

# FSIS Strategic Implementation Plan for Strengthening Small and Very Small Plant Outreach

2006-2007

## *Executive Summary*

### **FSIS Strategic Implementation Plan for Strengthening Small and Very Small Plant Outreach**

#### **Background**

In December 2005, the International HACCP Alliance hosted a strategic planning meeting of its members to consider the needs of small and very small plants. Government Agency personnel, including the FSIS Administrator, also participated in this meeting. The International HACCP Alliance includes over 120 members from nine countries representing industry associations, professional associations, educational foundations, universities, third party/private companies, and government cooperators. The members have worked to standardize industry's HACCP training efforts, develop uniform position on implementing HACCP, and working cooperatively with FSIS and other regulatory agencies. As a result of the December meeting, the following needs were shared with the FSIS Administrator and Executive Management Team.

- Acceptable supporting documentation for HACCP and other food safety programs
- Summary of questions and answers and Agency information
- Development of additional guidance documents
- Provide educational opportunities for both Agency and industry personnel
- Ensure a consistent message is being delivered
- To ensure that small and very small plants understand the appeal process and their right to appeal

In response to the listening sessions and the needs identified at the International HACCP Alliance meeting, the FSIS Administrator charged an ad hoc task force made up of members from all FSIS program areas to develop the Agency's response to the needs of small and very small plant owners and operators.

The task force met in January/February of 2006 and developed a strategic implementation plan to respond to the information small and very small plant needs. A copy of the strategic implementation plan was posted on the FSIS web site. The plan was shared at the summer meeting of the National Advisory Committee for Meat and Poultry Inspection. The reactions to the strategic implementation plan were very positive.

#### **Outreach accomplishments for FY 2006**

Here are some highlights of the accomplishments of the task force from February 2006 to September 2006.

- Established a group at the Technical Service Center to respond to technical questions from small and very small plants (toll free number 1-800-233-3935 or email [techcenter@fsis.usda.gov](mailto:techcenter@fsis.usda.gov)).

- Issued guidance on the appeals process to help small and very small plant owners and operators understand how to appeal an inspection decision.
- Initiated the Regulatory Education Sessions that bring industry and inspection personnel together to hear a common message about the regulations. These sessions are announced through the *Constituent Update* and on the FSIS web site. The sessions started in June on a pilot basis. By the end of September, 16 sessions were completed. The average attendance is 35 participants, with 60% from industry and 40% inspectors. Feedback shows that 86% of participants indicate that the sessions met their expectations, and 94% said they would recommend the sessions to others.
- Started proactive EIAO visits to small and very small plants to explain the purpose and process for conducting Food Safety Assessments and to offer resources to plant owners and operators to help them be prepared for the assessments.
- Shared information with small and very small plant owners and operators on how to contact USDA's Rural Development Agency regarding low interest loans for small businesses, and established a link to the Rural Development Agency's web site from the FSIS web site.
- Collaborated with the Cooperative State Research Extension and Education Service (CSREES) to identify a proposal with Extension personnel from the northeast that focuses on research related to the needs of small and very small meat, poultry, and egg processors to explore training needs related to food safety.
- Collected feedback on the Technical Service Center from users through a Federal Register Notice.
- Obtained feedback on how to design food defense materials to meet the needs of small and very small plant owners and operators.
- Initiated the development of a small/very small plant section for the FSIS web site.
- Developed a small/very small plant start up package to help owners and operators apply for a grant of federal inspection.
- Started the process to submit articles to trade publications to deliver outreach messages and solicit feedback from user groups.
- Established a clearinghouse to coordinate and issue commonly asked Q&As.

- Established a process for assessing overturned appeals and make information on the lessons learned from overturned appeals available to industry and inspection personnel.
- Gathered information about the needs of small and very small plant owners and operators.

### **Guiding strategies**

The task force recommended that the Agency implement the following guiding strategies to respond to the needs of small and very small plants and to strengthen outreach efforts.

One stop customer service: Develop a coordinated, easily accessible, consistent, and customer-oriented outreach program that provides small and very small plants with “one stop” service for obtaining information (technical, grant of inspection, validation, etc.), technical assistance, and answers to achieve compliance and promote food safety and food defense.

