



United States Department of Agriculture



OFFICE OF INSPECTOR GENERAL

Food Safety and Inspection Service's Oversight of the New Poultry Inspection System

Audit Report 24601-0006-31

OIG reviewed FSIS at the national office level to evaluate its implementation of NPIS at covered poultry slaughter facilities.

OBJECTIVE

Our objective was to examine the policies and procedures FSIS used to implement NPIS and determine if FSIS could improve its oversight at the national office level.

WHAT OIG FOUND

On August 21, 2014, the Food Safety and Inspection Service (FSIS) amended its poultry products regulations by promulgating the Modernization of Poultry Slaughter Inspection Final Rule. This new rule mandates that all poultry establishments take steps to prevent contamination, rather than reactively address contamination after it occurs. The final rule also provides an opportunity for establishments to convert to the New Poultry Inspection System (NPIS), a new inspection system for young chicken and all turkey slaughter establishments.

REVIEWED

We reviewed relevant laws, regulations, and other information in order to gain sufficient knowledge to evaluate FSIS' oversight of NPIS. We interviewed FSIS officials and an industry stakeholder group in order to gain an understanding of FSIS' poultry inspection activities as well as industry's opinion of NPIS.

In general, we found that FSIS is following its policies and procedures to implement NPIS as established in its Modernization of Poultry Slaughter Inspection Final Rule. However, when the Agency promulgated the final rule, it did not clarify when NPIS would be "fully implemented on a wide scale" so that the Agency could properly evaluate the effectiveness of this new program. Without a proper evaluation of NPIS' impact, FSIS cannot provide stakeholders with information regarding (1) the program's effectiveness or (2) obstacles impeding NPIS' acceptance within the industry.

RECOMMENDS

We recommend that FSIS (1) clarify the term "fully implemented on a wide scale" to facilitate evaluations of NPIS and (2) develop a plan that clarifies when it will evaluate and report on the effectiveness of NPIS.

FSIS concurred with our finding and recommendations, and we have accepted management decision on all recommendations.



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



DATE: December 19, 2018

AUDIT
NUMBER: 24601-0006-31

TO: Paul Kiecker
Acting Administrator
Food Safety and Inspection Service

ATTN: Steven Fisher
Chief Financial Officer
Food Safety and Inspection Service
Office of the Chief Financial Officer

FROM: Steve Rickrode
Acting Assistant Inspector General for Audit

SUBJECT: Food Safety and Inspection Service's Oversight of the New Poultry Inspection System

This report presents the results of the subject review. Your written response to the official draft is included in its entirety at the end of the report. We have incorporated excerpts from your response, and the Office of Inspector General's (OIG) position, into the relevant sections of the report. Based on your written response, we are accepting management decision for both of the audit recommendations in the report, and no further response to this office is necessary. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer (OCFO).

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. For agencies other than OCFO, please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<http://www.usda.gov/oig>) in the near future.

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Background and Objectives

Background

The Food Safety and Inspection Service (FSIS) is a Department of Agriculture (USDA) agency responsible for protecting the public health by ensuring the safety of the Nation's commercial supply of meat, poultry, and processed egg products. FSIS is tasked with reducing contamination and limiting illnesses through the regulation of agricultural food products. The Agency ensures food safety in poultry products through the authority of the Poultry Products Inspection Act.

On August 21, 2014, FSIS amended its poultry products regulations by promulgating the Modernization of Poultry Slaughter Inspection Final Rule.¹ This new rule mandates that all poultry establishments take steps to prevent contamination, rather than reactively address contamination after it occurs. Under the final rule, all poultry slaughter establishments are required to develop, implement, and maintain written procedures to prevent the contamination of carcasses and parts by enteric pathogens² and fecal material throughout the entire slaughter and dressing operation.³

Purpose of the New Poultry Inspection System (NPIS)

The final rule provides an opportunity for establishments to convert to the New Poultry Inspection System (NPIS), a new inspection system for young chicken and all turkey slaughter establishments, which FSIS believes is a more efficient and effective use of the Agency's resources.⁴ FSIS believes NPIS is a better use of the Agency's resources as it would enable FSIS inspectors to conduct more offline inspection activities that are more effective in ensuring food safety, allowing for one offline verification inspector—per line and per shift—and reducing the number of online inspectors to one per evisceration line, per shift.

