UNITED STATES DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE WASHINGTON, DC

FSIS PHIS DIRECTIVE

13,000.1 Rev. 1

8/31/12

SCHEDULING IN-PLANT INSPECTION TASKS IN THE PUBLIC HEALTH INFORMATION SYSTEM (PHIS)

I. PURPOSE

This directive provides instructions on how inspection program personnel (IPP) are to use the Public Health Information System (PHIS) task calendar to schedule their inspection tasks. PHIS provides information about the appropriate tasks for each establishment, their relative priorities based on their expected impact on public health, and their expected frequencies. PHIS assigns inspection tasks based on information in the establishment profile. IPP are to use their knowledge of the specific operations in their assigned establishments to schedule their inspection tasks in the most efficient and effective manner.

KEY POINT: Import reinspection types of inspections (TOIs) will be based on an import inspection application generated by the applicant (i.e. importer of record, broker or agent). The reinspection of imported products will then be assigned by PHIS when the import shipment is presented at the import establishment.

II. CANCELLATION

FSIS PHIS Directive 13,000.1, dated 4/11/11 FSIS Notice 70-11, dated 12/2/11

III. REASON FOR RE-ISSUANCE

A. This directive is being revised to reflect the recent upgrades to the PHIS system: changes to the Disconnected State (Section XIII) and the options IPP have to schedule tasks (Section IX, Part G).

IV. REFERENCES

A. PHIS reference materials are available on the PHIS Resources and Training page of *InsideFSIS*: PHIS Resources and Training

B. PHIS resources are also available on each computer to help inspection program personnel when a connection to the FSIS network is not available. They are in the Offline Issuances folder: My Computer\Local Disk (C:)\Offline_Issuances\PHIS References. If IPP do not have this reference folder on their computer, they are to click Start/FSIS Applications/Other Tools/Synchronize Offline Issuances to update their offline issuance folder.

V. BACKGROUND

FSIS recognizes that IPP have constraints on their time because of the individual operational characteristics of their assigned establishments, necessary travel for patrol assignments, unforeseen issues that arise, and other factors. The task calendar function of PHIS is designed to provide flexibility to IPP in determining when to perform their assigned inspection tasks. The

DISTRIBUTION: Electronic **OPI**: OPPD

PHIS task calendar displays which inspection tasks are to be performed in each assigned establishment and gives important information about each task, such as expected frequency and priority level. IPP are to use this information to decide what and when to schedule the necessary inspection tasks. In those assignments where IPP cannot complete all assigned tasks, IPP are to ensure that they complete the tasks based on the priority rating. The PHIS task priorities are based on the expected impact on public health.

VI. TERMINOLOGY

A. PHIS and the associated policy directives use some new language. IPP are to use these terms to better understand the system and operate within it. In most cases the new language does not change policy or IPP verification activities.

- B. New terms and an explanation of how they are used in PHIS include:
 - 1. Establishment (Plant) Profile: This is a set of demographic and operational data related to establishments or facilities regulated by FSIS at which FSIS personnel conduct inspection, verification, or certification activities. The Establishment Profile in PHIS is fundamentally the same as that in the Performance Based Inspection System (PBIS), but contains additional data related to plant operations and activities and demographics. PHIS will contain an Establishment Profile for meat, poultry, processed egg product establishments, import inspection establishments, and for facilities at which FSIS conducts voluntary inspection activities.
 - Task: This is a verification or data recording activity that IPP conduct. The term "task" includes not only the activities formerly known as procedures in PBIS, but also includes activities conducted by IPP that are not currently captured in PBIS, such as supplier tracking tasks, export certification tasks, and certain administrative tasks such as meeting with establishment management.
 - Routine Tasks: These are inspection verification activities conducted on a routine, ongoing, or planned basis whenever the establishment is in operation. Routine tasks are similar to scheduled procedures in PBIS.
 - 4. Directed Task: These are inspection verification activities performed on an as-needed basis. FSIS management or PHIS may initiate directed tasks in response to inspection findings, sample results, or other available information. For example, when IPP record a noncompliance record in PHIS, the system initiates a directed instance of the same task that resulted in the noncompliance. IPP are also able to initiate directed instances of routine tasks based on conditions they observe in establishments. When initiated by IPP the term "Directed Task" means the same as "Unscheduled Procedure" in PBIS.

KEY POINT: "Directed" sampling has a different connotation than directed task.

- 5. **Hazard Analysis Verification Task (HAV)**: This is a verification task performed by IPP focusing on establishments' hazard analyses, pre-requisite programs, and other supporting documentation.
 - **KEY POINT:** FSIS PHIS Directive 5000.6 has details of how to perform the HAV task, which includes a section on completion of the "Questionnaire" tab in PHIS. IPP are to answer specific related questions in order to complete the inspection task.
- 6. **Task Library**: This is the group of all possible inspection tasks that FSIS personnel will conduct at meat or poultry establishments, import inspection establishments, or

