



United States Department of Agriculture

# FSIS Final Action Verification—Audit of Food Safety and Inspection Service Ground Turkey Inspection and Safety Protocols



Report 24026-0002-22

February 2020

OFFICE OF INSPECTOR GENERAL



United States Department of Agriculture  
Office of Inspector General  
Washington, D.C. 20250



DATE: February 24, 2020

FAV

NUMBER: 24026-0002-22

TO: Stanley McMichael  
Associate Chief Financial Officer  
Office of the Chief Financial Officer

FROM: Gil H. Harden  
Assistant Inspector General for Audit

SUBJECT: FSIS Final Action Verification—Audit of Food Safety and Inspection  
Service Ground Turkey Inspection and Safety Protocols

The Office of Inspector General (OIG) completed a final action verification of all eight recommendations in our July 2015 report on the Audit 24601-0004-31, *Food Safety and Inspection Service Ground Turkey Inspection and Safety Protocols*. Final action verification (FAV) determines whether the final action documentation the agency provides to the Office of the Chief Financial Officer (OCFO) supports the agency's management decision reached with OIG.<sup>1,2</sup> Our objective was to determine whether the documentation the Food Safety Inspection Service (FSIS) provided to OCFO was sufficient to close the recommendations made in Audit Report 24601-0004-31.

In a memorandum dated July 5, 2018, OCFO reported to FSIS that final action was complete for all recommendations in the subject audit report. Based on our review of the documentation in OCFO's files, we concur with this decision for Recommendations 1, 2, 3, 4, 5, 7, and 8. Table 1 summarizes the actions FSIS took with respect to these recommendations. However, we do not concur with this decision for Recommendation 6. Table 2 provides information on Recommendation 6, including the reasons why the documentation provided was not sufficient to close the recommendation.

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<sup>1</sup> *Final action* is the completion of all actions that management has concluded, in its management decision, are necessary with respect to the finding and recommendations included in an audit report. DR1720-001, 6g(1), Audit Follow-up and Management Decision (Nov 2, 2011).

<sup>2</sup> *Management decision* is an agreement between agency management and OIG on the action(s) taken or to be taken to address a finding and recommendations cited in an audit report. The management decision must include the agreed-upon dollar amount affecting the recommendations and an estimated completion date unless all corrective action is completed by the time agreement is reached. DR1720-001, 6i, Audit Follow-up and Management Decision (Nov 2, 2011).

As noted in its response, OCFO agreed to reopen Recommendation 6 in its Audit Follow-up Tracking and Reporting (AFTR) system. OCFO stated that, subsequent to reopening the recommendation, an official memorandum will be prepared and sent to FSIS. The memorandum will explain that Recommendation 6 has been reopened and will remain open until OCFO receives evidence to support final action or explanation for not implementing actions as agreed in the management decision. In addition, the memorandum to FSIS will convey OCFO's intention to conduct periodic follow-up meetings to track FSIS' progress in implementing this recommendation.

## Background

Our report, *FSIS Ground Turkey Inspection and Safety Protocols*, made eight recommendations to FSIS.<sup>3</sup> OIG reviewed FSIS' inspection of ground turkey, including sampling and testing protocols, to evaluate the effectiveness of the ground turkey and other turkey products safety programs. OIG determined that FSIS could improve how it monitors the safety of turkey products.

OIG and FSIS reached management decision on all eight of the recommendations in a memorandum dated August 3, 2015. The memorandum detailed what actions FSIS needed to implement in order to achieve final action on the recommendations.

In accordance with Departmental Regulation 1720-001, the OCFO has the responsibility to determine final action for recommendations where OIG has agreed to management decision.<sup>4</sup> As such, OCFO evaluates agency-provided documentation to support planned corrective actions and to determine if final action has occurred.