According to FSIS, non-NPIS poultry inspection systems require up to four FSIS online inspectors—per line, per shift—checking carcasses for various quality defects such as feathers, bruises, and the two potential food safety defects, which are Septicemia/Toxemia and accidental fecal contamination.⁵ Then, one FSIS offline inspector per shift, regardless of the number of

¹ Modernization of Poultry Slaughter Inspection, 79 Fed. Reg. 49,566 (Aug. 21, 2014).

² "Enteric" relates to the intestines, and "pathogen" is defined as any disease-producing agent, especially a virus, bacterium, or other microorganism. Examples of enteric, or foodborne, pathogens include *Salmonella*, *Campylobacter*, *Norovirus*, and *E. coli*.

³ This new requirement applies to all poultry slaughter establishments except those that slaughter ratites (e.g., emu, ostrich, and rhea).

⁴ FSIS expects a pathogen reduction due to the implementation of NPIS and noted that the public should realize an annual cost savings of over \$11 million in potential reductions in human illness. Additionally, and separate from the cost savings related to human illness reductions, the Agency estimated a potential net cost savings of \$10 million by the second year of NPIS' implementation, due to an expected reduction of up to 630 positions and other factors. *Modernization of Poultry Slaughter Inspection*, 79 Fed. Reg. 49,624 (Aug. 21, 2014).

⁵ Offline inspection activities include checking for visible fecal contamination as well as verifying that bacterial conditions, such as *septicemia* or *toxemia*, are not present on the carcass. *Septicemia* is the invasion and persistence

evisceration lines, would perform a spot check prior to the carcasses entering the chiller and perform all other food safety inspection tasks related to (1) sanitation; (2) HACCP; and (3) microbiological and chemical residue sampling of carcasses.⁶ Under NPIS, establishment personnel perform sorting activities, including identifying and discarding carcasses and parts affected with food safety and quality defects—as required by the regulations—prior to the FSIS online inspection step.^{7,8}

FSIS established NPIS based on its experience from HIMP, a 1998 pilot initiative known as the Hazard Analysis and Critical Control Point (HACCP)-Based Inspection Models Project. As part of this project, FSIS authorized 20 young chicken establishments and 5 turkey establishments to voluntarily participate in the pilot. FSIS allowed the participating young chicken HIMP establishments to operate at line speeds of up to 175 birds per minute (bpm) via a *Salmonella* Initiative Program (SIP) waiver,⁹ which required them to demonstrate concurrent, consistent process control.¹⁰ Since 2007, young chicken HIMP establishments have been authorized to operate at line speeds of up to 175 bpm, depending on their ability to demonstrate consistent process control. The 175 bpm maximum line speed for young chickens under HIMP is faster than the maximum line speeds permitted under the other young chicken inspection systems.

FSIS recently published criteria that it will use to consider individual waiver requests from NPIS young chicken establishments to operate at up to 175 bpm. Establishments operating under other systems are required to comply with existing maximum line speed limits, which provide for line speeds that are no higher than 140 bpm.¹¹

of pathogenic bacteria in the bloodstream. *Toxemia* is blood poisoning resulting from the presence of toxins, such as bacterial toxins, in the blood.

⁶ FSIS requires establishments to incorporate chilling procedures into their Hazard Analysis and Critical Control Point, Sanitation Standards of Operations, or prerequisite requirements. The prime purpose of chilling a chicken carcass is to limit the growth of microorganisms that are harmful when consumed. Most establishments use one of three methods to chill the carcass: air-chilled, water-chilled, or a combination of air and water chilling.