- voluntary inspection facilities. The Task Library is comparable to PBIS's Inspection System Procedures (ISP).
- 7. Task List: This is the specific list of tasks that FSIS expects IPP to schedule and perform at a particular establishment, based on the information in the Establishment Profile. The Task List is comparable to the establishment specific ISP in PBIS, but it will also convey a date range for the task to be scheduled and performed, the number of the individual tasks that should be planned during the period, and the priority level of the task.
- 8. **Task Calendar**: This is the page in PHIS where IPP plan or schedule the tasks that they will perform. The task calendar allows IPP to schedule tasks on particular days, reschedule tasks to different days, and initiate documentation related to the findings of tasks performed, or reasons why tasks were not performed.
- 9. Status options for tasks scheduled onto the Task Calendar include:
 - a. Not opened (shown as blue in the task calendar) This term indicates that IPP have scheduled the task on the task calendar, but have not yet begun to enter results of the task in PHIS.
 - b. **Open** (yellow) This term indicates a task that has been scheduled and IPP have begun to enter results.
 - c. **Completed** (green with checkmark) This term indicates a task that has been scheduled and finished. IPP have performed all necessary verification and entered all results in PHIS.
 - d. **Not performed** (red with "X") This term indicates IPP scheduled a task from the Task List onto the Task Calendar but did not begin the task before the task end date. It may also be a task that has not been entered onto the Task Calendar before the task end date.
- 10. **Non-Compliance (NC)**: This is a finding by IPP during the performance of a verification task that an establishment or facility has not complied with one or more regulatory requirements. IPP are to record each regulatory requirement found noncompliant in the PHIS noncompliance page, and document the specific observations that support the noncompliance finding. Each individual NC is identified as part of its parent NR using the "Record (NR) Number" followed by a /1; /2, and /3.
 - a. Non-compliance status options in the PHIS system are:
 - 1. Open
 - 2. Finalized
- 11. **Non-Compliance Record (NR)**: PHIS generates a noncompliance record (NR) for any non-compliance associated with findings when performing a single verification task. For each task, no more than one NR may be generated. Each NR may contain one or more noncompliances found during a single verification task. An inspection task can have one NR, but that NR may include several separate noncompliances. Each individual NC is identified as part of its parent NR using the "Record (NR) Number" followed by a /1; /2, /3. NR status options in the PHIS system are:
 - a. **Finalized** This term is used when an NR is ready to be issued to an establishment or facility. Note that unlike PBIS, in PHIS IPP can finalize and

- present each individual noncompliance within the NR to establishment management separately.
- Completed This term is used when IPP have verified that the establishment or facility has been brought back into compliance with all the regulations that IPP found non-compliant in an NR.
- 12. Memorandum of Interview (MOI): This document is used to record and convey discussions with establishment or facility management, such as weekly meetings, or document supplier information in the event of Escherichia coli O157:H7 (E. coli O157:H7) and non-O157 STEC positive non-intact beef (or non-intact beef component) samples. In PHIS, this term is synonymous with the way it is used in PBIS. Terms associated with MOI are:
 - a. **Finalized** This term is used (and entered into PHIS) when an MOI is ready to be provided to an establishment or facility, and
 - b. Close (and Cancel) This term is used throughout PHIS, such as with MOIs and NRs, to have the system close a screen or popup window only. It does not mean that the NR is completed or the MOI finalized. In many places, the "cancel" button serves the same purpose.
- 13. **Assignment**: This is the establishment or set of establishments and facilities at which an individual IPP has primary inspection responsibilities on a regular basis. Each IPP can have only one assignment at any given time. IPP may also cover additional assignments on a relief or other temporary basis due to vacancies, training, or emergency leave. Each assignment has its own identifying number. PHIS gives IPP access to the information and tasks for all the establishments in his or her assignment and any additional coverage assignment(s). The PHIS task calendar shows the establishments and tasks for one assignment at a time. If IPP wish to see the tasks for a different assignment, they are to use the assignment filter at the top of the page to select another assignment from those available to them.
- 14. Coverage (covering an assignment): This is a temporary assignment to an establishment or set of establishments and facilities for which IPP have inspection responsibilities. This typically occurs due to vacancies, training, emergency leave, or to provide relief for IPP in regular assignments. When providing coverage, IPP are fully empowered to deliver inspection for plants or the assignment as the IPP officially assigned. More than one IPP can be assigned to the same coverage assignment and an IPP can be assigned to more than one coverage assignment.
- 15. **ADR Animal Disposition Reporting**: This is the set of functions of PHIS which replace the electronic Animal Disposition Reporting System (eADRS) to record numbers, weights, and dispositions of slaughtered livestock and poultry and schedules and submits livestock pathology and KIS residue samples.
- 16. **Directed Sample**: This is a sample request that Headquarters communicates to IPP through PHIS.
- 17. **Collector Generated Sample**: IPP collect samples based on established policies or supervisory concurrence to respond to a specific situation in an establishment. This includes poultry pathology, species identification or % fat content in sausage.
- 18. **Supplier Tracking**: This is the set of functions in PHIS, which replaces Supplier Tracking *E. coli* Positive System (STEPS) to identify suppliers of *E. coli* O157:H7

positive raw materials and initiate follow-up sampling and verification activities at those suppliers.

KEY POINT: The supplier tracking section of PHIS is not currently active. IPP will receive additional notification when they are to begin using supplier tracking. Until then, IPP are to continue collecting supplier information and reacting to STEPS information as before.

VII. PHIS TASK LIBRARY

A. The PHIS task library is a component of PHIS that defines the list of all the different kinds of FSIS verification tasks and defines their characteristics. Staff members in the Office of Policy and Program Development will design and maintain the tasks in the task library. The task library will include the following characteristics of each verification task:

- Name, task code, and description: In PHIS, task names are the common way to distinguish one task from another. Task codes are maintained internally for analytical purposes;
- Priority: Task priorities are expressed on a scale from 1 to 6, with 1 being reserved for emergency tasks, 2 being the highest routine priority, and 6 being the lowest priority. Data Analysis and Integration Group (DAIG) sets task priorities based on analysis of the relative public health importance of each task as listed in Attachment 2;
- 3. Expected frequency: For most routine tasks, the frequencies will be expressed in terms of establishment operating days. Others may be per month, per quarter, or per year. Some directed tasks may have only a number of instances by a specific due date rather than an ongoing frequency. Establishments' actual operations may vary from their profile, which causes PHIS to schedule more tasks than necessary. For example, some establishments may slaughter animals on only one shift but process products on two shifts. Sometimes, the appropriate frequency of a task is based on information that PHIS does not consider. For example, the presence of a functional food defense plan at the establishment changes the desired frequency of food defense verification tasks but PHIS does not consider this information when estimating frequencies. IPP are to follow the appropriate directives or other FSIS policies for determining how often to perform inspection tasks;
- 4. Inspector guidance: Brief guidance on how to perform the task, including links to applicable directives or notices;
- 5. Mandatory regulatory citations: These are the regulatory requirements that must be verified each time IPP perform the task;
- 6. Other regulatory citations: These are additional regulatory requirements that might be verified during the task;
- 7. Specific data to be recorded each time IPP perform the task; and
- 8. What types of establishments the inspection task applies to in terms of establishment profile characteristics, such as HACCP categories and product types.

VIII. PHIS PROFILE - ESTABLISHMENT TASK LIST

A. Each month, PHIS generates a list of tasks based on information in the profile for each establishment. The establishment task list will provide the source of routine inspection tasks to populate the task calendar.

- B. Because PHIS uses the establishment profile information to allocate inspection tasks; it is very important that IPP review the profile and update it as needed to accurately reflect the establishment operations. To access the establishment task list, simply click on Establishment Profile>Select Establishment>Inspection Tasks on the left navigation menu.
- C. When IPP review the establishment profile, they are to consider whether any applicable verification tasks appear to be missing from the establishment task list. PHIS places tasks on the establishment task list based on the information in the establishment profile. If an applicable inspection task appears to be missing, IPP are to first review the establishment profile to make sure the other profile information about the establishment is accurate. If the profile is inaccurate, PHIS may not add the correct tasks to the task list.
- D. Some verification tasks that appear on the establishment task list may not apply to the establishment's operations. IPP are to review the establishment task list when they review the establishment profile and de-select those tasks that do not apply to the establishment's current operations. Likewise, IPP are also to review the tasks that have previously been de-selected to ensure that those tasks still do not apply to the establishment's current operations. When IPP make a change on the establishment task list, PHIS will require them to record a justification for that change. Please refer to the PHIS User Notice and FSIS PHIS Directive 5300.1 for information on how to view or edit the establishment task list in the PHIS profile.
- E. For some tasks, the information in the profile is not sufficient to determine whether the task applies. For example, the Other Consumer Protection task to verify economic wholesomeness of products labeled with "X% added solutions" (04A02) applies only to establishments that use such labels. Because PHIS does not contain that information, IPP are to manually de-select that task in establishments that do not produce products labeled with "X% added solution".
- F. Some tasks are applicable on a temporary or seasonal basis. For example, an establishment produces beef jerky as a heat treated, shelf-stable product (03F) all year round. In October through December, the establishment also produces smoked turkeys as a heat treated, not fully cooked, not shelf-stable product. When the seasonal period of smoked turkey production is over, IPP would have to manually de-select the HACCP verification task for heat treated, not fully cooked, not shelf-stable (03H).).

KEY POINT: PHIS updates the establishment task list approximately once per day, usually overnight. If IPP make changes in the establishment profile information, it will take up to 24 hours for PHIS to make any resulting changes to the task list.

G. If IPP believe the establishment profile accurately represents the establishment's operations and product types, and still believe that an applicable inspection task is missing from the task list, they are to contact the Policy Development Division through askFSIS for assistance.

IX. PHIS TASK CALENDAR AND ROUTINE INSPECTION TASKS

A. PHIS provides a flexible tool for IPP to schedule multiple inspection tasks at one time. The PHIS calendar tool provides information about the tasks that IPP perform at each establishment in a given month. IPP are to use the information provided and their knowledge about the inspection assignment to schedule their inspection tasks each month. At the end of each month, IPP will designate any scheduled tasks (blue) that they did not complete as "not performed" and provide a justification by selecting from the list of reason codes provided in PHIS.

B. PHIS pro-rates the frequency for most routine inspection tasks based on the anticipated number of days each establishment will operate during a given month. PHIS makes an initial

calculation of the expected number of tasks based on each establishment's approved operating hours in the profile. For establishments that choose not to operate on one or more of their approved operating days, IPP are to mark those days as "inactive" on the PHIS task calendar.

C. For example, Establishment A is approved to operate Monday through Friday, 6 AM to 2:30 PM. However, during the summer, the establishment receives fewer orders; so management elects not to operate on Fridays in July and August. The inspector assigned to Establishment A marks those Fridays as "inactive" on the PHIS task calendar. Therefore, PHIS plans fewer instances of each inspection task to be performed during July and August because of the reduced number of operating days.

D. IPP are to use the PHIS task calendar page to schedule their inspection tasks. The task calendar page contains 3 sections: filter task list; task list; and calendar. On the task list, PHIS will display the tasks expected to be performed in each establishment within the inspection assignment. The establishment task list default view is domestic tasks (not including sampling tasks). IPP are to use the "Filter Task By" box to look at both domestic tasks and sampling tasks assigned to the establishment. The calendar task list provides information about each inspection task to IPP as they schedule tasks. The calendar task list will provide the following types of information:

1. Task name;

- 2. Priority: In situations where IPP are unable to complete all tasks in a given month, they are to use the priority scale to decide which tasks are more important to complete. Lower numerical priority values indicate more important tasks. In other words, it is more important to complete a priority 2 task than a priority 6 task. At the end of the month, if any tasks remain incomplete, they should generally be the lowest priority tasks;
- 3. Expected number (# planned): PHIS will consider the available information about the establishment's operating schedule and the intended frequency of each task to estimate how many instances of each task should occur during the month. Establishments' actual operations may vary from their profile, which causes PHIS to schedule more tasks than necessary. IPP are to follow the appropriate directives or other FSIS policies for determining how often to perform inspection tasks;
- 4. Number scheduled: As IPP schedule instances of each inspection task on the calendar, this field will keep track of how many have been scheduled. At the end of each month, the number scheduled should equal the expected number of instances for each routine task unless IPP determined that fewer of that task were needed based on applicable policies;
- 5. Start Date/End Date: These dates show the period during which the inspection task is to be performed the specified number of times. For most tasks the date range will correspond to a single month. For other tasks, the date range may include 3 months or more. IPP are to schedule the specified number of instances of the task before the stated end date. The calendar task list will display tasks for the current month and the next month. These will be indicated by the start date and end date; and
- 6. Number completed: As IPP perform their inspection tasks and enter results, the tasks will be designated as complete. As the tasks are marked complete, the "number completed" field will track them. In the ideal situation, when an inspector is able to complete all expected tasks in the month, the number completed will match the number scheduled and the number expected.

E. IPP are to use the above information about each task to schedule those tasks on the calendar. IPP should develop a method for preparing the task calendar that works best for them to achieve this goal. For instance, IPP may prepare a monthly calendar of inspection tasks for each establishment. On or before the first day of each month, IPP add all the expected number of instances of the routine tasks to the calendar. Alternately, IPP may decide to add instances of the routine tasks at the beginning of each work week. In either case, IPP are to use the following principles when scheduling tasks:

NOTE: PHIS provides several tools to help make it easier for IPP to schedule their assigned work. However, IPP are to adjust or rearrange the scheduled tasks as necessary throughout the month to adapt to changes in establishment operations and to make sure they perform the highest priority tasks that apply to the establishment.

- 1. IPP are to use their knowledge of establishment operations to schedule tasks when the applicable establishments will be operating and, if appropriate, will be producing the applicable product type;
- 2. IPP are to use their knowledge of travel times and other inspection duties to schedule tasks on days they expect to be able to perform them;
- 3. IPP are to avoid predictable patterns of scheduling tasks as much as possible. IPP are to schedule tasks on different days of the week throughout each month to prevent establishments from being able to predict when certain tasks will occur;
- 4. In cases where IPP become aware that they will not be able to complete all the tasks for the month, they are to give preference to higher priority tasks (with priority 1 being the most important, priority 2 the next most important, and so on);
- 5. In multi-inspector assignments, IPP are to coordinate their efforts to ensure that each inspector understands which tasks are his/her responsibility. If multiple IPP will participate in the same verification activity on a given shift, they are each to record the task performed and their individual results. In these cases, one inspector may record performance of the routine task and the other inspector(s) are to add a directed instance of the task to record their results; and
- 6. It is important that IPP do not schedule too many tasks on a given day or too many tasks in an individual establishment on a given day, as IPP will receive an advisory when they schedule more than 7 hours of tasks in one day. IPP may continue to schedule additional tasks beyond the seven hour limit if they can get those tasks done within their intended work hours for the shift (including any overtime). IPP are to schedule some tasks (work) in each establishment that is operating on a given day.

NOTE: At a minimum, IPP are to perform an operational Sanitation SOP verification task (recordkeeping or review and observation) in each establishment for each shift that it is operating.

- F. At the beginning of each workweek, IPP should ask establishment management what operations will be conducted and what products will be produced during the week. Based on the information provided by the establishment, IPP should re-schedule or remove inspection tasks as appropriate. In scheduling tasks IPP are to:
 - 1. Perform one Sanitation SOP verification task at each establishment each day;
 - 2. Perform the appropriate HACCP Verification, Humane Handling or Good Commercial Practices tasks as guided by the priorities as communicated

through the Establishment Task List and Calendar (See <u>Attachment 2</u> - Task Priority List); and

- 3. Collect and submit samples as directed through PHIS.
- G. IPP can schedule tasks on multiple days in a calendar month at one time. The available days in the calendar month will correspond with the Operating Schedule entered in PHIS in the "Establishment Profile" and any periods of inactivity recorded in the profile or on the task calendar. In the process of scheduling tasks IPP have two options: (1) elect to use the "schedule current months task" button or (2) choose the appropriate task (active time period) from the task calendar.
 - 1. If a Consumer Safety Inspector (CSI) expects to be in a particular assignment (or covering an assignment) for the whole month, he/she may elect to use the "schedule current month tasks" button on the task calendar. When a CSI clicks this button, PHIS will automatically schedule tasks on the CSI's calendar according to these rules:
 - a. The schedule current month tasks button does NOT schedule sampling tasks. IPP are to continue scheduling sampling tasks manually.
 - b. PHIS will only schedule tasks for an establishment on a day when the calendar indicates the establishment is active. (Therefore, IPP might find it beneficial to mark days active/inactive before clicking the button).
 - c. PHIS will schedule at least one task at each establishment in the assignment on each day that establishment is active; scheduling higher priority tasks first.
 - d. PHIS will not schedule more than an estimated 7 hours of tasks in one day for an individual inspection personnel. IPP may manually schedule additional tasks beyond the 7 hours. Note that PHIS observes the 7 hour limit per individual inspection personnel per day even if the individual is covering multiple assignments. Therefore, when an individual covers multiple assignments, it may be more efficient to schedule his/her tasks manually.
 - e. If an assignment includes multiple CSI positions, PHIS will give each CSI who clicks the "schedule current month tasks" button a proportional share of the tasks for the assignment. Each CSI in the assignment will have to click the button to have his or her share of the tasks scheduled.
 - 2. The second option IPP have to schedule tasks is to choose the appropriate task (active time period) from the task calendar. In this process IPP can schedule tasks by conducting the following:
 - a. Click "add" under the routine column to activate the calendar month popup browser, which will show the establishment name, task code/name, active period and remaining number of tasks to schedule. The calendar displays the days for IPP to randomly select and schedule the task. The available days reflect the establishment's anticipated operating schedule.
 - b. Alter the available days, as necessary, using the active/inactive feature on the task calendar. IPP can schedule one task, several tasks, or all the remaining routine tasks for the month at once by entering the desired number of tasks in each day of the calendar popup window. IPP can also schedule as many directed instances of a task by the same method.

