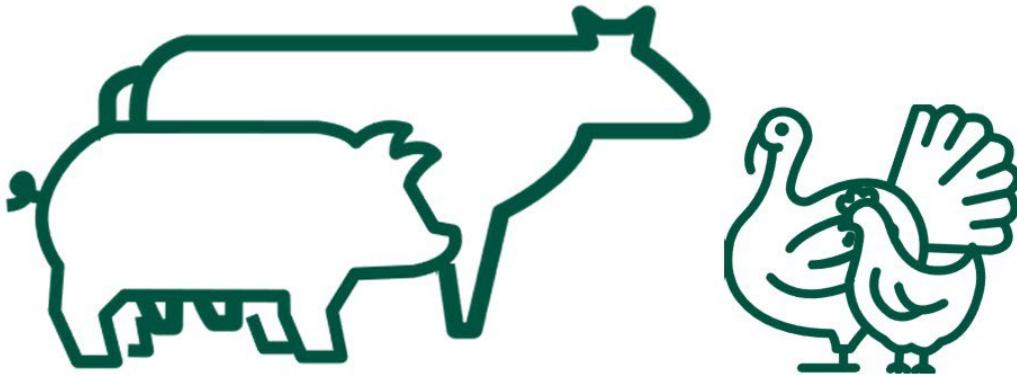


# DVMO Training Student Handout

# DVMO



Revised 07-01-24

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# Welcome to the DVMO HH/GCP Focused Training!

This course is required for new DVMOs (District Veterinary Medical Officers).

This self-paced training is recommended to be completed over 32 working hours during a four-week time-frame. You can spread out when you access the training according to your work schedule (e.g., access the training a few hours each day or complete it all at once over 4 working days, etc.). Participants may coordinate with their supervisor if additional time beyond the 32 working hours is needed.

This training focuses on the Humane Handling (HH) and Good Commercial Practices (GCP) job duties of the DVMO and includes other topics such as working with APHIS and soft skills. Topics covered include HH/GCP policies, conducting establishment HH/GCP verification and enhanced outreach visits, HH/GCP noncompliance and enforcement, and HH/GCP correlation, data, and other duties, APHIS MOUs, time management, managing up, maxiflex work schedule, transition training, and communications.

## Participant Instructions:

1. You must [click on this link to complete the registration/pre-course survey](#) now, before starting this course. Please be sure to enter your first and last legal name and your FSIS e-mail address. Do not complete the registration form more than one time.
2. It is recommended you complete this course across approximately 32 working hours, at your own pace during a four-week window. You do not have to complete the course in one sitting. To take this course you will need your government computer and internet connectivity.
3. You will see sections with one or more presentations or "modules" denoted with a black-and-white "H5P" icon. As you proceed to review and complete each presentation, please click on "Mark as Done" to the right of each presentation. Doing so will generate a Certificate of Completion at the end of the course.
4. We recommend you first review the [Introduction to Moodle](#) presentation to familiarize yourself with the features of this training site. **Note:** Please use Chrome, Firefox, or Edge (not Internet Explorer). Presentations have links to click, some of which will auto-download a file. If the link appears not to work, check your "downloads" (often in the upper right corner of your browser) to see if the file has been automatically downloaded.

Thank you for your participation in this training!

**Technical Support:** Email [CFLHelpDesk@usda.gov](mailto:CFLHelpDesk@usda.gov) or call **1-833-ASK-OEED** (1-833-275-6333), Mon-Fri - 8:30am - 6:00pm ET for assistance. Do not contact the USDA CEC (Client Experience Center) for assistance with this training system.

# Introduction to Moodle

## Learning Objectives

1. Learn how to navigate through the course.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	<p>You will see this icon (the "info button") throughout the course, in the bottom right-hand corner of the slides and on other parts of the slides.</p> <p>The slides provide an outline/overview of the key points. Click this icon to review additional information throughout the course.</p> <p>You may also download the student handout, which has the info button text printed in a PDF. You can reference the student handout while reviewing content on the slides.</p>
3	<p>These are presentations or "modules" (with the H5P black box in front). Click on the module title link to open the presentation.</p> <p>Below the modules, you may see PDF resource files and useful links.</p> <p>You do not need to open or click the file folders at the bottom. These just store information and material linked throughout the presentation.</p> <p>Use these arrows to open/close each section, to see the "modules" or presentations within.</p> <p>These are "Sections". Within each section are one or more "modules" or presentations to complete, as well as some PDF resources or useful links.</p> <p>Click "Mark as Done" on the right-hand side of the presentation when you have completed it (navigated through all the slides in the presentation), to track your progress.</p>
4	<p>Click to open a menu of the slides/slide titles within the entire presentation. Click again to close the menu.</p> <p>Click on the grey bar to navigate to specific slides.</p> <p>Click forward/backward arrows to navigate the slides.</p> <p>Click to view in full screen. Escape to exit full screen.</p>
5	N/A
6	N/A
7	<p>The material you will learn in this course focuses on the Humane Handling and Good Commercial Practices duties of your DVMO position.</p> <p>When reviewing the course presentations ("modules"), be sure to focus your learning on the Objectives at the beginning of each module. These Objectives provide you with the key learning points you should take from the training.</p> <p>Please complete the modules in order and mark your completion of the modules as you go.</p>

	<p>To supplement your learning, complete the OJT Procedures Tool with one or more mentors. You may have already started or completed this document, or you may have yet to start it. Either way is fine - just be sure to complete the procedures at some point as you learn your new role over the first few months.</p> <p>This course is specific to the HH/GCP related duties of the DVMO.</p> <p>If you are interested in courses that cover other concepts, consider the following:</p> <ul style="list-style-type: none"> <li>• Electronic Exports (self-paced, for IPP with export responsibilities; ask supervisor about enrollment)</li> <li>• <a href="#">PHV Refresher - Sheep and Goat</a> (self-paced, covers case studies on disease dispositions in sheep/goats; self-enroll via AgLearn)</li> <li>• <a href="#">PHV Refresher - Cattle</a> (self-paced, covers case studies on disease dispositions in cattle; self-enroll via AgLearn)</li> <li>• <a href="#">PHV Refresher - Swine</a> (self-paced, covers case studies on disease dispositions in swine; self-enroll via AgLearn)</li> </ul>
8	N/A
9	N/A

# HH/GCP Overview: HH/GCP Policy & DVMO Role Module

## Learning Objectives

1. List the Statutes, regulations, directives, and FSIS industry guidance relevant to Humane Handling (HH) and Good Commercial Practices (GCP).
2. Describe the types of HH/GCP establishment visits.
3. Explain the importance of HH/GCP correlation and fostering a collaborative partnership amongst the National Humane Handling Enforcement Coordinator (HHEC), District Management, other DVMOs, the FLS, and the IIC.
4. Recognize the leadership role of the HHEC and coordinating with the HHEC on HH/GCP related issues and communications, to include external stakeholders.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<p>Policy and issuances are available on the <a href="#">FSIS Humane Handling Website</a>, including HH/GCP applicable Federal Register Notices and other training materials.</p> <p>Official HH enforcement actions taken by FSIS are available on the <a href="#">Humane Handling Enforcement Webpage</a>. You can view examples of situations that led to enforcement and examples of official enforcement letters.</p> <p>The following FSIS Directives apply to the DVMO's HH/GCP responsibilities:</p> <ul style="list-style-type: none"> <li>• <a href="#">FSIS Directive 6900.2</a> “Humane Handling and Slaughter of Livestock” – informs IPP of requirements, verification activities, and enforcement actions for ensuring that the handling and slaughter of livestock is humane. Includes instructions to IPP for conducting HH activities and how to assess whether an establishment’s systematic approach is robust (if applicable – not all establishments will have a systematic approach because this is non-regulatory). The directive also includes information for entering HH verification data into PHIS.</li> <li>• <a href="#">FSIS Directive 6110.1</a> “Verification of Poultry Good Commercial Practices”– provides instructions to IPP for gathering and assessing information when verifying poultry GCP. Also provides instructions on GCP NRs and poultry mistreatment MOIs. Includes guidance on how to review NRs/MOIs to assess accuracy.</li> <li>• <a href="#">FSIS Directive 6100.1</a> “Ante-mortem Livestock Inspection” – provides instructions to IPP on performing ante-mortem inspection, which does reference some information on HH.</li> <li>• <a href="#">FSIS Directive 12600.1</a> "Voluntary and Other Reimbursable Inspection Services" - provides information on the voluntary HH/GCP tasks.</li> <li>• <a href="#">FSIS Directive 6090.1</a> "Firearms Safety in Official Livestock Establishment" - provides safety procedures for inspection program personnel (IPP) to follow when firearms are used in official establishments to render animals immediately unconscious.</li> </ul>
4	We will first cover the DVMO's role in Humane Handling/Good Commercial Practices, including a brief introduction to the types of visits a DVMO will conduct specific to HH/GCP verification.
5	The DVMO's job duties include being the FSIS Agency’s Subject Matter Expert (SME) and the District Office (DO) primary contact on issues that concern poultry GCP and livestock HH.

	<p>DVMOs will perform a key role in correlating with Inspection Program Personnel (IPP) and Frontline Supervisors (FLSs) about FSIS policies and procedures (specifically those related to poultry GCP, HH of livestock, ante-mortem (AM) procedures, and residues), and responding to inquiries or issues pertaining to poultry GCPs and livestock HH.</p> <p>The DVMO will assess relevant District data, conduct GCP Verification Visits (GCPVVs) and HH Verification Visits (HHVVs) at poultry and livestock slaughter establishments, respectively, to determine whether amenable species are handled in a manner consistent with requirements, and conduct verification visits at establishments that slaughter exotic species under voluntary inspection. The DVMO spends time preparing for, conducting, and documenting these in-plant visits (e.g., HHVVs, GCPVVs, DVMO Enhanced Outreach Visits (DEOVs)).</p> <p>DVMOs will also assist with enforcement actions related to poultry GCP and livestock HH noncompliances and the denial or withdrawal of inspection services for exotic livestock and voluntary poultry (e.g., game birds). This includes conducting enforcement related Verification Visits (VVs).</p>
6	<p>DVMOs perform DVMO Enhanced Outreach Visits (DEOVs), Humane Handling Verification Visits (HHVVs), and Good Commercial Practices Verification Visits (GCPVVs).</p> <p>The objective of the Verification Visits is to determine whether amenable species are handled in a manner consistent with regulatory requirements. DVMOs will also conduct VV at establishments that slaughter under voluntary inspection.</p> <p>There are two sub-categories of Verification Visits -</p> <ol style="list-style-type: none"> <li>1. VV for assessment (this is a routine regulatory visit); and</li> <li>2. VV for cause (e.g., based on GCP or HH noncompliance issues).</li> </ol> <p>Routine VVs are conducted every 12-18 months, including at facilities under voluntary inspection.</p> <p>The objective of the DVMO Enhanced Outreach Visit is to support and expand small and very small slaughter establishments' knowledge of humane handling and GCP best practices. This is to ensure more consistent application of humane handling and GCP best practices and compliance with regulatory requirements.</p> <p>Following the instruction in <a href="#">FSIS Directive 5220.1</a> "Grant of Inspection Management", the DVMO visits new establishments following the issuance of the conditional grant of inspection to verify livestock are being handled humanely and that poultry are being handled consistent with good commercial practices. You will learn more about the DEOV and VVs in future modules.</p> <p>DVMOs may also visit establishments as instructed by the District Office to investigate in response to complaints or videos posted by a person or entity outside of FSIS.</p>
7	<p>During all Verification Visits at poultry and livestock slaughter establishments (i.e., GCPVV, HHVV), the DVMO is to assess the establishment's compliance with each of the regulatory requirements applicable to the establishment's operating practices - GCP for poultry or the HH for livestock. The DVMO is to:</p> <ul style="list-style-type: none"> <li>• Verify compliance with GCPs in poultry slaughter establishments and perform an assessment of an establishment's poultry welfare program when the establishment chooses to maintain a poultry welfare program; or</li> <li>• Verify compliance with HH regulations in livestock slaughter establishments and perform an assessment of an establishment's written livestock HH program when the establishment chooses to maintain a written HH program.*</li> </ul> <p>*Note: These written programs are voluntary (not regulatory requirements) and just because an establishment has a written program, does not mean they are implementing the program as written. If the</p>



	establishment is not following the program as written, that is not a noncompliance unless there are also <a href="#">9 CFR 313</a> regulations that are not being met.
8	<p>VVs for cause are performed when there are situations of noncompliance or enforcement actions. DVMOs are to conduct a VV for cause for a variety of reasons, some of which include:</p> <ul style="list-style-type: none"> <li>• HH egregious noncompliance has occurred.</li> <li>• Directed by the DO.</li> <li>• Repetitive noncompliances pertaining to GCP or HH exist.</li> <li>• HH data in PHIS, such as information contained in the Animal Disposition Reporting (ADR) and the Humane Handling Activities Tracking System (HATS), indicates a negative trend such that a review is warranted.</li> <li>• Trends of noncompliances pertaining to GCP or HH are occurring.</li> <li>• IPP request assessment of a ritual exemption practice pertaining to slaughter.</li> <li>• Directed by Headquarters or participating in enhanced surveillance activities.</li> <li>• A follow-up VV pertaining to a suspension being held in abeyance, Notice of Intended Enforcement (NOIE) in deferral, or other enforcement is assigned by the DO.</li> </ul>
9	<p>An enhanced outreach visit is performed in both poultry and livestock slaughter establishments. The visit targets small and very small establishments. It is designed to support and clarify poultry GCP or livestock HH regulatory requirements. This is a voluntary visit and is NOT associated with any enforcement action.</p> <p>The DVMO can offer the visit to small and very small establishments that they think will benefit from the outreach visit (e.g., new establishment, new ownership, new slaughter species, trend of noncompliance, owner interested in new stunning method).</p> <p>The enhanced outreach visit is also performed when requested by small and very small establishments.</p>
10	N/A
11	<p>Now that you understand an overview of the DVMO's role in HH/GCP, we'll cover FSIS' Statutory and Regulatory authority surrounding humane handling of livestock. This section includes information on the Statutes, regulations, and directives for humane handling of livestock.</p> <p>After we cover livestock, we'll move on to covering the policy surrounding poultry Good Commercial Practices. <b>Note</b> that poultry are <b>not</b> covered under the Humane Methods of Slaughter Act.</p>
12	<p>The Humane Methods of Slaughter Act requires that the slaughtering and handling of livestock be carried out only by humane methods.</p> <p>IPP conduct verification activities to verify compliance with the <a href="#">9 CFR 313</a> "Humane Slaughter of Livestock" regulations. They do so by following the instructions in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock".</p> <p>IPP verify that exotic animals are slaughtered and handled in compliance with the 9 CFR 352 "Exotic Animals and Horses; Voluntary Inspection" regulations. 9 CFR 352.10 cross references 9 CFR 313.2 and 9 CFR 313.15 or 313.16. IPP follow instructions in <a href="#">FSIS Directive 12,600.1</a> "Voluntary and Other Reimbursable Inspection Services.</p> <p>Note: The regulatory definition of livestock includes cattle, sheep, swine, and goat. The regulatory definition of exotic animals includes reindeer, elk, deer, antelope, water buffalo, bison, buffalo, or yak.</p>
13	<p>The <a href="#">Humane Methods of Slaughter Act</a> (HMSA) requires that the slaughtering and handling of livestock, including non-ambulatory disabled livestock, be carried out only by humane methods. Two methods of slaughter were determined to be humane. The first method requires that livestock are rendered insensible to pain on the first application of the stunning device before being shackled, hoisted, cast, or cut. This means that the animal must be unconscious and unable to feel pain before it is "stuck" (veins and arteries</p>

	<p>severed so it bleeds out), before it is shackled and hoisted into the air, or before it is dropped onto a table/floor.</p> <p>The second method is in accordance with the ritual requirements of any religious faith that prescribes a method of slaughter where the animal suffers loss of consciousness by anemia of the brain caused by the simultaneous and instantaneous severance of the carotid arteries with a sharp instrument. This method is usually called ritual slaughter. In ritual slaughter, the animal's throat is cut from side to side with a sharp knife, deeply enough for the major arteries and veins to be severed. Examples of ritual slaughter include Jewish (Kosher) slaughter and Islamic (Halal) slaughter.</p> <p><b>Note:</b> The HMSA applies only to livestock (not poultry).</p> <p>In addition to the HMSA, the FMIA includes sections that relate to HH – specifically, <a href="#">Section 603</a> (Examination of animals prior to slaughter; use of humane methods) and <a href="#">Section 610</a> (Prohibited acts – which includes that no firm* shall slaughter/handle livestock in a manner not in accordance with the HMSA).</p> <p>*Includes custom exempt facilities.</p>
14	<p>The regulations for humane slaughter are in <a href="#">9 CFR 313</a>.</p> <p><a href="#">9 CFR 500</a> lists regulations that define types of enforcement actions, reasons for which FSIS may take a regulatory control action (one of which is due to inhumane handling or slaughtering of livestock), when FSIS may take withholding actions and suspensions, and establishment appeal rights.</p> <p><a href="#">9 CFR 307</a> includes information on facilities and schedule of operations. <a href="#">9 CFR 309</a> addresses ante-mortem inspection, including NAD animals.</p> <p>As a DVMO, you must be familiar with these regulations. You will verify establishments meet the regulatory requirements when conducting Verification Visits (VVs). You will correlate with IPP on their understanding and verification of these regulations. You will provide clarification on the regulatory requirements to establishments when conducting DVMO Enhanced Outreach Visits (DEOVs). You may provide expertise on HH related appeals that reach the District Office. When necessary, you will work with IPP and the District Office on further enforcement actions (e.g., Notices of Suspension, Notices of Intended Enforcement) related to Humane Handling.</p>
15	<p>So far, we've covered the Statutory and Regulatory authority surrounding livestock HH. Next, we'll review the policy in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock", which informs IPP of the requirements, verification activities, and enforcement actions for ensuring the handling and slaughter of livestock is humane.</p> <p>As a DVMO, you serve as a subject-matter-expert on matters of HH and slaughter of livestock. It is important that you understand what IPP should be doing at the establishment, as well as what your role is. We'll visit both of these topics on the upcoming slides.</p>
16	<p><a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" includes terminology, definitions for the terms on this slide. As an SME, you should be aware of these terms and definitions.</p> <ul style="list-style-type: none"> <li>• Humane Handling: Handling and slaughter practices that cause a minimum of excitement, pain, injury, or discomfort to livestock.</li> <li>• Ambulatory Disabled Livestock: Livestock capable of walking but with physical impairment such as central nervous system signs, lameness, or similar conditions.</li> </ul>

	<ul style="list-style-type: none"> <li>• Non-Ambulatory Disabled Livestock: Livestock that cannot rise from a recumbent position or that cannot walk, including, but not limited to, those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral column, or metabolic conditions.</li> <li>• Egregious Inhumane Treatment: An egregious situation is an act or condition that results in severe harm to animals, for example: Making cuts on or skinning conscious animals; Excessive beating or prodding of ambulatory or nonambulatory disabled animals or dragging of conscious animals; Stunning of animals and then allowing them to regain consciousness; Failing to immediately (or promptly) render an animal unconscious after a failed initial stunning attempt (e.g., no planned corrective actions).</li> <li>• Slips: When a portion of the leg other than the foot touches the ground or floor, or a foot loses contact with the ground or floor in a non-walking manner.</li> <li>• Falls: When an animal loses an upright position suddenly, in which a part of the body other than the limbs touches the ground or floor.</li> <li>• Shackling: Livestock are shackled when a device (e.g., rope, chain) used to hoist the animal has been placed around the animal's leg, even if the device has not been drawn tight.</li> <li>• Hoisting: The process whereby an animal after it is shackled, is raised, usually from a lying position, and suspended by a leg or legs.</li> <li>• Suitable Equipment: Establishment equipment that can enable establishment personnel to move non-ambulatory disabled livestock with a minimum of excitement, pain, or injury. Examples: skid loaders and self-propelled tractors capable of pulling stone boats (sleds).</li> <li>• Suitable Restraints: Establishment-provided restraints capable of effectively restraining livestock (including disabled livestock when necessary).</li> </ul>
17	<p>To verify establishments are meeting the Humane Handling regulatory requirements, IPP conduct the Livestock Humane Handling Verification task and document the results in PHIS.</p> <p>IPP spend their verification time conducting activities across 9 specific categories – we call these HATS categories. HATS stands for Humane Handling Activities Tracking System. Each HATS category focuses on specific Humane Handling regulatory requirements. If you have worked as a livestock PHV, you'll likely already be very familiar with these.</p> <p>The HH task should be conducted once per slaughter shift, by multiple IPP when possible. IPP should vary the times they conduct these activities. Time spent verifying requirements in each of the 9 HATS categories is recorded in quarter-hour increments in PHIS. IPP should also conduct the HH task when animals are on-site (even if it is during a processing-only shift).</p> <p>Except in very small establishments, there should be an entry of at least one-quarter hour in the HATS Cat IV (Ante-mortem (AM) inspection) for every slaughter shift (because on each occurrence of AM, IPP are to make verification observations in Category IV)*. In addition to the daily Category IV verification, IPP are to verify one or more other HATS categories during each slaughter shift. Over time, IPP should routinely verify all HATS categories.</p> <p>In the very small establishments, IPP will still be performing AM inspection on every shift, but there are special instructions for documenting their HATS activities and recording times (which we'll discuss later). As a DVMO, you must be aware of what policies IPP are to follow for Routine Verification Activities. You will review HATS data in PHIS to verify IPP are completing their routine verification activities per agency guidance. If they are not, as DVMO, you will address these issues with the in-plant team via their supervisory channels.</p> <p>*Note: IPP should not count all the time they spend performing AM as time in category IV; rather, count the time spent verifying the animal handling or facilities component.</p>
18	<p>In addition to the verification activities we discussed on the previous slide:</p>

	<ul style="list-style-type: none"> <li>If an establishment has a robust systematic approach (which has been agreed upon by the Agency – SPHV, FLS, DVMO, DO reviewed), IPP have additional verification to complete. We will cover what IPP verify in these instances in a little bit, when we review the Robust Systematic Approach later in an upcoming module.</li> </ul> <p>If IPP have concerns about these other verification activities, they may reach out to you, the DVMO, with their concerns.</p>
19	<p>The 28 hour law, which can be found in <a href="#">49 USC 80502</a>, requires transporters to stop and provide animals with food, water, and rest.</p> <p>Transporters may not confine animals in a vehicle or vessel for more than 28 consecutive hours without unloading the animals for feeding, water, and rest. Transporters who have deprived livestock of food, water, or rest for more than 28 hours are in violation of the Twenty-Eight Hour Law.</p> <p>If IPP have concerns the 28 hour law may not have been followed (livestock arrive exhausted or dehydrated) they should:</p> <ul style="list-style-type: none"> <li>Ask establishment management whether the truck driver stopped within the preceding 28 hours to provide animals food, water, and rest.</li> <li>If the truck driver or establishment will not provide the information, or if IPP have evidence the 28 hour law was not followed, IPP contact their supervisor.</li> <li>Document their observations and actions taken in a Memorandum of Interview (MOI) (under a Livestock HH task).</li> <li>Provide a copy of the MOI to the establishment.</li> </ul> <p>IPP’s supervisor contacts APHIS AVIC (veterinarian in charge) so APHIS can conduct an investigation. As a DVMO, you may be responding to questions from IPP about their observations. You may also be involved with discussions among the DO and APHIS.</p>
20	<p>There are two sections in the HMSA applicable to ritual slaughter.</p> <p><a href="#">Section 1902 (b)</a>: “slaughtering in accordance with the ritual requirements of the Jewish faith or any other religious faith that prescribes a method of slaughter whereby the animal suffers loss of consciousness by anemia of the brain caused by the simultaneous and instantaneous severance of the carotid arteries with a sharp instrument and handling in connection with such slaughtering” is humane.</p> <p><a href="#">Section 1906</a>: “Nothing in this chapter shall be construed to prohibit, abridge, or in any way hinder the religious freedom of any person or group. Notwithstanding any other provision of this chapter, in order to protect freedom of religion, ritual slaughter and the handling or other preparation of livestock for ritual slaughter are exempted from the terms of this chapter.”</p> <p>In establishments that perform ritual slaughter:</p> <ul style="list-style-type: none"> <li>IPP request the establishment manager inform them about what type of ritual slaughter (e.g., Kosher or Halal) is performed, when it will be performed, who will perform it, and how it will be performed.</li> <li>IPP verify that the HH regs (<a href="#">313.1</a>, <a href="#">313.2</a>) for handling before preparation for ritual slaughter are met (for example, confirm water availability, check conditions of pens/ramps, verify no excessive use of electric prods).</li> <li>At the point where the animal is prepared for ritual slaughter (including positioning of the animal, the ritual slaughter cut, and any additional cuts by or under the supervision of the religious authority to facilitate bleeding), IPP are not to interfere. If IPP have concerns, they are to contact DO through their supervisor.</li> <li>IPP also verify, after the ritual slaughter cut (and any additional cuts to facilitate bleeding), that no dressing procedure (e.g., head skinning, ear removal) is performed until the animal is insensible.</li> </ul>