Technical resources: Provide a full range of technical resources targeted to meet key needs of small and very small plants to help improve the quality of food safety and food defense plans. Technical resources are clear, easily understood, continually reviewed and updated, meet rigorous scientific standards, and are accessible through the “one stop” service.

Education/training: Provide access and resources to support ongoing teaching/education for small and very small plants, and ensure that employees and partners have training that equips them to effectively assist in outreach activities.

Partnerships: Develop and expand active partnerships with industry, academia, consumers, federal, State, and international public health partners to support our outreach strategies.

Needs assessment: Use multiple strategies to conduct ongoing, regular activities to determine the needs of small and very small plants, and modify efforts to target the needs identified.

Evaluation: Establish performance measures for small and very small plant outreach that are used for short and long-term planning, and actively evaluate results to demonstrate the value added by outreach activities.

Resource/budget: Leverage existing resources so that they are efficient and effective, and demonstrate Agency commitment to support small and very small plant outreach efforts.

Efforts are underway to communicate with FSIS employees and to ensure they are involved and understand the importance of their role in outreach to small plants, realize the potential benefit, and actively participate in Agency activities.

### **Implementation Plan**

In order to implement these recommendations, the task force developed a strategic implementation plan. The plan is attached. The implementation plan outlines action steps and proposed timelines for implementing the guiding strategies recommended to strengthen FSIS outreach for small and very small plants. The action plans shows what was accomplished during FY 2006 and outlines the activities planned for FY 2007.

### **Communication Plan**

The task force also developed and implemented a communications plan to announce the actions FSIS will take to strengthen its outreach efforts. The communication plan covered the types of activities and messages that needed to be delivered to internal and external stakeholders to raise awareness of FSIS outreach activities. The communications plan was implemented in May 2006 when the Agency made a public announcement of this initiative.

**OBJECTIVE: One-stop service, easy access.** FSIS provides small and very small plants with coordinated, one-stop service for obtaining consistent information, technical assistance, and answers, in order to enhance regulatory compliance and promote food safety and food defense. The customer-oriented service is fully accessible.

Major Activity		Lead
<p>Establish a team at the Technical Service Center to provide support to respond to calls, faxes, and e-mails from small and very small plants.</p>	<p><b><u>Completed in FY 06</u></b></p>	
	<p><b>Key Action Items</b></p>	
	<p>Identify ad hoc team to serve the needs of small/very small plants.</p>	TSC
	<p>Define the team’s functions including linkages to SIPO and other staffs.</p>	TSC
	<p>Establish and implement a system to route small and very small plants to the TSC 1-800 toll free telephone number using the new phone system, and to the TSC email address for technical assistance.</p>	OCIO
	<p>Draft initial standard operating procedures for workflow describing how FSIS will respond to and track inquiries.</p>	TSC
	<p>Draft initial customer service standards for the ad hoc team.</p>	TSC
	<p>Collaborate with the Meat and Poultry Hotline to benchmark best practices.</p>	TSC
	<p>Announce and pilot the ad hoc team approach to serve the needs of small and very small plants.</p>	TSC
	<p>Modify SOPs and customer service standards based on pilot results.</p>	TSC
	<p><b><u>Planned for FY 07</u></b></p>	
	<p>Develop recommendations and a plan for the Management Council decision on long-term implementation covering staffing and resource issues.</p>	Administrator’s designee
	<p>Officially designate a section of the TSC to better serve the needs of small and very small plants.</p>	TSC

**OBJECTIVE: One-stop service, easy access.** FSIS provides small and very small plants with coordinated, one-stop service for obtaining consistent information, technical assistance, and answers, in order to enhance regulatory compliance and promote food safety and food defense. The customer-oriented service is fully accessible. (continued)

Major Activity		Lead
Develop a web gateway to enhance small and very small plants with internet access to information and guidance on regulatory compliance, public health safety and food defense.	<b><u>Completed in FY 06</u></b> <b><u>Key Action Items</u></b>	
	Designate an “owner” of the small/very small plant web pages to ensure there is a link to all existing resources that serve the needs of small/very small plants.	SIPO
	Review the existing site and prepare it for the roll out announcement of the resource.	SIPO
	Develop and roll out a communications plan that announces the web page and email address.	SIPO
	<b><u>Planned for FY 07</u></b>	
	Develop a rotating ad for the FSIS homepage signifying the small/very small plant outreach web gateway.	SIPO
	Establish a reporting mechanism with OCIO that provides a count of the number of hits to the web page on specific topics of interest to small and very small plants.	SIPO
	Establish a working group that continually improves and updates the small/very small plant web pages based on feedback from users, including a link to Q&As, and a draft web gateway to pilot for usability.	SIPO
	Determine the number of small/very small plants that have internet access.	OFO
	SIPO	
Plan, build, and implement an extranet that allows small/very small plants to customize their FSIS web services.		