⁷ According to FSIS, additional offline inspection procedures include verifying HACCP procedures, Sanitation Standards of Operations, and collecting samples for *Salmonella* and *Campylobacter*.

⁸ Online inspection activities include a consistent online inspection of each carcass at a fixed location before the chiller. These activities focus on food safety to determine whether each carcass is adulterated because of a food safety issue or other condition that warrants condemnation of the entire carcass.

⁹ The FSIS Administrator may in specific classes of cases waive for limited periods any provisions of the regulations in order to permit appropriate and necessary action in the event of a public health emergency or to permit experimentation so that new procedures, equipment, and processing techniques may be tested to facilitate definite improvements. For example, under SIP, a waiver of line speeds allows the establishment to use alternative procedures to operate at line speeds of up to 175 bpm.

¹⁰ Establishments are required to have controls or preventative measures in place for various processing categories. For example, the establishments' controls for the slaughter processing category may include written procedures to prevent carcasses affected with bacterial conditions, such as *septicemia* and *toxemia*, from entering the chiller. For NPIS, FSIS' offline verification inspector would verify that the establishment has developed written procedures for preventing such carcasses with *septicemia* or *toxemia* from entering the chiller.

¹¹ The fastest maximum line speeds authorized under the other FSIS poultry products inspection systems are 140 bpm for the Streamlined Inspection System, 91 bpm for the New Line Speed Inspection System, and 51 bpm for the New Turkey Inspection System. NPIS uses one online inspector, whereas FSIS' other poultry inspection systems may use up to four, three, and two inspectors, respectively.

Because an establishment's conversion to NPIS is not mandatory, previous FSIS poultry inspection regulations remain in effect. As such, young chicken and turkey slaughter establishments may continue to operate under their current inspection system. Business considerations are an underlying factor regarding if and/or when a facility would convert to NPIS, as the conversion often involves modifications in equipment and additions to establishment personnel.

Implementation of NPIS

FSIS' implementation of NPIS has required extensive planning and coordination with converting establishments. One FSIS official stated that implementing a new inspection system is "not like flipping on a light switch." Agency officials had to review staffing needs and announce job opportunities so there would be enough staff at NPIS establishments for both day and night shifts. Additionally, FSIS national officials consulted with district managers to form a plan for the placement of inspectors and any changes needed within the establishments located in each respective district. Depending on who applied for inspector positions, a newly-hired inspector may have been required to attend four weeks of inspection methods (IM) training, which is required for both the carcass inspector and verification inspector duties.¹² In addition, the timing of the IM training had to be carefully considered due to the timing of the inspector job announcements and hiring process.

FSIS' implementation of NPIS has occurred in phases. FSIS uses a computerized ranking system to determine the schedule of establishments for implementation of NPIS. This ranking system takes into consideration the following factors: (1) the location of the establishment with respect to other federally-inspected establishments; (2) past performance of the establishment; and (3) FSIS' staffing needs. FSIS implements NPIS in phases by clusters of establishments in close geographic proximity to one another. The initial phase consisted of the 20 young chicken and 5 turkey HIMP establishments who began conversion to NPIS in July 2015. The conversion of HIMP plants to NPIS was a relatively short process as they were already operating under many similar inspection and quality control requirements.

Evaluation of NPIS' Impact

FSIS plans to evaluate the overall impact of NPIS once a sufficient number of facilities have converted and sufficient data are available. According to the Modernization of Poultry Slaughter Inspection Final Rule, after NPIS has been fully implemented on a wide scale and the Agency has gained at least a year of experience under the new system, FSIS will assess the impact of changes adopted by establishments operating under NPIS. This assessment will be accomplished by evaluating the results of the Agency's *Salmonella* and *Campylobacter* verification sampling,¹³

¹² The carcass inspector duties include a continuous online inspection of each carcass at fixed locations before the chiller with a focus on food safety to determine whether each carcass is unadulterated. The verification inspector performs duties such as monitoring and evaluating establishment process controls and verifying that establishments follow good commercial practices.