	<p>As a DVMO conducting Verification Visits (VVs) (covered in depth in a later module), if the establishment conducts ritual slaughter, you will assess the establishment procedures to determine whether they are complying with the HMSA and guidance issued in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock". For example, the HH regulations require that animals be rendered unconscious before being shackled, but this requirement may not apply in a ritual slaughter operation if the ritual authority indicates that the animal needs to be shackled before it is cut. However, handling procedures occurring before and after the ritual method of restraint and cut are to meet the HH regulatory requirements.</p> <p><b>Note:</b> For animals that are ritually slaughtered, the ritual slaughter cut will not be evaluated for HATS category VIII (Stunning Effectiveness). But for those establishments that are ritually slaughtering, and in addition utilize stunning methods, the stun effectiveness will be evaluated. "Ritual Slaughter Bubble" is terminology that refers to the period that ritual slaughter is executed. More information on this term is provided in a future module.</p>
21	<p>In addition to the HATS verification activities, IPP are also to verify that animals are not brought into the establishment through entrances or pathways where:</p> <ul style="list-style-type: none"> <li>• IPP may not be aware that the animals are being moved and, therefore, may not be able to determine whether the animal is eligible for slaughter for human food (e.g., this situation would occur if non-ambulatory disabled cattle, dead livestock, or uninspected animals are brought into the establishment through a secondary or alternative entrance).</li> <li>• The nature of the entrance may lead to the inhumane handling of the animal (e.g., the entrance is so small that the animal may be hurt).</li> <li>• The equipment used, or the lack of equipment, may lead to inhumane handling of the animal (e.g., lack of ramps or slippery ramps).</li> </ul> <p>The purpose of this verification is to provide IPP with a means to verify that all livestock that enter the establishment are doing so under conditions that meet the relevant statutory and regulatory requirements. This is not intended to prohibit the use of alternative entrances.</p> <p>IPP make observations while performing the Livestock Humane Handling Verification task for any evidence that animals are being moved through secondary entrances, or there are any of the other listed problems. They are to make observations under HATS Category VIII – "Stunning Effectiveness" because stunning is typically done near the location of secondary or alternative entrances. More on HATS Category VIII in the upcoming slides.</p> <p>If IPP find evidence that any of the situations described above has occurred, they are to control the condemned livestock (see <a href="#">9 CFR 309.13</a>) and take a regulatory control action (<a href="#">9 CFR 500.2</a>) by tagging the entrance to prevent the use of the entrance. They are to document noncompliance and take regulatory control actions (e.g., tagging equipment, alleyways, and pens). (See <a href="#">9 CFR 313.50</a>)</p>
22	<p>This slide shows an overview of the 9 HATS categories that IPP will verify, which are listed in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock", along with procedures for how to verify and examples of noncompliance.</p> <p>Not only do IPP verify these categories, but you as the DVMO will verify these as well during your verification visits*. Thus, it is important that you understand how to verify each of these nine categories. You will learn about each of these categories in detail in an upcoming module.</p> <p>*Note: DVMO does not document HATS hours in PHIS during VVs.</p>
23	<p>IPP record odd-hour verification in PHIS under a directed HH verification task, selecting "Supervisor Instruction" as the reason (so when you are reviewing in PHIS, this is how you'd expect to see these odd-hour inspections documented by IPP). If IPP document an NR during odd hours, the DVMO should expect to</p>

	<p>receive a copy of it (per the directive – IPP should send the NR to SPHV, FLS, DVMO). (Often, Districts instruct IPP to send the draft NR to DVMO prior to issuing a final NR).</p> <p>As the DVMO, you should be familiar with the policy and what IPP are expected to do because the DVMO will verify this is being followed by IPP. You may need to discuss/weigh in on these topics with the FLS, such as when/how often IPP should conduct odd hour inspection.</p>
24	<p>When IPP observe humane handling noncompliance, they must take immediate action. The specific action they take will depend on the nature of the noncompliance and the response of the establishment.</p> <p>Some noncompliance with <a href="#">9 CFR 313</a> does not cause animals to be injured, to be in pain, or to be under excessive excitement or discomfort (e.g., failure to provide access to water).</p> <p>IPP will take action on this type of noncompliance by:</p> <ul style="list-style-type: none"> <li>• Informing the establishment of the noncompliance and request they take steps to prevent recurrence (<a href="#">9 CFR 313.50</a>).</li> <li>• Document a Noncompliance Record under the Livestock Humane Handling Verification task: <ul style="list-style-type: none"> <li>○ Specify which HATS category was being performed.</li> <li>○ <b>Note:</b> If the noncompliance is covered by a second HATS category, note both categories on the NR; list the category where the noncompliance occurred first.</li> <li>○ Cite all relevant regulations in the NR.</li> <li>○ Provide clear, concise description of the noncompliance.</li> <li>○ Provide any evidence that supports the noncompliance occurred.</li> </ul> </li> <li>• Verify the establishment takes the necessary corrective actions and measures to achieve regulatory compliance and prevent recurrence.</li> </ul> <p>In these situations where the noncompliance does not cause injury to animals, IPP take a regulatory control action (RCA) in accordance with <a href="#">9 CFR 500.2(a)(4)</a> and as specified in <a href="#">9 CFR 313.50(a) or (b)</a> if:</p> <ul style="list-style-type: none"> <li>• Establishment management fails to take corrective actions and measures to achieve compliance and prevent recurrence (or does not promptly provide the inspector with satisfactory assurances that such actions will be taken).</li> <li>• A subsequent noncompliance is observed that derives from the same or related cause, indicating a failure to continue effective implementation of previously proffered corrective and preventative measures.</li> </ul> <p>When an RCA is taken because of employee actions, IPP need to consider the most appropriate place for applying the tag - specific to the location and nature of the violation. The placement should control the situation and prevent injury, pain, or excessive excitement or discomfort to animals.</p> <p>The RCA remains in place until the establishment implements the appropriate corrective actions and further preventative measures that ensure compliance. If the establishment continues to violate the regulatory requirements or does not adequately correct a noncompliance, the IIC will reach out to their direct supervisor and a DVMO to determine if an enforcement action should be taken.</p> <p><a href="#">Example NR - no injury</a></p>
25	<p>If IPP observe humane handling noncompliance (inhumane slaughter or handling) that is causing injury or distress to the animal, IPP are to first take action to ensure that the animal does not continue to be harmed.</p> <p>The next consideration IPP will make is if the noncompliance is egregious or non-egregious because the actions they take will depend on this determination. This slide describes actions IPP take for non-egregious inhumane slaughter or handling (e.g., non-egregious stunning effectiveness failures or driving animals too fast and causing a few to slip and fall).</p>

	<p>When IPP observe a non-egregious stunning failure or humane handling noncompliance, after ensuring the animal does not continue to be harmed, IPP:</p> <ul style="list-style-type: none"> <li>• Inform the establishment (<a href="#">9 CFR 313.50</a>).</li> <li>• Document a Noncompliance Record under the Livestock Humane Handling Verification task: <ul style="list-style-type: none"> <li>○ Specify which HATS category was being performed.</li> <li>○ <b>Note:</b> If the noncompliance is covered by a second HATS category, note both categories on the NR; list the category where the noncompliance occurred first.</li> <li>○ Cite all relevant regulations in the NR.</li> <li>○ Provide clear, concise description of the noncompliance.</li> <li>○ Provide any evidence that supports the noncompliance occurred.</li> <li>○ For a <b>non-egregious stunning effectiveness failure*</b>, IPP are to document in the NR that the noncompliance was promptly and effectively corrected.</li> </ul> </li> <li>• Verify that the establishment takes appropriate corrective or preventative actions.</li> </ul> <p>*A stunning effectiveness failure is non-egregious when IPP (typically in consultation with their chain-of-command and the DVMO) determine that the event was a discrete, rare failure to render livestock unconscious by a single blow, gunshot, or other approved means, and that the establishment promptly and effectively corrected the noncompliance.</p> <p>In these situations where IPP observe non-egregious noncompliance that causes injury or distress, IPP take a regulatory control action (RCA) in accordance with <a href="#">9 CFR 500.2(a)(4)</a> and following procedures in <a href="#">9 CFR 313.50 (a), (b), and (c)</a>. IPP take RCA:</p> <ul style="list-style-type: none"> <li>• Before informing establishment management when it is necessary for FSIS, rather than the establishment, to stop the inhumane treatment of livestock.</li> <li>• When the establishment operator fails to take action or fails to promptly provide the inspector with satisfactory assurances that such action will be taken.</li> </ul> <p>The RCA remains in place until the establishment implements appropriate corrective actions and preventative measures that ensure compliance. As discussed on the previous slide, when RCA is taken because of employee actions, IPP will need to consider the most appropriate place for applying the tag to effectively control the situation and prevent further injury or distress to animals.</p> <p>If the establishment continues to have noncompliance or does not adequately correct the noncompliance, the IIC will communicate with their direct supervisor and a DVMO to determine if an enforcement action should be taken.</p> <p><a href="#">Example NR - injury, not egregious</a></p>
26	<p>It is important for IPP to understand how to determine if a noncompliance observed is of an egregious nature, because the actions FSIS takes depends on this determination. As a DVMO, you may be called upon for your expertise when determining if a HH event is egregious.</p> <p>An egregious situation is an act or condition that results in severe harm to animals. This slide and the following two slides have specific examples of egregious situations.</p>
27	<p>This slide lists more examples of egregious situations.</p>
28	<p>This slide lists more examples of egregious situations, specifically those that involve multiple ineffective stun attempts. Understanding this criteria is critically important in order to determine if a situation is egregious or not.</p>
29	<p>If IPP determine that an egregious inhumane slaughter or handling noncompliance has occurred, FSIS will take an enforcement action.</p>

	<p>The IIC takes the following actions:</p> <ul style="list-style-type: none"> <li>• Immediately stop the inhumane slaughter or handling with an appropriate regulatory control action (RCA) to prevent the inhumane handling or slaughter from continuing.</li> <li>• Verbally notify the establishment management that the IIC will correlate with FSIS management and the DVMO. The District Manager determines the enforcement action that will be taken according to <a href="#">9 CFR 500.3(b)</a>.</li> <li>• Correlate with FSIS management and the DVMO to receive the District Manager's determination and instructions for actions.</li> </ul> <p>During correlation with FSIS management (e.g., SPHV, FLS, DO, DVMO), the following information is considered:</p> <ul style="list-style-type: none"> <li>• Whether the establishment is operating under a robust systematic approach (RSA) for humane handling of animals.</li> <li>• Whether the establishment has demonstrated the robustness of the program by effectively and consistently implementing all aspects of the program.</li> <li>• Establishment history of compliance (number of NRs related to HH regulatory requirements).</li> <li>• Whether the establishment has recent HH enforcement actions.</li> <li>• Whether a suspension action is necessary to prevent inhumane handling from continuing.</li> <li>• Whether the egregious noncompliance represents a rare finding or an anomaly in an otherwise well-functioning system.</li> </ul> <p>After correlating with FSIS management, the IIC documents their observations of the humane handling incident in an NR and provides the NR to FSIS management for their use in documenting the enforcement action. The IIC also provides a copy to the establishment. As a DVMO, you will review these NRs to verify for accuracy and support.</p> <p><a href="#">Example NOS due to egregious noncompliance.</a></p>
30	<p>If IPP determine that an egregious inhumane slaughter or handling noncompliance has occurred, FSIS will take an enforcement action.</p> <p>If an establishment is suspended (receives an NOS) or is issued an NOIE (Notice of Intended Enforcement) or a Denial of Voluntary Services), the IIC informs the establishment that they will need to proffer acceptable corrective actions and preventative measures to the District Office.</p> <p>As a DVMO, you will assist in the review of the establishment's actions. This includes providing feedback on where the response is adequate and where the response is unlikely to result in the establishment meeting the regulatory requirements. You will assist in the construction of a Verification Plan based on those actions. When an immediate suspension action is warranted, but is likely to result in inhumane treatment of additional animals (e.g., a line stoppage that may result in animals having to stay on a truck during an extremely hot day), the IIC consults with their chain-of-command to consider delaying the implementation of the suspension action until they can ensure that animals on-site or in-transit have been handled humanely.</p>
31	<p>IPP follow the methodology provided in <a href="#">FSIS Directive 5000.1</a> "Verifying an Establishment's Food Safety System" to determine whether a HH noncompliance trend exists.</p> <p>When IPP identify HH noncompliance, IPP are to consider whether a noncompliance is associated with previous noncompliance at the establishment. NRs listing the same HATS category do not automatically constitute a trend of noncompliance. It is also possible to have noncompliance in different HATS categories</p>



	<p>that are associated, due to the same underlying cause (e.g., lack of employee training). IPP must support that there is a trend of inhumane handling when associating HH NRs.</p> <p>IPP discuss any trends of noncompliance with establishment management during the weekly meetings. IPP continue to associate NRs until they determine an enforcement action is necessary to bring the establishment into compliance. If IPP determine an enforcement action is necessary, they contact their chain-of-command and provide support for this determination. The District Manager will determine whether to suspend inspection.</p> <p><b>Note:</b> If IPP determine there are trends of noncompliance at an establishment that has a written animal handling program the establishment believes to be a robust systematic approach, IPP will notify their chain-of-command and a DVMO may be scheduled to conduct an assessment of the establishment's handling procedures. If IPP observe the establishment is not following their program, IPP follow the steps for discussing this finding with the establishment and documenting an MOI in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock".</p>
32	<p>The FMIA prohibits slaughter or handling of livestock in connection with slaughter in any manner not in accordance with the HMSA. This applies to all animals on the premises of a federally-inspected establishment whether those animals are designated for slaughter under federal inspection or for slaughter under Custom Exempt.</p> <p>If IPP are on-site performing official duties related to regulated product and observe inhumane handling or slaughter practices of custom exempt livestock, they are to immediately notify establishment management of their observations and request that establishment management address the issue. IPP document their observations on an MOI and provide a copy of the MOI to their immediate supervisor, the DVMO, and the establishment.</p>
33	N/A
34	N/A
35	Now that you understand FSIS' Statutory and Regulatory authority surrounding humane handling of livestock, we'll cover the policy surrounding poultry Good Commercial Practices. This section includes information on the Statutes, regulations, and directive for poultry GCPs.
36	<p>Poultry are to be slaughtered in a manner that ensures that breathing has stopped before scalding, so that the birds do not drown, and that slaughter results in thorough bleeding of the poultry carcass. Compliance with these requirements helps ensure that poultry are treated humanely. In general, poultry should be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product.</p> <p>Other than the Poultry Products Inspection Act (PPIA) provision at <a href="#">21 USC 453(g)(5)</a> and the regulatory provisions outlined in <a href="#">9 CFR 381.65(b)</a>, there is no specific regulation or slaughter statute for poultry. If birds hung on the slaughter line die before slaughter because of mishandling, or if birds are being killed in a manner that does not comply with GCP as defined in <a href="#">9 CFR 381.65(b)</a>, the resultant product is adulterated under the PPIA.</p> <p>We'll cover this when we discuss GCP Verification Visits, but it's an important point that there is <b>no regulatory requirement for stunning during poultry slaughter</b> (which differs from livestock). IPP verify that poultry slaughtered under voluntary inspection are slaughtered in accordance with <a href="#">9 CFR 362.2(a)</a>, which cross-references 9 CFR part 381 (including <a href="#">381.65(b)</a>). IPP complete a Good Commercial Practices (V) task for verification done under voluntary species by following instructions in <a href="#">FSIS Directive 12,600.1</a> "Voluntary and Other Reimbursable Inspection Services".</p>
37	We've covered the Statutory and Regulatory authority surrounding poultry GCP. Next, we'll review the policy in <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices", which provides instructions to IPP for writing a noncompliance record (NR) for noncompliance with the regulations

	<p>requiring the slaughter of poultry in accordance with Good Commercial Practices, as well as instructions for composing a Memorandum of Interview (MOI) when documenting a meeting between IPP and establishment management regarding an observation of the mistreatment of live poultry before slaughter. It is important that you understand what IPP should be doing at the establishment, as well as what your role is. Just like we did with livestock, we'll visit both of these topics as we review the directive.</p>
38	<p>To verify establishments are meeting the GCP regulatory requirements, IPP conduct the GCP Verification task and document this in PHIS. As a DVMO, you will provide expertise to IPP on when and how to conduct the GCP Verification task. You will identify any potential errors and follow-up with local supervision. On a per-shift basis, when the establishment slaughters, IPP perform a GCP Verification task. Most of the time, IPP perform this task by systematically observing the conditions from the receiving through pre-scald areas. Once a week, instead of performing observations, IPP review establishment GCP records (when available). This day is randomly selected.</p> <p>During observation, IPP visit areas from receiving or holding through pre-scald. IPP observe whether establishment employees are mistreating birds or handling them in a way that will cause death or injury or will prevent thorough bleeding or result in excessive bruising.</p> <p>During the once-weekly records review, IPP ask the establishment for any records regarding GCP. While not required, if the establishment uses video surveillance of live poultry handling areas, IPP should review a sample of these records. Refer to <a href="#">FSIS Directive 5000.9</a> "Verifying Video or Other Electronic Monitoring Records" for instructions on reviewing records created by video.</p> <p>IPP are to assess the records to determine whether there is evidence that the establishment is monitoring its GCP from receiving through pre-scald areas. If no such records exist, or if the records do not provide a basis to make a judgement on whether the establishment is following GCP, IPP are to make observations. If IPP are able to determine via the records that the establishment is following GCP, then IPP can complete the task based on the records review.</p>
39	<p>As a DVMO, you will routinely review and provide expertise on documentation related to poultry mistreatment, including GCP NRs and MOIs. You will correlate with IPP to ensure IPP are familiar with the issues that determine whether to document a GCP NR or a poultry mistreatment MOI and ensure that IPP consistently document these issues in the proper format.</p> <p>During poultry handling and slaughter, IPP are to document GCP noncompliance in a Noncompliance Record (NR) when they can demonstrate that an establishment has lost process control and there is an ongoing pattern or trend of birds dying otherwise than by slaughter (e.g., birds repeatedly entering the scalding tank while still breathing), or when there is repeated occurrence of birds being intentionally and repeatedly mistreated by establishment personnel.</p> <p>If IPP cannot support a loss of process control by an establishment, they are to document poultry mistreatment in MOIs under the GCP task.</p> <p>An NR is also appropriate if the birds are not being appropriately bled out, with the establishment's handling practices resulting in the production of adulterated product (e.g., as evidenced by equipment malfunction that results in increased numbers or clusters of cadavers being disposed of or condemned). Cadavers are poultry that die from causes other than slaughter or are not physiologically dead because of ineffective slaughter before they enter the scald vat and drown. Carcasses of poultry that die from drowning may exhibit signs of incomplete exsanguination, resulting in an unwholesome carcass (see <a href="#">FSIS Directive 6100.3</a> "Ante-Mortem and Post-Mortem Poultry Inspection" and <a href="#">9 CFR 381.90</a>). As above, IPP must support a loss of process control by the establishment to document a GCP noncompliance. For example, if the establishment's equipment is not properly aligned, and as a result, the system is repeatedly putting birds into the scalding tank while they are still breathing, the birds are dying otherwise than by slaughter, they</p>

	<p>are adulterated, and the establishment's system is out of control. IPP would issue a GCP NR and take appropriate regulatory control action.</p> <p><b>Note:</b> an isolated instance does not represent a loss of process control. For example, FSIS personnel would not issue a GCP NR for an isolated observation of a single bird entering a poultry scald tank while still breathing. If the system is otherwise under control, IPP would discuss the instance with the establishment and document the mistreatment in a GCP MOI.</p>
40	<p>To document GCP noncompliance, IPP must have determined that the establishment lost control of its process for handling birds and thus is not operating in accordance with GCPs. As a DVMO, you may be asked to provide your expertise on matters of poultry mistreatment and process control.</p> <p>When determining whether there has been a loss of process control, IPP consider multiple factors, including whether the cause of the problem is that the establishment's equipment (e.g., bleeding or stunning equipment) is not functioning properly. While stunning is not a requirement in poultry slaughter, if stunning system malfunction contributes to process control concerns, it should be noted by IPP.</p> <p>IPP ask questions such as:</p> <ul style="list-style-type: none"> <li>• What is the problem and when did it occur?</li> <li>• Is the establishment's equipment not functioning properly?</li> <li>• How long did the problem last?</li> <li>• How did the establishment react and what did they do to correct the problem?</li> <li>• Were there periods of control?</li> <li>• Did the problem reoccur?</li> </ul> <p>IPP document noncompliance with <a href="#">9 CFR 381.65(b)</a> when the establishment is found not following GCP (e.g., IPP observe frequent or repeated instances of birds not being slaughtered in a manner that results in thorough bleeding of the carcasses or of birds still breathing when they enter the scald, and the process that the establishment is employing is not able to prevent these problems from recurring).</p> <p>IPP follow instructions in <a href="#">FSIS Directive 5000.1</a> "Verifying an Establishment's Food Safety System" for documenting the noncompliance. IPP document the NR under the Poultry GCP task and include the following information in the description of the noncompliance:</p> <ul style="list-style-type: none"> <li>• Date and approximate time when IPP observed the noncompliance.</li> <li>• Where IPP observed the noncompliance.</li> <li>• Description of the event and explanation of how it is noncompliant (e.g., birds observed breathing when entering scald).</li> <li>• Description of any actions taken by the establishment to address or correct the noncompliance.</li> <li>• Any regulatory control action taken, including the U.S. Reject tag number.</li> </ul> <p><b>Note:</b> IPP should not quote the HMSA, Federal Register, the establishment's written plans, or any other guidelines in the NR.</p> <p>GCP Poultry NR</p> <p>At approximately 1530 hours, while performing a Good Commercial Practices verification task, I observed the following non-compliance with regulation <a href="#">9 CFR Part 381.65(b)</a>: At 1530 hours, the inspector at Inspection Station number 1 identified five cadaver birds without a bleed cut on the neck. I presented the cadavers to Mr. Smith, Evisceration Supervisor and then preceded to the re-hang area and noted twenty cadavers on the re- hang table without a bleed cut on the neck and an additional fifteen cadavers in a U.S. Condemn barrel next to the re-hang table that did not have a bleed cut on the neck. I preceded to the area just prior to the scald and noted five additional birds enter the scald still breathing and conscious. These birds did not appear to have a neck cut. I then preceded to the kill line and found no back-up cutter present at the station located just past the automatic knife. Additionally, stunned birds were passing through the automatic knife cut without the neck being cut and some birds were passing above the blade not stunned. I</p>

	<p>requested that Mr. Smith immediately stop the kill line and placed U.S. Reject tag number B15759535 to the hanging area. Mr. Smith and additional supervisors adjusted the stunner and the automatic knife to ensure proper stunning and bleed cuts as well as added additional back-up employees after the automatic knife. Any birds prior to the scalding that were still conscious, breathing or did not have bleed cuts were cut and bleed out and returned to the line. Mr. Smith confirmed an additional forty cadavers were condemned per regulation <a href="#">9 CFR Part 381.90</a>. After corrective actions and preventative measures were reviewed, I removed the U.S. Reject tag from the hanging area and the line was allowed to restart.</p>
41	<p>Poultry mistreatment MOIs are primarily issued when the establishment is mistreating birds before or during shackling or elsewhere in the slaughter operation, up until the kill step, but the mistreatment event does not demonstrate that the establishment's process is out of control (e.g., only single or small numbers of birds are involved). In this type of situation, there is not noncompliance with <a href="#">9 CFR 381.65(b)</a>.</p> <p>For example, IPP may observe isolated instances of poultry mistreatment after the normal kill step, such as a bird that is still breathing when entering the scalding. Or IPP may observe an unusually high number of injuries to the birds (e.g., broken legs or wings, but there is no evidence of intentional mistreatment). After immediately notifying the establishment of the mistreatment and discussing the mistreatment with the establishment after the event is resolved, IPP document the discussion in an MOI. IPP should document the MOI following the methodology in FSIS Directive <a href="#">6110.1</a> "Verification of Poultry Good Commercial Practices" and <a href="#">8010.2</a> "Investigative Methodology".</p> <p>IPP document the MOI under the poultry GCP Verification task. The MOI should include:</p> <ul style="list-style-type: none"> <li>• The establishment number, name, and the date and time of the meeting.</li> <li>• All meeting participants, including IPP.</li> <li>• A description of the mistreatment event, when it was observed, where it was observed, and the names of who witnessed the event.</li> <li>• A description of the observations that led IPP to determine mistreatment.</li> <li>• Summary of any actions taken directly by the establishment in response to the event and its response to any discussion between establishment management and IPP.</li> </ul> <p><b>Note:</b> IPP are not to quote the HMSA, Federal Register, establishment plans, or any other guidelines in the MOI.</p> <p>In specific situations (e.g., off-premises issue, poor husbandry practices) the DVMO may need to provide additional notification to appropriate state officials. The DVMO will collaborate with in-plant IPP and the DCS to prepare a Letter of Concern and a cover letter. The LOC is sent to establishment management, and the cover letter and copy of LOC is sent to appropriate state officials. <a href="#">Click to see an example of this type of communication.</a></p> <p><b>Note:</b> If you observe large numbers of dead poultry or birds showing signs of disease, consider FAD/RAD and contacting APHIS and State veterinarians. See <a href="#">FSIS Directive 6000.1</a> "Responsibilities Related to Foreign Animal Diseases (FADs) and Reportable Conditions" and <a href="#">Directive 6020.1</a> "Enhanced Inspection of Poultry in Response to a Notification of a Highly Pathogenic Avian Influenza Outbreak".</p>
42	<p>You will routinely review HH/GCP NRs and MOIs to determine the accuracy and consistency of this documentation.</p> <p>This slide has examples of HH and GCP MOIs for you to review (click the example links to review). If you have not already, you will review many more examples with your mentor during your OJT Procedures. <a href="#">On IPP Help, you can find tutorials for how to document HH/GCP MOIs.</a> It is important for documentation purposes that the MOIs are documented appropriately under HH or GCP.</p> <p>In custom exempt operations, IPP document inhumane handling or slaughter practices in an MOI, which is sent to their supervisor and DVMO for review.</p>

	When a systematic approach (not a regulatory requirement) was previously considered "robust", but is no longer determined to be "robust", IPP inform the establishment and document this finding in an MOI. The MOI is sent to IPP's supervisor, FLS, DVMO and District. A copy is provided to the establishment.
43	N/A
44	DVMOs are district-wide experts on HH/GCP issues and are the primary contact within the District for HH and slaughter issues. As such, they communicate with many partners within FSIS to accomplish our mission. The next slide covers the types of partners you will communicate with as a DVMO, and the importance of maintaining communication and partnerships with these FSIS personnel.
45	<p>Collaborative partnerships and communications are essential in completing our mission consistently and effectively.</p> <p>As a DVMO, you serve as a leader and subject-matter-expert in HH/GCP across your entire district. You must proactively communicate with many FSIS partners to achieve success.</p> <p>DVMOs meet monthly via Teams with the National Humane Handling Enforcement Coordinator (HHEC) and other DVMOs. Part of the purpose of these meetings is to ensure uniform policy interpretation and approach to HH/GCP events across the country.</p> <p>DVMOs correlate with in-plant IPP, including IICs and FLSs, about FSIS policies and procedures that pertain to HH/GCP. This includes the review of district-wide HH/GCP documentation, discussion of observations you make during Verification Visits, and responding to inquiries or issues pertaining to HH/GCP. The DVMO involvement will help ensure IPP are consistently and accurately implementing inspection methodology. DVMOs assist in HH related enforcements. As such, they work with District Management, which may include District Managers, Deputy District Managers, District Case Specialists, and others involved in enforcements at the district level.</p> <p>It can be challenging to provide clear, concise, timely communication with involvement of multiple FSIS partners. However, this successful collaboration and communication ensures we complete our mission.</p>
46	The next section covers the role of the National Humane Handling Enforcement Coordinator (HHEC) and how the DVMO will coordinate with the HHEC on HH/GCP issues.
47	<p>As a DVMO, you will work with the National Humane Handling Enforcement Coordinator (HHEC) in your role. Thus, it is helpful to understand the role of the HHEC and how it relates to your work.</p> <p>The National program coordinator and primary Agency contact for humane handling and good commercial practices (HH/GCP) issues.</p> <p>The HHEC has the following responsibilities and roles:</p> <ul style="list-style-type: none"> <li>• Provides direction to field regulatory activities, in integrating specialized technical programs within FSIS and other Federal and State Agencies, managing HH/GCP implementation activities associated with new Agency strategies, programs, policies, and regulatory or legal mandates for HH/GCP and animal care.</li> <li>• National review and coordination of policy development, implementation, and correlation of the humane handling activities of the DVMO. Conducts correlations with the DVMO to ensure compliance with humane handling procedures as outline in 9 CFR part 313.</li> <li>• Participates with the executive and senior leadership team of OFO, in directing, formulating, recommending, policies and procedures carrying out implementation of the Humane Methods of Slaughter Act.</li> <li>• Is the OFO expert and primary contact on issues of animal handling procedures. Coordinates with the PPD, OPHS, OPPD, ODIFP, OPARM, and outside experts regarding current policy on humane handling and good commercial practices. Agency spokesperson with State and Local law enforcement on HH/GCP issues.</li> </ul>