**OBJECTIVE: One-stop service, easy access.** FSIS provides small and very small plants with coordinated, one-stop service for obtaining consistent information, technical assistance, and answers, in order to enhance regulatory compliance and promote food safety and food defense. The customer-oriented service is fully accessible. (continued)

Major Activity		Lead
<p>Develop a web gateway to enhance small and very small plants with internet access to information and guidance on regulatory compliance, public health safety and food defense.</p>	<p><i>Planned for FY 07</i> <del>Key Action Items</del></p> <p>Develop and implement the RightNow application that allows web users to search and find answers to questions (a companion to the current “Ask Karen” feature of the FSIS web site).</p> <p>Develop and implement web-based methods to allow small/very small plants to request and receive resource materials, apply for a grant of inspection, register as a food handler, etc.</p> <p>Identify existing resources and develop new additional materials for small and very small plants including small business resources, technical background information on foodborne pathogens, food safety issues, emerging issues, food defense, and sources for validation references and post them to the web page.</p>	<p>OPPED</p> <p>SIPO</p> <p>OPHS</p>



**OBJECTIVE : Technical assistance:** FSIS will provide a full range of technical resources targeted to meet key needs of small and very small plants to help improve the quality of food safety and food defense plans.

Major Activity	Key Action Items	Lead
Develop IKEs to clarify agency policy as needed.	Develop IKEs for food safety and food defense issues.  Publicize IKE comment page in internal newsletters, work unit meetings, etc.  Develop IKEs on topics including the availability and range of existing resources.	TSC
Develop materials to explain and clarify the appeals process.	<p><b><u>Completed in FY 06</u></b></p> Develop an IKE on the appeals process.  Issue FSIS guidance in easily understandable language explaining the appeals process.  <p><b><u>Planned for FY 07</u></b></p> Develop a process for assessing overturned appeals with lessons learned, and post the information so it is accessible to inspectors and industry.  Publicize where information on the appeals process can be found on the web in Constituent Alert.  Develop a Notice announcing the location on the FSIS web site with information on overturned appeals.	TSC  OPPED  OFO OFO OPPED
Update and organize existing resources for small and very small plants.	<p><b><u>Completed in FY 06</u></b></p> Establish a panel to review FSIS documents for clarity and accuracy.  Identify FSIS documents to be reviewed.  Establish a central clearinghouse to coordinate Q&A responses.  Regularly distribute and post new materials and commonly asked questions and Q&As to FSIS website, and make them available in a written format when requested.	TSC  TSC  TSC TSC

**OBJECTIVE : Technical assistance:** FSIS will provide a full range of technical resources targeted to meet key needs of small and very small plants to help improve the quality of food safety and food defense plans. (continued)

Major Activity	Key Action Items	Lead
Develop new materials to meet unmet needs.	<u>Completed in FY 06</u>	
	Develop a new plant start up package and template for the small and very small plant seeking a grant of inspection.	OFO
	<u>Planned for FY 07</u>	
	Publicize the new plant start up package.	OFO
	Issue the electronic HACCP plan development tool that will assist small and very small plants in developing a HACCP plan.	OPPED
	Post redacted letters that clarify policies related to small and very small plants on the FSIS web.	OFO
	Revise documents as needed for clarity and accuracy.	TSC
	Post the updated documents on the small/very small plant web page.	SIPO

**OBJECTIVE : Training/education:** Access and resources are provided to support ongoing teaching/education for small and very small plants and to ensure that employees and partners have training to effectively equip them to assist in outreach activities.