## Scope and Methodology

The scope of this FAV is limited to determining whether FSIS' plan of action for all of the recommendations in the original audit report were completed in accordance with the management decisions reached on August 3, 2015. To accomplish our objective, we reviewed documentation FSIS submitted to the OCFO. We did not perform internal control testing or make site visits to determine whether the underlying deficiencies that were initially identified had been corrected. In addition, we did not provide an opinion on the results of the implementation or effectiveness of each recommendation. This FAV was conducted in accordance with our internal guidance IG-7710, *Nonaudit Work* and *Final Action Verification Guidance and Procedures*. As a result, this FAV is not conducted in accordance with Generally Accepted Government Auditing Standards, issued by the Comptroller General of the United States, or the Quality Standards for Inspection and Evaluation, issued by the Council of the Inspectors General for Integrity and Efficiency. However, before we performed the non-audit service, we determined that it would not impair our independence to perform audits, inspections, attestation engagements, or any other future or ongoing reviews of the subject.

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<sup>3</sup> Audit Report 24601-0004-31, *FSIS Ground Turkey Inspection and Safety Protocols*, dated July 29, 2015.

<sup>4</sup> DR1720-001, 7d(1-9), Audit Follow-up and Management Decision (Nov 2, 2011).

## Results of Final Action Verification

### *Recommendations with Sufficient Documentation*

We determined that FSIS provided sufficient documentation to OCFO of corrective actions implemented to achieve final action for seven recommendations in the subject report (Recommendations 1, 2, 3, 4, 5, 7, and 8). We detail the reasons for our determinations in Table 1.

**Table 1. Recommendations with Sufficient Documentation to Achieve Final Action**

Rec. No.	Recommendation	Action Taken
1	For future <i>Salmonella</i> Initiative Program (SIP) letters, if the agency elects to issue new SIP waivers, at the approval process, develop one consolidated document including appropriate attachments that clearly and concisely outlines the waived procedures, the plant's requirements based on the waiver, and supporting documents the plant will make available so that the Inspection Program Personnel (IPP) can fully and adequately monitor the plant's compliance with the SIP letter.	FSIS has developed sample letters that it plans to use in the future when an establishment requests a waiver from regulatory requirements under a SIP waiver. These sample letters serve to document that FSIS has implemented the new process for SIP letters. FSIS will send one consolidated revised SIP waiver letter that includes attachments that outline the waived procedures, and the procedures the plant is required to follow based on the waiver. The revised SIP letter will also instruct that the establishment must provide supporting records and documents to IPP for verification purposes. The revised SIP letter also outlines the IPP establishment verification responsibilities.
2	To determine compliance with SIP letters and IPP monitoring of the SIP letter, perform a review of plants with SIP letters using similar tools to those which Enforcement Investigation and Analysis Officers (EIAO) use in their verification of SIP procedures while performing Food Safety Assessments (FSA).	FSIS has performed public health risk evaluations (PHRE) on a random sample of 16 out of the 22 young chicken and young turkey establishments with SIP line speed waivers. This review identified that (1) plants are following the SIP protocol, (2) IPP adequately monitor SIP, (3) EIAOs were aware the establishments were participating in SIP, and (4) IPP were documenting SIP-specific information through either the Memorandum of Interview (MOI) or in direct communication with the EIAO.