¹³ *Salmonella* and *Campylobacter* are enteric pathogens (i.e., bacteria) that are significant food safety hazards associated with meat and poultry products. FSIS uses verification sampling to assess industry performance and controls for reducing *Salmonella* and *Campylobacter* in raw meat and poultry products.

reviewing documentation on establishments' Other Consumer Protection (OCP) performance,¹⁴ and other relevant factors. FSIS will consider these results in assessing whether establishments operating under NPIS have implemented measures that are effective in maintaining process control.

As FSIS is currently in the process of gathering sufficient data by which to assess the effectiveness of NPIS and monitor its implementation, the Office of Inspector General (OIG) has approached the review of NPIS as a two-phase audit. This audit represents the first phase in which we reviewed the implementation and oversight of NPIS from the national office level. For the second phase, OIG intends to review the implementation and oversight of NPIS at the field or plant level.

Objectives

Our objective was to examine the policies and procedures FSIS used to implement and guide NPIS and determine if FSIS could improve the oversight of NPIS at the national office level.

¹⁴ FSIS established five OCP measures relating to non-food safety concerns in HIMP establishments. According to FSIS, while noncompliance with OCP concerns does not constitute a food safety issue, it may result in a product not meeting consumers' expectations of poultry that is considered "ready to cook." Examples of OCP concerns include bruises, sores, or dressing defects, such as feathers remaining on the carcass.

Section 1: NPIS Program Evaluation

Finding 1: FSIS Needs to Develop a Timeline for Evaluating and Reporting NPIS' Effectiveness

In general, we found that FSIS is following its policies and procedures to implement NPIS as established in its Modernization of Poultry Slaughter Inspection Final Rule. When the Agency promulgated the final rule, it did not, however, clarify when NPIS would be “fully implemented on a wide scale” so that the Agency could properly evaluate the effectiveness of this new inspection system.¹⁵ FSIS officials explained that, because conversion to NPIS was not mandatory, the final rule does not specify a timeframe, or a number or percentage of establishments needed to convert to NPIS before the Agency would evaluate the program. FSIS officials explained that fewer establishments switched to NPIS than initially expected and business considerations may play a role in the lack of program participation. Without evaluating the overall impact of the program changes, FSIS cannot provide stakeholders with comprehensive information regarding the program’s effectiveness and obstacles impeding the program’s broad acceptance within the industry.¹⁶

As stated in the Modernization of Poultry Slaughter Inspection Final Rule, “[a]fter... NPIS has been fully implemented on a wide scale and the Agency has gained at least a year of experience under the new system, FSIS intends to assess the impact of changes adopted by establishments operating under NPIS by evaluating the results of the Agency’s *Salmonella* and *Campylobacter* verification sampling, reviewing documentation on establishment’s OCP [Other Consumer Protection] performance, and other relevant factors.”¹⁷ FSIS will consider these metrics and various performance results as it assesses whether establishments operating under NPIS have implemented measures that are effective in maintaining process control.

FSIS did not, however, clarify when the program would be “fully implemented on a wide scale” so that it could properly evaluate the program. FSIS needs to determine at what point the program would be considered widely implemented (e.g., percentage of plants, percentage of production, etc.). Alternatively, if the expected number or percentage of plants cannot be met within a reasonable period of time, we recommend that FSIS additionally specify a deadline date by which it would begin its evaluation.

Based on its activities to-date, FSIS has made progress in externally communicating pertinent information regarding NPIS, such as reporting test results and other quality activities. FSIS shared its preliminary data analyses at a stakeholders’ meeting in October 2017, and Agency officials reported that they are continuously evaluating NPIS establishment performance through

¹⁵ The initial implementation phase of NPIS consisted of the 20 young chicken and 5 turkey HIMP establishments who started converting to NPIS in July 2015. The total number of covered facilities was estimated to be 219 as of the date of the final rule (Aug. 21, 2014).

¹⁶ Stakeholders refers to USDA leaders, Congress, industry trade groups, establishment owners, establishment management, and the public.