<b>Major Activity</b>		<b>Lead</b>
Provide education/training for FSIS employees on small and very small plant outreach resources.	<p><b><i>Planned for FY 07</i></b>  <b>Key Action Items</b></p> <p>Post a course in AgLearn for FSIS employees on the resources and technical information available to assist small and very small plants.</p> <p>Provide a course in AgLearn on the appeals process.</p>	<p>CFL</p> <p>CFL</p>
Conduct Regulatory Education Sessions to bring industry and inspection personnel together to foster a common understanding of regulatory requirements.	<p><b><i>Completed in FY 06</i></b></p> <p>Develop seminar material (including train the trainer materials, instructor materials, and participant materials).</p> <p>Conduct train-the-trainer sessions to prepare CFL regional trainers to conduct the seminars.</p> <p>Post a schedule of the seminars on the web and announce the dates, times, and locations through a variety of methods.</p> <p>Pilot the sessions. Review participant feedback. Make adjustments as needed.</p> <p>Incorporate information on SPS requirements and food defense guidance into the seminars.</p> <p>Videotape a session.</p>	<p>CFL</p> <p>CFL</p> <p>CFL</p> <p>CFL</p> <p>CFL</p> <p>CFL</p>

**OBJECTIVE : Training/education:** Access and resources are provided to support ongoing teaching/education for small and very small plants and to ensure that employees and partners have training to effectively equip them to assist in outreach activities.

Major Activity		Lead
<p>Conduct Regulatory Education Sessions to bring industry and inspection personnel together to foster a common understanding of regulatory requirements.</p>	<p><i>Planned for FY 07</i> <b>Key Action Items</b></p> <p>Conduct seminars in conjunction with FSRE classes</p> <p>Issue a DVD with the videotaped session to small and very small plants.</p> <p>Add topics to the sessions (e.g., food defense, Sanitation Performance Standards).</p> <p>Conduct sessions for I-house owners and operators.</p>	<p>CFL</p> <p>CFL</p> <p>CFL</p> <p>CFL</p>

**OBJECTIVE : Training/education:** Access and resources are provided to support ongoing teaching/education for small and very small plants and to ensure that employees and partners have training to effectively equip them to assist in outreach activities.

Major Activity		Lead
Provide training to help ensure accurate and consistent answers to technical questions and the development of materials targeted to the needs of small and very small plants.	<p><b><u>Completed in FY 06</u></b>  <b>Key Action Items</b>                      Provide training to FSIS employees who develop written materials for small and very small plants on how to write in a clear and plain manner.</p> <p><b><u>Planned for FY 07</u></b>                      Conduct training for FSIS employees who answer phone calls from small and very small plants including the use of a standard method of answering questions, interviewing skills, and dealing with challenging callers.</p> <p>Conduct social marketing training for SIPO employees to help them develop materials targeted to the needs of small and very small plants</p>	<p>CFL</p> <p>CFL</p> <p>CFL</p>
Provide training resources to States to strengthen their ability to provide services to assist small and very small plants.	<p><b><u>Completed in FY 06</u></b>                      Pilot the process of conducting FSRE classes for States (Utah, Georgia, Texas).</p> <p><b><u>Planned for FY 07</u></b>                      Regularly work with States to schedule and conduct FSRE classes.</p>	<p>CFL</p> <p>CFL</p>
Collaborate with the International HACCP Alliance and CSREES to conduct “beyond the basics of HACCP plan development” workshops for industry.	<p><b><u>Completed in FY 06</u></b>                      Explore the feasibility of conducting the workshops.</p> <p><b><u>Planned for FY 07</u></b>                      Pilot a workshop.</p>	<p>Administrator’s designee</p> <p>CFL</p>
Collaborate with the International HACCP Alliance to conduct a walk through of FSRE and EIAO training for industry.	<p><b><u>Planned for FY 07</u></b>                      Conduct the workshop</p>	<p>CFL</p>

**OBJECTIVE: Partnerships:** FSIS educational partnerships with academia, industry, consumers, Federal, State, and international partners support and enhance the effectiveness of outreach strategies for small and very small plants.