Rec. No.	Recommendation	Action Taken
3	Based on the results of FSIS' review of plants with SIP letters, take appropriate actions to modify procedures for monitoring compliance with existing SIP letters and all future SIP letters.	FSIS has revised Directive 5020.1, <i>Verification Activities for the use of New Technology in Meat and Poultry Establishments and Egg Products Plants</i> dated October 6, 2016, to provide IPP with additional instructions on monitoring compliance with all existing and future SIP letters. This directive cancels Directive 5020.1, <i>Verification of Salmonella Initiative Program</i> .
4	Review the process of how sanitation Noncompliance Records (NRs) are drafted and the data that are recorded, in order to develop a methodology to assure the information recorded in them can be better utilized by the agency to determine the scope and complexity of any underlying plant process control issues. Based on the review, FSIS should develop a plan with appropriate timeframes and milestones to implement the new and improved methodology.	FSIS has developed and performed an analysis, <i>FSIS Ground Turkey Inspection and Safety Protocols: Poultry Sanitary Dressing Noncompliance Analysis</i> dated February 2017. In the analysis FSIS considered whether the utilization of sanitation noncompliance records could be improved and better inform PHRE and FSA scheduling. From this review FSIS recommended that Sanitary Dressing NRs should not be weighted differently than other types of NRs when deciding to change its operations. This analysis also suggests that IPP have a greater understanding of the Sanitary Dressing Task and how to document noncompliance, and that FSIS' efforts to clarify documentation of sanitation NRs have had a positive impact.
5	Establish a formal system to periodically review and update agency directives to assure that they are still applicable and technically accurate.	FSIS has developed a chart that includes all current FSIS Directives in the 1,000-13,000 series. This chart is reviewed and updated quarterly by FSIS program areas to determine whether the directives are up-to-date, or whether they need to be revised or canceled. As a result of instituting this process, FSIS has identified a number of directives that FSIS plans to revise or cancel over

Rec. No.	Recommendation	Action Taken
		the next year. FSIS has completed establishing a formal system to periodically review and update Agency directives.
7	Develop a plan with appropriate timeframes and milestones to issue appropriate guidance to establishments on how to improve their turkey prerequisite programs in order to correct the specific concerns addressed in this finding.	<p>FSIS has developed the fourth edition of the <i>Compliance Guideline for Controlling Salmonella and Campylobacter in Raw Poultry</i> dated December 2015 to assist poultry processors in controlling <i>Salmonella</i> and <i>Campylobacter</i> in raw poultry products. This guidance includes specific information to assist industry in properly addressing food safety concerns in the following seven areas:</p> <ol style="list-style-type: none"> <li>1. recommended best practices,</li> <li>2. information on the components of a prerequisite program,</li> <li>3. recommendations for maintaining sanitary conditions during operations,</li> <li>4. information explaining that sampling procedures should be described in a written program,</li> <li>5. information explaining that interventions used (and their operational parameters) need to be safe and suitable,</li> <li>6. information on how establishments should document their use of antimicrobial interventions,</li> <li>7. information on actions that establishments should take if they find steps in their prerequisite programs have not been properly implemented or followed.</li> </ol>

Rec. No.	Recommendation	Action Taken
8	Review the Hazard Analysis Verification (HAV) Directive, as related to the issues from this finding. Determine if the concerns raised in our report should be incorporated into FSIS procedures for field personnel when they perform a HAV task. If warranted, develop a plan with appropriate timeframes and milestones to provide additional guidance to the FSIS IPP or revise and reissue the FSIS HAV Directive.	FSIS has developed <i>Analysis of Prerequisite Program Noncompliance Records Issued During HAV Tasks</i> , dated December 12, 2016. In this analysis, FSIS evaluated how IPPs are accessing establishments' prerequisite programs during the performance of the HAV task and determined that IPP need additional direction. FSIS Directive 5000.6, <i>Performance of The Hazard Analysis Verification Task</i> , needed to be revised to include additional instructions.

*Recommendation without Sufficient Documentation*

FSIS did not take proper corrective action and did not provide sufficient documentation to OCFO for Recommendation 6. Although OCFO closed the recommendation, we do not concur that the corrective action implemented achieved final action for this recommendation. We detail the reason for our determination in Table 2.

We informed FSIS officials of the results of this final action verification on September 27, 2019.