¹⁷ Modernization of Poultry Slaughter Inspection, 79 Fed. Reg. 49,591 (Aug. 21, 2014).

FSIS' inspection activities.¹⁸ Such external knowledge transfer complies with the Government Accountability Office's *Standards for Internal Control in the Federal Government Handbook*, which states that agency management should communicate quality information externally relating to the entity's events and activities.¹⁹ In its October 2017 meeting, FSIS presented its efforts to measure the current performance of NPIS through various determinations, including whether the Agency's inspectors at NPIS establishments performed increased offline verification tasks, whether these establishments maintained process control, and if they have similar levels of *Salmonella* and *Campylobacter* when compared to their non-NPIS counterparts.^{20, 21}

We spoke to FSIS officials about when they would begin a final evaluation of NPIS' overall effectiveness. FSIS officials said that since NPIS is a voluntary program, they did not want to commit to a discrete metric by which they would begin their evaluation because of uncontrollable factors such as plant conversion and the availability of such data. FSIS also stated it has no reason to expect the newly implemented NPIS system not to be at least as effective as traditional or other inspection systems. However, FSIS officials did report that they would continue to monitor converted establishments to ensure a smooth transition and track pathogen rates as more establishments opt to convert to NPIS. In addition, FSIS officials stated that they will be updating their initial data analyses at the end of calendar year 2018 and will share the results with stakeholders at that point.

In order for FSIS to demonstrate its progress toward meeting the expected benefits outlined in the NPIS final rule, we believe that the Agency should develop an evaluation plan with a prescribed timeline and associated milestones. The milestones in this evaluation plan would help clarify when FSIS will conduct interim analyses and present findings with the ultimate goal of collecting sufficient data to properly evaluate NPIS' overall regulatory impact on participating facilities. This final evaluation of NPIS' impact will be necessary in order to confidently assess whether the program's objectives were indeed achieved. FSIS should include in its evaluation plan how often it will report the results of its evaluations in order to best inform USDA leaders, legislators, consumer advocates, and the general public. This information should help stakeholders make decisions regarding whether FSIS' regulatory changes have achieved the success claimed in the final rule, and what reasonable modifications, if any, can be made to the program in order to improve its overall effectiveness. Although FSIS officials said it would be difficult to predict when NPIS will be fully implemented on a wide scale, they agreed to continue

¹⁸ FSIS evaluated the pathogen testing data for 55 chicken and turkey establishments that converted to NPIS, which included the 20 young chicken and 5 turkey HIMP establishments. The Agency analyzed the pre-conversion versus post-conversion data from July 1, 2013, through Mar. 31, 2017. In FSIS' preliminary analysis, the Agency concluded that no significant change was seen in pathogen levels for converting establishments, therefore, the converting establishments were able to maintain process control.

¹⁹ United States Government Accountability Office, *Standards for Internal Control in the Federal Government*, Sept. 2014, GAO-14-704G, p. 68, 15.03.

²⁰ FSIS' preliminary findings showed that *Salmonella* and *Campylobacter* levels are lower for all poultry slaughter establishments since implementation of the new mandatory requirements of the Modernization of Poultry Slaughter Inspection Final Rule.

²¹ Specifically with respect to the impact of NPIS, FSIS' preliminary analyses found that inspectors are performing the increased offline verification tasks as intended and that NPIS-converted establishments have similar *Salmonella* levels as like establishments that have not converted.

their efforts to periodically evaluate the impact of changes under NPIS and determine whether the program is achieving its objectives.

Recommendation 1

Clarify the term “fully implemented on a wide scale” to facilitate evaluations of NPIS.

Agency Response

In its December 11, 2018, response, FSIS stated:

FSIS is monitoring and assessing the impact of changes adopted by establishments operating under NPIS. FSIS’ preliminary findings showed that Salmonella-positive rates are lower for all poultry slaughter establishments since implementation of the new mandatory requirements of the Modernization of Poultry Slaughter Inspection Final Rule. Specifically, with respect to the impact of NPIS, FSIS’ preliminary analyses found that inspection program personnel (IPP) are performing the increased offline verification tasks as intended and that NPIS-converted establishments have similar Salmonella-positive rates as like establishments that have not converted.