Major Activity		Lead
Re-energize existing partnerships.	<p><b><i>Completed in FY 06</i></b>  <b><u>Key Action Items</u></b>                      Coordinate with CSREES to make them aware of key educational needs of small and very small plant needs so that these needs are considered for grants.</p> <p>Provide a contact for universities to use to identify round table dates and scheduling information. Use university coordinator to gather feedback through roundtables and university led classes. Collaborate with the International HACCP Alliance to communicate the round table schedule.</p> <p><b><i>Planned for FY 07</i></b></p> <p>Develop a list outlining the expertise of university contacts (e.g., validation, sanitation) and make the expertise list available as a resource to assist small and very small plants who are looking for specialized advice and technical assistance.</p> <p>Coordinate with Districts/universities conducting round table sessions and provide resources (e.g., speakers, information sharing) to the round table leaders.</p> <p>Provide training and other support materials to extension, university, and other interested partners nationally and internationally.</p>	<p>Administrator's designee</p> <p>Administrator's designee</p> <p>TSC</p> <p>OFO</p> <p>SIPO</p>

**OBJECTIVE: Partnerships:** FSIS educational partnerships with academia, industry, consumers, Federal, State, and international partners support and enhance the effectiveness of outreach strategies for small and very small plants. (continued)

Major Activity		Lead
Build new partnerships.	<p><b><i>Completed in FY 06</i></b>  <b><u>Key Action Items</u></b>                      Met with scientific advisors at the International HACCP Alliance to establish a process for ensuring supporting documentation is available for each processing category.</p> <p>Partner with the Rural Development Agency to distribute information to small and very small plants about low interest loans that can help with facilities and equipment improvements to enhance food safety and defense.</p> <p>Served as a panel member for the USDA Partner Meeting with small businesses.</p> <p>Presented the strategic implementation plan to the USDA’s Small Farm Coordinators.</p> <p><b><i>Planned for FY 07</i></b>                      Post supporting documentation provided by the International HACCP Alliance scientific advisors for each processing category.</p>	<p>Administrator’s Office designee</p> <p>TSC</p> <p>Administrator’s Office designee</p> <p>Administrator’s Office designee</p> <p>Administrator’s Office designee</p>
Support and maintain partnerships.	<p><b><i>Planned for FY 07</i></b>                      Obtain input from partners to find out what support they need, and actively work with them to ensure that they have adequate resources to assist small and very small plants.</p>	<p>Administrator’s Office designee</p>

**OBJECTIVE: Partnerships:** FSIS educational partnerships with academia, industry, consumers, Federal, State, and international partners support and enhance the effectiveness of outreach strategies for small and very small plants. (continued)

Major Activity		Lead
Establish international partnerships to assist small and very small plants that export products into the U.S.	<p><b><i>Completed in FY 06</i></b>  <b><u>Key Action Items</u></b></p>	
	<p>Conduct briefings of international officials (French, Dutch, Vietnamese, and Italians).</p>	OIA
	<p>Approach the Foreign Agriculture Service about translating materials to assist small and very small plant operators in foreign countries who export product to the U.S.</p>	OIA
	<p><b><i>Planned for FY 07</i></b></p>	
	<p>Continue briefings for international officials.</p>	OIA



**OBJECTIVE: Needs assessment:** Small and very small plant outreach needs are identified through ongoing and regular needs assessment process that enables FSIS to better understand the needs of small and very small plants and target agency outreach programs and services more efficiently and effectively.

<b>Major Activity</b>		<b>Lead</b>
Gather formal public comment on small/very small plant and other stakeholder needs through issuance of a Federal Register Notice.	<p><b><u>Completed in FY 06</u></b>  <b><u>Key Action Items</u></b>                      Draft a Federal Register Notice (FRN) that identifies and explains current and future outreach programs and services, and develop key questions and/or topic areas for receiving public input on Agency outreach programs and services.</p> <p>Issue the Federal Register Notice.</p> <p><b><u>Planned for FY 07</u></b>                      Assess and compile input from FRN and develop a summary of the comments describing key needs to drive outreach.</p>	<p>OPPED</p> <p>OPPED</p> <p>OPEER</p>
Utilize existing agency data to identify small/very small plant characteristics determine key needs.	<p><b><u>Planned for FY 07</u></b>                      Develop a profile using maps and other Agency data to show the characteristics (e.g., numbers, location) of small/very small plants to help better target Agency services.</p> <p>Analyze existing data and information (e.g., Food Safety Assessments, recalls, enforcement actions, testing, food security MOIs, etc.) to identify areas where small/very small plants are struggling with regulatory compliance.</p> <p>Survey EIAO's to gather input on key areas of small and very small plant need (potential areas of technical weaknesses).</p>	<p>CPAO</p> <p>TSC</p> <p>OFO</p>