- c. For a given day, place the appropriate number in the box corresponding with the randomly selected day (e.g., place a "1" in the box, indicating that one task should be scheduled for the selected day).
- d. Alternately, use the calendar popup window to schedule tasks on the same day each week using the day-of-week boxes at the top of the calendar popup window.
- e. For a given day of the week, IPP put the desired number of tasks for that day in the box and click the check box next to the day of the week. For example, IPP would click the check box for Tuesday and put "1" in the box for Tuesday to schedule one task each Tuesday of the month.
- f. Once scheduling of tasks has been completed for the calendar month, click "save" and the scheduled tasks will automatically populate to the task calendar.
- g. If there are any additional tasks that need to be scheduled, IPP can go to the calendar to add them to the particular day.
- H. Planned frequencies of PHIS tasks do not always reflect actual establishment operations. In cases where establishment operations require fewer instances of a task, IPP are to mark scheduled tasks as not performed. In cases where establishment operations require additional instances of a task, IPP are to initiate directed instances of the appropriate tasks in accordance with applicable policies.
- I. The task calendar allows flexibility to re-schedule tasks during the month to adapt to changing conditions as necessary. If IPP are unable to complete scheduled tasks (i.e. blue status) during the month, they are to use the calendar to re-schedule those tasks for later in the month. At the end of the month, IPP are to record any tasks not yet begun (i.e. blue status) as "not performed" in PHIS and select the appropriate reason code. There are two ways to designate an inspection task as "not performed" in PHIS:
 - 1. From the PHIS task calendar:
 - a. Right-click on the inspection task in the PHIS task calendar and select "Justification".
 - c. In the Task Status pop-up window, select a reason from the dropdown list.
 - d. Click "save" and then "close".
 - 2. From the Inspection Verification menu:
 - a. Click on the Inspection Verification menu on the left navigation panel.
 - b. Click the Select Establishment sub-menu and click the radio button to select the desired establishment.
 - c. Click the Inspection Task List sub-menu and find the desired task.
 - d. Click the icon in the "Status" column.
 - e. Select the appropriate reason in the Justification drop-down on the Task Status page.

Click "save" and then "close". 3. The available choices to justify a task as "not performed" are: a. Double covered assignments; b. Triple covered assignements; c. Too many plants to physically go to each plant; d. Working the slaughter line; e. Plant not operating Process/product not available; g. Assigned other duties; h. Not enough time to complete the task; Higher priority task too precedent; Plant not visited; k. Task assigned to another inspector; Weather related issues; m. Safety concerns; n. Administrative duties; o. Work unit meetings; p. Plant under review; q. Traffic related delay; IPPS review; s. TEAM meetings; Training; u. Unable to log into the system (aka connectivity); v. Short staffing; w. Computer issues; and

x. Russian reviews.

NOTE: Once a task has been marked as "not performed" the status cannot be changed.

J. As the month progresses, IPP are to revisit the task calendar daily to check for newly added directed procedures including sampling requests, export certification requests, or other directed procedures (see Section XI, below).

KEY POINT: When the needs of FSIS require it, IPP may be instructed to cover additional establishments or assignments for a vacancy or when the assigned inspector is on leave. PHIS allows IPP, when instructed through their supervisory chain, to select other inspection assignments using the Coverage Assignments menu to display on their task calendar in PHIS (See Section XI. below). IPP will then be able to display either their regular assignment tasks or the tasks for the covered assignment on their PHIS task calendar. IPP will want to make sure they have the right establishment and shift showing before scheduling their assignments.

X. DIRECTED INSPECTION TASKS

A. PHIS may add additional inspection tasks to the calendar task list throughout the month. These added tasks may include the following types of tasks:

- Directed tasks: Directed inspection tasks are those that do not occur on a routine basis in all establishments under normal circumstances. FSIS initiates these tasks in response to inspection findings, laboratory results, or other information that requires follow-up verification activity;
- 2. Sampling requests: PHIS adds sampling requests to the task list based on the domestic establishment sampling programs for which the establishment is eligible or as follow-up samples in response to other findings. IPP are to refer to <u>FSIS Directive 10,210.1</u> for more information on sample programs. IPP are to refer to <u>FSIS Directive 13,000.2</u> for instructions on scheduling and recording information about sample collection;
- B. PHIS may add a directed inspection task in several ways.
 - 1. In some cases, PHIS will automatically add a directed task to the task list in response to certain information or laboratory results within the system.
 - 2. Alternately, FSIS Headquarters personnel may add directed tasks to one or more establishments based on identified needs.
 - 3. IPP are to initiate directed tasks when they have a reason to perform an additional instance of a routine task. In other words, IPP are to initiate an additional instance of one or more of the routine procedures in the calendar task list when they are instructed to perform a task at a higher frequency than the routine frequency in PHIS. For example, in poultry slaughter establishments, Directive 6420.2 instructs IPP to perform a zero tolerance verification task twice per shift for each slaughter line. The routine poultry zero tolerance task in PHIS has an expected frequency of twice per shift without regard for the number of slaughter lines. Therefore, in establishments with multiple slaughter lines, IPP are to schedule additional instances of this task as directed tasks to meet the instruction in the directive.
 - 4. IPP are also to initiate directed tasks when appropriate based on conditions observed in the establishment. For example, if while walking through the establishment performing other duties, an inspector observes a noncompliance with the sanitation performance standards (SPS), the inspector is to initiate a directed instance of the SPS verification task to record the findings and document the noncompliance.
 - 5. IPP can also schedule as many directed instances of a task by using the same

method as described for routine tasks. When scheduling directed tasks, IPP must remember to select a reason from the dropdown at the bottom of the calendar popup window. IPP will only be able to add multiple directed tasks with the same reason on the calendar from the list.

