determining equivalence, and verifying ongoing equivalence through document review, onsite audits, and point of entry (POE) product reinspection. The agency plans on strengthening existing efforts in risk-based sampling based on country profiles, previously identified issues, and using baselines and data analytics tools to monitor point of entry reinspection activities. The agency will continue to work with and review State Meat and Poultry Inspection (MPI) Programs for the 27 states that implement requirements “at least equal to” federal food safety requirements. Lastly, further outreach will occur with small and very small establishments and other domestic stakeholders about food safety requirements.
- Strengthen Sampling Programs – FSIS is expanding its sampling programs to address gaps in testing for pathogens and chemical residues. As FSIS increases the percentage of different products tested, it will also increase the percentage of establishments to collect samples to close identified sampling gaps, reduce exceptions to what it samples and tests, review its sample prioritization criteria and modify as necessary, and gather knowledge on the relative risk of contamination of regulated products. Approaches to increase testing and identify gaps include unifying testing so that FSIS only collects one sample for each product and tests it for multiple microbiological hazards or chemical residues, using sampling algorithms (similar to the FY 2017 Ready-to-Eat (RTE) algorithm), and leveraging new technology to increase precision, gain efficiencies, and better identify and define hazards to decrease their presence in food.
- Ensure Establishments Are Meeting Pathogen Reduction Performance Standards – This strategy focuses on using pathogen reduction performance standards to assess the food safety performance of establishments that slaughter and process meat and poultry products. In FY 2018, FSIS plans to finalize and implement an overall assessment and enforcement strategy for poultry *Salmonella* and *Campylobacter* reduction performance at establishments slaughtering and processing raw poultry (including assessment of the FY 2017 six new performance standards). FSIS also plans to analyze and communicate results regarding the effect of neutralizing Buffered Peptone Water (nBPW) on the performance standards for poultry carcasses and parts. To facilitate continual improvement in addressing *Salmonella* in red meat, FSIS plans to develop an action plan that outlines the hurdles associated specifically with *Salmonella* in beef. FSIS recently implemented sampling for the baseline phase of the Raw Pork Products Exploratory Sampling Project for *Salmonella* in intact and non-intact pork cuts and comminuted pork. The related study will be completed in FY 2018, and data gathered will be used to inform FSIS policies regarding pork products and to develop industry guidance and/or performance standards.

- Promote Food Defense Practices – FY 2018 will continue the previous implementation of a multi-year strategy for food defense that included modifications to food defense tasks, further integration of food defense into FSIS policies, outreach by developing, revising, and distributing tools, resources, and guides, and collaboration with FDA and other agencies and organizations. In addition, the agency shifted from measuring voluntary adoption of functional food defense plans to focusing on the importance of implementing and maintaining food defense practices in all FSIS-regulated establishments. In FY 2018, FSIS plans to continue its work in aligning and integrating key food defense concepts and activities into day-to-day inspection operations, and it will continue to update critical food defense policies. FSIS plans to also conduct vulnerability assessments to identify critical risks and immediately identify the best practices to reduce them.
- Improve Food Safety at In-Commerce Facilities – A particular agency priority is verifying that retail locations that operate delis are safely handling ready-to-eat (RTE) meat and poultry for sale to consumers. FSIS plans to continue to expand outreach, education, and training about in-commerce food safety, on FSIS rules, regulations, and guidance affecting in-commerce firms, and will encourage improvements to the FDA Food Code to enhance public health in retail. FSIS plans to continue to conduct most of its surveillance at the highest risk business types that handle the largest product volumes (that State or local authorities do not routinely visit). The agency will conduct approximately 15% of its surveillance activities at retailers to continue to track progress on safe-handling practices at retail delis, enforce recordkeeping requirements for retailers that grind beef and document violations, and educate retail deli operators.
- Enhance Response to Foodborne Illness Outbreaks and Adulteration Events – In FY 2017, FSIS continued implementing several strategies to improve communication and collaboration with public health partners, with the aim of enhancing foodborne illness reporting and increasing effectiveness of foodborne illness investigations. After FSIS completes analysis of focus group data in early FY 2018, the agency will use the results to inform development of foodborne illness guidance materials that are easy to access and practical to encourage early detection, reporting, and diagnosis of foodborne related illness. To obtain insight into information gaps that FSIS may address through partner outreach, the agency began administering an annual survey to gather information from key State partners. FSIS plans to use these survey results to help focus on areas of greatest need, to plan better, and to promote early reporting by partners of adverse events. The agency will also utilize advances in technology, such as whole genome sequencing (WGS), to understand and respond better to foodborne hazards that are of greatest concern to public health.
- Increase Public Awareness of Recalls, Foodborne Illness, and Safe Food Handling Practices – In FY 2018, FSIS plans to expand its outreach efforts to the press, continue to work with partners to expand the reach of safety messaging, and engage with the public and key stakeholders through traditional and new media. Key activities for FY 2018 include being more proactive with national, regional/State, and local media about recalls, foodborne illness, and safe food-handling practices, tracking the impressions these placements achieve, and training field staff to serve as spokespeople during local interviews and food demonstrations. FSIS plans to also continue to increase engagement with the public and other key stakeholders through digital communications outreach and briefings, and execute three food safety outreach-related initiatives. Other key activities will include tracking the quantity and quality of partnership activities promoting safe food handling, and establishing strategic plan baselines and targets to increase the percent of consumers identified.