FSIS now believes NPIS has been fully implemented on a wide scale, accounting for over 50% of poultry slaughter volume nationwide. A recent wave of conversions raised this number to approximately 52 percent of the poultry slaughter volume in the past few months. For a comprehensive evaluation of full implementation, as FSIS will address in the plan in response to recommendation 2, the Agency will assess the impact of changes adopted by NPIS establishments based on at least two years of data after conversion. Establishments have been converting to NPIS on a rolling basis and many of the establishments have not been operating under NPIS for a full two years. In order to complete a comprehensive analysis of NPIS implementation, FSIS intends to collect two years of data from all converted establishments including those establishments that recently converted to NPIS.

Estimated Completion Date: December 11, 2018.

OIG Position

We accept management decision for this recommendation.

Recommendation 2

Develop a plan with a prescribed timeline and associated milestones that clarifies when FSIS will continue to conduct interim analyses and present relevant findings, with the ultimate goal of collecting sufficient data to evaluate and externally report the overall effectiveness of NPIS in meeting its stated programmatic objectives.

Agency Response

In its December 11, 2018, response, FSIS stated:

FSIS will develop a plan with a prescribed timeline and associated milestones that clarifies when FSIS will conduct interim analyses and present relevant findings with the ultimate goal of collecting additional data to evaluate and externally report the overall effectiveness of NPIS in meeting its stated programmatic objectives. FSIS is monitoring and assessing the impact of changes adopted by establishments operating under NPIS. FSIS has evaluated the *Salmonella* results from NPIS plants, and the work performed in those plants by FSIS inspection personnel, and has found that NPIS plants are functioning as effectively as those that have not converted to NPIS.

Estimated Completion Date: February 28, 2019.

OIG Position

We accept management decision for this recommendation.

Scope and Methodology

This audit represents the first phase of an intended two-phase audit, in which we focused solely on FSIS' implementation and oversight of NPIS from the national office level. To complete our audit of FSIS' oversight of NPIS, we performed audit steps at the FSIS national office in Washington, D.C., and spoke with key external stakeholders at the National Chicken Council, a non-profit trade association within the chicken industry. We conducted audit fieldwork from May 2017 to June 2018.

The scope of our audit work covered FSIS' implementation of NPIS since its inception, beginning with the final rule's promulgation in August 2014, to May 23, 2017. The initial wave of converting establishments—the 20 young chicken and 5 turkey HIMP establishments—converted to NPIS in July 2015. As of May 2018, approximately 32 percent²² of poultry slaughter facilities have converted to NPIS.

To accomplish our objective, we:

- reviewed relevant laws, regulations, guidelines, directives, notices, information from industry websites, and agency strategic plans and reports in order to gain sufficient knowledge to evaluate FSIS' oversight of NPIS;
- interviewed FSIS officials in order to gain an understanding of FSIS' poultry inspection activities, including FSIS' assessment of NPIS' effectiveness; and
- interviewed an industry stakeholder group in order to gain an understanding of the poultry industry's opinion of NPIS.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

²² As of May 15, 2018, 70 poultry slaughter facilities converted to NPIS. The total number of covered facilities was estimated to be 219 as of the date of the final rule (Aug. 21, 2014).