	<ul style="list-style-type: none"> <li>• Global responsibility to participate, review, comment on WOAH animal care and humane handling recommendations from the US. Reviews/assesses Industry and Animal Rights advocacy groups comments on global documents.</li> <li>• Provides expert level guidance to employees and industry on humane handling. Develops implementation and evaluation strategies for HH/GCP. Coordinates, develops, and delivers training session on the subject of humane handling slaughter verification procedures, and regulatory responsibility under the Humane Methods of Slaughter Act as well as effective implementation of good commercial practices in a regulatory environment.</li> <li>• Participates with EAROs to direct, coordinate and integrate activities of subordinate district offices and serves as the policy level expert for interfacing of HH/GCP inspection matters with officials of FSIS, USDA and other Government agencies, industry, trade associations and employee union and professional organizations.</li> <li>• Provides leadership and direction on major Agency initiatives and OFO project assignments associated with development, implementation, and evaluation of: <ul style="list-style-type: none"> <li>○ Humane handling activities consistent with the FSIS Strategic Plan and Agency direction.</li> <li>○ Regulatory enforcement policies, procedures, and strategies. Develops implementation and evaluation strategies as it relates to humane handling activities.</li> </ul> </li> <li>• Agency spokesperson at public, industry, and other government meetings; prepares/delivers management proposals on issues/matters affecting the bargaining unit and supervisory associations. Develops and fosters cooperative relationships with varied individuals/groups. Ensures activities are properly coordinated with internal/external groups.</li> <li>• Serves as policy level representative in consultations and issue resolution sessions with affected parties. Participates with AA and DAA to evaluate, recommend and implement approaches to obtain program goals/objectives as proposed by other Agency program areas resulting from external reviews, audits, HH appeals and/or mandates.</li> <li>• Collaborates with department OGC on HH legal issues.</li> </ul>
48	<p>The DVMO and HHEC may work together in a variety of circumstances. For example:</p> <ul style="list-style-type: none"> <li>• The DVMO attends monthly correlation calls with the HHEC. These calls are designed to correlate on unusual HH cases (to ensure a uniform approach across the Districts) and to discuss the status of: <ul style="list-style-type: none"> <li>○ District enforcement actions.</li> <li>○ New establishments coming on board.</li> </ul> </li> <li>• The HHEC will provide the DVMO with updates on Headquarters issues that may have an impact on HH/GCP issues, or the work of the DVMO.</li> <li>• The HHEC may work with DVMOs in small groups on specific projects, as needed.</li> <li>• The DVMO may respond to urgent district data requests sent by the HHEC if needed by the Executive Team or Department.</li> <li>• The HHEC and DVMO may discuss problems at the District level for resolution.</li> <li>• The HHEC and DVMO correlate on external communications.</li> </ul>
49	N/A
50	N/A

# HH/GCP Overview: HATS Verification Module

## Learning Objectives

1. Demonstrate how to verify HATS activities, identify HATS errors, and how to use HATS data to identify potential humane handling issues or trends.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<a href="#">FSIS Directive 6900.2</a> “Humane Handling and Slaughter of Livestock” – describes how IPP are to perform and document the Livestock Humane Handling Verification task, including how to document hours spent verifying the nine HATS categories. It includes procedures to verify and document, as well as examples of noncompliance.
4	We will first cover the nine HATS categories, along with examples of noncompliance in each category.
5	<p>The table on this slide provides an overview of the nine HATS categories and their corresponding regulations.</p> <p>It is important that IPP understand which of the <a href="#">9 CFR 313</a> regulations to mark as verified for the specific verification activities IPP complete. IPP should review the specific regulatory citations to verify they are marking the appropriate regulations in PHIS (e.g., selecting within the appropriate regulations for type of stunning method used). <a href="#">Click to view a PHIS stunning regulations reference.</a></p>
6	<p>Inclement weather (such as rain, heat, snow or ice) may cause adverse effects on facilities and animal handling. IPP must verify the establishment adapts facilities and handling to inclement weather.</p> <p>Examples of noncompliance include:</p> <ul style="list-style-type: none"> <li>• U.S. Suspect or disabled livestock are not placed in a covered pen. (<b>Note:</b> there is no requirement to have a dedicated covered pen – only that the establishment can show they can and will provide a covered area when needed.)</li> <li>• Livestock are slipping/falling due to icy floor conditions.</li> <li>• Livestock do not have access to water in holding pens due to frozen water in buckets or troughs.</li> <li>• Livestock are overheated because of lack of proper shade or because of lack of water for cooling.</li> </ul> <p>HATS Category I – Adequate Measures for Inclement Weather</p> <p>At approximately 0645 hours while performing HATS Category IV - Handling During Ante-mortem Inspection, I observed the following non-compliance with HATS Categories I – Adequate Measures for Inclement Weather and III – Water and Feed Availability: Three goats were present in pen 1 and four steers were present in pen 3. Both pens had red plastic water buckets placed in the corners of the pens and as I reviewed the contents I noted that the water was frozen. I notified Mr. Smith, Slaughter Supervisor of the non-compliance with regulation <a href="#">9 CFR 313.2(e)</a> with regards to access to water in holding pens. Mr. Smith proceeded to dump the contents of the buckets out and I noted an approximately eight-centimeter layer of ice build-up on the top of each water bucket. Mr. Smith immediately refilled the buckets and stated he would refill them as needed during the day’s production. I periodically verified that the establishment was compliant through the day. I verbally notified Mr. Smith of the forthcoming non-compliance record.</p>
7	IPP must verify the establishment’s livestock handling facilities are in proper repair and positioned properly during livestock unloading activities.

	<p>IPP also must verify the establishment is handling livestock humanely during unloading.</p> <p>Examples of noncompliance:</p> <ul style="list-style-type: none"> <li>• Condition of facilities (ramps, chutes, floors, vehicles) appear likely to injure or are injuring animals.</li> <li>• Vehicles or ramps are not properly positioned leading to injury of animals, or no ramp is available when necessary.</li> <li>• Animals are forced to move faster than normal walking speed.</li> <li>• Animals are slipping/falling.</li> <li>• Disabled or US Suspect animals are not separated from normal ambulatory animals.</li> <li>• Disabled animals are dragged while conscious.</li> <li>• Animals are excessively prodded or not driven with a minimum of excitement and discomfort.</li> </ul> <p>Note: Slow hogs (not able to move at same normal walking speed as others, tend to lie down, but are otherwise ambulatory and normal, bright, alert) must also be moved in a manner that protects them from the group/lot.</p> <p>HATS Category II – Truck Unloading</p> <p>At approximately 1430 hours while performing HATS Category II – Truck Unloading, I observed the following non-compliance: While watching truck unloading from the outside unloading area, I observed a livestock hauler driving one dairy cow off a livestock trailer. The cow slipped as she was walking from the trailer to the unloading ramp and her right front foot slipped into an approximately fifteen- centimeter gap between the trailer and the ramp. The cow was not able to remove her foot from the gap and vocalized. The hauler continued to try and drive the animal forward. I verbally requested that he discontinue trying to move the animal and informed him that the cow was stuck. I then notified Ms. Smith, Slaughter Supervisor, of the situation and she immediately assisted the cow in removing its front foot. After the foot was removed, I noted a five-centimeter bleeding wound on the right front foot, but the animal was fully ambulatory. As there were two other dairy cows on the trailer, I verbally notified Ms. Smith that no further unloading could occur until the gap hazard was corrected. Ms. Smith had the livestock hauler realign his truck and once no hazards were present, I allowed the other two dairy cows to be unloaded. The unloading of the other two animals went without incident. I verbally informed Ms. Smith of the forthcoming non-compliance record with regulations <a href="#">9 CFR 313.1(b)</a> (provide good footing) and <a href="#">9 CFR 313.2(a)</a> (driving with a minimum of excitement and discomfort).</p>
8	<p>IPP must verify livestock have access to water in holding pens, and if livestock are held longer than 24 hours, they have access to feed.</p> <p>Noncompliance examples:</p> <ul style="list-style-type: none"> <li>• Water is not accessible to livestock in holding pens.</li> <li>• Feed has not been provided to livestock held longer than 24 hours.</li> </ul> <p>HATS Category III – Water and Feed Availability (1 NR for Lack of Feed and 1 NR for Lack of Water)</p> <p>NR 1:</p> <p>At approximately 1140 hours while performing HATS Category III – Water and Feed Availability, I observed the following non-compliance: I noticed that pen 2, containing twenty head of market swine, had no visible feed in the pen. I observed truck unloading of this lot at approximately 0730 hours yesterday (2019-04-10). I asked Mr. Smith, Slaughter Supervisor, if the establishment had provided feed to the swine prior to my arrival today and he stated they had not. I verbally notified Ms. Smith, Establishment Owner of the forthcoming noncompliance record and that the animals had not been provided feed as required by regulation <a href="#">9 CFR 313.2(e)</a> as they had not been provided feed after being held for twenty-four hours. Ms. Smith immediately provided adequate feed to the twenty head of swine.</p>



	<p>NR 2: At approximately 0830 hours while performing HATS Category III – Water and Feed Availability, I observed the following non-compliance: I checked pens 2 and 3 and noted there were approximately six head of heifers without access to water. There were three black rubber round water bins present in the pens, but they did not contain any water. I verbally notified Mr. Smith, Slaughter Supervisor, that there was no water in pens 2 and 3 as required by regulation <a href="#">9 CFR 313.2(e)</a> and that I would be documenting my findings in a non-compliance record. Mr. Smith immediately filled the three rubber buckets with water.</p>
9	<p>While conducting AM, IPP verify the establishment’s facilities and procedures for humanely handling animals.</p> <p>Noncompliance examples:</p> <ul style="list-style-type: none"> <li>• Facilities are not maintained in good repair or may otherwise lead to animal injury.</li> <li>• Livestock are excessively prodded with an electric prod.</li> <li>• Livestock are injured because of handling practices.</li> <li>• Livestock are moved faster than a normal walking speed.</li> </ul> <p>Note: When an establishment offers recumbent livestock for ante-mortem inspection, the establishment may help an animal that is capable of rising by providing the animal support (e.g., providing a steadying hand). Such support may not be by mechanical means, nor is the establishment permitted to lift the animal in any way. Also, once the animal has risen, it is to ambulate without assistance (e.g., without hobbles), so that the PHV can observe it. The establishment must treat the animal humanely when attempting to have it rise or ambulate. FSIS does not consider forcing an animal to stand or ambulate by kicking or prodding (e.g., electrical prodding) to be humane.</p> <p>HATS Category IV – Handling During Ante-mortem Inspection At approximately 1000 hours while performing HATS Category IV – Handling During Ante-mortem Inspection, I observed the following non-compliance: I observed a dairy cow with a five-centimeter wound on her right rear flank that appeared fresh and was actively bleeding. Once all 5 head of dairy cows were removed from pen 5, I requested to review the pen. On the north side wall, I observed a rusted gate post with adhered hair and fresh blood. The edges of the rusted post were sharp when touched. The sharp edge was approximately two-meters off the ground, was approximately three-centimeter in length and matched the height of the wound on the dairy cow. I verbally notified Ms. Smith, Establishment Owner, of the non-compliance with regulation <a href="#">9 CFR 313.1(a)</a> with regards to poor pen maintenance that led to animal injury. Ms. Smith stated they would not be able to repair the pen immediately, so I placed U.S. Reject tag number B40682148 on the pen. I verbally notified Ms. Smith of the forthcoming non-compliance and the regulatory control action taken.</p>
10	<p>IPP must verify the establishment handles U.S. Suspect and disabled livestock humanely.</p> <p>As mentioned earlier when discussing the HATS Cat I for inclement weather, there is no requirement for a dedicated covered pen for animals that are not suspect, disabled or dying; therefore, this requirement can be met if the establishment can show they can and will provide a covered area when needed.</p> <p>Noncompliance examples:</p> <ul style="list-style-type: none"> <li>• Conscious animals are dragged.</li> <li>• Disabled animals are not separated from normal ambulatory animals.</li> <li>• US Suspect and disabled livestock are not provided or placed in a covered pen.</li> </ul> <p>HATS Category V – Handling of Suspect and Disabled At approximately 1445 hours while performing HATS Category IV – Handling During Ante-mortem Inspection I observed the following non-compliance with HATS Category V – Handling of Suspect and Disabled Animals: At approximately 1000 hours, Dr. Jones, Inspector-In-Charge had identified a U.S. Suspect</p>

	<p>(M-1234567) beef cow with back-tag number 41DL 2468. The establishment had separated the cow from other animals in pen 6 which was not a covered pen as required by regulation <a href="#">9 CFR 313.1(c)</a> and <a href="#">313.2(d)(1)</a>. It was sunny, hot, (108 degrees Fahrenheit according to the establishment's outside thermometer) and humid. The cow was laying laterally on her right side, breathing irregularly, and her tongue was hanging out of her mouth.</p> <p>Dr. Jones was notified of the findings and requested that the establishment take the animal's temperature, which was 105 degrees Fahrenheit. Dr. Jones notified Mr. Smith, Barn Supervisor, of the findings and Mr. Smith elected to euthanize the animal. I observed the animal humanely euthanized and prior to removal from the pen, slashed and denatured. I had the establishment place U.S. Condemn tag number Z-7654321 in the animal's ear prior to removal and remove the U.S. Suspect tag. I verbally notified Mr. Smith of the forthcoming non-compliance record.</p> <p><b>Note:</b> This finding could also fall under HATS Category I - Inclement Weather</p>
11	<p>IPP verify the establishment's procedures for humanely and effectively moving livestock do not involve excessive prodding or use of sharp objects.</p> <p>IPP verify this category after AM inspection has occurred, and make observations in multiple locations (pens, alleyways, single file chutes and stunning areas).</p> <p>Establishments should use implements (electric prods, canvas slappers) as little as possible to minimize excitement and injury and are not to drive livestock faster than a normal walking speed.</p> <p>IPP should also verify the establishment is not separating and moving livestock by mechanical devices (such as power activated gates) by forcibly pushing/dragging livestock across the floor or causing excitement, discomfort, or injury. Verify the mechanical devices are moving livestock w/ a minimum of excitement, discomfort, and injury.</p> <p>Examples of noncompliance:</p> <ul style="list-style-type: none"> <li>• Being prodded excessively causing livestock to become overexcited, injured, or move faster than normal walking speed.</li> <li>• Forcibly pushing or dragging livestock across the floor.</li> <li>• Handling livestock in a manner that does not minimize excitement, discomfort, injury, or pain.</li> </ul> <p>HATS Category VI – Electric Prod/Alternative Object Use</p> <p>At approximately 1030 hours while performing HATS Category VI – Electric Prod/ Alternative Object Use, I observed the following non-compliance: As I entered the pen area, I observed an establishment employee near the restrainer driving a sow with a hand-held battery powered electric prod. The sow was balking at the entrance to the restrainer and the employee shouted at the animal to move. When the animal would not move, the employee placed the electric prod on the rear of the animal and pushed the button four times in quick succession. The animal vocalized but did not move forward. The employee placed the electric prod on the rear of the animal again and pushed the button four times in quick succession. The animal again vocalized but did not move forward. The employee then used profane language and yelled at the animal to move forward and appeared to be in the process of using the electric prod again when I requested that he discontinue the use of the prod.</p> <p>I placed U.S. Reject tag number B19283746 on the restrainer and requested Ms. Smith, Slaughter Supervisor, come to the restrainer. I verbally notified Ms. Smith of my observations of non-compliance with regulation <a href="#">9 CFR 313.2(b)</a> and the excessive use of the electric prod on the sow. Ms. Smith had the employee driving hogs removed from the area. Ms. Smith identified and removed a white wash towel that had been draped over the front of the restrainer and requested that she try to move the sow forward into the restrainer.</p>

	<p>After further verbal preventative measures were given, I removed by the regulatory control action and the sow was moved forward and humanely stunned without further incident. I verbally informed Ms. Smith of the forthcoming non-compliance record.</p>
12	<p>IPP must verify the establishment prevents livestock from slipping and falling due to inadequate footing or improper handling practices, including the floor of the restraint box/area.</p> <p>Noncompliance example:</p> <ul style="list-style-type: none"> <li>• Animals slip and fall due to facility issues or improper handling practices.</li> </ul> <p>HATS Category VII – Observations for Slips and Falls</p> <p>At approximately 0730 hours, while performing HATS Category VII – Observations for Slips and Falls, I observed the following non-compliance: An establishment employee was driving five steers from pen 2 to the holding pen. Three of the five steers were observed to slip and then fall after being moved around a right-hand turn between the pens. All three animals rose and appeared unharmed and continued to walk into the holding pen area. After the area was clear and safe to observe, I noted an area approximately two meters in radius of ice and manure build-up at the area where the steers fell.</p> <p>I notified Mr. Smith, Slaughter Supervisor, of the ice and manure build-up and my observations of the movement of animals around the right-hand turn and tagged the alleyway prior to the holding pen with U.S. Reject tag number B66468123. Mr. Smith scraped the ice and manure away and added salt and hay to the area to improve footing and stated they would minimize the use of that area due to the sharp corner. After verbal preventative measures were given and the area verified as compliant, I removed the regulatory control action. I verbally notified Mr. Smith of the forthcoming non-compliance record in regard regulations <a href="#">9 CFR 313.2(b)</a> and <a href="#">9 CFR 313.2(d)</a>.</p>
13	<p>IPP must verify the establishment’s procedures to appropriately and effectively administer stunning methods that are rapid and effective and produce unconsciousness in the animals before they are shackled, hoisted, thrown, cast or stuck.</p> <p>Livestock must be rendered insensible to pain (unconscious) by a single blow or gunshot or an electrical, chemical, or other means that is rapid and effective.</p> <p>Stunning area should be designed/constructed to limit free movements of animals and allow stunning blow to have a high degree of accuracy.</p> <p>AM condemned animal are to be euthanized humanely.</p> <p>Noncompliance examples:</p> <ul style="list-style-type: none"> <li>• Establishment does not or cannot consistently render an animal(s) unconscious with a single application of the stunning methodology.</li> <li>• There are no records for CO2 gas concentrations.</li> </ul> <p><b>Note:</b> Reminder that for ritually slaughtered animals, we do not evaluate the ritual cut. However, if they use stunning methods in addition to the cut, the stun effectiveness will be evaluated. IPP are to verify that the humane handling of livestock before preparation for ritual slaughter complies with <a href="#">9 CFR 313.1</a> and <a href="#">313.2</a>.</p> <p>HATS Category VIII – Stunning Effectiveness</p> <p>At approximately 0915 hours, while observing HATS Category VIII – Stunning Effectiveness, I observed the following non-compliance: A stunning employee attempted to stun a lamb with a hand-held captive bolt device. The first attempt was ineffective as the lamb remained conscious. The lamb remained standing, was tracking the stunning employee with its eyes and moving its head away from the employee. The lamb vocalized immediately after the captive bolt contacted the head. There was a wound observed on the head of the lamb approximately three centimeters above the half-way point between the eyes and blood was</p>

	<p>observed coming from its nose. The stunning employee immediately made a second attempt to stun the lamb which was effective. I placed U.S. Reject tag number B91827364 on the restrainer and verbally discussed my observations with Mr. Smith, Establishment Owner.</p> <p>After Mr. Smith provided verbal preventative measures I removed the regulatory control action. I verbally informed Mr. Smith of the forthcoming non-compliance record and that the establishment failed to render the animal immediately unconscious with the first application of the stunner and failed to meet the regulatory requirements of <a href="#">9 CFR 313.15(a)(1)</a>.</p>
14	<p>IPP must verify that animals do not regain consciousness after stunning. When verifying this category, IPP focus on the time after stunning and throughout the process of shackling, throwing, casting, hoisting, sticking and bleeding of the animal to verify that the animals remain unconscious/insensible until death.</p> <p>The regulations provide for the stunning methods listed on the slides. We'll talk more about each of these methods later in an upcoming module.</p> <p>Noncompliance examples:</p> <ul style="list-style-type: none"> <li>• Establishment further process (e.g., shackle, hoist, cut) livestock not rendered unconscious by the method of stunning.</li> <li>• Animals regain consciousness after being stunned.</li> </ul> <p><a href="#">Example NOS</a></p>
15	<p>As a DVMO, you should ensure that IPP are correctly verifying and documenting HATS activities (e.g., routinely review HATS reports in PHIS and correlate with IPP). IPP should appropriately vary the times during their tour of duty when they verify that animals are handled humanely.</p> <p>You should verify that IPP are making supportable decisions surrounding their HATS verification. As the DVMO, you will weigh in on discussions surrounding how IPP should prioritize HATS. The FLS provides direction to IPP.</p>
16	<p>This slide summarizes how IPP are expected to record/document HATS time in PHIS. As a DVMO, you will verify IPP are doing this correctly.</p> <p>IPP enter the time they verified HATS categories in one-quarter hour increments, under the duration heading in HATS. They are to round up to next quarter hour if necessary (i.e., spend 20 minutes verifying HATS categories, they would record 2 quarter hour increments – 30 minutes).</p> <p>Total maximum time entered across all HATS categories generally shouldn't exceed total operational hours for that respective shift. A minimum of one-quarter hour is expected to be entered for each slaughter shift in HATS Category IV – AM inspection (exception in very small establishments).</p> <p>In very small establishments, as the total amount of inspection time spend on HATS during one shift may be only .25 hours, the documenting a minimum of one-quarter hour HATS Category IV-AM inspection doesn't apply. This is because the lowest amount of time you can record in PHIS is one-quarter hour. So, while IPP will be performing AM at these very small establishments on each shift, they will rotate through the HATS category type that they document so that the other HATS categories are documented in PHIS over time. IPP will conduct AM and another HATS category verification each shift, rotating through documenting a different HATS category each slaughter day. In this manner, all HATS activities performed by IPP will be documented in PHIS over the course of several slaughter days.</p> <p>When IPP identify noncompliance that was not under the selected category for observations, IPP will record HATS time for both the category that was being performed and for the category in which the noncompliance occurred.</p>

17	<p>DVMOs ensure IPP are correctly verifying HATS activities, correctly documenting their activities, and appropriately varying from day-to-day the times during their tour of duty when they verify that animals are handled humanely.</p> <p>The next set of slides provides examples of reports the DVMO may run to verify IPP HATS activities are performed and documented as described in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock", including common findings or questions the DVMO may follow-up on based on the reports.</p>
18	<p>There are two types of HATS reports a DVMO may typically run to verify IPP are performing and documenting HATS categories per agency procedures:</p> <ul style="list-style-type: none"> <li>• HATS Detail Summary - provides 3 tabs of information on the HATS hours and category types documented by IPP (veterinary and non-veterinary hours).</li> <li>• HATS Validation - provides dates where slaughter data and HATS hours are not both documented.</li> </ul> <p>On at least a quarterly basis, the DVMO is to generate the HATS Detail and Summary report for each establishment and circuit in PHIS to affirm that the task is completed. The DVMO is to review and analyze inspection information in HATS for PHV and non-PHV time, performance in each of the nine HATS categories, and individual inspector HATS performance time to determine if IPP are performing and documenting HATS times appropriately. The DVMO is to provide recommendations to the FLS on items that require follow-up and send this information to DO management.</p> <p>The DVMO is to assess any potential problem areas to provide guidance to IPP and to identify any issues that need to be discussed with the FLS. The DVMO is to determine:</p> <ul style="list-style-type: none"> <li>• Whether all HATS categories are evaluated regularly.</li> <li>• Whether there are predictable patterns in the performance of the HATS categories such as IPP always recording the same amount of time for each category every day.</li> <li>• Whether the time entries are reasonable for the species and classes of animals slaughtered.</li> </ul> <p>The DVMO is to report to DO management, on at least an annual basis, any district-wide trends identified from their analysis and correlation sessions.</p>
19	<p><a href="#">Click to view an example of the HATS Detail Summary Report.</a></p> <p>Spend some time getting familiar with this report and the information within. The DVMO will review this report for HATS hours per day and HATS categories verified.</p> <p>The report has 3 tabs:</p> <ul style="list-style-type: none"> <li>• <b>Totals:</b> <ul style="list-style-type: none"> <li>○ This tab shows the HATS hours per slaughter day and per head slaughtered. There is no nation-wide documented "acceptable" average HATS hours. Coordinate with your district and OJT Mentor on the expectations for HATS hours.</li> <li>○ Per <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock", the total maximum time that would be entered across all HATS categories will generally not exceed the total operational hours for that respective shift.</li> </ul> </li> <li>• <b>Hours by Role:</b> <ul style="list-style-type: none"> <li>○ This tab shows how much HATS time, and in what categories of HATS, was verified by a veterinarian versus a non-veterinarian.</li> <li>○ Per <a href="#">FSIS Directive 6900.2</a>, both veterinarian and non-veterinarian hours are recorded. IPP verify and document verification of all HATS categories over time.</li> <li>○ <b>Note:</b> If IPP document <b>zero</b> hours of time in any HATS category, the HATS category will not show up on this table. Make sure you verify that each HATS category is represented in the table.</li> </ul> </li> <li>• <b>Details:</b></li> </ul>