**Table 2. FSIS' Implemented Corrective Action Insufficient to Achieve Final Action**

Rec. No.	Recommendation	Action Taken	Reason Not Sufficient to Close
6	Develop a plan with appropriate timeframes and milestones to revise the agency's pathogen sampling program in order to consider the following issues:  (1) sampling of imports, (2) sampling of currently exempt plants,	FSIS had made public the prevalence estimate for comminuted poultry products, prevalence estimates for turkey and broiler carcasses and chicken parts at <u>Sampling Results for FSIS Regulated Products</u> : <a href="https://www.fsis.usda.gov/wps/portal/fsis/topics/data-collection-and-reports/microbiology/sampling-project-results/results">https://www.fsis.usda.gov/wps/portal/fsis/topics/data-collection-and-reports/microbiology/sampling-project-results/results</a> . However, FSIS also agreed to develop a schedule, with milestones, for periodically	FSIS did not develop a schedule, with milestones, for periodically updating Salmonella prevalence estimates.

<b>Rec. No.</b>	<b>Recommendation</b>	<b>Action Taken</b>	<b>Reason Not Sufficient to Close</b>
	(3) sampling of Category 1 plants, and (4) sampling to determine the estimated prevalence of <i>Salmonella</i> .	updating <i>Salmonella</i> prevalence estimates.	

OCFO should reopen Recommendation 6 and obtain the correct documentation to support final action from FSIS. We request that you provide us verification that corrective action was taken to sufficiently achieve final action for this recommendation.

As noted in its response, OCFO agreed to reopen Recommendation 6 in its AFTR system. Subsequent to reopening the recommendation in AFTR, an official memorandum will be prepared and sent to FSIS. The memorandum will explain that Recommendation 6 has been reopened and will remain open until OCFO receives evidence to support final action or explanation for not implementing actions as agreed in the management decision. In addition, the memorandum to FSIS will convey OCFO's intention to conduct periodic follow-up meetings to track FSIS' progress in implementing this recommendation. The memorandum to FSIS and the reopening of Recommendation 6 will be completed by January 31, 2020.

cc: Cara LeConte, Chief Financial Officer, Food Safety and Inspection Service





**United States  
Department of  
Agriculture**

Office of the Chief  
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1400 Independence  
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20250

January 22, 2020

**TO:** Gil H. Harden  
Assistant Inspector General for Audit  
Office of the Inspector General

**FROM:** Stanley McMichael /s/  
Associate Chief Financial Officer

**SUBJECT:** Food Safety and Inspection Service—Final Action Verification—FSIS  
Ground Turkey Inspection and Safety Protocols—24601-0004-31

We have reviewed the Office of Inspector General (OIG) memorandum dated December 23, 2019 on the subject audit. In response to the draft report, the Office of the Chief Financial Officer (OCFO) will reopen Recommendation 6 in our “Audit Follow-up Tracking and Reporting” system (AFTR), upon receipt of the final (OIG) report. Subsequent to reopening the recommendations in AFTR, an official memorandum will be prepared and sent to the Food Safety and Inspection Service’s (FSIS) Chief Financial Officer. The memorandum will explain why Recommendation 6 has been reopened and will remain open until OCFO receives evidence to support final action or explanation for not implementing actions as agreed in the management decision. In addition, the memorandum to FSIS will convey OCFO’s intention to conduct periodic follow-up meetings to track FSIS’ progress in implementing this recommendation.

The memorandum to FSIS and the reopening of Recommendation 6 will be completed by January 31, 2020.

If you have any questions or need additional information, please have a member of your staff contact Annie Walker, Director, Internal Control Division at (202) 720-9983.

Attachment

**FSIS—Final Action Verification— *FSIS Ground Turkey Inspection and Safety Protocols—24601-0004-31***

**Management Response Recommendation 6:**

- Upon receipt of OIG’s final action verification report, OCFO will reopen recommendation 6.
- OCFO will prepare an official memorandum addressed to the FSIS’ Chief Financial Officer requesting the agency provide evidence demonstrating that it has developed a schedule, with milestones, to periodically update *Salmonella* prevalence estimates.

**Corrective Action completion date:** January 31, 2020

**Responsible Organization:** OCFO Internal Control Division

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