2. Goal 2 – Modernize Inspection Systems, Policies, and the Use of Scientific Approaches

The two main strategies for Goal 2 are to improve food safety and humane handling practices through adoption of innovative approaches, and enhance access to complete and accurate information to inform agency and industry decisions. These outcomes will be achieved through the following:

- Modernize Scientific Techniques and Inspection Procedures – FSIS plans to expand the whole genome sequencing capacity, further explore innovative inspector tools through pilot projects, and identify, pilot and implement the use of new and innovative methodologies to improve hazard detection and response.
 - Whole Genome Sequencing (WGS): In the short term, the agency plans to continue to use WGS to understand *Listeria monocytogenes* harborage better. In addition, FSIS plans to work with FDA and other agencies/partners to develop specific procedures for sharing WGS information involving dual jurisdiction establishments. FSIS plans to develop criteria for determining when serotype, pulsed-field gel electrophoresis (PFGE), antibiotic resistance, and WGS results should trigger a PHRE, and procedures for communicating actionable results from the laboratory to the field. In addition, FSIS plans to use WGS data to support enforcement actions in Category 3 establishments when applicable. More specifically, for poultry establishments that are Category 3 for *Salmonella*, FSIS plans to explore the use of WGS analysis with other existing techniques to determine if product isolates contain *Salmonella* of relevance to public health. The agency will use this information to develop a framework for regulatory considerations and subsequent inspection actions.
 - Inspector Tools:
 - In FY 2017, FSIS assessed the utility of certain tools, such as adenosine triphosphate (ATP) sampling of surfaces, and an imaging device that may be used to provide inspectors and other field staff with information to help them make sampling decisions. FSIS determined that the tools tested did not meet FSIS' evaluation criteria (suitability, time to results, and usability by inspectors). In FY 2018, FSIS plans to explore other tools to assess their applicability in slaughter and processing establishments. The agency also plans to continue exploring the development and application of real-time microbiological testing methodology for field application. Other activities related to modernization of procedures include establishing functionality in PHIS for tracking E. coli O157:H7 Positive Suppliers (STEPS), Recall Management, and Industry Notification of Adulteration applications.
 - FSIS plans to continue to monitor the number of establishments whose non-compliance rate decreases 120 days after receiving an early warning alert (EWA) for Public Health Regulations Noncompliance Records (PHR/NRs). FSIS plans to begin assessing performance of individual establishments that fail to show improvement. In addition, FSIS is developing an early notice alert for Inspection Program Personnel (IPP) in poultry establishments whose performance is declining from Category 2 to Category 3.
 - FSIS plans to also continue to modernize inspection procedures and develop new approaches to assess the industry's control of hazards. Specifically, FSIS plans to continue to implement NPIS in establishments that opt in and are ready to adopt the new system.
 - FSIS plans to also explore alternatives for evaluating the effectiveness of process control, and for identifying conditions that may lead to cross-contamination of product during slaughter and processing. This may include using food-contact-surface sampling at pre-op for *Salmonella* and *STEC* in select

establishments. Similarly, FSIS recently assessed surface-sampling methods as a potential alternative to N-60 or grab sampling for collecting trim and other raw ground beef components. The agency plans to continue its collaboration with USDA's Agricultural Research Service to perform a pilot study in FY 2018 to determine the applicability of this method to collect samples in FSIS-regulated establishments. FSIS also plans to explore how best to expand the Accredited Laboratory Program to include microbiological testing and to update analytic methods.

- Increase Adoption of Humane Handling Best Practices – This section primarily focuses on livestock slaughter through using humane methods, with a specific focus on restraint and/or stunning of livestock to improve establishment compliance and reduce the risk of humane handling incidents at slaughter establishments. FSIS recently launched an initiative to increase understanding of signs of consciousness in livestock during the process of slaughter through training to approximately 65% of agency Public Health Veterinarians (PHVs), which will continue in FY 2018. FSIS plans to also begin training other field personnel responsible for livestock humane handling verification duties. In support of this effort, FSIS plans to design, create, and implement reference material on recognizing signs of consciousness in livestock on the IPP Help Button. Last, the agency will also publish a Federal Register Notice (FRN) regarding its intent to hold livestock owners, transporters, haulers, and other persons not employed by an official establishment responsible if they inhumanely handle livestock in connection with slaughter while on the premises of an official establishment.
- Improve the Reliability, Access, and Timely Collection and Distribution of Information and Data – In FY 2018, FSIS plans to continue FY 2017 activities including development of more tools to aid access and visualization of FSIS data to assist IPP in performing inspection tasks, and to provide innovative ways of presenting guidance for industry, information to inspectors and consumers, and analysis with partners

3. Goal 3 – Achieve Operational Excellence

The two main strategies for Goal 3 are to maintain a well-trained and engaged workforce, and improve processes and services. These outcomes will be achieved through improved recruiting and retention for critical positions, enhancing training and development opportunities, ensuring equal opportunity and diversity and inclusion, enhancing efficiency and effectiveness of key processes and systems, and improving service delivery.

4. Cross Cutting

The agency plans to enhance collaboration with its partners by increasing activities and involvement with PulseNet, FoodNet, Partnership for Food Protection, Interagency Food Safety and Analytics Collaboration, Interagency Risk Assessment Consortium, Interagency Collaboration on Genomics for Food and Feed Safety, FSIS research priorities, and advisory committees.

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We will continue to monitor strategies, developments, and other information pertaining to FY 2018 implementation and operational policies. Please contact us with any questions.