	<ul style="list-style-type: none"> <li>○ This tab shows the HATS hours and category details for each day, including HATS hours, HATS category verified, and head count.</li> <li>○ Per <a href="#">FSIS Directive 6900.2</a>, a minimum of one-quarter hour is expected to be entered for each slaughter shift in HATS category IV "Ante-mortem Inspection" (except for very small establishments that slaughter one to a few animals per day). In addition, IPP are to verify one or more other HATS categories during each slaughter shift.</li> <li>○ In very small establishments that slaughter one to a few animals per day, IPP perform ante-mortem every slaughter shift, but the documentation of HATS time is different. Because the total amount of inspection time spent on HATS may only be one quarter-hour, IPP rotate through documenting the appropriate HATS categories when entering HATS each day.</li> </ul>
20	<p><a href="#">Click to review an example of a HATS Validation report.</a></p> <p>The DVMO will review this report to look for days when the establishment had slaughter data, but no HATS tasks were documented (first tab), and vice versa (days HATS were documented, but no slaughter data - second tab).</p> <p>If the DVMO identifies these types of findings, the next step is to follow-up with IPP to determine the reason, so we have documentation to explain the findings. It may not be possible to adjust the findings in PHIS (limited time window to make changes in PHIS), however documentation of the reason behind the finding is important in case of any future questions. If the findings are due to IPP error, the DVMO can share guidance on FSIS policy.</p> <p>Examples of why there may be slaughter data with no corresponding HATS hours:</p> <ul style="list-style-type: none"> <li>● IPP have not yet or have forgotten to enter HATS hours.</li> <li>● IPP have entered the HATS hours on a day that did not correspond to the slaughter day (see note below).</li> </ul> <p>Examples of why there may be HATS hours documented with no corresponding slaughter data:</p> <ul style="list-style-type: none"> <li>● HATS hours are documenting an odd-hours inspection.</li> <li>● IPP have not yet or have forgotten to enter slaughter data.</li> <li>● IPP entered the HATS hours on a day that did not correspond to the slaughter day (see note below).</li> </ul> <p><b>Note:</b> In PHIS, routine HH tasks scheduled will default to the date the task is actually entered. Thus, if IPP enter a routine HH task for yesterday's slaughter today (the day after slaughter), IPP must change the date of the HH task to match the actual slaughter date. HATS hours they enter into that task may appear on the incorrect date (other than date of slaughter) if they do not change the actual date.</p>
21	<p>When reviewing the HATS reports, you'll look for any findings that seem inconsistent or abnormal, based on previous history and your good judgement.</p> <p>Examples include:</p> <ul style="list-style-type: none"> <li>● HATS times that seem high (based on knowledge of operations).</li> <li>● HATS time documented for non-slaughter plant.</li> <li>● HATS time that does not include both veterinary and non-veterinary HATS hours.</li> <li>● No HATS time documenting Category IV (VS w/ one to a few head/day exception).</li> <li>● Slaughter data on days with no corresponding HATS hours documented.</li> <li>● HATS hours documented on days with no corresponding slaughter data (could be odd-hour inspection HATS).</li> </ul> <p>This slide has some examples of HATS reports. Review the examples and see what you notice in each report. Then, click on the info button next to the example for insights into the report.</p>
22	N/A

23	N/A
24	N/A

# HH/GCP Overview: Stunning, Handling, and Systematic Approach

## Learning Objectives

1. Recognize current approved stunning and handling methods for livestock and poultry.
2. Assess whether an establishment has implemented a systematic (or robust systematic) approach to humane handling and slaughter, or a systematic approach to GCP.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<p><a href="#">FSIS Directive 6900.2</a> “Humane Handling and Slaughter of Livestock” – includes information for IPP on approved handling methods, including examples of noncompliant methods of handling livestock. It also includes information on the approved stunning methods described in the regulations.</p> <p><a href="#">FSIS Directive 6110.1</a> “Verification of Poultry Good Commercial Practices” – provides instructions to IPP for verifying poultry are handled in accordance with GCP. In general, poultry should be handled in a manner that prevents needless injury and suffering. <b>Note:</b> there are no stunning requirements for poultry slaughter.</p> <p><a href="#">FSIS Directive 6100.1</a> “Ante-mortem Livestock Inspection” – provides instructions to IPP on performing ante-mortem inspection, which does reference some information on HH.</p> <p><a href="#">FSIS Directive 6090.1</a> "Firearms Safety in Official Livestock Establishment" - provides safety procedures for inspection program personnel (IPP) to follow when firearms are used in official establishments to render animals immediately unconscious.</p>
4	<p>In the "HH/GCP Policy &amp; DVMO Role" module, you received an overview of the stunning and handling methods for both livestock and poultry. You reviewed the HATS categories, including examples, that IPP use to verify establishment livestock handling practices and approved stunning methods. You also learned that there is no requirement for stunning in poultry slaughter.</p> <p>In the first part of this module, you will learn in more detail about approved stunning methods in livestock. You will also learn how to assess stunning in poultry slaughter if the establishment chooses to stun prior to slaughter.</p>
5	<p>Before we dive into detail on each type of stunning method, there are some general principles that apply to all stunning methods. As a DVMO, you will verify establishments meet the regulatory requirements surrounding stunning (during Verification Visits) as well as provide your expertise regarding IPP inquiries.</p> <p>In general:</p> <ul style="list-style-type: none"> <li>• Stunning equipment must be maintained in good repair and free from pain-producing features. Equipment in poor repair can interfere with the rapid and effective application of the stunning blow. This can result in an incomplete or unsuccessful stun. Examples of poorly maintained equipment may include frayed wires or water inside electrical cords/switches, corroded electrodes or switches.</li> <li>• Effective stunning requires effective restraint. If an animal is not effectively restrained, it will be much more difficult to locate the stunning blow with a high degree of accuracy. The stunning area should be designed and constructed to limit the free movement of animals. It should be free of unnecessary holes or other openings. Overhead drop gates should not cause injury on contact with animals.</li> <li>• A well-trained and experienced establishment employee must operate stunning devices. The employee must be able to accurately and consistently position the stunning devices so that the animal is rendered immediately unconscious.</li> </ul>



	<ul style="list-style-type: none"> <li>Animals need to be delivered to the stunning area with a minimum of excitement or discomfort. It is more difficult to place the stunning device accurately, and the method of stunning may not work as effectively, on an excited or injured animal. Stunning areas should contain flooring that prevents slips and falls.</li> </ul> <p>With any stunning method, it is important to observe the amount of time it takes for the animal to begin bleeding out (“sticking”) after being stunned. Although there is no regulatory requirement for this time period, if the “stun to stick” interval is prolonged, it could result in animals regaining or beginning to regain sensibility on the bleed rail.</p> <p>It is also important to perform HATS verification at different times of the day. Equipment that may be working well in the morning can malfunction later in the day. Personnel get fatigued, may feel pressure to get a certain number of animals stunned by a particular time, or may be focusing on after work activities. Animals that have been standing around all day can get restless and more difficult to handle quietly and calmly. All these things can contribute to careless handling and/or stunning techniques, resulting in ineffective stuns.</p>
6	<p>To meet the statutory requirements in the HMSA, all animals must be rendered insensible to pain by a single blow or gunshot or an electrical, chemical or other means that is rapid and effective, before being shackled, hoisted, thrown, cast, or cut. They should remain insensible until death. This requirement includes cattle, calves, horses, mules, sheep, swine, and other livestock.</p> <p>The regulations describe four acceptable methods for producing a state of surgical anesthesia (surgical anesthesia is defined as a state where the animal feels no painful sensations). The four acceptable methods are:</p> <ul style="list-style-type: none"> <li>Chemical (carbon dioxide - CO<sub>2</sub>)</li> <li>Mechanical (captive bolt)</li> <li>Mechanical (gunshot)</li> <li>Electrical (electric current)</li> </ul> <p>Under HATS Category VIII - Stunning Effectiveness - IPP record their verification of the establishment’s procedures to appropriately and effectively administer stunning methods that produce unconsciousness in the animal before the animal is shackled, hoisted, thrown, cast, or stuck. See <a href="#">9 CFR 313.5</a>, <a href="#">313.15</a>, <a href="#">313.16</a>, and <a href="#">313.30</a>. <b>Note:</b> Establishments that conduct ritual slaughter may not utilize stunning. The ritual slaughter cut will not be evaluated. For establishments that are ritually slaughtering, and in addition utilize stunning methods found in <a href="#">9 CFR 313</a>, the stun effectiveness will be evaluated.</p> <p>Under HATS Category IX - Conscious Animals on the Rail - IPP record their verification that the establishment ensures that animals do not regain consciousness after stunning and throughout shackling, sticking, and bleeding. See <a href="#">9 CFR 313.5</a>, <a href="#">313.15</a>, <a href="#">313.16</a>, and <a href="#">313.30</a>.</p>
7	<p>Carbon dioxide gas (CO<sub>2</sub>) is approved for rendering swine, sheep, and calves unconscious, though it is most commonly used in swine. A carbon dioxide gas chamber is designed on the principle that carbon dioxide is heavier than normal atmospheric air. The chamber is open at both ends for the entry and exit of the animals to anesthetizing CO<sub>2</sub> concentrations or can be a pit structure where animals are lowered into the pit then brought out after inducing insensibility to pain. For swine only, CO<sub>2</sub> can be administered to induce death. Once anesthesia has occurred, the animals are removed from the chamber and are ready to be shackled, hoisted, or placed on a table for bleeding.</p> <p>The gas must be administered in a way that produces surgical anesthesia quickly and calmly, with a minimum of excitement and discomfort to the animals. The establishment must maintain a uniform carbon dioxide concentration in the chamber so that the degree of anesthesia in exposed animals will be constant. The gas concentration and exposure time, also known as the dwell time, must be recorded graphically</p>

	<p>throughout each day's operation. All gas producing and control equipment must be maintained in good repair and all indicators, instruments, and measuring devices must be available for inspection by FSIS. An example of poorly maintained equipment includes leaking seals around the CO2 chamber.</p> <p><b>Note:</b> Animals stunned with CO2 can recover consciousness very quickly after stunning. If the animals are not dead on leaving the chamber, they need to be bled out to ensure they do not return to consciousness.</p>
8	<p>There are two types of mechanical captive bolt stunners—penetrating and non-penetrating—used to produce immediate unconsciousness in cattle, sheep, goats, and swine. Both types have gun-type mechanisms that fire a bolt or shaft out of a muzzle. A measured charge of gunpowder (a blank cartridge) or accurately controlled compressed air propels the stunning bolt.</p> <p>A well-trained and experienced establishment employee must operate both types. The employee must be able to accurately and consistently position the stunning devices so that the bolt hits the skull at the right location to produce immediate unconsciousness. At establishments that handle different slaughter classes (i.e., handles both sheep/goats and cull cows/bulls), the employee must also be able to adjust the air pressure or detonation charge when the sex, breed, or size of the animal changes.</p> <p>Some establishments have adopted a practice of “double knocking”—that is, the animals are stunned with two blows delivered in very rapid succession. This is also called "security stun", "safety stun" or "assurance stun". These are applied at the discretion of the establishment. The rationale behind this procedure is that the consequences of an animal regaining consciousness are so severe that establishment managers want to make certain that it will not happen. Therefore, there is a second blow as a “security stun” only. The important point to consider here is that to meet the statutory and regulatory requirements, the first stun must be effective at rendering the animal insensible to pain.</p> <p>Equipment must be maintained in good repair. Examples of poorly maintained equipment includes damp powder in captive bolt cartridges or build-up of residue/debris in captive bolt devices.</p>
9	<p>When fired, the bolt in the penetrating type of captive bolt stunner penetrates the skull and enters the brain. Unconsciousness is caused by physical brain damage, sudden changes in intracranial pressure, and concussion. The brain from animals stunned with penetrating captive bolts may be saved for edible purposes provided the establishment removes the large blood clots, bone splinters, hair, and debris from the brain.</p> <p><b>Note:</b> <a href="#">9 CFR 313.15(b)(2)(ii)</a> prohibits the use of stunning devices that inject air into the cranial cavity of cattle and <a href="#">9 CFR 310.13(b)(2)</a> prohibits the use of pneumatic stunning devices that inject compressed air into bovine skulls during stunning. Air-injection stunning is a method of deliberately injecting compressed air into the cranial cavity as a part of the stunning process. This policy ensures portions of the brain are not translocated into the tissues of the carcass (a protection against BSE).</p>
10	<p>Penetrating captive bolt devices powered by compressed air must have accurate, constantly operating air pressure gauges. The gauges must be easily read and conveniently located for inspection by FSIS. Adequate safety features must be in place.</p>
11	<p>Many establishments will use the non-penetrating type of captive bolt to avoid the time-consuming task of physically removing large blood clots, hair, bone, splinters, and debris from the brain. The non-penetrating (concussion) bolt is similar to the penetrating bolt except that it has a bolt with a flattened circular head (mushroom head). When fired, the mushroom head meets the skull, but does not penetrate the brain. The animal becomes insensible from acceleration concussion and sudden changes in intracranial pressure.</p> <p>Accurate placement of the stunning blow is very important when using a non-penetrating captive bolt stunner. The amount of hair on the animal's head will also have an impact on the effectiveness of the stunning blow. Because there is no physical destruction of the brain during non-penetrating stunning, close observation and rapid bleed-out is important post-stun to ensure the animal does not regain consciousness.</p>

12	<p>Another type of mechanical device used for stunning is the firearm. It can be used on cattle, calves, sheep, goats, and swine. The caliber of the firearm must be such that a single shot of a bullet or projectile into the animal must produce immediate unconsciousness.</p> <p>The establishment should consider the size and type of livestock (age, breed, sex) when considering the firearm's caliber, powder charge, and type of ammunition. Firearms must be maintained in good repair. An example of poorly maintained equipment includes build-up of residue/debris in gun barrels.</p> <p>If a small-bore firearm is used, the regulations identify the following types of projectiles as acceptable:</p> <ul style="list-style-type: none"> <li>• hollow pointed bullets</li> <li>• frangible iron/plastic composition bullets</li> <li>• powdered iron missiles</li> </ul> <p>Use of gunshot/firearms requires well-trained and experienced operators. Aiming and discharging of firearms should be directed away from operating areas. Firearms must be equipped with safety devices to prevent injuries from accidental discharge.</p> <p>Always consider your safety when observing stunning done with firearms. Ensure that you are out of the way of ricochet and standing away from the direction of fire.</p> <p><b>Note:</b> Per <a href="#">9 CFR 310.18(b)</a>, when firearms are used, the brains, cheek meat, and head trimmings from the animal may not be saved for edible product.</p>
13	<p>The final method approved for stunning animals is electric current. Electrical stunning is used for hogs, calves, sheep, and goats. While approved for use in cattle, this is not a common practice. It is most widely used for hogs.</p> <p>The operator must control the timing, voltage, and current so that each animal is properly stunned. If too much or too high of a current is applied in the stunning process, capillaries may be damaged (resulting in multiple pinpoint hemorrhages in the muscle tissue), and hemorrhages or other tissue changes can occur that could interfere with the inspection procedure. This is commonly referred to as "splashing" or "speckling". If this condition is seen on the post-mortem disposition rail, it is prudent to investigate the stunning process and discuss the findings with establishment managers.</p> <p>Equipment must be maintained in good repair. An example of poorly maintained equipment includes build-up of residue/debris on electrical wands.</p>
14	<p>The animal is restrained so that the electric current can be applied with a minimum of excitement and discomfort.</p> <p>The placement of the electrodes varies from establishment to establishment. It can be across the head only (head only stunning), on the head and thoracic region (head-cardiac arrest stunning), or across the head only then thoracic region only (two phase stunning). The design of the stunning wand can vary considerably (one or two pieces). Whichever way is used, the current passing through the animal must be enough to ensure surgical anesthesia throughout the bleeding operation.</p>
15	<p>Head-only stunning induces a grand mal epileptic seizure, resulting in insensibility to pain. With head-only stunning, it is recommended that the stun to bleed interval does not exceed 30 seconds. While not a regulatory timeframe, if the "stun to stick" interval is prolonged, it could result in animals regaining or beginning to regain sensibility on the bleed rail.</p> <p><b>Note:</b> Hot-wanding (if electrodes are energized prior to being pressed against the animal, causing the animal to feel pain) is a HH concern.</p>

16	<p>Cardiac arrest stunning will induce a grand mal epileptic seizure and cardiac fibrillation—essentially inducing a heart attack. This means that the head must be stunned first (or simultaneously with the heart) because to stun the chest first would cause pain not insensibility, which is a violation of the humane handling requirements.</p> <p>In cardiac arrest stunning, the stun to stick interval is not as critical because the animal is much less likely to regain sensibility. However, some establishments have had problems with cardiac arrest stunned animals regaining consciousness and stunning effectiveness must be verified on a regular basis.</p>
17	<p>Ritual slaughter is permitted without a stunning device in accordance with ritual requirements. For animals that are ritually slaughtered, the ritual cut will not be evaluated (the handling and restraint prior to the cut, and the ritual cut itself is often referred to as the "ritual bubble"). However, ritual slaughter establishments are required to meet all the humane handling regulatory requirements except stunning prior to shackling, hoisting, throwing, cutting, or casting. All animals must be unconscious or insensible to pain prior to any dressing procedures such as head skinning, leg removal, ear removal, horn removal, or opening hide patterns.</p> <p>For those establishments that are ritually slaughtering, and in addition utilize stunning methods, the stun effectiveness <b>will</b> be evaluated.</p> <p>As a DVMO, you may be contacted by IPP for your expertise regarding any concerns surrounding ritual slaughter.</p> <p>Ritual Slaughter Bubble – this terminology refers to the period that ritual slaughter is executed. During this period IPP would not take action or interfere with the ritual process. This point begins when the animal is restrained in preparation for the ritual cut and ends when the operator releases their restraint after the ritual cut.</p> <p>Here are two examples to consider regarding ritual slaughter and the “bubble”:</p> <ul style="list-style-type: none"> <li>• If the operator uses a sawing motion for the cut or multiple cuts during the ritual slaughter, that is not actionable, as it is within the bubble.</li> <li>• It is an egregious act to drag an animal by the horns or other body parts. If this is done prior to restraining the animal to prepare for the ritual cut, that is actionable by FSIS. If grabbing the animal by the horns or other body parts occurs during the restraint and within the ritual bubble, it is not actionable.</li> </ul>
18	<p>While stunning is not required for poultry slaughter, if an establishment utilizes stunning, IPP should consider if the stunning system contributes to process control concerns. Common methods used to stun poultry include electrical stunning and controlled atmosphere stunning (CO<sub>2</sub>). Captive bolt may be used, primarily for ratites.</p> <p>IPP verify if stunning equipment is functioning properly. Electrically stunned poultry that have been effectively stunned will have an arched neck and tucked-in wings posture.</p>
19	<p>Establishments must effectively administer stunning methods that produce unconsciousness in livestock. Livestock are to be rendered insensible to pain (unconscious) by a single blow or gunshot or by an electrical, chemical, or other means that is rapid and effective. The establishment must ensure that animals do not regain consciousness after stunning and throughout shackling, sticking, and bleeding.</p> <p>Thus, in addition to understanding the acceptable stunning methods, you must also understand how to assess consciousness. You will use this information in future modules when determining the appropriate action to take during HH events.</p>
20	<p>When assessing unconsciousness, you need to observe the animals at different places along the bleed rail. For example, you could perform verification just after stunning when the animal is in the shackle pit. Then,</p>

	<p>you could observe animals after they have been hanging on the bleed rail for several minutes. Always be aware of your safety when performing verification of unconsciousness.</p> <p>Livestock must remain insensible to pain (unconscious) from the time they are stunned until they are dead.</p> <p>You may use the following signs to verify that animals are insensible to pain (unconscious):</p> <ol style="list-style-type: none"> <li>1. The head dangles from a flaccid (limp and flexible) neck. If the animals are suspended from an overhead rail, the head should hang straight down. This can be difficult to see if the animal is lying on its side.</li> <li>2. The tongue may hang straight down and out of the mouth.</li> <li>3. The eyelids should be wide open, and the pupils fully dilated so, at a distance, the eyes appear black.</li> <li>4. There is no menace response (the reflex blinking that occurs at the rapid approach of an object).</li> <li>5. There is no vocalization—mooring, bellowing, bleating, or squealing.</li> </ol> <p>You may observe movement of the head and neck. This movement can be because of involuntary reflexes caused by random firing of damaged muscle neurons. It can be associated with movement of equipment. It may also be voluntary movement because the animal is regaining consciousness.</p> <p>Some properly stunned animals may make some noises such as snoring type breaths or groans due to being relaxed, having stomach gas escape, or the last dying breaths. These noises may be mistaken as vocalizations.</p> <p>Some of the signs that an animal <i>may</i> be returning to sensibility include:</p> <ol style="list-style-type: none"> <li>1. Rhythmic breathing.</li> <li>2. Eye reflex in response to touch ("corneal reflex" or "palpebral reflex"). This sign is not used for electrically stunned animals. Also, be very aware of safety if using this method to check insensibility.</li> <li>3. Spontaneous natural eye blinks without touching the eye or eye area.</li> <li>4. Tense and moving tongue or lips.</li> </ol> <p>Note that these signs need to be carefully assessed and interpreted, as they are indications that the animal <b>may</b> be returning to consciousness or that the stunning was ineffective. They are not, in and of themselves, a definitive determination that the animal is conscious and able to feel pain.</p>
21	<p>Hallmark signs of a conscious animal include the righting reflex, vocalization, and eye tracking and/or reacting to surroundings. Conscious animals may stand intentionally or remain standing after a stunning attempt.</p> <p>A previously stunned animal that has regained sensibility (consciousness) may vocalize. It may also show a "righting reflex". The term "righting reflex" is used to describe the physical actions taken by an animal to move itself into a normal lying, sitting, or standing posture. For example, a conscious cow hanging from a bleed rail will show a contracted back, stiff extended neck and rigid extended forelegs as it tries to pull itself into a normal upright position. An animal lying flat on its side may try to lift its head and may try to roll up into a sternal position or stand. The animal may display eye tracking and react to surroundings.</p> <p>On occasion, you may see an animal's neck flex laterally—that is, to one side —after it has been stunned and hoisted. Do not mistake this sideways spasm for a "righting reflex"; make sure you look at the head to determine if the animal is unconscious.</p> <p><b>Note:</b> If an animal shows signs of involuntary and rapid back and forth eye motion, or brief irregular, normal or rapid breathing (rib cage moves in-and-out without significant pause), these signs alone are <b>not</b> evidence of a conscious animal. If you observe animals exhibiting these signs you should notify the establishment of</p>

	your observations and continue to monitor to ensure the animal does not return to consciousness. The establishment must determine how to address the situation.
22	N/A
23	N/A
24	N/A
25	N/A
26	N/A
27	<p>In the second part of this module, you will learn how to determine if a livestock slaughter establishment uses a systematic approach to humane handling and slaughter.</p> <p>You will also learn how to determine if a poultry slaughter establishment is using a systematic approach to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices.</p> <p>There is no regulatory requirement for establishments to utilize a systematic approach. However, if an establishment decides to implement this approach, both DVMOs and IPP will review the program and records as part of their verification activities.</p>
28	<p>In 2004, FSIS published a <a href="#">Federal Register Notice</a>, which stated that a systematic approach was beneficial in meeting the regulatory requirements for humane handling and encouraged livestock slaughter establishments to adopt that approach. The <a href="#">Federal Register Notice</a> outlined four steps to the systematic approach, which are:</p> <ol style="list-style-type: none"> <li>1. Conduct an initial assessment of where, and under what circumstances, livestock may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter, and of where, and under what circumstances, stunning problems may occur.</li> <li>2. Design facilities and implement practices that will minimize excitement, discomfort, and accidental injury to livestock.</li> <li>3. Evaluate periodically the handling methods the establishment employs to ensure that those methods minimize excitement, discomfort, or accidental injury and evaluate those stunning methods periodically to ensure that all livestock are rendered insensible to pain by a single blow.</li> <li>4. Respond to the evaluations, as appropriate, by addressing problems immediately and by improving those practices and modifying facilities when necessary to minimize excitement, discomfort, and accidental injury to livestock.</li> </ol> <p>It is important to understand that there is <b>no</b> regulatory requirement for an establishment to have a systematic approach to humane handling. It is also important to understand that an establishment can have and effectively implement a systematic approach that does not incorporate a written program. Having said that, FSIS has stated that establishments may choose to develop and implement a robust systematic approach that, among other things, includes a written animal handling program with records that are available for review by FSIS (see <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock", Attachment 3).</p> <p>For FSIS to consider a systematic approach to be <b>robust</b>, the systematic approach should include a written animal handling program.</p>
29	<p>For FSIS to consider a systematic approach to be robust, the systematic approach should include a written animal handling program that effectively addresses through its design, maintenance, and execution, the four aspects of a systematic approach (initial assessment, design/implementation, periodic evaluation, response to evaluation) <b>and</b> also should:</p> <ul style="list-style-type: none"> <li>• Describe procedures that the establishment will effectively implement to stay in compliance with the humane handling regulations.</li> <li>• Describe records that the establishment will keep to demonstrate that the program is being implemented as written.</li> </ul>

	<ul style="list-style-type: none"> <li>• Describe records that the establishment will keep to demonstrate the program will effectively prevent identified potential noncompliance.</li> <li>• Describe actions the establishment will take when it fails to implement the program as written or fails to prevent a noncompliance.</li> <li>• Be available to inspection program personnel for review.</li> </ul>
30	<p>During HH Verification Visits, the DVMO assesses whether a systematic approach is being implemented by the establishment to ensure that food animals are handled and slaughtered in a manner that is consistent with the HH requirements.</p> <p>When establishment management believes they have an animal handling program that equates to a robust systematic approach and would like it reviewed by FSIS, the PHV, FLS, DVMO, and DO all may play a role in reviewing the program and implementation records.</p> <p>Specifically, the responsibilities include:</p> <ul style="list-style-type: none"> <li>• The PHV, District Veterinary Medical Officer (DVMO) and District Office (DO) management are to determine whether the information presented by establishment management meets the criteria for a robust systematic approach.</li> <li>• If the criteria are met, the inspector-in-charge (IIC) is to inform the establishment that it has a robust systematic approach.</li> <li>• The PHV/IIC is to document the determination in a MOI under the Livestock Humane Handling Verification task in PHIS. A copy of the MOI is to be emailed to the DVMO, Frontline Supervisor (FLS), and Deputy District Manager (DDM) and provided to establishment management.</li> <li>• IPP, when conducting their daily HATS procedures, will verify the establishment is following the program.</li> </ul> <p><b>Note:</b> The establishment is not required to provide IPP access to a written humane handling program. However, IPP will not be able to verify effective implementation of a program that the establishment believes reflects a robust systematic approach without access to the written program.</p>
31	<p>If an establishment has a Robust Systematic Approach, what is the significance of this for our regulatory enforcement?</p> <p>FSIS will take the fact that the establishment has a Robust Systematic Approach into consideration when determining how to proceed when an incident occurs involving egregious inhumane treatment of an animal.</p> <p>You as the DVMO will be involved in discussions among the IIC, FLS, and District Office when an egregious inhumane handling event occurs. As part of that discussion, you will consider whether the establishment is operating under a robust systematic approach. This includes considering whether the establishment has demonstrated the robustness of the program via effective/consistent implementation; considering the establishment’s history of compliance (indicated by NRs related to HH); the establishment’s recent enforcement history; whether a suspension action is necessary to prevent inhumane handling from continuing; and overall, whether the egregious noncompliance represents a rare finding or anomaly in an otherwise well-functioning system.</p> <p>Keep in mind that noncompliance is noncompliance, regardless of whether the establishment implements a robust systematic approach. An egregious event is still an egregious event. If an establishment does choose to implement a systematic approach that FSIS deems is robust, FSIS will consider this when determining what type of enforcement action to take (NOIE vs NOS). If the establishment has an RSA, FSIS may apply regulatory discretion and issue an NOIE instead of an NOS, when appropriate.</p>

