**Public Health Risk Evaluation (PHRE) Workshop**

On July 1, 2019, the District Office (DO) received a prioritized list of establishments for scheduling FSAs based on public health risk. The DO reviewed the list and assigned you to conduct a PHRE for Prudent Poultry P-0001Z, Prudent, TX. Prudent Poultry is a one-shift slaughter operation, with one slaughter line that slaughters 2,100 birds per hour using the Meyn Maestro System, and produces ready-to-cook whole chicken, necks, and giblets for further processing in a cut-up operation establishment.

As the first step, you logon to PHIS and locate the PHRE for Establishment reports. Once you access the PHRE for Establishment #P-0001Z Report page, you proceed by evaluating the establishment’s historical data of the last 6 months by reviewing the sub-reports under each hyperlink. Following are the results of your review:

1. Establishment profile – shows that this establishment is under the *Salmonella/Campylobacter* sampling programs
2. MOIs for an Establishment – after reviewing the 18 Weekly meetings MOI for the past 6 months, the information revealed that a trend was developing for fecal contamination on chicken carcasses. Also, there were sanitation issues during pre-op as well as sanitary dressing concerns.
3. NR List and Summary – After reviewing 45 NRs issued in the past 6 months the data revealed the following:
   * February 2019: 3 NRs for fecal contamination, 2 were associated; 1 Pre-op Sanitation NR associated with a previous NR (January 2015)
   * March 2019: 4 NRs for fecal contamination, 2 of which were associated, and 2 Pre-op Sanitation NRs that were associated
   * April 2019: 5 NRs for fecal contamination, 3 were associated; 2 Pre-op Sanitation NRs that were associated
   * May 2019: 15 NRs for fecal contamination, 4 were associated; 4 Pre-op Sanitation NRs that were associated; 1 NR for HACCP for failure to implement CCP1 (Zero Tolerance Monitoring) in the HACCP plan
   * June 2019: 3 NRs for fecal contamination, 2 were associated; 1 Pre-op Sanitation NRs that was associated to the last NR issued in May for the same cause.

The ten associated Pre-op Sanitation NRs listed above document insanitary conditions with findings of product residue on food contact surfaces (FCS) on every NR, condensation dripping on FCS on 2 NRs, and black grease on FCS documented in 2 NRs.

Additional NRs document that SPS non-compliances, due to condensation, have been issued on three different occasions in May 2015 during operations in the picking, evisceration and processing areas; all of the NRs were associated.

Furthermore, the PHR report shows that there were 236 Poultry Zero Tolerance completed tasks with 30 noncompliances (12.7%) where regulation 381.65(f) was cited 30 times (top of the list).

1. HACCP Sets for an Establishment – the information revealed that the establishment is under the Project code HC\_CH\_CARC01. There were 8 positive sample results out of 52 samples collected; 5 positive results were for *Salmonella* and 5 for *Campylobacter* in the FSIS sampling verification program when evaluating the number of samples taken within the 52-week period.
2. Sampling Results for an Establishment – the FSIS lab results shows 5 positives (Not Acceptable) for both *Salmonella* and *Campylobacter* within 52 samples in the completed recent 52-week moving window – establishment has greater than 50 percent of the standard. The establishment’s level of process control is under Category 2 for both *Salmonella* and *Campylobacter*, demonstrating variable slaughter process control which indicates on-going insanitary conditions may be present. The *Salmonella* serotypes and PFGE patterns were variable (report includes dates, serotypes and genotypes).
3. Public Health Regulation Report – the data shows that the PHR noncompliance rate exceeds the Noncompliance Cut Point for PHRE/FSA scheduling; a significant percentage of the noncompliances were based on regulation 381.65(f).

During your evaluation, other background information showed that no FSA was performed within the timeframe selected; the last FSA was done in 2017 with no further enforcement action. No recalls have been conducted, and no consumer complaints in CCMS. You also correlated with the IPP assigned to the establishment and the FLS about your findings, and gather further information concerning the establishment’s food safety system. IPP and FLS expressed concerns that the establishment is not implementing or maintaining their written procedures effectively, to ensure that product contaminated with visible fecal material does not enter the chiller. The in-plant personnel is also concerned about the design, as well as the implementation of the establishment’s microbiological sampling program used to demonstrate process control and prevention of contamination of carcasses.

**Workshop Instructions:**

1. Make a determination of what action to take following the PHRE evaluation and document your recommendations to the District Manager using the PHRE tool in your training book.
2. Based on your PHRE decision, develop an Assessment Plan for conducting an FSA, if warranted. Include the critical information in the plan.

Document your recommendation and provide an outline for the Assessment Plan.