- D. IPP are to check the calendar task list at least daily to be aware of any new sampling or export tasks that have been added to the task list. When these types of tasks appear in the task list, IPP are to schedule them on the calendar using the same principles as for routine tasks in section VIII above. Some directed tasks will have an end date before the end of the current month. IPP are to ensure that they schedule directed tasks so that they can be completed before the applicable end dates.
- E. When scheduling directed inspection, sampling, or export tasks, IPP are to consider the priorities of the new tasks relative to the tasks already scheduled on the calendar to ensure that they still complete the most important tasks by the end of the month.
- F. If IPP determine that they will not be able to complete all high priority tasks or all directed tasks by the applicable end dates, they are to discuss the situation with their immediate supervisor as soon as possible. The supervisor will be able to advise IPP on how to best arrange the necessary tasks or may be able to spread the necessary work to other agency personnel.
- G. Periodically, IPP may receive alerts through PHIS that will appear on their home page. The alerts will inform inspectors of certain findings in the data related to the establishment, or instruct them to perform certain tasks or take other action. For example, an alert may inform IPP that a Headquarters directed task is approaching its due date. IPP are to respond to these alerts according to the alert instructions.

XI. COVERAGE OF ASSIGNMENTS

A. PHIS maintains information about IPP in-plant assignments and the information available to a PHIS user is constrained by his/her work assignments. However, in many cases, IPP are tasked with covering assignments other than their permanent assignment. The most obvious case is relief inspectors, but many other IPP will temporarily cover other assignments on occasion. To receive and enter the necessary information to cover other assignments, IPP must be designated as covering those assignments in PHIS. This temporary coverage does not disrupt the permanent assignment structure, but allows IPP to interact with PHIS while providing temporary coverage of another employee's duties. These coverage relationships can be set up within PHIS on a long term basis and only used when needed, or they can be set up only when the coverage occurs. PHIS includes two mechanisms by which temporary coverage can be designated.

- B. At the District Office level, the supervisory resource management analyst (SRMA) and/or resource management specialist (RMS) can directly designate individual employees to provide coverage in the Assignments page of PHIS. For import inspection personnel, the Office of International Affairs/Office of Assistant Administrator (OIA/OAA) handles assignment coverage responsibilities. When there are predetermined coverage situations like temporary duty assignments for relief inspectors or coverage for pre-approved leave periods, the SRMA/RMS or OIA/OAA (for imports) will add the applicable employees to the coverage for the assignments within the resource management section of PHIS.
- C. For more immediate and unforeseen situations that necessitate temporary coverage of assignments, IPP have access to a page in PHIS called "Coverage Assignments." When IPP are instructed to temporarily cover another employee's duties they are to use the "Coverage Assignments" page to select the specified assignments and add them to their coverage list.

D. When one or more coverage assignments have been set up for an IPP, whether by the SRMA/RMS, OIA/OAA (for imports), or by the inspector, those covered assignments will be available to that inspector through the PHIS task calendar and Inspection Verification menus. On the task calendar page, IPP are to use the blue "Filter Inspection Task List" section at the top of the page to select an assignment from the available choices. The establishment task list and task calendar will then display the information for that assignment and allow the inspector to schedule tasks and enter results for that assignment. When IPP are finished working in the covered assignment, they are to use the "Filter Inspection Task List" again to select their regular assignment.

E. When IPP cover an assignment, they are to review the tasks already scheduled for that assignment and the remaining tasks on the task list and make sure they complete tasks that are already in progress (open tasks) as well as tasks that are not yet started (not opened or not scheduled yet), focusing first on the higher priority tasks. If IPP are covering multiple assignments at the same time, they are to ensure that they focus on the highest priority tasks first and then complete lower priority tasks if time permits.

XII. DOCUMENTING TASK RESULTS

A. Once IPP have performed an inspection task, they are to record the results of that task in PHIS. IPP are to open the results page for the specific inspection task and enter their verification results in the appropriate fields. PHIS allows inspection tasks to extend over more than one day. IPP may enter partial results on one day and then return to the task to enter the remaining results on a later day. IPP are to indicate which of the available regulatory requirements they verified while performing the task. PHIS will not allow an inspection task to be marked as complete until IPP indicate that they have verified all mandatory regulatory requirements. Once IPP have entered all necessary results, they are to mark the task as completed.

B. When IPP observe noncompliance during an inspection task, they are to indicate noncompliance on the regulations tab of the task results and click "save." PHIS will then allow them to document a noncompliance record (NR). (See <u>Attachment 3</u> on documenting noncompliance in PHIS).

C. When appropriate, IPP may document findings that do not represent noncompliance in the "Findings" tab of the task results page. When IPP verify that an establishment's corrective actions met applicable regulatory requirements, they are to describe the observations that led them to conclude that the establishment's corrective actions met the requirement. In other cases, IPP may choose to document observations that do not support noncompliance, but should be communicated to establishment management. If the findings should be communicated to establishment management, IPP are to document a memorandum of interview (MOI) from the task results page.