	<p><b>Note:</b> If an establishment is suspended or receives a Notice of Intended Enforcement (NOIE) – the establishment no longer is considered to have a robust systematic approach. After the suspension has been lifted and the enforcement action has been closed with a Letter of Warning, the establishment may request a review of their system to determine if it is again robust.</p> <p>Establishments that slaughter voluntary (exotic) species may also choose to have a systematic approach that is considered robust. However, at these establishments, FSIS issues a denial of service for egregious HH events (there is no choice between an NOIE or NOS).</p>
32	<p>If the establishment develops and implements what it considers to be a robust systematic approach and IPP have informed the establishment that the Agency agrees, IPP are to verify implementation of the establishment’s robust systematic approach as part of performing their daily HATS procedures. While performing these daily HATS procedures, IPP verify that the establishment is following its animal handling program by using the elements found in Attachment 3 of <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock".</p> <p>This would include observing (or reviewing):</p> <ul style="list-style-type: none"> <li>• Establishment employees during the handling and slaughter of animals.</li> <li>• Establishment employees implementing corrective actions, when appropriate.</li> <li>• Documents that show the establishment evaluated its robust systematic approach (e.g., stunning and handling practices, maintenance logs for facilities and equipment).</li> <li>• The establishment’s response to its evaluations.</li> </ul> <p>When IPP verify the implementation of the RSA, they are reviewing procedures and documents - thus, no additional HATS time is recorded for this review.</p> <p><b>Note:</b> Because a documented systematic approach is not a regulatory requirement, failure to implement provisions of such a program is <b>not</b> a noncompliance unless such failure to implement results in an identifiable failure to meet specific regulatory requirements.</p>
33	<p>The next few slides cover what IPP may expect when verifying each of the four aspects of an establishment's robust systematic approach. The examples are not all-inclusive.</p> <p>As a DVMO, you may be responding to IPP if they have questions or concerns when verifying an establishment's RSA. You will also be verifying if an establishment has implemented an RSA during your Verification Visits.</p>
34	<p>The first aspect of developing and implementing a robust program involves conducting an initial assessment to determine where, and under what circumstances, livestock may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter, and where, and under what circumstances, stunning problems may occur.</p> <p>IPP determine if the establishment conducted and documented this assessment, and considered:</p> <ul style="list-style-type: none"> <li>• Areas or equipment specific to the establishment where, or that could cause, animals to experience excitement, discomfort, or accidental injury.</li> <li>• Standard animal handling procedures specific to the establishment to ensure that livestock are handled in a manner to minimize excitement, discomfort, and accidental injury.</li> <li>• Stunning procedures and equipment that are designed to prevent an ineffective stun or a return to consciousness after stunning.</li> <li>• Is there documentation to support that the establishment performed this assessment?</li> </ul> <p>The documented format of this assessment could be a narrative, checklist, flow chart, or other form of documentation. Attachment 2 of the "<a href="#">FSIS Compliance Guide for a Systematic Approach to Humane Handling of Livestock</a>" contains a "Sample Assessment Tool".</p>



	<p><b>Note:</b> If an establishment has had an animal handling program in place for years and no longer have the documentation for their initial assessment, IPP ask the establishment to describe the assessment/actions the establishment undertook. IPP document this discussion in an MOI.</p>
35	<p>The second aspect of developing and implementing a robust program involves designing facilities and implementing practices that will minimize excitement, discomfort, and accidental injury to livestock.</p> <p>IPP determine if the establishment's animal handling program has addressed and maintains documentation of matters such as:</p> <ul style="list-style-type: none"> <li>• Facility design, and methods for correcting identified problems.</li> <li>• Standard operating procedures (SOPs) for live animal handling, which may include features such as: <ul style="list-style-type: none"> <li>○ Designation of a person or a position responsible for providing water and feed so as to meet regulatory requirements.</li> <li>○ Posted stocking levels for live animal holding pens.</li> <li>○ Procedures for identifying and handling disabled or very young animals.</li> </ul> </li> <li>• An animal handling training program for new employees working with live animals.</li> <li>• Scheduled periodic (e.g., quarterly or annual) refresher training for all employees responsible for handling live animals.</li> <li>• Procedures for checking that contracted truck drivers delivering animals to the establishment have received humane handling certification.</li> <li>• Procedures for ensuring (e.g., through maintenance records or recording devices) that stunning devices (e.g., captive-bolt, firearm, electrical stunning systems, or CO2 systems) are properly and regularly maintained so that animals are rendered insensible to pain as provided for in the regulations for the various stunning methods.</li> </ul>
36	<p>The third aspect of developing and implementing a robust program involves periodically evaluating:</p> <ul style="list-style-type: none"> <li>• The handling methods the establishment employs to ensure those methods minimize excitement, discomfort, or accidental injury.</li> <li>• The stunning methods to ensure that all livestock are rendered insensible to pain by a single blow.</li> </ul> <p>IPP determine if the establishment has written procedures for verifying that its program is effectively implemented. This may include:</p> <ul style="list-style-type: none"> <li>• A method for assessing, e.g., through periodic monitoring, whether those establishment areas where live animals are held or pass through are in good condition and do not present any potential for injury, for example: evidence that written work orders are created when facility repairs are needed, or maintenance logs documenting regular equipment inspections and maintenance are performed on equipment used to move animals.</li> <li>• In-house monitoring or similar method to ensure effective program implementation (including how often the monitoring will be performed and at what points in the process monitoring will occur).</li> <li>• In-house and third-party humane handling audits that employ industry accepted auditing methods. Third party audit results should be reviewed by the establishment.</li> <li>• Video surveillance of live animal holding and handling areas or stunning areas that allow for regular, randomly selected observations.</li> <li>• Provision in the animal handling program for periodic documented monitoring of the stunning through bleed-out area to assess stunning practices and to verify that no animals return to consciousness during the post-stun through bleed-out period.</li> <li>• Annual reassessment of all features of the program, including design, results, and effectiveness.</li> <li>• A method to identify developing trends (e.g., statistical process control charting) and periodic (e.g., weekly, monthly, quarterly) reviews of deficiencies identified during monitoring or audits. The establishment should make decisions based on these reviews to remedy deficiencies.</li> </ul>
37	<p>The fourth aspect of developing and implementing a robust program involves responding to the periodic evaluations by addressing problems immediately and improving practices and modifying facilities to minimize excitement, discomfort, and accidental injury to livestock.</p>

	<p>IPP determine if the establishment has a written program for responding to and making changes in response to identified problems, such as:</p> <ul style="list-style-type: none"> <li>• Provisions in the written animal handling program addressing actions to take in the event of a natural disaster, e.g., flood, tornado, or other catastrophic event such as a facility fire or major mechanical breakdown, to minimize injury or distress to animals on-site at or en route to the establishment.</li> <li>• A method to track changes made in handling methods that address actual and potential problems identified during monitoring or audit activities.</li> </ul> <p>IPP will also consider if the establishment has a method that employees and management would implement in the event an unanticipated inhumane incident occurs. The method may:</p> <ul style="list-style-type: none"> <li>• Specify what an employee who observes an inhumane handling incident should do (e.g., take immediate action to eliminate or minimize further animal pain and notify supervisor).</li> <li>• Specify what a supervisor should do when incidents are reported (e.g., document the incident, investigate and assess the incident, and develop preventative measures).</li> <li>• Provide that the establishment's animal handling program will be reviewed and updated as needed, including a provision for periodic (e.g., annual) assessment by management.</li> </ul> <p>If an inhumane stunning incident occurs, the method may describe:</p> <ul style="list-style-type: none"> <li>• That employees are to take immediate action to minimize any further pain, stop further slaughter, and notify management.</li> <li>• That management will assess the incident and implement immediate corrective actions before resuming slaughter, and document those actions taken.</li> </ul>
38	<p>The robust systematic approach is not a regulatory requirement. An establishment may choose not to have an RSA.</p> <p>If an establishment has an RSA, but IPP observe that the establishment is not following the written animal handling program:</p> <ul style="list-style-type: none"> <li>• IPP discuss their observations with establishment management and document this discussion in a MOI under the Livestock Humane Handling Verification task in PHIS.</li> <li>• If IPP continue to observe ineffective implementation of the animal handling program, they are to continue to document and discuss as above. Additionally, they are to notify their immediate supervisor and the DO (District Veterinary Medical Officer (DVMO) or Deputy District Manager (DDM)) of their observations. The IPP, immediate supervisor and DO (e.g., DVMO) are to hold a discussion about the IPP's observations to determine if the establishment is still implementing a robust systematic approach.</li> </ul> <p>If IPP determine that the establishment is no longer implementing an RSA, the PHV/IIC will inform the establishment of this, and IPP will document this in a MOI under the Livestock Humane Handling Verification task in PHIS. IPP provide a copy of the MOI to the DVMO, FLS, DDM and to establishment management.</p> <p>The establishment may request a review by the PHV later to determine if they are now meeting the criteria for an RSA. If the program is robust, the IIC informs the establishment that it again has an RSA. IPP document this in a MOI under the Livestock Humane Handling Verification task in PHIS and a copy of the MOI is provided to the DVMO, FLS, DDM and to establishment Management.</p> <p>And remember, if an establishment receives an NOS or NOIE for a humane handling situation, their program is no longer robust. They need to respond to the enforcement, and then after that, they can re-evaluate if their program is robust.</p>

	<p><b>Note:</b> Establishments may object to the content of the MOI and in it, FSIS' determination that their systematic approach is no longer robust. The establishment can document its concerns or disagreement in several ways, including documenting through PHIS, informing the inspector orally or in writing, or bring their objections to the attention of other agency officials in the supervisory chain of command. More information on this is found in <a href="#">FSIS Directive 5010.1</a> "Food Safety Related Topics for Discussion During Weekly Meetings with Establishment Management".</p>
39	<p>So far, you've learned how to determine if a livestock slaughter establishment uses a systematic approach to humane handling and slaughter.</p> <p>Next, you will learn how to determine if a poultry slaughter establishment is using a systematic approach to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices.</p> <p>As a reminder, while there is no regulatory requirement for a systematic approach, if the establishment utilizes this approach, both DVMOs and IPP will review the program and records as part of their verification activities.</p>
40	<p>In 2005, FSIS published a <a href="#">Federal Register Notice</a>, which stated that a systematic approach is one method poultry operations may wish examine to ensure that poultry are handled and slaughtered in a manner that is consistent with good commercial practices.</p> <p>A "systematic approach" is one in which establishments focus on treating poultry in such a manner as to minimize excitement, discomfort, and accidental injury the entire time that live poultry are held in connection with slaughter.</p> <p>The <a href="#">Federal Register</a> Notice outlined three steps to the systematic approach, which are:</p> <ol style="list-style-type: none"> <li>1. Assessing under what circumstances poultry may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter.</li> <li>2. Taking steps to minimize the possibility of such excitement, discomfort, and accidental injury.</li> <li>3. Evaluating periodically how poultry are being handled and slaughtered to ensure: <ul style="list-style-type: none"> <li>○ That any excitement, discomfort, or accidental injury is being minimized.</li> <li>○ That all poultry are slaughtered in a manner that results in thorough bleeding of the poultry carcass.</li> <li>○ That breathing has stopped before scalding.</li> </ul> </li> </ol>
41	<p>The <a href="#">Federal Register Notice</a>, outlines the first aspect of a systematic approach as assessing under what circumstances poultry may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter.</p> <p>In this step, establishments conduct an assessment of where handling problems may occur. They would consider such factors as:</p> <ol style="list-style-type: none"> <li>1. Whether they are providing training for their employees in handling live poultry.</li> <li>2. Whether feed and water withdrawal is kept to the minimum level consistent with good processing practices.</li> <li>3. Whether they have appropriately designed and maintained facilities for bird delivery to the establishment.</li> <li>4. Whether holding areas are equipped with an adequate number of fans to ensure proper ventilation for birds.</li> <li>5. Whether stunning equipment (if applicable) and killing equipment are constantly monitored to ensure proper functioning for humane processing.</li> <li>6. Whether all poultry are dead before entering the scald.</li> <li>7. Whether establishment personnel and equipment handle poultry in a manner that minimizes broken legs and wings.</li> </ol>

	<p>These factors are based on information provided in the <a href="#">National Chicken Council Animal Welfare Guidelines and Audit Checklist</a>.</p>
42	<p>The <a href="#">Federal Register Notice</a> outlines the second aspect of a systematic approach as taking steps to minimize the possibility of such excitement, discomfort, and accidental injury. In this step, establishments determine whether their facilities are designed and maintained to prevent excitement, discomfort, and accidental injury to poultry the entire time that live poultry is held in connection with slaughter.</p> <p>The <a href="#">Federal Register Notice</a> outlines the third aspect of a systematic approach as evaluating periodically how poultry are being handled and slaughtered to ensure:</p> <ul style="list-style-type: none"> <li>• That any excitement, discomfort, or accidental injury is being minimized.</li> <li>• That all poultry are slaughtered in a manner that results in thorough bleeding of the poultry carcass.</li> <li>• That breathing has stopped before scalding.</li> </ul> <p>In this step, establishments periodically evaluate their handling methods to ensure that their employees are in fact minimizing excitement, discomfort, or accidental injury to live poultry, that their methods ensure all poultry are slaughtered in a manner that results in thorough bleeding of the carcass, and that their methods ensure poultry breathing has stopped before scalding.</p>
43	<p>The DVMO will assess whether the Agency recommendations for a systematic approach have been implemented by the poultry slaughter establishment. This is <b>not</b> a regulatory requirement, however.</p> <p>As part of their assessment during Verification Visits, the DVMO:</p> <ul style="list-style-type: none"> <li>• Is to assess the level of supervisory engagement of establishment employees at the live hang area. This includes, to the extent possible, assessing the role of upper establishment management in the establishment's written GCP or animal welfare program.</li> <li>• Is to review, if available, the formal poultry handling and slaughter program (written GCP program, training records, recorded in-house or 3rd-party audits or verifications), and other documents or records (including video records using <a href="#">FSIS Directive 5000.9</a> "Verifying Video or Other Electronic Monitoring Records") made available by establishment management.</li> <li>• Is to review these documents or records to assess whether they are being implemented; if noncompliances have occurred; if effective measures to return to compliance described in the establishment's program were implemented; and any trends or other issues exist which need to be discussed or resolved.</li> </ul> <p>Unlike in livestock, there are no specific instructions to IPP for verifying a systematic approach in poultry. However, IPP are expected to follow procedures in <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices" when verifying poultry GCP, which includes a weekly review of any GCP documentation generated by the establishment (including any video records).</p>
44	<p><a href="#">Click to review an example livestock HH program.</a></p> <p>Does this program meet the elements of a robust systematic approach, if implemented as written by the establishment?</p>
45	<p>This program does not meet all four elements of a robust systematic approach. Specifically, the program is missing an initial assessment of the establishment's HH/slaughter system, and the program does not mention any method of reassessment when necessary.</p> <p>The establishment could add the following information to this program, and if implemented as written, demonstrate a robust systematic approach:</p> <p><b>Assessment/Reassessment:</b>  We based our initial assessment on the tool (attachment 2) in the FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock. We will reassess our plan as needed based on our monitoring results. We will document any reassessment, and summarize all changes to our plan and</p>

	records, on the back of our monitoring record. Within 30 days, one of the owners will review any reassessments.
46	N/A
47	N/A

# DVMO Visits: Verification Visits Module

## Learning Objectives

1. Describe how to prepare for a HH/GCP verification visit.
2. Analyze data utilized to prepare for a HH/GCP verification visit.
3. Describe how to conduct a HH verification visit and a GCP verification visit.
4. List the five topics that should be covered with the establishment and IPP during a HH/GCP visit.
5. Explain how to conduct an exit meeting after a verification visit.
6. Demonstrate how to complete “Report of HH Verification Review” and “Report of GCP Correlation Visit” in PHIS.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<p><a href="#">FSIS Directive 6900.2</a> “Humane Handling and Slaughter of Livestock” – informs IPP of requirements, verification activities, and enforcement actions for ensuring that the handling and slaughter of livestock is humane. Includes instructions to IPP for conducting HH activities and how to assess whether an establishment’s systematic approach is robust (if applicable – not all establishments will have a systematic approach because this is non-regulatory). The directive also includes information for entering HH verification data into PHIS.</p> <p><a href="#">FSIS Directive 6110.1</a> “Verification of Poultry Good Commercial Practices” – provides instructions to IPP for gathering and assessing information when verifying poultry GCP. Also provides instructions on GCP NRs and poultry mistreatment MOIs. Includes guidance on how to review NRs/MOIs to assess accuracy.</p> <p><a href="#">FSIS Directive 6100.1</a> “Ante-mortem Livestock Inspection” – provides instructions to IPP on performing ante-mortem inspection, which does reference some information on HH.</p> <p><a href="#">FSIS Directive 12600.1</a> "Voluntary and Other Reimbursable Inspection Services" - provides information on the voluntary HH/GCP tasks.</p>
4	<p>A previous module covered the types of visits a DVMO may conduct: DVMO Enhanced Outreach Visit (DEOV), verification visits (VVs), and new grant visits (see <a href="#">FSIS Directive 5220.1</a> "Grant of Inspection Management").</p> <p>The DEOVs and VVs differ in that the objective of the DEOV is to support and expand establishments' knowledge of HH/GCP best practices, while VVs are to determine that amenable species and exotic species under voluntary inspection are handled in a manner consistent with regulatory requirements. In this module, we will review in detail how you, as a DVMO, will prepare for and conduct <b>VVs</b>. In a later module, you will learn how to prepare for and conduct DEOVs.</p> <p>The difference between routine and for cause VVs is recapped below.</p> <p>DVMOs conduct routine regulatory visits, including at facilities under voluntary inspection, to assess establishment compliance with each of the regulatory requirements applicable to the establishment's operating practices.</p> <p>DVMOs conduct for cause VVs when there are situations involving noncompliance or enforcement actions. This includes situations such as:</p> <ul style="list-style-type: none"> <li>• HH egregious noncompliance has occurred.</li> <li>• When directed by the DO.</li> </ul>

	<ul style="list-style-type: none"> <li>• Repetitive noncompliances pertaining to GCP or HH exist.</li> <li>• HH data in PHIS, such as information contained in the Animal Disposition Reporting (ADR) and the Humane Handling Activities Tracking System (HATS), indicates a negative trend such that a review is warranted.</li> <li>• Trends of noncompliances pertaining to GCP or HH are occurring.</li> <li>• IPP request assessment of a ritual exemption practice pertaining to slaughter.</li> <li>• Directed by Headquarters or participating in enhanced surveillance activities.</li> <li>• A follow-up VV pertaining to a suspension being held in abeyance, Notice of Intended Enforcement (NOIE) in deferral, or other enforcement is assigned by the DO.</li> </ul>
5	<p>Over the next few slides, you'll learn how to prepare for a VV for both livestock and poultry slaughter establishments.</p>
6	<p>DVMOs are to prepare for a routine regulatory GCPVV or HHVV at each official slaughter establishment approximately every 12-18 months. This frequency also applies to establishments under voluntary inspection services in accordance with <a href="#">9 CFR Part 352</a>.</p> <p>The DVMO is to use professional judgment in determining whether to provide advance notification of the verification visit to the establishment.</p> <p>However, to obtain a candid view of the implementation of good commercial practices or livestock humane handling at the establishment, the DVMO may not announce the visit in advance.</p> <p>If the DVMO is making a first-time visit to an establishment operating under a new grant of inspection to assess good commercial practices or humane handling practices, the DVMO is to contact the establishment beforehand.</p> <p>For cause VVs will be scheduled when needed, for the causes you previously learned. During for cause visits, you follow similar methodology as for routine visits - however, you may be focused on particular findings or observations. For example, when performing for cause visits in response to an enforcement action that is now in abeyance or deferral, you will initially focus your visits on the verification plan. At the last follow-up visit, you will conduct a comprehensive verification. Additionally, for cause visits may involve reviewing other data prior to the visit, such as a complaint or other evidence that prompted the visit. Remember that discussion with the in-plant IPP is important to gather information that might be relevant to your investigation or recommendation.</p>
7	<p>The DVMO is to review all relevant data and information to determine whether there are patterns or trends that need to be investigated when visiting the establishment. Review, at a minimum, 6-12 months of FSIS data (in PHIS) pertaining to GCP or livestock humane handling prior to visiting the establishment. The types of data include:</p> <ul style="list-style-type: none"> <li>• Poultry PHIS Reports, such as: <ul style="list-style-type: none"> <li>○ Establishment Profile.</li> <li>○ Slaughter Heads Details (e.g., pounds condemned antemortem, cadavers).</li> <li>○ Establishment's GCP noncompliance history (filter for Poultry Good Commercial Practices task/regulation, establishment NRs, RCAs, previous enforcement actions).</li> <li>○ MOIs and Letters of Concern (LOCs) prepared concerning the establishment's treatment of birds.</li> <li>○ Good Commercial Practice Validation for an Establishment.</li> <li>○ Poultry Cadaver Summary for a District.</li> </ul> </li> <li>• Livestock PHIS Reports, such as: <ul style="list-style-type: none"> <li>○ Establishment Profile</li> <li>○ HATS Detail and Summary and/or HATS Validation Report for an Establishment.</li> <li>○ Humane Handling NRs for an Establishment.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Establishment compliance history (review regulatory control actions, humane handling NRs, previous enforcement actions, or other pertinent information).</li> <li>○ Humane Handling robust systematic approach (RSA).</li> <li>○ In-plant Residue Sampling Results for an Establishment and repeat violator information.</li> <li>○ Ante-mortem and Post-mortem Disposition Summary for the establishment.</li> </ul>
8	<p>In preparation for the VV, the DVMO is to also review other available information, such as:</p> <ul style="list-style-type: none"> <li>• Prior GCPVV or HHVV reports, including any actions or recommendations.</li> <li>• Concerns raised by the IPP or the FLS.</li> <li>• Complaints from 3rd-parties.</li> <li>• Odd-hour inspection reports.</li> </ul> <p>This is in addition to the PHIS data noted on the previous slide.</p> <p>Based on your review of all the available data, you will determine whether there are patterns or trends that need to be investigated when visiting the establishment. This review and assessment will ensure you are prepared for and can manage your time most efficiently during the VV.</p>
9	<p>This slide shows an example set of PHIS reports and findings a DVMO may consider when conducting their pre-visit data review in preparation for a routine <b>Livestock VV</b>.</p> <p>Your district may have specific reports or information they direct you to run, in addition to HH related reports (e.g., residue, APHIS sampling, etc.). You should work with your OJT Mentor to understand any additional responsibilities your district requires of DVMOs.</p> <p>Most of these example reports were run from the time of the previous HH VV to present. Consult your District Office and OJT mentor, and use good professional judgement, when determining the timeframe for which to run pre-visit data reports.</p> <p><a href="#">Click to review an example Establishment Profile.</a></p> <p>You may review the Establishment Profile report for information to complete summary information in your DVMO VV report (covered later in this module).</p> <p>Your focus will be on HH related information. However, if you observe information in the EP that doesn't make sense but is unrelated to HH, you can share this information with the IIC (for example, in this report, the grant inauguration date is 01/01/2013, but the GOI update is 4/20/2011, indicating perhaps the dates are reversed in the profile).</p> <p>If the establishment slaughters under a religious exemption (e.g., Kosher or Halal), it should be indicated in the establishment profile.</p> <p><a href="#">Click to review an example of the HATS Detail Summary Report.</a></p> <p>The DVMO will review this report for HATS hours per day and HATS categories verified. Per <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock", the DVMO is to ensure that the PHV or other IPP are correctly verifying HATS activities and correctly documenting their activities.</p> <p>The report has 3 tabs - the information in each tab, along with some specifics about this example report, are below:</p> <ul style="list-style-type: none"> <li>• <b>Totals:</b> <ul style="list-style-type: none"> <li>○ IPP in this example report averaged 1.56 HATS hours per day. Coordinate with your district and OJT Mentor on the expectations for "average" HATS hours.</li> </ul> </li> </ul>



- Per [FSIS Directive 6900.2](#), the total maximum time that would be entered across all HATS categories will generally not exceed the total operational hours for that respective shift.
- **Hours by Role** (view how much HATS time was verified by a veterinarian vs a non-veterinarian; verify that all HATS categories have times entered):
  - In this example report, you can see both PHV (4.25) and non-PHV (107) HATS hours are documented, with the majority being non-PHV hours. Coordinate with your district on expected veterinarian vs non-veterinarian HATS time.
  - Per [FSIS Directive 6900.2](#), both veterinarian and non-veterinarian hours are recorded. IPP verify and document verification of all HATS categories over time.
  - **Note:** If IPP document zero hours of time in any HATS category, the HATS category will not show up on this table. Make sure you verify that each HATS category is represented in the table.
- **Details** (view the HATS details for each day - HATS hours, ante-mortem hours, and head count):
  - In this example report, there is one day (5/11/23) where HATS categories were verified but there is no livestock headcount. There are several days where HATS categories were documented verified, but category IV was not documented as verified. The DVMO may ask IPP about these types of inconsistencies and share guidance with IPP on FSIS policy.
  - Per [FSIS Directive 6900.2](#), a minimum of one-quarter hour is expected to be entered for each slaughter shift in HATS category IV "Ante-mortem Inspection" (except for very small establishments). In addition, IPP are to verify one or more other HATS categories during each slaughter shift.
  - In very small establishments that slaughter one to a few animals per day, IPP perform ante-mortem every slaughter shift, but the documentation of HATS time is different. Because the total amount of inspection time spent on HATS may only be one quarter-hour, IPP rotate through documenting the appropriate HATS categories when entering HATS each day.

[Click to review an example of a HATS validation report.](#)

The DVMO will review this report to look for days when the establishment had slaughter data, but no HATS tasks were documented (first tab), and vice versa (days HATS were documented, but no slaughter data - second tab).

In this example report, there was one finding on 12/9/22 for slaughter data with no HATS documented; and one finding (5/11/23) for HATS documented, but no slaughter data. The DVMO may follow up with IPP on these inconsistencies and share guidance on FSIS policy.

**Note:** In PHIS, routine HH tasks scheduled will default to the date the task is actually entered. Thus, if IPP enter a routine HH task for yesterday's slaughter today (the day after slaughter), IPP must change the date of the HH task to match the actual slaughter date. HATS hours they enter into that task may appear on the incorrect date (other than date of slaughter) if they do not change the actual date.