Abbreviations

BPM	birds per minute
FSIS.....	Food Safety and Inspection Service
HACCP	Hazard Analysis and Critical Control Point
HIMP.....	HACCP-Based Inspection Models Project
IM.....	inspection methods
NPIS	New Poultry Inspection System
OCP	Other Consumer Protection
OIG	Office of Inspector General
SIP	Salmonella Initiative Program
USDA.....	Department of Agriculture

**FSIS'
RESPONSE TO AUDIT REPORT**



United States Department of Agriculture

Food Safety and
Inspection Service

1400 Independence
Avenue, SW,
Washington, D.C.
20250

TO: Gil H. Harden
Assistant Inspector General
Office of Inspector General

FROM: Paul Kiecker /s/ 12/11/2018
Acting Administrator
Food Safety and Inspection Service

SUBJECT: OIG Official Draft Report: Food Safety and Inspection
Service's Oversight of the New Poultry Inspection
System (Audit 24601-0006-31)

FSIS appreciates the opportunity to review and comment on this Official Draft report. The Food Safety and Inspection Service (FSIS) reviewed the Official Draft report and has general comments followed by a response to each recommendation.

FSIS General Comments

Modernizing poultry slaughter inspection means adopting a science-based, preventative approach to addressing contamination on poultry carcasses. The New Poultry Inspection System (NPIS), which is an optional inspection system for young chicken and all turkey establishments, is designed to facilitate pathogen reduction in poultry products by shifting Agency resources to allow FSIS inspectors to perform more offline inspection activities that are more effective in ensuring food safety, while providing for a more efficient and effective online carcass-by-carcass inspection. This system allows FSIS inspectors to spend less time on activities that focus on carcass quality defects that have little relationship to preventing pathogens like *Salmonella* and instead focus more on food safety-related offline inspection activities, such as conducting more zero tolerance food safety examinations of carcasses, taking samples for testing, checking plant sanitation, verifying compliance with food safety plans, observing live birds for signs of disease or mistreatment, and ensuring plants are meeting all applicable regulations.

Finding 1: FSIS Needs to Develop a Timeline for Evaluating and Reporting NPIS' Effectiveness

Recommendation 1

Clarify the term "fully implemented on a wide scale" to facilitate evaluations of NPIS.

FSIS Response

FSIS is monitoring and assessing the impact of changes adopted by establishments operating under NPIS. FSIS' preliminary findings showed that *Salmonella*-positive rates are lower for all poultry slaughter establishments since implementation of the new mandatory requirements of the Modernization of Poultry Slaughter Inspection Final Rule. Specifically, with respect to the impact of NPIS, FSIS' preliminary analyses found

that inspection program personnel (IPP) are performing the increased offline verification tasks as intended and that NPIS-converted establishments have similar *Salmonella*-positive rates as like establishments that have not converted.

FSIS now believes NPIS has been fully implemented on a wide scale, accounting for over 50% of poultry slaughter volume nationwide. A recent wave of conversions raised this number to approximately 52% of the poultry slaughter volume in the past few months. For a comprehensive evaluation of full implementation, as FSIS will address in the plan in response to recommendation 2, the Agency will assess the impact of changes adopted by NPIS establishments based on at least two years of data after conversion. Establishments have been converting to NPIS on a rolling basis and many of the establishments have not been operating under NPIS for a full two years. In order to complete a comprehensive analysis of NPIS implementation, FSIS intends to collect two years of data from all converted establishments including those establishments that recently converted to NPIS.

Estimated Completion Date: Upon issuance of audit report

Recommendation 2

Develop a plan with a prescribed timeline and associated milestones that clarifies when FSIS will conduct interim analyses and present relevant findings, with the ultimate goal of collecting sufficient data to evaluate and externally report the overall effectiveness of NPIS in meeting its stated programmatic objectives.

FSIS Response

FSIS will develop a plan with a prescribed timeline and associated milestones that clarifies when FSIS will conduct interim analyses and present relevant findings with the ultimate goal of collecting additional data to evaluate and externally report the overall effectiveness of NPIS in meeting its stated programmatic objectives. FSIS is monitoring and assessing the impact of changes adopted by establishments operating under NPIS. FSIS has evaluated the *Salmonella* results from NPIS plants, and the work performed in those plants by FSIS inspection personnel, and has found that NPIS plants are functioning as effectively as those that have not converted to NPIS.

Estimated Completion Date: February 28, 2019.

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