XIII. DISCONNECTED STATE

A. If PHIS is not functioning for any reason, IPP are to use the disconnected state application (DCU). If IPP have synchronized frequently and have scheduled their tasks in advance, they should be able to document the results of those tasks in the disconnected state. If the disconnected state does not work, IPP are to perform a selection of tasks that are appropriate for the establishment, remembering to favor higher priority tasks as set out in Attachment 2. IPP are to record notes on paper to document the tasks performed and the resulting findings. Notes are to be kept in a secure location in the inspection office. As soon as PHIS is again available, IPP are to document the task results in PHIS. IPP are to refer to Attachment.2 about how to prioritize inspection tasks. If certain inspection tasks cannot be performed due to PHIS

being unavailable, IPP are to record those tasks as not performed as instructed in Section IX, part I.

KEY POINT: Import assignments do not have access to the Disconnected State. Import inspection personnel will refer to FSIS Directive 9500.1 when PHIS is not functioning.

XIV. SPECIAL CONSIDERATIONS FOR PHIS ISSUES

A. At times, IPP may encounter problems using PHIS. <u>Attachment 1</u> is a guidance document that consists of an itemized table divided into three categories to which IPP can utilize as a tool to determine who will handle their PHIS issues.

B. If IPP experience problems using PHIS, they are to enter their issues into Footprints or call the Service Desk at 1-800-473-9135 so their problems can be resolved quickly. For instructions on how to enter a Footprints ticket, visit

https://inside.fsis.usda.gov/fsis/DocumentViewerServlet?filename=FSISIntranet/Inspection/Documents/fsisprdb20110617023602.docx.

- C. Once IPP submit a ticket into Footprints, the PHIS Incident Management Response Team (IMRT), comprised of PHIS subject matter experts, will categorize the issue and assign it to 1 of the 3 listed areas: OFO T3 District Offices, OPPD, or IT group for resolution.
 - 1. If the issue is a user misunderstanding and requires in-person coaching, the team will send it to the appropriate T3 District Office group for resolution. The T3 District Office group is comprised of employees nominated by each district, mostly from OFO, who have the software capabilities to help navigate PHIS users through any screens that may be giving them trouble. Import related T3 issues are being directed to the designated OIA representative.
 - 2. Policy related issues will be forwarded to Office of Policy and Program Development (OPPD).
 - 3. Computer-related and PHIS system issues are handled by the PHIS IT Group for prioritization and analysis. FSIS will communicate PHIS fixes through an Agency-wide user notice, when available. Import computer related issues are handled by designated OIA representatives.

XV. SUPERVISORY RESPONSIBILITIES

A. The supervisor plays a key role in ensuring that decisions made by IPP are consistent with FSIS statutory authority, regulatory requirements, and Agency policy, and that duties are performed in accordance with the prescribed inspection methods and procedures addressed in all applicable FSIS directives.

- B. FSIS supervisory personnel are to discuss how to schedule tasks in PHIS with IPP, as described in this directive, to ensure that IPP understand how to follow the listed principles to schedule their tasks in an effective and efficient manner.
- C. Supervisory personnel are to ensure that IPP correctly apply the procedures described in this directive, verifying applicable regulatory requirements, making informed decisions, properly responding to updated information and directed tasks, and completing the work as expected.
- D. Supervisory personnel should refer to the current version of the <u>FSIS Guide for Conducting</u> <u>In-Plant Performance System (IPPS) Assessments</u> for additional guidance and instructions.

XVI. DATA ANALYSIS

On at least an annual basis, the Data Analysis and Integration Group (DAIG), within the Office of Data Integration and Food Protection (ODIFP), will analyze completion rates and results of sampling tasks in conjunction with other FSIS data sources and outside public health information. The DAIG will also perform analyses on an ad hoc basis, as necessary. Additionally, based on this analysis, DAIG will make recommendations regarding the relative priorities and frequencies of sampling tasks to address identified public health issues.

Direct questions concerning this directive to the Policy Development Division (PDD) through askFSIS at http://askfsis.custhelp.com or call 1-800-233-3935 and follow the prompts.

Acting Assistant Administrator

Office of Policy and Program Development

Attachment 1: PHIS IMR Guidance Document

A. This guidance document is for inspection program personnel (IPP) who use the Public Health Information System (PHIS) and encounter problems while using PHIS, review this document to choose the <u>next step</u>. Choosing the correct next step will help direct IPP and assist the PHIS IMR group to resolve the issue.

B. The problems the PHIS IMR group assist with generally fall into three categories: 1) IPP need information on how to use PHIS, 2) PHIS computer problems and 3) To better understand the inspection policy. The following table provides examples of these three categories and IPP's next step, that is, who to contact:

	You need information on how to use PHIS	You have PHIS computer problems	You want to better understand the inspection policy
Example Issues You Might Encounter	I can't find? I need help with the User's Guide. Why am I missing HACCP tasks? How do I remove a task from the task calendar? How do I add information to my MOI? How do I add assignments to my task calendar? How do I use the ADR function?	My e-auth access is not working. Error messages! Your connection to PHIS is not working. "run-out/server application error" message. Your MOI is missing information. Unnecessary symbols appear in your printed documents. Suggestions on how to improve PHIS functions.	I don't understand a part of the Directive (or Notice). Do I follow what is written in the Directive? My inspection team and I disagree. The establishment disagrees with my action. What do I verify when performing a task? What types of products fall under the Raw Intact Category?
Your Next Step Contact	Your Supervisor or knowledgeable co- worker	Footprints or call the Service Desk at 1-800-473-9135	Consult with your supervisor first, then AskFSIS or call OPPD at 1-800-233-3935.