As part of the DVMO's pre-visit data review, the DVMO should review any HH related NRs or MOIs. In this example, there were no HH NRs or HH MOIs written during the timeframe reviewed, so there is no example report to review.

[FSIS Directive 6900.2](#) "Humane Handling and Slaughter of Livestock" instructs IPP to send copies of any humane handling or slaughter noncompliance NRs to their immediate supervisor, FLS, and DVMO.

[Click to review an example of the Slaughter Heads Detail report.](#)

This report provides you with the slaughter dates, class/subclasses of slaughtered animals, head counts, and veterinary dispositions. The report is separated into tabs by inspected and custom. A tab at the end of the report includes "No Kill" periods.

The information in this report is useful to understanding some of the establishment's operations, prior to a VV, as well as to look for any AM/PM condemned categories related to HH (e.g., injuries, moribund, NAD). Depending on instruction from your district, as a DVMO you may also follow-up on any "pending" dispositions.

At establishments that have voluntary inspection (e.g., exotics slaughter), you may verify that IPP are documenting Humane Handling (V) tasks (run PHIS Task Summary report) as per [FSIS Directive 12,600.1](#) "Voluntary and Other Reimbursable Inspection Services" (1 per shift when FSIS inspected exotics slaughter occurs).

[Click here to see an example of an odd-hour inspection form.](#)

Odd-hour inspections do not occur at all establishments, but if they do at the establishment you plan to conduct a VV at, you may verify that odd-hour inspections are occurring at the frequency discussed (with IIC, District, and DVMO).

The DVMO is responsible for reviewing the odd-hour form (FSIS Form 8100-1). You'll learn more about how to review these forms in a later module.

Depending on instruction from your district, as a DVMO, you may review sampling result reports - including those related to residue sampling (KIS testing, NRP and NARMS) and APHIS-related sample collection (TB surveillance, BSE, Brucellosis). For example, [FSIS Directive 10,800.4](#) "The National Residue Program Roles Functions and Responsibilities" describes the District Office responsibilities surrounding repeat residue violator notification reports, which may be something you assist with as a DVMO. More information on DVMO responsibilities for the National Residue Program are covered in a later module.

Follow-up with your District and OJT Mentor to learn more about any district-specific reports you may run prior to verification visits, outside of the HH related reports.

For example, [click to review this Sampling Status Report](#). Focusing on the residue-specific examples and clicking on the several tabs available, you can see which NARMS and NRP samples were not scheduled or were cancelled but not justified. Depending on instruction from your district, you may follow up with in-plant IPP on these types of findings and share policy information found in [FSIS Directives 10,800.1](#) "Residue Sampling, Testing and Other Verification Procedures under the National Residue Program for Meat and Poultry Products" and [10,800.2](#) "Residue Sampling and Testing under the National Residue Program for Meat and Poultry Products".

Another example, [click to review this IPP Sampling Report](#). At your district's direction, you may use this report and the dispositions listed in the Slaughter Heads Details report to compare the types of dispositions to the in-plant residue (KIS tests) to verify that IPP are conducting KIS testing according to the procedures in [FSIS Directive 10,800.3](#) "Prioritizing Inspector-Generated Sampling under the National Residue Program for Meat and Poultry Products".

DVMOs play a role in ensuring IPP are employing correct decision-making regarding humane handling activities.

	<p>During VVs, you may share with IPP the recommended HH training courses (<a href="#">Basics</a> and <a href="#">Consciousness and Stunning</a>) on AgLearn and the <a href="#">Situation-Based HH training</a> on the FSIS website.</p> <p><a href="#">Click to review an example of a previous HH VV Report.</a></p> <p>As part of your pre-visit data review, you should review enforcement history, as well as the previous HH VV Report. In this example, under "findings" from the previous VV, there are some items you may follow up on at an upcoming VV: loose board alongside of unloading ramp, piece of upturned metal/piece of wire, manure/liquid material that could result in issues maintaining good footing.</p>
10	<p>This slide shows an example set of PHIS reports and findings a DVMO may consider when conducting their pre-visit data review in preparation for a routine <b>Poultry</b> VV.</p> <p>Your district may have specific reports or information they direct you to run, in addition to GCP related reports (e.g., residue sampling, poultry weights, etc.). You should work with your OJT Mentor to understand any additional responsibilities your district requires of DVMOs.</p> <p>Most of these example reports were run from the time of the previous GCP VV to present. Consult your District Office and OJT mentor, and use good professional judgement, when determining the timeframe for which to run pre-visit data reports.</p> <p><a href="#">Click to review an example Establishment Profile.</a></p> <p>You may review the Establishment Profile report for information to complete summary information in your DVMO VV report (covered later in this module).</p> <p>Your focus will be on GCP related information. However, if you observe information in the EP that doesn't make sense but is unrelated to GCP, you can share this information with the IIC.</p> <p>The profile should indicate any religious exemptions, such as a religious exemption for the slaughter and processing of poultry (see <a href="#">FSIS Directive 6030.1</a> "Religious Exemption for the Slaughter and Processing of Poultry"). If you find that an establishment is slaughtering under a religious exemption, but it is not listed in the profile, you should follow-up with the FLS/IIC.</p> <p><a href="#">Click to review an example GCP Validation Report.</a></p> <p>This report has two tabs to review. The first tab shows dates when there was slaughter data entered but no corresponding GCP task was scheduled, or the GCP task is incomplete. The second tab shows dates when there was a GCP task documented, but no slaughter data entered.</p> <p>In this example, there are four dates without GCP tasks and nineteen dates without slaughter data, but a GCP task was documented. As a DVMO, you may follow up with these types of inconsistencies with IPP.</p> <p><b>Note:</b> In PHIS, any routine GCP task scheduled will default to the date it was actually entered. Thus, if IPP enter a routine GCP task for yesterday's slaughter today (the day after slaughter), IPP must change the date of the GCP task to match the actual slaughter date. On shifts that start on one day and end the next day (e.g., third shift), IPP should enter the GCP tasks and slaughter data on the day the shift started.</p> <p><a href="#">Click to review an example of GCP MOI report.</a></p> <p>There were no GCP NRs associated with this example visit.</p>

As part of the DVMO's pre-visit data review, the DVMO should review any GCP related NRs or MOIs. These should look familiar, as IPP should send the DVMOs the MOIs or NRs at the time they are written.

[FSIS Directive 6110.1](#) "Verification of Poultry Good Commercial Practices" instructs IPP to provide copies of GCP MOIs and instructs DVMOs to correlate with IPP about FSIS policies and procedures that pertain to GCP in poultry, including a review of GCP NRs and mistreatment MOIs to determine the accuracy and consistency of this documentation.

[Click to review an example Poultry Cadaver Summary report.](#)

You may review this report and compare, month to month, the numbers for DOA (dead-on-arrival) birds and cadaver birds. This gives you information about possible GCP or poultry mistreatment issues - birds dying otherwise than by slaughter.

In this example report, you can see the DOA numbers are similar from month to month, with a slight increase associated with inclement weather months (December 21, June/July/Aug 22, April 23). You can see there are minimal numbers of cadaver birds.

**Note:** NPIS establishments do not have to report the number of cadavers.

[Click to review an example of the Slaughter Heads Detail report.](#)

This report provides you with the slaughter dates, class/subclasses of slaughtered animals, head counts, and dispositions. The report is separated into tabs by inspected and custom. A tab at the end of the report includes "No Kill" periods.

The report also includes DOAs by day, so if you identified a high DOA count in the Poultry Cadaver report, you may look at the Slaughter Heads Detail report to determine which day(s) the high DOA counts occurred. In this example, December 7-8, 2021, had high daily DOA numbers (and a corresponding GCP MOI written by IPP). On June 21, 2021, there was a high AM condemn (other than DOA) count. As a DVMO, you may follow up on similar findings at your VVs to determine if any GCP or poultry mistreatment issues are occurring.

At establishments that have voluntary inspection (e.g., voluntary poultry slaughter), you may verify that IPP are documenting Good Commercial Practices (V) tasks (run PHIS Task Summary report) as per [FSIS Directive 12,600.1](#) "Voluntary and Other Reimbursable Inspection Services" (1 task per shift when FSIS inspected voluntary poultry slaughter occurs).

Depending on instruction from your district, as a DVMO, you may review sampling result reports - including those related to residue sampling (NRP and NARMS).

Follow-up with your District and OJT Mentor to learn more about any district-specific reports you may run prior to verification visits, outside of the GCP related reports.

For example, [click to review this Sampling Status Report](#). Focusing on the residue-specific examples and clicking on the several tabs available, you can see which NARMS and NRP samples were not scheduled or were cancelled but not justified. Depending on instruction from your district, you may follow up with in-plant IPP on these types of findings and share policy information found in [FSIS Directives 10,800.1](#) "Residue Sampling, Testing and Other Verification Procedures under the National Residue Program for Meat and Poultry Products" and [10,800.2](#) "Residue Sampling and Testing under the National Residue Program for Meat and Poultry Products".

[Click to review an example Missing Poultry Weight report.](#)

	<p>Per <a href="#">FSIS Directive 6100.3</a> "Ante-Mortem and Post-Mortem Poultry Inspection", IPP enter poultry weight information into PHIS, including total weight in pounds of chilled or frozen product (supplied by the establishment). Depending on your district's instruction, you may verify and follow-up on any missing poultry weights.</p> <p><a href="#">Click to review an example of a previous GCP VV Report.</a></p> <p>As part of your pre-visit data review, you should review enforcement history, as well as the previous GCP VV Report. In this example, under "findings" from the previous VV, there are some items you may follow up on at an upcoming VV: condition of batteries, cones without rolled edges that may cause injury.</p>
11	<p>Livestock Pre-visit Data Workshop:</p> <ul style="list-style-type: none"> <li>• <a href="#">Establishment Profile</a></li> <li>• <a href="#">HATS Validation Report</a></li> <li>• <a href="#">HATS Detail Summary Report</a></li> <li>• <a href="#">Slaughter Heads Detail Report</a></li> <li>• <a href="#">Previous VV Report</a></li> </ul> <p>Poultry Pre-visit Data Workshop:</p> <ul style="list-style-type: none"> <li>• <a href="#">Establishment Profile</a></li> <li>• <a href="#">GCP Validation Report</a></li> <li>• <a href="#">Poultry Cadaver Summary</a></li> <li>• <a href="#">Slaughter Heads Detail Report</a></li> <li>• <a href="#">Previous VV Report</a></li> </ul>
12	<p>Livestock Pre-visit Data Workshop Keys:</p> <ul style="list-style-type: none"> <li>• Establishment Profile - no significant findings.</li> <li>• <a href="#">HATS Validation Report</a> - one day in which slaughter data was entered, but no HH/HATS data was documented would be prudent to follow-up on with IPP at the upcoming VV.</li> <li>• <a href="#">HATS Detail Summary Report</a> - several items to follow-up on with IPP at the upcoming VV, including no HATS hours documented for HATS Category V, no PHV HATS hours documented, and one day with zero HATS Category IV documented (while other HATS categories were documented).</li> <li>• Slaughter Heads Detail Report - no significant findings.</li> <li>• <a href="#">Previous VV Report</a> - Two items mentioned in the previous visit report (hogs skidding/losing footing and back-up stunning device) would be prudent to follow-up on with the establishment at the upcoming VV.</li> </ul> <p>Poultry Pre-visit Data Workshop Keys:</p> <ul style="list-style-type: none"> <li>• Establishment Profile - no significant findings, though you may have noticed the IIC is not designated in the establishment profile. You could mention that to IPP.</li> <li>• <a href="#">GCP Validation Report</a> - twenty-eight days in which slaughter data was entered, but no GCP task was documented (or the GCP task was incomplete) would be prudent to follow-up on with IPP at the upcoming VV. This may be a situation to remind IPP that the date of the GCP task will default to the day it is actually entered.</li> <li>• <a href="#">Poultry Cadaver Summary</a> - you may take note of several months where the cadaver and DOA numbers were higher than the other months, which seems to be associated with inclement weather months.</li> <li>• <a href="#">Slaughter Heads Detail Report</a> - you can filter the data under the Poultry tab to identify the specific slaughter days in which the DOAs were high; you may also identify there are several days where there are AM condemnments NOT including DOAs, which is unusual. You can also filter the data under the Poultry Dispositions tab to look for possible GCP related issues, such as high condemn rates for bruises, plant rejects, and cadavers. These may or may not indicate GCP issues, but are important to identify and consider for your upcoming VV.</li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="#">Previous VV Report</a> - Items mentioned in this report, including loose birds on the trailers, birds touching the cage around the DOA disposal opening in the platform floor, nonfunctioning fans in the live haul shed, and trailer stock density would be prudent to follow-up on with the establishment at the upcoming VV.</li> </ul>
13	Over the next few slides, you'll learn how to conduct a VV at both livestock and poultry slaughter establishments.
14	<p>This slide shows an overview of the steps to conduct a HH or GCP VV visit. You'll learn more about the specifics of "observe and verify" for HH versus GCP visits later in this module.</p> <p><b>Note:</b> The DVMO should use professional judgement when determining how and in what order to complete the steps listed.</p>
15	<p>The first step of conducting the HH or GCP VV is to meet with inspection program personnel (IPP) at the establishment.</p> <p>The DVMO meets with IPP at the start of the GCPVV or HHVV. When practical, discuss questions or concerns related to GCP or HH with the IIC/PHV before meeting with establishment management. Information from the IIC/PHV may help to guide the DVMO regarding issues or areas that may need attention during the visit.</p>
16	<p>The next step of the HH or GCP VV is to meet with the establishment, if available.</p> <p>At some point during the visit, the DVMO should cover these 5 topics with both the establishment management and FSIS IPP.</p> <p>The DVMO is to use discretion and professional judgment in determining the appropriate time to discuss the following items, as necessary, so they are all covered at some point during the visit:</p> <ol style="list-style-type: none"> <li>1. The reason for the visit (e.g., verification, outreach, or other).</li> <li>2. An explanation of how the purpose of the visit is different from the daily verification that is done by IPP regarding GCP or HH.</li> <li>3. That the role of the DVMO is to assist in providing clarification and an understanding of GCP or HH.</li> <li>4. That if the DVMO determines the establishment is not implementing GCPs or complying with HH requirements, the DVMO is to recommend appropriate action to IPP or District Management, which could include taking a regulatory control action (RCA), issuing NRs, enforcement actions, or other actions.</li> <li>5. That during the visit, the DVMO assesses whether a systematic approach is being implemented by the establishment to ensure that food animals are handled and slaughtered in a manner that is consistent with the GCPs or HH requirements.</li> </ol>
17	<p>After meeting with IPP and the establishment management, the next step is to make observations, review programs and records, and assess if the establishment meets the regulatory requirements.</p> <p>The regulations vary between livestock and poultry, so let's start with our VV observations for livestock, first. Then, we will address poultry, and finally exotic animals.</p> <p>The DVMO is to observe and verify the establishment meets requirements concerning HH of livestock during the VV.</p> <p>During the livestock HHVV, the DVMO is to:</p> <ul style="list-style-type: none"> <li>• Follow the methodology in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock".</li> <li>• Assess whether Agency recommendations for a systematic approach to HH and slaughter have been implemented by the establishment. This is <b>not</b> a regulatory requirement. (We covered this in detail in the Stunning, Handling, and Systematic Approach module).</li> </ul>

	<ul style="list-style-type: none"> <li>• Review documents made available by establishment management if there is a formal program (written animal handling plan, training records, recorded in-house or 3rd-party audits or verifications). The DVMO is to review these documents to assess: <ul style="list-style-type: none"> <li>○ HH practices implementation.</li> <li>○ Noncompliance history.</li> <li>○ Corrective measure implementation.</li> <li>○ Any trends or other issues that exist which need to be discussed or resolved.</li> </ul> </li> <li>• Assess whether any issues exist that the DVMO needs to discuss or resolve with establishment management pertaining to the establishment's HH practices.</li> <li>• Review any other establishment implemented procedures to help monitor compliance with HH and slaughter requirements.</li> </ul>
18	<p>During the livestock HHVV, the DVMO is to (continued from previous slide):</p> <ul style="list-style-type: none"> <li>• Observe all the areas where live animals are unloaded, held in conjunction with slaughter, and all other areas up to and including the bleed out area until the animal is deceased. To the extent possible, the DVMO is to assess HH activities on each slaughter shift. The DVMO is to assess whether facility conditions, equipment operation, and other overall handling and slaughter practices meet the regulatory requirements of <a href="#">9 CFR 313</a>.</li> <li>• Verify the HH and slaughter of livestock as instructed in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" using the 9 HATS categories for verifying establishment compliance with the HH regulations. (We covered these categories in the HH/GCP Policy and DVMO Role module).</li> </ul>
19	<p>After meeting with IPP and the establishment management, the next step of your VV is to make observations, review programs and records, and assess if the establishment meets the regulatory requirements.</p> <p>This slide provides the GCPVV observations for poultry.</p> <p>The DVMO is to observe and verify the establishment meets requirements concerning GCPs for poultry during the VV.</p> <p>During a poultry GCPVV, the DVMO is to:</p> <ul style="list-style-type: none"> <li>• Follow the methodology used in <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices".</li> <li>• Assess whether Agency recommendations for a systematic approach to live bird handling have been implemented by the establishment. This is not a regulatory requirement. (We covered this in detail in the general module).</li> <li>• Make observations of the live poultry receiving or holding areas through pre-scald areas to assess facility conditions, equipment operations, and implementation of GCPs by establishment employees.</li> </ul> <p>The DVMO is to seek answers to questions, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Are live bird handling practices causing injuries or death?</li> <li>• Are facility conditions and equipment operation (e.g., unloading equipment, stunning equipment, bleeding equipment) causing injury or mistreatment of poultry?</li> </ul> <p><b>Note:</b> There is no regulatory requirement for stunning during poultry slaughter. DVMOs should be observing for:</p> <ol style="list-style-type: none"> <li>1. Breathing birds entering the scalding tank.</li> <li>2. Increased numbers of cadavers identified in the evisceration area or at PM inspection.</li> </ol> <p>Other than the PPIA provision at <a href="#">21 USC 453(g)(5)</a> and the regulatory provisions outlined in <a href="#">9 CFR 381.65(b)</a>, there is no specific regulation or Federal HH and slaughter statute for poultry.</p>

20	<p>The DVMO will correlate their findings from their pre-visit data review with their on-site observations and available inspection records.</p> <p>After you have assessed for systematic approach, reviewed establishment records and documentation, and made observations and verified using the 9 HATS tasks that to verify establishment is meeting regulatory requirements, you may determine the establishment is noncompliant.</p> <p>If during the VV, the DVMO observes noncompliance related to the humane treatment of livestock, or the mistreatment of poultry, the DVMO is to notify in-plant IPP so they can address the noncompliance or mistreatment as instructed in FSIS Directives <a href="#">6900.2</a> "Humane Handling and Slaughter of Livestock" or <a href="#">6110.1</a> "Verification of Poultry Good Commercial Practices".</p> <p>The DVMO is to ensure any harm to the animal is stopped immediately.</p>
21	<p>This slide covers a type of for cause VV, the "follow-up" visit in response to a suspension held in abeyance or an NOIE in deferral. More information on these types of enforcement actions will be covered in a future module.</p> <p>The DVMO conducts or oversees humane handling enforcement action verification plan follow-up assessment visits at 30-, 60-, and 90-day intervals for an NOIE in deferral, or after a suspension is held in abeyance.</p> <p>The DVMO prepares a report of recommendations as to whether the enforcement action should be closed or if additional action is needed. An inhumane handling NOIE or suspension action is not to be closed out without 30-, 60-, and 90-day on-site visits by the DVMO.</p> <p>When the DVMO conducts the 30-day and 60-day verification plan follow-up assessment, the visit is confined to the verification plan items and if the verification plan is found to be sound then the DVMO can make the next visit the final visit. At the final visit (90-, 120-day, etc.) the DVMO conducts a complete HHVV. In some instances, it may be necessary for the DO to assign a DVMO-trained PHV to conduct a humane handling enforcement action verification plan follow-up assessment visit to assess the adequacy of an establishment's corrective and preventive measures during the abeyance period. When this occurs, the DVMO is to communicate with the DVMO-trained PHV regarding any questions or issues that surface where the DVMO's subject matter expertise may be needed. This follow-up verification visit should not be delegated to any personnel beyond a DVMO-trained PHV.</p>
22	<p>If there are exotic animals slaughtered under voluntary inspection at the time of the DVMO's visit, the DVMO is to verify that the handling and stunning procedures used by establishment employees meet the applicable regulations.</p> <p>VVs are also performed at establishments and facilities that only slaughter animals under voluntary inspection in accordance with <a href="#">9 CFR Part 352</a> and <a href="#">9 CFR Part 362</a> (exotic species and poultry - note that this does not include facilities slaughtering rabbits. There is no reference to HH/GCPs in <a href="#">9 CFR Part 354</a> and no applicable cross-references to these requirements for rabbit slaughter).</p> <p>The handling and slaughter of exotic animals are covered in regulation <a href="#">9 CFR 352.10</a>; this regulation requires:</p> <ul style="list-style-type: none"> <li>• The HH of exotic animals as set out in <a href="#">9 CFR 313.2</a>, which includes: unloading and handling procedures; handling of disabled animals; access to water; and, if held over 24 hours, access to feed.</li> <li>• The effective application of stunning methods to render exotic animals unconscious as set out in 9 CFR <a href="#">313.15</a> and <a href="#">313.16</a>.</li> </ul>
23	N/A



24	<p>So far, you've learned how to prepare for and conduct HHVV and GCPVVs.</p> <p>The rest of this module covers how to conduct an exit meeting at the end of the HHVV or GCPVV and how to complete documentation of your visits in PHIS.</p>
25	<p>At the conclusion of the GCPVV or HHVV, the DVMO is to hold an exit meeting with IPP and establishment management.</p> <p>During HHVV and GCPVV exit meetings, the DVMO is to discuss:</p> <ul style="list-style-type: none"> <li>• The reasons for conducting HHVV or GCPVV (if not already discussed).</li> <li>• The DVMO's observations during the visit.</li> <li>• Topics or concerns brought forward by establishment management.</li> </ul> <p>Before holding an exit meeting, the DVMO may need to meet with IPP, including the inspector-in-charge (IIC) and the FLS to clarify matters or follow-up on some issues. The DVMO is to provide guidance and facilitate understanding of all FSIS requirements and procedures pertaining to poultry mistreatment and GCP issues and HH. This meeting is to occur at the end of the DVMS verification visit. If time is limited, a follow-up discussion by phone call or e-mail is appropriate.</p> <p>It is important to consider your method of communication and feedback delivery during the exit meeting. Adjusting your methods and adapting to the situation and the establishment will increase your effectiveness. For example, if the owner or manager is very busy (perhaps working on the slaughter floor themselves!), you may provide flexibility and adjust the exit meeting based on their availability - perhaps as a conference call the following day, versus in-person on the day of slaughter. Some establishment owners may not be interested in meeting or discussing HH/GCP, and you may therefore offer to speak with someone else - like the slaughter manager or supervisor, instead. You may leave a card and an offer for them to reach out to you with any questions.</p>
26	<p>This slide discusses specific observations the DVMO should address at the HHVV exit meeting. The following slide discusses specific observations to discuss at the GCPVV exit meeting.</p> <p>At the <b>HHVV</b> exit meeting, the DVMO discusses their observations, including:</p> <ul style="list-style-type: none"> <li>• The HH practices that are effectively being implemented.</li> <li>• The HH practices that the DVMO has concerns about or that may need improvement.</li> <li>• The HH practices that are not being performed in accordance with regulatory requirements, including NRs or RCAs that have been taken.</li> <li>• Whether 3rd-party audit findings indicate noncompliance issues, other problems or weaknesses associated with the establishment's HH or slaughter practices, and whether the establishment has implemented any measures to resolve these matters.</li> <li>• Whether the establishment uses a systematic approach in the handling and slaughter of livestock and whether its approach is consistent with the four aspects of a systematic approach, and whether the systematic approach is robust. If such an approach is not being used by the establishment, the DVMO is to explain that although utilizing a systematic approach is not a regulatory requirement, FSIS recommends that establishments utilize such an approach.</li> </ul>
27	<p>At the <b>GCPVV</b> exit meeting, the DVMO discusses their observations, including:</p> <ul style="list-style-type: none"> <li>• Handling procedures that are being successfully implemented.</li> <li>• Handling procedures that the DVMO has concerns about, i.e. adequate but could be improved.</li> <li>• Inadequate implementation (i.e., NRs or RCA taken).</li> <li>• Whether or not live poultry at the establishment are being handled in a manner that is consistent with GCP.</li> <li>• Whether the establishment uses a systematic approach in the handling and slaughter of birds and whether its approach is consistent with GCP. If such an approach is not being used by the</li> </ul>

	<p>establishment, the DVMO is to explain that although utilizing a systematic approach is not a regulatory requirement, FSIS recommends that establishments utilize such an approach.</p>
28	<p>At the end of the VV, the DVMO is to meet with IPP to provide guidance and facilitate understanding of all FSIS requirements and procedures pertaining to HH, poultry mistreatment and GCP issues.</p> <p>This meeting is to occur at the end of the DVMO verification visit. If time is limited, a follow-up discussion by phone call or e-mail is appropriate.</p> <p>Topics the DVMO should discuss with IPP may include:</p> <ul style="list-style-type: none"> <li>• Ante-mortem inspection methods as it relates to HH, including decision-making, documentation, and regulatory control.</li> <li>• GCP noncompliance and poultry mistreatment.</li> <li>• Robust systematic approach (RSA) status.</li> <li>• The establishment’s design and execution of practices pertaining to HH or implementing GCP.</li> </ul> <p>The DVMO is to make any necessary recommendations about IPP training needs or may point out specific issues associated with HH or GCP for which IPP need further guidance. If there are specific issues with IPP performance of GCP or HH duties, the DVMO is to discuss the specific issues with IPP's direct supervisor.</p>
29	<p>After completing a VV, the DVMO documents the visit by entering their findings into PHIS under the DVMS/DVMO role. The next few slides explain the type of information that you will enter.</p>
30	<p>After the DVMO completes the GCPVV and HHVV (including voluntary inspection visits and enforcement follow-up visits), the DVMO (under the DVMS/DVMO role) is to enter the visit information into PHIS by completing the appropriate FSIS Forms:</p> <ul style="list-style-type: none"> <li>• FSIS Form 6000-31 (Report of Humane Handling Visit).</li> <li>• FSIS Form 6000-32 (Report of Good Commercial Practices Visit).</li> </ul> <p>In PHIS, the visit information for both GCPVVs and HHVVs are entered in two steps, the Basic Visit Information and the Narrative Report. The information that is entered within each step is entered under the appropriate tab.</p> <p><b>Note:</b> If a non-DVMO PHV trained in HH/GCP VV methodology conducts a VV, the non-DVMO PHV provides any visit information gathered to the DVMO. The DVMO then enters the information into PHIS.</p> <p>After completion of the forms in PHIS, the reports are distributed to appropriate personnel (e.g., the IIC and FLS). IPP maintain a printed copy of the report in the government file. The IIC, or the DVMO, may provide a copy to establishment management upon request.</p>
31	<p>In PHIS, visit information for the HHVV is entered in two steps. The first step is the Basic Visit Information. Under Basic Visit Information for the HHVV, the DVMO enters the appropriate information under each of the seven listed tabs:</p> <ul style="list-style-type: none"> <li>• <b>Plant:</b> Enter the visit dates.</li> <li>• <b>Names:</b> FSIS personnel assigned to the establishment on the day of the visit.</li> <li>• <b>Species:</b> Select the species observed. Enter: <ul style="list-style-type: none"> <li>○ Number of head slaughtered for the day of visit.</li> <li>○ Estimate number of head slaughtered per hour.</li> <li>○ The number of animals observed during the visit.</li> </ul> </li> <li>• <b>Stunning:</b> Select the stunning method used or ritual slaughter, if observed.</li> <li>• <b>Reason:</b> Select the reason for the visit. If this VV is for a Verification Plan follow-up visit (30-60-90 days) select “Special Correlation/Other” and "Egregious Violation". Enter the description in the text box (e.g., "30-day verification visit").</li> <li>• <b>Approach:</b> Indicate whether or not the establishment has a systematic approach or if it was not assessed. Indicate the establishment has a <b>written</b> systematic approach. If the establishment does</li> </ul>