**OBJECTIVE: Needs assessment:** Small and very small plant outreach needs are identified through ongoing and regular needs assessment process that enables FSIS to better understand the needs of small and very small plants and target agency outreach programs and services more efficiently and effectively. (continued)

<b>Major Activity</b>		<b>Lead</b>
Collaborate with industry associations to obtain information on key outreach needs.	<p><b><u>Completed in FY 06</u></b>  <b>Key Action Items</b>                      Collaborate with the International HACCP Alliance to gather information about small and very small plant needs.</p> <p><b><u>Planned in FY 07</u></b>                      Review feedback from focus group meetings conducted by Resolve.</p> <p>Collaborate with the primary investigators that have received a grant from CSREES to collect data about training needs of small and very small plants in the northeast.</p>	<p>Administrator's Office designee</p> <p>Administrator's Office designee</p> <p>Administrator's Office designee</p>

**OBJECTIVE : Evaluation:** Conduct regular evaluations of the impact of outreach activities to determine short and long-term results and to demonstrate the value added by outreach activities.

Major Activity		Lead
<p>Gather feedback about Agency resources and tools for small and very small plants.</p>	<p><b><u>Completed in FY 06</u></b>  <b><u>Key Action Items</u></b>                      Gather feedback from participants on the pilot of the Regulatory Education Sessions</p> <p>Conduct informal focus group to gather input from small and very small plant operators on food defense guidance.</p> <p><b><u>Planned in FY 07</u></b>                      Conduct informal focus group to gather input from small and very small plant operators on Agency guidance.</p> <p>Continue to gather feedback from participants on the Regulatory Education Sessions.</p> <p>Gather feedback on small/very small plant section of the FSIS web page.</p>	<p>CFL</p> <p>OFDER</p> <p>Administrator's Office designee</p> <p>CFL</p> <p>Administrator's Office designee</p>
<p>Conduct studies to evaluate new and existing FSIS materials and services available for small and very small facilities.</p>	<p><b><u>Planned in FY 07</u></b>                      Establish a user's group consisting of small and very small plant owners, operators, and representatives (e.g., modeled after the NACMPI) to provide feedback about the usefulness of existing tools and services, to pilot new activities or materials, and to make recommendations on how to improve the outreach function to better meet needs</p>	<p>Administrator's Office designee</p>

**OBJECTIVE : Leverage resources:** Existing resources are leveraged so they are used efficiently and effectively, demonstrating the Agency’s commitment to support small and very small plant outreach efforts.

<b>Major Activity</b>		<b>Lead</b>
<p>Ensure Cooperative Agreements are targeted to meet small and very small plant needs.</p>	<p><b><i>Completed in FY 06</i></b>  <b><u>Key Action Items</u></b>                      Explored the possibility of fully utilizing Cooperative Agreement funds from 2005 and prior to support small/very small plant outreach.</p> <p><b><i>Planned in FY 07</i></b></p> <p>Work with programs to close out FY 2005 Cooperative Agreements and ensure that applicable deliverables are made available to assist small and very small plants.</p> <p>Develop a communication plan to share results of the FY 2005 Cooperative Agreements with small and very small plants.</p>	<p>Administrator’s Office designee</p> <p>Administrator’s Office designee</p> <p>Administrator’s Office designee</p>

**OBJECTIVE : Leverage resources:** Existing resources are leveraged so they are used efficiently and effectively, demonstrating the Agency's commitment to support small and very small plant outreach efforts. (continued)

<b>Major Activity</b>		<b>Lead</b>
Utilize EIAO's to provide outreach to small and very small plants.	<p><b><u>Completed in FY 06</u></b>  <b><u>Key Action Items</u></b>                      Update EIAO training materials explaining the expanded role of EIAO in FSIS outreach activities.</p> <p>Establish plans for EIAOs to meet proactively with small/very small plants to explain what to expect from an FSA and to distribute outreach materials.</p> <p><b><u>Planned in FY 07</u></b>                      Continue proactive EIAO visits. Track and report the number and results.</p>	<p>OFO</p> <p>OFO</p> <p>OFO</p>