ADDITIONAL RESOURCES

Check here to find Updated <u>PHIS training materials</u> and Users Guides. Read a PHIS article from the <u>Small Plant News</u>.

Attachment 2: Prioritization of Procedures

- Priority 1 High
 - Reserved for emergency directed procedures
- Priority 2 High
 - All Verification and Follow up Sampling for
 - E. coli O157:H7 and other strains of Shiga Toxin-producing E. coli (STEC) in raw beef products
 - Listeria monocytogenes sampling in ready-to-eat products
 - Salmonella (as directed)
 - All pre-operational and operational Sanitation SOP tasks
 - Humane Handling and Good Commercial Practices Tasks

Priority 3 Medium

- All Other Sampling (i.e. residues, pathology)
- Sanitation Performance Standards and Sanitary Dressing verification tasks
- Hazard Analysis Verification Tasks
- Slaughter HACCP verification tasks and zero tolerance verification tasks

Priority 4 Medium

- Raw, non-intact (i.e. ground) HACCP verification tasks
- Raw intact HACCP verification tasks
- Fully cooked, not shelf-stable HACCP verification tasks
- Heat treated, not fully cooked, not shelf-stable HACCP verification tasks

Priority 5 Low

- Thermally processed, commercially sterile (i.e. canning) HACCP tasks
- Not heat treated, shelf-stable HACCP verification tasks
- Heat treated, shelf-stable HACCP verification tasks
- Secondary Inhibitors HACCP verification tasks
- Custom/Retail exemption verification tasks
- Review/Update establishment profile and establishment meetings

Priority 6 Low

- Generic E. coli verification tasks
- Economic wholesomeness verification tasks
 - Percent Yield/Shrink
 - X Percent Solution
 - MSS/MSP/PDBFT/PDPFT/PDCB/AMRS
 - Batter/Breading
 - Livestock Finished Product Standards
 - Poultry Finished Product Standards
- Labeling verification tasks
 - Labeling Product Standards
 - Child Nutrition/Grade Labeling/Declared Count/Vignette
 - Labeling Net Weights
 - General Labeling
- Export tasks
- Food Defense Procedures

Attachment 3: Documenting Noncompliance

Inspection Task status:

	Status in PHIS	Definition	
Inspection Procedure (Task)	Not Open	Task has been added to inspector's task calendar	
		Verification component option has NOT been selected in PHIS	
	Open	Verification component option has been selected in PHIS	
		IPP have begun to enter results	
	Completed	All verification has been performed and all results have been entered for the procedure	
		• If an NR was issued, the NR's status has been updated to "completed"	
		"Inspection completed" box has been marked on "the inspection results" page for the procedure	

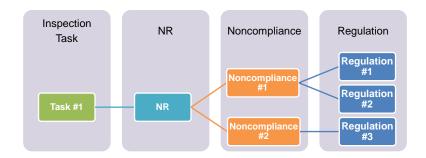
Noncompliance status:

	Status in PHIS	Definition
Noncompliance (NC)	Open	A noncompliance has been documented on an NR
	Finalized	The noncompliance is ready to deliver to establishment management
Noncompliance Record (NR)	Open	An NR has been created in PHIS
	Completed	All of the mandatory regulations have been verified
		The establishment has brought itself into compliance with the regulations for each noncompliance in the NR

Business Rules

PHIS enforces the following business rules:

- There is a maximum of one NR per Inspection Task
- There may be one or many Noncompliances per NR
- There may be one or more non-compliant Regulations per Noncompliance



NR and Associated Noncompliances

Case 1:

Activity	Monday	
Inspection Task	Initiate 1	Complete 6
NR	Create 2	Complete 5
Noncompliance	Add 3	Finalize 4

- 1. Initiate / claim the Inspection Task
- 2. Create the NR
- 3. Add a Noncompliance (associated to one or more Regulations)
- 4. Finalize the Noncompliance (finalize, print, sign, and provide)
- 5. Complete the NR (after all verification performed / verifying return to compliance)
- 6. Complete the Inspection Task (after all results entered)
- There is a maximum of one NR per Inspection Task
- There may be one or many Noncompliances per NR
- There may be one or more non-compliant Regulations per Noncompliance

NR and Associated Noncompliances

Case 2:

Activity	Monday	
Inspection Task	Initiate 1 Complete 6	
NR	Create 2 Complete 5	
Noncompliance	Add / Finalize 3	
Noncompliance	Add / Finalize 4	

- 1. Initiate / claim the Inspection Task
- 2. Create the NR
- 3. Add the 1st Noncompliance (associated to one or more Regulations) Finalize the 1st Noncompliance (finalize)
- 4. Add the 2nd Noncompliance (associated to one or more Regulations) Finalize the 2nd Noncompliance (finalize, print, sign, and provide)
- 5. Complete the NR (after all verification performed / verifying return to compliance)
- 6. Complete the Inspection Task (after all results entered)

NR and Associated Noncompliances

Case 3:

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Activity	Mon	Tue	Wed	Thu
Inspection Task	Claim 1	Open		Complete 7
NR	Create 2	Compliance Verified 5 →		Complete 6
Noncompliance	Add / Finalize 3	Finalized		
Noncompliance		Add / Finalize 4	Fina	lized

- 1. Initiate / claim the Inspection Task
- 2. Create the NR
- 3. Add the 1st Noncompliance (associated to one or more Regulations) Finalize the 1st Noncompliance (finalize)
- 4. Add the 2nd Noncompliance (associated to one or more Regulations) Finalize the 2nd Noncompliance (finalize, print, sign, and provide)
- 5. Verify return to compliance
- 6. Complete the NR (after all results entered)
- 7. Complete the Inspection Task