	<p>not operate under a systematic approach, select the items that have been implemented in the establishment's operations.</p> <ul style="list-style-type: none"> <li>• <b>Recommendations:</b> Select the outcome of the HHVV. If the recommendation is other than "No Action," enter the event or noncompliance and select which HATS category applies.</li> </ul> <p>After entering the information, save the information in PHIS.</p>
32	<p>In PHIS, visit information for the GCPVV is entered in two steps. The first step is the Basic Visit Information. Under Basic Visit Information for the HHVV, the DVMO enters the appropriate information under each of the six listed tabs:</p> <ul style="list-style-type: none"> <li>• <b>Names:</b> FSIS personnel attending visit. Add N/A if no PHV attended.</li> <li>• <b>Species:</b> Select the species observed; if stunning, select the type; and enter the line speed.</li> <li>• <b>Approach:</b> Indicate whether the establishment has a system (in writing or not) for slaughtering poultry in accordance with GCP. If not, briefly describe why in the text box.</li> <li>• <b>Reason:</b> Select the reason for the visit and enter the visit dates.</li> <li>• <b>Recommendations:</b> Select the outcome for the GCPVV. If "Other," type event in text.</li> <li>• <b>Findings:</b> Type "See Narrative Report Section".</li> </ul> <p>After entering the information, save the information in PHIS.</p>
33	<p>In PHIS, visit information for the HH and GCP VV is entered in two steps. The second step is the Narrative Report section.</p> <p>Under Narrative Report for the HH and GCP VV, the DVMO enters the appropriate information under each of the listed tabs:</p> <ul style="list-style-type: none"> <li>• <b>Correlation:</b> Enter the names of FSIS personnel and establishment management that attended the VV. Enter discussion notes made throughout the visit.</li> <li>• <b>Pre-Visit:</b> Summarization of: <ul style="list-style-type: none"> <li>○ the type of establishment.</li> <li>○ prior NRs, MOIs, and enforcement actions.</li> <li>○ the adequacy of the establishment's previous corrective and preventive measures.</li> </ul> </li> <li>• <b>Approach:</b> <ul style="list-style-type: none"> <li>○ For poultry, indicate whether the establishment has a system (in writing or not), for slaughtering poultry in accordance with GCP. Explain your findings.</li> <li>○ For livestock, indicate whether, or not, the establishment has a systematic approach; a written systematic approach that is not robust; or a robust systematic approach. Explain your findings.</li> </ul> </li> </ul>
34	<p>Continuing from the previous slide, when entering information under the Narrative Report for the HH and GCP VV, the DVMO enters the appropriate information under each of the listed tabs:</p> <ul style="list-style-type: none"> <li>• <b>Reasons:</b> Indicate the outcome of the visit and whether the findings were compliant or non-compliant with applicable regulations and any non-regulatory MOIs.</li> <li>• <b>Findings:</b> <ul style="list-style-type: none"> <li>○ Describe when, where, and what was observed during the visit, and the conclusions that were made.</li> <li>○ Include all necessary facts, number of livestock observed, and explain the support for recommendations during the visit.</li> <li>○ Provide details of discussions with IPP and establishment officials and the exit meeting content.</li> <li>○ Address all relevant noncompliance issues, including discussion of recent noncompliances that occurred relating to any noncompliance observed during the present visit. The DVMO is to include an assessment of the adequacy of the establishment's previous corrective and preventive measures and how they affect the current noncompliance.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Describe what was discussed with the establishment regarding its implementation of their system (whether in writing or not) for slaughtering poultry in accordance with GCP or HH and include any recommendations for improving or maintaining the RSA (livestock only), as well as any responses from the establishment. <ul style="list-style-type: none"> <li>▪ For <b>poultry</b> specifically, the DVMO is to document that the establishment was operating under a system demonstrating GCP and the discussion with the establishment about its implementation of its system demonstrating GCP or document that the establishment was not operating under a system demonstrating GCPs, but that FSIS recommends operating under a system demonstrating GCPs, though it is not a regulatory requirement.</li> <li>▪ For <b>livestock</b> specifically, the DVMO is to advise the establishment on how to begin implementation and maintenance of an RSA.</li> </ul> </li> </ul> <p>After entering the information, save the information in PHIS.</p> <p><b>Note:</b> This section must be filled out completely before it can be saved. After completion of the forms in PHIS, the reports are distributed to appropriate personnel, as described on the overview slide.</p>
35	Click the links on the slide to view examples of completed HH & GCP VV Reports.
36	N/A
37	N/A
38	N/A

# DVMO Visits: DVMO Enhanced Outreach Visits Module

## Learning Objectives

1. Describe HH/GCP DVMO Enhanced Outreach pre-visit, visit, and post-visit methodology.
2. Explain how to contact establishment management and IPP prior to a DVMO Enhanced Outreach Visit.
3. List the goals to achieve during a HH/GCP DVMO Enhanced Outreach Visit.
4. Demonstrate how to complete the Outreach Report in PHIS and enter survey information into the DVMO SharePoint.
5. Demonstrate how to provide effective feedback to establishments at DVMO Enhanced Outreach Visits.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<p>The DVMO follows the outreach visit process found in the <a href="#">DVMS Enhanced Outreach Plan</a> (weblink) when conducting DEOVs.</p> <p><a href="#">Click here to download the DVMS Enhanced Outreach Plan.</a></p>
4	<p>In the first part of this module, you will learn how a DVMO prepares for, conducts, and closes out a DVMO Enhanced Outreach Visit.</p> <p>Later in the module, you will learn how a DVMO documents the DEOV in PHIS and the evaluation survey in the DVMS SharePoint.</p>
5	<p>DVMOs conduct the DVMO Enhanced Outreach Visit in poultry or livestock slaughter establishments, as well as establishments that slaughter exotic species under voluntary inspection.</p> <p>DEOVs prioritize small and very small establishments. The DVMO conducts DEOVs to provide support, understanding and clarification of GCP or humane handling requirements. The visit is meant to help prevent GCP and humane handling noncompliances.</p> <p>The DVMO is to prioritize those establishments that historically have a higher frequency of GCP or humane handling noncompliance issues.</p> <p>DEOVs can be offered by the DVMO, or the establishment can request the visit. The DEOV is voluntary/optional and not associated with any enforcement action. It is distinct from the routine regulatory verification visits.</p>
6	<p>The DVMO follows the outreach visit process found in the <a href="#">DVMS Enhanced Outreach Plan</a> when preparing, conducting, and closing out the DEOV.</p> <p>The DVMO prepares for the DEOV by doing the following:</p> <ul style="list-style-type: none"> <li>• Review the DVMS Enhanced Outreach Plan methodology.</li> <li>• Contact small and very small slaughter establishments to offer assistance and schedule a non-regulatory GCP or HH DEOV.</li> <li>• Review PHIS data and prior verification visit reports to determine what topics/materials to provide at the DEOV.</li> </ul> <p>When contacting an establishment, the DVMO informs the establishment that:</p>

	<ul style="list-style-type: none"> <li>• The visit is a voluntary or optional visit and distinct from the routine regulatory VV.</li> <li>• The visit is to provide support, understanding, and clarification of GCP or humane handling requirements.</li> <li>• The visit is meant to help prevent GCP and humane handling noncompliances.</li> </ul> <p>Topics the DVMO will cover at the DEOV are tailored to the establishment and may include:</p> <ul style="list-style-type: none"> <li>• GCPs</li> <li>• Proper stunning and restraint of animals</li> <li>• Sufficient humane handling facilities for livestock</li> <li>• Humane handling enforcement actions</li> <li>• Robust systematic approach (RSA) to humane handling and slaughter of livestock</li> <li>• Communications with establishment management</li> </ul>
7	<p>When conducting a DEOV, the DVMO will introduce and explain the DEOV visit and the difference between this visit (non-regulatory) and a GCPVV or HHVV (regulatory). The DVMO explains that:</p> <ul style="list-style-type: none"> <li>• The DEOV is part of the Agency Outreach Program.</li> <li>• The DEOV is to provide support, understanding, and clarification of humane handling requirements specific to the small and very small establishments.</li> <li>• The DEOV will provide the DVMO an opportunity to highlight prevention of humane handling or GCP events that may result in noncompliance or enforcement actions.</li> </ul> <p>During the DEOV, the DVMO will discuss the following topics relevant to the specific establishment:</p> <ul style="list-style-type: none"> <li>• Pertinent GCP topics, concerns, and resources</li> <li>• Sufficient humane handling facilities</li> <li>• Humane handling enforcement actions</li> <li>• Robust systematic approach (RSA) to humane handling and slaughter of livestock</li> <li>• Proper stunning and restraint of animals</li> </ul> <p>Also, during the DEOV, the DVMO will:</p> <ul style="list-style-type: none"> <li>• Complete a walk-through of the poultry or livestock facilities.</li> <li>• Provide examples of noncompliances.</li> <li>• Review any topics requested during the pre-visit contact, or other items as they arise during the visit.</li> </ul> <p><b>Note:</b> If during a DEOV the DVMO observes noncompliance the DVMO will notify IPP of this finding. IPP are responsible for taking appropriate action in response to the noncompliance.</p>
8	<p>To close out the DEOV, the DVMO will meet with the establishment and summarize the items they discussed during the visit.</p> <p>The DVMO will also review evaluation questions with the establishment personnel that the visit was conducted with. The responses to these evaluation questions are documented by the DVMO on the DVMO SharePoint Site.</p>
9	<p>So far, you've learned how the DVMO prepares for and conducts a DEOV. Over the next few slides, you will learn how a DVMO documents the DEOV (both in PHIS and in the DVMS SharePoint Site).</p>
10	<p>In the same manner as the verification visit, including for voluntary inspected establishments (refer to Verification Visits module), the DVMO completes the following in PHIS:</p> <ul style="list-style-type: none"> <li>• Enter the outreach visit data into PHIS in FSIS Forms 6000-31 (Report of Humane Handling Visit) and 6000-32 (Report of Good Commercial Practices Visit).</li> <li>• For the type of visit, in the "Reason" tab in the DVMS Visit entry window in PHIS, select "Special Correlation/Other" and then type in the word "Outreach" or "Voluntary" (in the case of voluntary inspection facilities) in the "Other Reason" text box.</li> <li>• In the "Recommendations" tab, mark "Other" and type in "Outreach."</li> </ul>

	<p>The DVMO will send the report to the FLS and the IIC. The IIC, or the DVMO, may provide the establishment a copy upon request.</p> <p><a href="#">Click to review an example outreach visit report.</a></p>
11	<p>In addition to documenting DEOV visit data in PHIS, the DVMO will also enter establishment evaluation survey data into the DVMO SharePoint Site. If you do not have access to this site, work with your OJT Mentor to obtain access and learn how to use the site.</p> <p><a href="#">Click to review the survey questions.</a></p> <p><b>Note:</b> If the establishment declines a DEOV, the DVMO completes the survey by indicating the date and that the establishment has declined a DEOV.</p>
12	<p>The DEOVs are to provide support, understanding, and clarification of HH/GCP requirements. During your visit, you will likely provide feedback to the establishment on where they may prevent noncompliance and improve their HH/GCP. Learning to provide effective feedback is an important skill, not only for DEOVs, but for other interactions as well.</p>
13	<p>The DEOV is an opportunity for the DVMO to establish themselves as a resource for HH/GCP assistance and information. Your ability to provide feedback that is effectively received by the establishment will improve compliance and prevent noncompliance. Thus, it is essential to develop and grow in your ability to deliver effective feedback.</p> <p>It is important to be prepared for your DEOV, so that you can anticipate the potential resources and tools you will need to provide effective feedback. As part of your pre-visit data review, you will gather information that will help you determine the type of feedback that may be necessary, as well as the best way to deliver that feedback. For example, the data you review in PHIS may lead you to gather resources on a particular type of stunning method or handling practice. The discussion you have with IPP may lead you to prepare yourself for a confrontational plant manager, who is in a better mood towards the end of the day or week, rather than first thing Monday morning. Be prepared for your visit and consider the best approach to delivery of feedback based on the information you have available to you.</p> <p>You should consider your audience when providing feedback, which will help you consider your method to deliver feedback. You may not know much about your audience before you arrive, or you may learn additional information during your visit that will help you tailor how you deliver feedback. For example, if you are working with a very small establishment, a verbal discussion may be more effective than a written conversation or documentation to ensure understanding.</p> <p>Delivering feedback effectively is a skill that you can continue to grow and learn with. Observe mentors or colleagues that you admire delivering feedback. What do you see them utilizing to succeed? Consider previous situations where you provided feedback - what went well? Where could you improve? Take advantage of the continuous learning opportunities provided by FSIS, such as a Mentor program, or courses such as <a href="#">Leadership Through Feedback</a> on LinkedIn Learning. The more you learn and practice this skill, the more effective you will be.</p>
14	N/A
15	N/A
16	N/A

# HH/GCP: Noncompliance & Enforcement Module

## Learning Objectives

1. Explain the DVMO role in HH/GCP noncompliance and enforcement.
2. Assess HH/GCP events to determine what actions should be taken.
3. Identify and respond to egregious humane handling events.
4. Assess an establishment's response to a HH related enforcement action.
5. Develop a verification plan based on an establishment's proffered corrective actions in response to a humane handling enforcement.
6. Describe actions to complete during the abeyance/deferral period and when to recommend closing an enforcement case.
7. Discuss how HH events are addressed in voluntary/exotic species services and custom exempt operations.
8. Describe best practices for constructing FSIS documentation, including noncompliance records, enforcement letters, and memoranda.
9. Identify how to adapt your communication style to effectively communicate with others in response to HH/GCP noncompliance and enforcement.

## "Info Button" Notes

Slide	Info Button Text
1	N/A
2	N/A
3	N/A
4	<p>The following FSIS Directives apply to the DVMO's HH/GCP responsibilities surrounding noncompliance and enforcement:</p> <ul style="list-style-type: none"> <li>• <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" describes how to address noncompliance with and without injury to animals and distinguishes between egregious and non-egregious events.</li> <li>• <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices" provides instructions for determining when to document GCP NRs versus poultry mistreatment MOIs.</li> <li>• <a href="#">FSIS Directive 5000.1</a> "Verifying an Establishment's Food Safety System" describes when RCA can be taken (for inhumane handling or slaughtering of livestock) and includes information on withholding actions, suspensions, abeyance, and verification plans.</li> <li>• <a href="#">FSIS Directive 5100.3</a> "Administrative Enforcement Action Decision-Making and Methodology" describes the enforcement methodology and decision-making thought process that District Office personnel are to use to ensure all actions are supportable and properly documented.</li> </ul>
5	<p>Over the next few slides, you'll learn your specific role as a DVMO, a subject-matter-expert in HH/GCP. DVMOs assist in-plant IPP and the District Office on matters of HH/GCP in a number of ways.</p>
6	<p>As the subject-matter-expert in HH and GCP, DVMOs assist the DO and in-plant IPP with both HH issues and GCP issues, including noncompliance and poultry mistreatment.</p> <p>DVMOs advise DO management and work collaboratively with in-plant IPP to accomplish the work of the mission for humane handling. The DVMO participates in the development of enforcement and documentation of noncompliances.</p> <p>Typically, DVMOs are to provide the following assistance:</p> <ul style="list-style-type: none"> <li>• Provide guidance and direction to IPP regarding HH noncompliance issues and recommendations on appropriate next steps.</li> </ul>



	<ul style="list-style-type: none"> <li>• Review MOIs and NRs prepared by IPP pertaining to GCP and HH issues.</li> <li>• Provide advice and recommendations pertaining to corrective measures proposed by an establishment to address noncompliance issues.</li> </ul>
7	<p>Continued from the previous slide, as HH/GCP SMEs, the DVMOs are also to provide the following assistance:</p> <ul style="list-style-type: none"> <li>• Assist in the review of corrective and preventative measures provided by an establishment in response to the noncompliance.</li> <li>• Participate in any FSA or investigation that requires the DVMO's expertise.</li> </ul> <p><b>Note:</b> DVMOs may be directed by District management to conduct additional duties during enforcement actions.</p>
8	<p>When a non-egregious noncompliance event takes place at an establishment, the DVMO is to work collaboratively, when needed, with the IIC assigned to the establishment to:</p> <ul style="list-style-type: none"> <li>• Immediately take a necessary regulatory control action (RCA) to prevent continued inhumane handling.</li> <li>• Work with the IIC to document the NR.</li> <li>• Assist in the review of corrective and preventive measures provided by the establishment in response to the noncompliance.</li> </ul> <p>If the establishment continues to violate the regulatory requirements or does not adequately correct a noncompliance, the DVMO is to communicate and actively participate with the SPHV, FLS, and DO management to discuss and determine if an enforcement action should be taken.</p>
9	<p>When an egregious noncompliance event takes place at an establishment, the DVMO is to work collaboratively with the IIC assigned to the establishment to:</p> <ul style="list-style-type: none"> <li>• Immediately take a necessary RCA to prevent continued egregious inhumane handling.</li> <li>• Immediately notify the FLS and District Office for prompt discussion of an enforcement action; notify establishment management of a possible enforcement action.</li> <li>• Work with the IIC to document the basis for the enforcement action recommendation (e.g. suspension or NOIE) and promptly forward this information to the DO management for DM determination and decision.</li> <li>• Assist in the review of corrective and preventive measures provided by the establishment in response to the noncompliance.</li> </ul> <p>In collaboration with DO Management, the DVMO is to work to ensure IPP draft documentation has been reviewed to support the DM's determination that the noncompliance rises to an enforcement level.</p>
10	<p>The DVMO is to follow the process outlined in <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices" for documentation of poultry GCP noncompliance.</p> <p>Other than the PPIA provision at <a href="#">21 USC 453(g)(5)</a> and the regulatory provisions outlined in <a href="#">9 CFR 381.65(b)</a>, there is no specific regulation or Federal humane handling and slaughter statute for poultry. Therefore, when situations exist that may warrant taking further action because poultry are not being handled in a manner consistent with good commercial practices, the DVMO is to consult with the DO, OFO Headquarters, or the Office of Investigation, Enforcement and Audit (OIEA) Regional Manager.</p> <p>The DVMO, in collaboration with OIEA, may notify appropriate jurisdictional authorities, including State officials, of findings that could be in violation of State and local animal welfare codes.</p>
11	<p>This slide provides a brief overview of the DVMO's role in enforcement cases. We will cover this in much more depth later in this module.</p> <p><b>Note:</b> Inhumane handling or slaughter practices of custom exempt livestock observed by IPP (while on-site performing official duties) is addressed per <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of</p>

	Livestock". IPP immediately notify the establishment, request that the establishment address the issue, document their observations in an MOI, and provide a copy of the MOI to their immediate supervisor, the DVMO, and the establishment.
12	<p>If the DVMO collects information that demonstrates that an establishment has knowingly or willfully engaged in inhumane practices or the mistreatment of live animals as an effort to intentionally circumvent the law, the DVMO is to immediately contact the District Manager and OIEA regarding how to handle the matter. In some instances, it may be necessary for OIEA to initiate a criminal investigation.</p> <p>For situations involving mistreatment of poultry, as is discussed in Section V. B. of <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices", the DVMO is to correlate with the District Manager and OIEA regarding providing notification to the appropriate State or local officials for proper handling. If additional notification is necessary, the DVMO is to:</p> <ul style="list-style-type: none"> <li>• Collaborate with the in-plant inspection team and District Case Specialist to prepare a Letter of Concern (LOC) and a cover letter and send: <ul style="list-style-type: none"> <li>○ The LOC to establishment management.</li> <li>○ A cover letter and copy of the LOC to the appropriate state official.</li> <li>○ Copies of the LOC to the IIC at the establishment and the FLS.</li> <li>○ Keep one copy of the LOC in the District Office.</li> </ul> </li> </ul>
13	<p>DVMOs are to perform VVs in facilities that slaughter animals under voluntary inspection in accordance with <a href="#">9 CFR Part 352</a> and <a href="#">9 CFR Part 362</a> (poultry and exotic species; rabbits not included) DVMOs follow methodology in <a href="#">FSIS Directive 12,600.1</a> "Voluntary and Other Reimbursable Inspection Services".</p> <p>In accordance with <a href="#">9 CFR 352.6(a)(5)</a>, FSIS may deny the benefits of inspection to an establishment "for the use of operating procedures which are not in accordance with the regulations of this part." Therefore, in the event that a DVMO observes an egregious noncompliance pertaining to the humane treatment or handling of live animals at an establishment that is operating under voluntary inspection, the DVMO is to work collaboratively with the IIC assigned to the establishment to:</p> <ul style="list-style-type: none"> <li>• Immediately take a regulatory control action to prevent continued egregious inhumane handling.</li> <li>• Verbally notify establishment management that the DO is being contacted to initiate a denial of service action.</li> <li>• Immediately notify the DO for prompt documentation of the action.</li> <li>• Work collaboratively with the IIC to document the basis for the regulatory control action in an NR and promptly forward this information to the DO.</li> <li>• Assist in the review of corrective and preventive measures provided by the establishment in response to the noncompliance.</li> <li>• Consider additional actions when an establishment is unable or unwilling to provide corrective and preventive measures to ensure humane handling and treatment. Such actions may include recommending the action to deny or withdraw voluntary inspection services in accordance with the Department's rules of practice (<a href="#">7 CFR 1.147(b)</a>) associated with such services.</li> </ul>
14	N/A
15	N/A
16	N/A
17	<p>Now that you are more familiar with your role as a DVMO in HH/GCP noncompliance and enforcement, let's apply what you've learned across multiple modules.</p> <p>In this section, you will practice how to identify, assess, and respond to HH/GCP events, including how to identify and respond to egregious HH events. This is important not only so that you can identify noncompliance during your verification visits, but also so you can provide expertise to other IPP during HH/GCP events.</p> <p>Remember to use your available resources as you practice identifying, assessing, and responding to HH/GCP events. These include:</p>

	<ul style="list-style-type: none"> <li>• HH/GCP Policy &amp; DVMO Role Module</li> <li>• Stunning, Handling, &amp; Systematic Approach Module</li> <li>• <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" for HH events (non-egregious and egregious)</li> <li>• <a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices" for GCP and poultry mistreatment</li> </ul> <p>If you have questions about a specific scenario or do not understand the keyed response, note those questions down. Be sure to discuss your questions with your OJT Mentor.</p>
18	<p>To identify, assess, and respond to HH/GCP events, you must understand the regulations and procedures (in FSIS Directives). Livestock and poultry regulations and procedures differ, so you should review and understand both.</p> <p><a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" describes the actions IPP take when they identify HH noncompliance, including noncompliance that involves no injury to animals, as well as egregious and non-egregious noncompliance. It also defines what egregious means and provides examples. It is important to understand how to identify when noncompliance is egregious, because egregious noncompliance results in enforcement action.</p> <p><a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices" describes the actions IPP take when they identify poultry mistreatment. It is important to understand how to determine if the mistreatment is isolated, or if the mistreatment represents a process that is out of control, because this determines if IPP document an NR or an MOI.</p> <p><a href="#">Link to 9 CFR 313</a>  <a href="#">Link to 9 CFR 381.65(b)</a></p>
19	<p>As the DVMO, you must understand how to respond to HH/GCP events so that, when necessary, you can provide expertise to IPP.</p> <p><a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" describes the regulatory control actions IPP take when they identify HH noncompliance. The actions IPP take depend on the nature of the situation. When egregious noncompliance is observed, further enforcement action is taken.</p> <p><a href="#">Link to 9 CFR 313.50</a>  <a href="#">Link to 9 CFR 500.2(a)(4)</a>  <a href="#">Link to 9 CFR 500.3(b)</a></p>
20	<p>Continuing from the previous slide:</p> <p><a href="#">FSIS Directive 6110.1</a> "Verification of Poultry Good Commercial Practices" describes the regulatory control actions IPP take when they identify poultry mistreatment. IPP may take a regulatory control action when they observe the establishment's process is out of control and is repeatedly causing mistreatment.</p> <p><a href="#">Link to 9 CFR 500.2(a)(2) and (3)</a></p>
21	<p>This slide is a refresher on material you learned previously regarding how to assess consciousness. If you need to review these materials prior to working on the upcoming scenarios, access them using the links below:</p> <ul style="list-style-type: none"> <li>• Stunning, Handling, and Systematic Approach module</li> <li>• "<a href="#">How to Determine Insensibility (Unconsciousness) in Cattle, Pigs, and Sheep in Slaughter Plants</a>" by Dr. Temple Grandin</li> <li>• "<a href="#">FSIS-Humane Handling-Consciousness and Stunning</a>" training in AgLearn (includes scenarios with video on determining consciousness)</li> </ul>
22	N/A

23	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• If this scenario represents noncompliance, is it an egregious situation?</li> <li>• Did the FLS take appropriate action?</li> <li>• What is your recommendation for this scenario (No NR, NR only, NR and NOIE, NR and NOS)?</li> </ul>
24	<p>The establishment is noncompliant with <a href="#">9 CFR 313.2(b)</a> which states: "Electric prods, canvas slappers, or other implements employed to drive animals shall be used as little as possible in order to minimize excitement and injury. Any use of such implements which, in the opinion of the inspector, is excessive, is prohibited. Electrical prods attached to AC house current shall be reduced by a transformer to the lowest effective voltage not to exceed 50 volts AC."</p> <p>Yes, this situation is considered egregious. The establishment electrically prodded a market hog in the anus (sensitive area).</p> <p>From <a href="#">FSIS Directive 6900.2</a> under examples of egregious inhumane treatment: "Otherwise causing unnecessary pain and suffering to animals".</p> <p>Yes, the FLS took appropriate action.</p> <p>From <a href="#">FSIS Directive 6900.2</a>, IPP are to take immediate action to stop the inhumane slaughter or handling of livestock that is of an egregious nature with an appropriate regulatory control action to prevent the inhumane handling from continuing. IPP are then to correlate with the DVMO and DO to receive instructions for actions.</p> <p>In this scenario, an egregious inhumane handling event occurred. Per <a href="#">FSIS Directive 6900.2</a>, FSIS will move to an enforcement action if an egregious inhumane handling noncompliance has occurred.</p> <p>Per the scenario, this establishment does maintain a robust animal handling program. Therefore, you will consider whether a Notice of Suspension or a Notice of Intended Enforcement is appropriate.</p> <p>Based on the FLS' observations, you conclude that although the establishment has a robust animal handling program, the establishment was not implementing this robust program (in this specific instance, the establishment employee purposefully applied and energized the electric prod on the anus of the animal, which is not in accordance with the establishment's procedures). You recommend a NOS be issued by the DO.</p> <p>Per <a href="#">FSIS Directive 6900.2</a>, FSIS considers whether the establishment operates under a robust systematic approach <b>and</b> whether the establishment has demonstrated the robustness of the program by effectively and consistently <b>implementing</b> the program.</p>
25	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• If this scenario represents noncompliance, is it an egregious situation?</li> <li>• Should the PHV take an RCA? If not, what should the PHV do?</li> <li>• What is your recommendation for this scenario (No NR, NR only, NR and NOIE, NR and NOS)?</li> </ul>
26	<p>No, there is no noncompliance based on what the SPHV observed.</p> <p>There are no definitive signs of consciousness observed based on the SPHV's location. She could not definitively say that the animal was righting itself or eye tracking because she was not able to see the head of the animal, and since no vocalization was heard, there are no observations to support a conclusion that the animal was conscious. Movements made by the animal could just be reflexive, and without observation of the whole animal, we cannot definitively state that the animal was conscious.</p>

	<p>Statements made by establishment personnel, whether affirmative or contradictory to IPP findings, should not be used when determining what course of action FSIS should take. We base our regulatory decisions on observations by IPP and the assessment of those observations.</p> <p>There is no noncompliance in this scenario.</p> <p>No, regulatory control action is not supportable in this situation. The SPHV should increase HATS verifications in the stunning and sticking areas for at least the remainder of the shift and should review the CO2 settings with establishment management on the equipment display panel. The SPHV should look at the number of animals being loaded into the gondolas, the CO2 concentration, the cycle time, signs of consciousness of animals emerging from the butinas, the stun to stick interval, and the quality of the stick.</p> <p>No NR.</p> <p>For an establishment with a robust animal welfare program, we would expect them to investigate the incident and implement corrective actions such as increasing monitoring in this area and retraining employees.</p>
27	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• If this scenario represents noncompliance, is it an egregious situation?</li> <li>• What is your recommendation for this scenario (No NR, NR only, NR and NOIE, NR and NOS)?</li> </ul>
28	<p>There is no noncompliance in this scenario.</p> <p>In this situation, you have all the hallmarks of the mantra “the head is dead.” There may be sounds heard after stunning, particularly when the animal (usually cattle) is being hoisted due to the throat relaxing and air moving across the vocal cords, but you need to determine if this is a sound from a conscious animal.</p> <p>Look at the big picture and evaluate the animal closely for signs of consciousness. The establishment applied a security knock out of an abundance of caution, which they can do at any point in the process after the animal has been rendered insensible and as many times as they want as long as the animal stays in an unconscious state throughout the slaughter process.</p> <p>There is no noncompliance in this scenario.</p> <p>No NR.</p>
29	
30	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• If this scenario represents noncompliance, is it an egregious situation?</li> <li>• Did IPP take appropriate action?</li> <li>• What is your recommendation for this scenario (No NR, NR only, NR and NOIE, NR and NOS)?</li> </ul>
31	<p>Yes, the establishment failed to comply with <a href="#">9 CFR 313.15(a)(1) and 313.15(b)(1)(iv)</a>. The establishment failed to implement immediate corrective actions following an ineffective stunning attempt. IPP had to notify establishment personnel that the animal was still conscious, and the establishment needed to implement corrective actions to render the animal immediately insensible.</p> <p>The stunning operator was not trained. The establishment normally performs slaughter under the religious exemption without the use of stunning but will captive bolt stun animals when they cannot be restrained in the head catch instead of performing the ritual cut. When stunning is used (no matter before or after the ritual cut), the stunning regulations apply and should be verified.</p>

	<p>9 CFR 313.15(a)(1) states: "The captive bolt stunners shall be applied to the livestock in accordance with this section so as to produce immediate unconsciousness in the animals before they are shackled, hoisted, thrown, cast, or cut. The animals shall be stunned in such a manner that they will be rendered unconscious with a minimum of excitement and discomfort."</p> <p>9 CFR 313.15(b)(1)(iv) states: "The stunning operation is an exacting procedure and requires a well-trained and experienced operator. He must be able to accurately place the stunning instrument to produce immediate unconsciousness. He must use the correct detonating charge with regard to kind, breed, size, age, and sex of the animal to produce the desired results."</p> <p>Yes, this situation is considered egregious. The establishment failed to implement immediate corrective actions following an ineffective stunning attempt.</p> <p>From <a href="#">FSIS Directive 6900.2</a>, stated as an example of "egregious inhumane treatment" includes: "failing to immediately (or promptly) render an animal unconscious after a failed initial stunning attempt."</p> <p>Yes, IPP took appropriate action.</p> <p>From <a href="#">FSIS Directive 6900.2</a>, IPP are to take immediate action to stop the inhumane slaughter or handling of livestock that is of an egregious nature with an appropriate regulatory control action to prevent the inhumane handling slaughter from continuing. IPP are then to correlate with the DVMO and DO to receive instructions for actions.</p> <p>In this scenario, an egregious inhumane handling event occurred. Per <a href="#">FSIS Directive 6900.2</a>, FSIS will move to an enforcement action if an egregious inhumane handling noncompliance as occurred. Therefore, you will consider whether a Notice of Suspension or a Notice of Intended Enforcement is appropriate.</p> <p>This establishment does not implement a robust systematic approach, so the only option would be to issue a Notice of Suspension (NOS).</p> <p>If the establishment had a robust animal welfare program, based on the circumstances stated above, regulatory discretion would still not apply because the establishment was not implementing the program in a robust manner (untrained person performing captive bolt stunning, and trained personnel failed to act appropriately when the animal was not rendered insensible on the first stunning attempt).</p> <p>Per <a href="#">FSIS Directive 6900.2</a>, FSIS considers whether the establishment operates under a robust systematic approach <b>and</b> whether the establishment has demonstrated the robustness of the program by effectively and consistently <b>implementing</b> the program.</p>
32	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• If this scenario represents noncompliance, is it an egregious situation?</li> <li>• What is your recommendation for this scenario (No NR, NR only, NR and NOIE, NR and NOS)?</li> </ul>
33	<p>Yes, an electrically stunned animal regained consciousness while shackled and hoisted. The establishment failed to comply with <a href="#">9 CFR 313.30(a)(4)</a> which states "The stunned animal shall remain in a state of surgical anesthesia through shackling, sticking, and bleeding."</p> <p>In this scenario, an animal regained consciousness after stunning; therefore, the situation is considered egregious, and an enforcement action is warranted.</p> <p>From <a href="#">FSIS Directive 6900.2</a> under examples of "egregious inhumane treatment" includes: "stunning of animals and then allowing them to regain consciousness."</p>

	<p>In this scenario, an egregious inhumane handling event occurred. Per <a href="#">FSIS Directive 6900.2</a>, FSIS will move to an enforcement action if an egregious inhumane handling noncompliance has occurred.</p> <p>Per the scenario, this establishment does maintain a robust animal handling program. Therefore, you will consider whether a Notice of Suspension or a Notice of Intended Enforcement is appropriate.</p> <p>In this incident, when the animal was identified as conscious, there was no attempt made to render the animal unconscious and insensible to pain before proceeding with attempts to exsanguinate it using a knife. You conclude that although the establishment has a robust animal handling program, the establishment was not following the program as written. You recommend a NOS be issued by the DO.</p> <p>Per <a href="#">FSIS Directive 6900.2</a>, FSIS considers whether the establishment operates under a robust systematic approach <b>and</b> whether the establishment has demonstrated the robustness of the program by effectively and consistently <b>implementing</b> the program.</p>
34	N/A
35	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• If this scenario represents noncompliance, is it an egregious situation?</li> <li>• What is your recommendation for this scenario (No NR, NR only, NR and NOIE, NR and NOS)?</li> </ul>
36	<p>Yes, the establishment is noncompliant with <a href="#">9 CFR 313.15(a)(1)</a>. While the establishment did quickly implement corrective actions following each ineffective stunning attempt, it took four stunning attempts with a captive bolt gun before the steer was rendered insensible.</p> <p>9 CFR 313.15(a)(1) states "The captive bolt stunners shall be applied to the livestock in accordance with this section so as to produce immediate unconsciousness in the animals before they are shackled, hoisted, thrown, cast, or cut. The animals shall be stunned in such a manner that they will be rendered unconscious with a minimum of excitement and discomfort."</p> <p>Yes, this situation is considered egregious. Four stunning attempts indicate there was a prolonged discomfort and excitement of the animal due to the inability to render it insensible.</p> <p>From <a href="#">FSIS Directive 6900.2</a> under examples of egregious inhumane treatment: "Multiple ineffective stun attempts; Prolonged discomfort and excitement of the animal due to the inability to render it insensible after the application of the immediate corrective actions."</p> <p>In this scenario, an egregious inhumane handling event occurred. Per <a href="#">FSIS Directive 6900.2</a>, FSIS will move to an enforcement action if an egregious inhumane handling noncompliance has occurred.</p> <p>Per the scenario, this establishment does maintain a robust animal handling program. Therefore, you will consider whether a Notice of Suspension or a Notice of Intended Enforcement is appropriate.</p> <p>In this incident, the establishment was prepared and took immediate corrective actions following the failed stunning attempts and maintained control over the animal. They recognized that due to the anatomic anomaly, a stunning attempt to the forehead in the target area was not successful; therefore, a different approach was needed and released the animal from the head catch so that a poll shot could be performed, which was successful at rendering the animal insensible. The establishment was implementing their program as written.</p> <p>Therefore, you recommend an NOIE be issued to the establishment (instead of an NOS).</p>
37	Review and assess the scenario on this slide. Ask yourself these questions:

	<ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• Should the PHV take RCA?</li> <li>• What is your recommendation for this scenario (No NR, weekly meeting MOI, GCP MOI, GCP NR)?</li> </ul>
38	<p>No, there is no noncompliance. There are no regulatory requirements for providing poultry with access to food or water on the inspected premises like there are for livestock. Additionally, there are no regulatory requirements related to holding times for poultry.</p> <p>No, there is not support for taking an RCA.</p> <p>There is no evidence of noncompliance with the regulatory requirements. There is no evidence of birds being killed in a manner that does not comply with GCP as defined in 9 CFR 381.65(b). There is no trend of birds dying otherwise than by slaughter.</p> <p>9 CFR 381.65(b) states "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. Blood from the killing operation must be confined to a relatively small area."</p> <p>This is a good topic for the PHV to discuss with establishment management and document in a general or weekly meeting, not a GCP MOI.</p> <p>Per <a href="#">FSIS Directive 6110.1</a>, poultry mistreatment MOIs are primarily issued when the establishment is mistreating birds before and up until the kill step, but the mistreatment event does not demonstrate that the establishment's process is out of control. This scenario does not provide evidence of poultry mistreatment that would warrant a GCP MOI.</p>
39	<p>Review and assess the scenario on this slide. Ask yourself these questions:</p> <ul style="list-style-type: none"> <li>• Does this scenario represent noncompliance? If so, what is the regulatory citation that applies?</li> <li>• Should the PHV take RCA?</li> <li>• What is your recommendation for this scenario (No NR, weekly meeting MOI, GCP MOI, GCP NR)?</li> </ul>
40	<p>No, there is no noncompliance.</p> <p><a href="#">9 CFR 381.65(b)</a> requires that breathing has stopped prior to birds entering the scald tank. While this bird was conscious, alert, and breathing and would have entered the scald tank if action was not taken, <a href="#">FSIS Directive 6110.1</a> states that adherence to GCP is a process control issue.</p> <p>This is an isolated incident involving a single bird and there is no evidence demonstrating a loss of process control, therefore, there is no noncompliance.</p> <p>There is not support to take a RCA in this situation. The scenario describes an isolated instance. <a href="#">FSIS Directive 6110.1</a> describes taking RCA in situations when the establishment's process is out of control (e.g., an ongoing pattern or trend of putting birds into the scalding tank while they are still breathing).</p> <p>You decide to document the conversation with the slaughter supervisor in a GCP MOI.</p> <p>Per <a href="#">FSIS Directive 6110.1</a>, an isolated instance of mistreatment or a single bird entering the scald tank breathing does not represent a loss of process control and is to be documented in a mistreatment MOI, not an NR.</p> <p>The PHV should continue to observe the process to verify the process is under control.</p>



41	<p>The DVMO will use the methodology in <a href="#">FSIS Directive 5100.3</a> "Administrative Enforcement Action Decision-Making and Methodology" to assist the District Office in humane handling related enforcement actions. When FSIS observes noncompliance of an egregious nature, we take further enforcement action.</p> <p>Over the next few slides, you'll learn more about your role in this process. You will practice how to review and assess an establishment's response to enforcement, as well as how to construct a Verification Plan based on the establishment's response.</p>
42	<p>As a DVMO, you will evaluate and recommend HH enforcement actions when there is an inhumane handling incident, or an action based on a history of establishment HH violations. You will correlate with the District Case Specialist on the enforcement strategy and support for the enforcement.</p> <p>DVMOs document their recommendation for appropriate enforcement action under <a href="#">9 CFR Part 500</a>. The recommendation is based on information from IPP, DVMO first-hand observational knowledge, and establishment history of HH noncompliance. The documented recommendation must specify the regulatory requirements and relevant statutory authorities the establishment has not met.</p> <p>DVMOs review NRs provided by in-plant IPP that describe inhumane incidents. The DVMO ensures the NR provides all relevant information that supports the enforcement action and provides these documents to the District Case Specialist for inclusion in the Administrative Enforcement Report (AER).</p> <p>When there are trends of HH noncompliance, the DVMO provides an analysis of the noncompliance trends when they determine that the noncompliance history supports further enforcement. This analysis is included in the AER case file.</p>
43	<p>As a DVMO and subject-matter-expert on HH, you will assist in drafting the NOIE and NOS letters, or other documents associated with the enforcement action, as needed. You may also participate in scheduling and attending conference calls with the establishment to discuss the contents of the enforcement letter. DVMOs assist in the review of the establishment's proposed corrective actions and preventative measures. You will learn more about this on the next slide.</p> <p>DVMOs assist in the development and review of the Verification Plan. You may draft the VP or assist the District Case Specialist. The DVMO discusses the VP with the in-plant team (e.g., FLS, IPP) to ensure that there is a clear understanding of the noncompliance issues and of the specific verification procedures.</p> <p>DVMOs also conduct follow-up verification visits to the establishment for a minimum of 90 calendar days at 30-day intervals during the deferral/abeyance period. The DVMO documents the follow-up verification visits and will provide recommendations to the District Office to help the DO decide when an enforcement action should be reinstated or closed.</p> <p><b>Note:</b> The DVMO is not to close an inhumane handling enforcement action without one or more on-site visits during the abeyance/deferral period.</p> <p>DVMOs must follow all evidence collection procedures in accordance with <a href="#">FSIS Directive 8010.3</a> "Procedures for Evidence Collection, Safeguarding and Disposal" and ensure that all evidence is transferred under chain of custody to the District Case Specialist for inclusion in the AER. That includes what you learned on the previous slide (NRs provided by IPP, analysis of noncompliance trends) as well as documentation from follow-up verification visits during the deferral/abeyance period.</p>
44	<p>When assisting with documenting enforcement letters, the DVMO follows the methodology described in <a href="#">FSIS Directive 5100.3</a> "Administrative Enforcement Action Decision-Making and Methodology".</p> <p>The enforcement letter must:</p>

	<ul style="list-style-type: none"> <li>• Include information to explain the findings in a manner that encompasses all defining aspects of the alleged violation in chronological order (earlier to most recent).</li> <li>• Ensure the findings link the alleged violations to FSIS statutory and regulatory requirements and that enforcement letters describe who is involved, what happened, when it occurred, where noncompliance was found, and why the Agency is taking action.</li> <li>• Ensure the enforcement letter describes the facts in a manner that makes clear any past noncompliance and how previous noncompliance relates to present noncompliance. When applicable, the DO is to describe whether the establishment’s previously proposed corrective actions and preventive measures were ineffective to address the noncompliance.</li> <li>• Ensure suspension letters (NOS, NROS) contain hearing rights as defined under <a href="#">9 CFR 500.5(d)</a>. The DO is to inform the establishment in the enforcement letter that it may request a hearing pursuant to the Uniform Rules of Practice and include the name, title, and contact information of the Chief of OIEA -EOB, to request such hearing. Any enforcement action taken in accordance with the ROP may be appealed.</li> <li>• Use the third person.</li> </ul>
45	<p>When assisting with documenting intended enforcement letters, the DVMO follows the methodology described in <a href="#">FSIS Directive 5100.3</a> "Administrative Enforcement Action Decision-Making and Methodology". Intended enforcement actions (see <a href="#">9 CFR 500.4</a>) are documented in Notice of Intended Enforcement (NOIE) letters. This notification provides an establishment with prior notification that FSIS may take a withholding action or impose a suspension of the assignment of inspectors at the establishment and provides the establishment an opportunity to demonstrate or achieve compliance.</p> <p>NOIE letters must include:</p> <ul style="list-style-type: none"> <li>• FSIS' authority under the Acts.</li> <li>• An explanation of the findings and basis for action in a chronological order of events.</li> <li>• Findings linked to the Acts and regulatory requirements.</li> <li>• The establishment’s previous enforcement history.</li> <li>• The establishment’s processes or products that are affected by the action.</li> <li>• The expected format for the establishment’s response and a three business day timeframe for the establishment to respond to the DO.</li> <li>• The DO contact information.</li> </ul> <p>When assisting with documenting enforcement letters, the DVMO follows the methodology described in <a href="#">FSIS Directive 5100.3</a>.</p> <p>Letters of Deferral (LODs) are issued after the District Office decides to defer the decision to take an enforcement action and allow the establishment the opportunity to implement the proposed corrective actions and preventive measures.</p> <p>LODs contain:</p> <ul style="list-style-type: none"> <li>• A brief explanation of the findings and basis for action that led the DO to issue the NOIE, including the dates of issuance of the NOIE letter.</li> <li>• The establishment’s processes or products that are affected by the NOIE action.</li> <li>• Findings from the DO review and acceptance of the establishment’s proposed corrective actions and preventive measures.</li> <li>• DO contact information.</li> <li>• Reminder that FSIS has the authority to take a suspension or withholding action if the establishment fails to implement its proposed corrective actions and preventive measures or if the corrective actions and preventive measures are not effective.</li> </ul>

When assisting with documenting enforcement letters, the DVMO follows the methodology described in [FSIS Directive 5100.3](#).

Notices of Suspension are issued under the conditions described in [9 CFR Part 500](#). A NOS letter must include:

- FSIS' authority under the Acts.
- An explanation of the findings and basis for action in a chronological order of events.
- Findings linked to the Acts and regulatory requirements.
- The establishment's previous enforcement history.
- The establishment's processes or products that are affected by the action.
- Expected format for the establishment's response to the DO.
- DO contact information.
- Appeal rights and hearing rights.

When assisting with documenting enforcement letters, the DVMO follows the methodology described in [FSIS Directive 5100.3](#).

A suspension may be reinstated during the abeyance period as per the conditions in [9 CFR Part 500](#). The DO is to document a reinstatement of suspension in an NROS letter that provides the establishment with an explanation of the findings that led to the District's decision to reinstate the suspension.

A NROS must include:

- FSIS' authority under the Acts.
- An explanation of the findings and basis for action in a chronological order of events, including the findings from the previous suspension action.
- Findings linked to the Acts and regulatory requirements.
- The establishment's previous enforcement history, including the previous suspension action.
- The establishment's processes or products that are affected by the action.
- Expected format for the establishment's response to the DO.
- DO contact information.
- Appeal rights and hearing rights.

When assisting with documenting enforcement letters, the DVMO follows the methodology described in [FSIS Directive 5100.3](#).

NOSA or NROSA are issued after the establishment responds to the DO with acceptable corrective actions and preventive measures, to permit the establishment the opportunity to implement the proposed corrective actions and preventive measures.

NOSA/NROSA letters must contain:

- A brief explanation of the findings and basis for action that led the DO to issue the NOSA or NROSA including the dates of issuance of the enforcement letter.
- The establishment's processes or products that are affected by the enforcement action.
- The findings from the DO review and acceptance of the establishment's proposed corrective actions and preventive measures.
- The DO contact information.
- A reminder that FSIS has the authority to reinstate the suspension or withholding action if the establishment fails to implement its proposed corrective actions and preventive measures or if the corrective actions and preventive measures are not effective.

	<p>The DVMO may assist the DO in writing other letters described in <a href="#">FSIS Directive 5100.3</a>.</p> <p>The DO issues the following letters to an establishment, as appropriate. These letters are not enforcement letters. However, these letters can be used to correspond in writing with the establishment.</p> <ul style="list-style-type: none"> <li>• <b>Letter of Warning:</b> issued to an establishment to close an enforcement action after the completion of the verification period. The DO is to issue an LOW to close an enforcement action only when the establishment has been able to demonstrate that the corrective actions and preventive measures have been successfully implemented and corrected the noncompliance described in the enforcement letter and related documents for a minimum of 90 calendar days.</li> <li>• <b>Letter of Concern:</b> issued in accordance with <a href="#">FSIS Directive 6110.3</a> "Ante-Mortem and Post-Mortem Poultry Inspection" to describe GCPs at poultry establishments where GCPs are not followed. An LOC is not an enforcement letter and is not enforcement-related. The DO is not to issue an LOC to establishments to describe enforcement actions, close out enforcement actions, or to request additional information from establishments.</li> <li>• <b>Official Correspondence Letter:</b> issued when necessary to correspond with the establishment in writing for issues not clearly defined in other parts of <a href="#">FSIS Directive 5100.3</a>.</li> </ul>
46	<p>An FLS contacts you to get your feedback on the following situation that just occurred at the establishment she is covering.</p> <p>While observing establishment employees move market hogs up the single file drive alley chute, the FLS observed a hog stop before the last back stop gate to the stunning box. The establishment employee, who was carrying a rattle paddle and an electric prod, tapped the hog with the rattle paddle a few times in an effort to drive the hog forward. The animal did not move, and the employee then applied the electric prod directly on the anus. The hog vocalized and ran up the chute in response.</p> <p>The FLS took regulatory control of the process and placed U.S. Rejected tag number B45503538 on the door to the drive alley chute. The barn supervisor (Mr. Unnamed) and the quality control manager (Mr. No Name) were notified of the observations. The establishment has a robust animal welfare program.</p> <p>You determined that the establishment is noncompliant with <a href="#">9 CFR 313.2(b)</a> and that the situation is considered egregious. The establishment electrically prodded a market hog in the anus (sensitive area). Based on the FLS' observations, you conclude that although the establishment has a robust animal handling program, the establishment was not implementing this robust program. You recommend a NOS be issued by the DO.</p> <p><a href="#">Use this template to draft an NOS.</a></p> <p>Place information in the Findings/Basis for Action section and in the Summary and Conclusion section, where prompted.</p>
47	<p><a href="#">Click to view the example NOS.</a></p>
48	<p>DVMOs review the establishment's proffered corrective actions and preventative measures in response to the enforcement action.</p> <p>The DVMO assists the District Office in assessing these actions to determine if they contain the following elements:</p> <ul style="list-style-type: none"> <li>• Procedures or assessment methods the establishment will use to address the cause of the regulatory noncompliance.</li> <li>• Specific actions the establishment will use to eliminate and prevent the cause of the regulatory noncompliance.</li> <li>• Monitoring activities the establishment will use to ensure that changes are implemented and effective to address the regulatory noncompliance.</li> <li>• Any applicable supporting documentation.</li> </ul>

	<p>If the establishment has a history of previous enforcement, the DVMO should consider if the current proffered corrective actions and preventative measures are substantially different and meaningful. The DVMO may also need to request clarification from the establishment, based on the establishment's responses.</p> <p>After determining that the establishment's proposed corrective actions and preventative measures contain the elements above, the District Office (with DVMO assistance) will develop a Verification Plan and issue a deferral or abeyance letter. As a DVMO, you may assist in drafting these documents.</p>
49	<p><a href="#">Review the NOS.</a></p> <p>Situation Recap: An FLS contacts you to get your feedback on the following situation that just occurred at the establishment she is covering.</p> <p>While observing establishment employees move market hogs up the single file drive alley chute, the FLS observed a hog stop before the last back stop gate to the stunning box. The establishment employee, who was carrying a rattle paddle and an electric prod, tapped the hog with the rattle paddle a few times in an effort to drive the hog forward. The animal did not move, and the employee then applied the electric prod directly on the anus. The hog vocalized and ran up the chute in response.</p> <p>The FLS took regulatory control of the process and placed U.S. Rejected tag number B45503538 on the door to the drive alley chute. The barn supervisor (Mr. Unnamed) and the quality control manager (Mr. No Name) were notified of the observations. The establishment has a robust animal welfare program.</p> <p>You determined that the establishment is noncompliant with <a href="#">9 CFR 313.2(b)</a> and that the situation is considered egregious. The establishment electrically prodded a market hog in the anus (sensitive area). Based on the FLS' observations, you conclude that although the establishment has a robust animal handling program, the establishment was not implementing this robust program. You recommend a NOS be issued by the DO.</p> <p><a href="#">Click to review the establishment's response to the NOS.</a></p>
50	<p>How does your assessment of the establishment's response and follow-up questions compare to the assessment and questions below?</p> <p>Assessment of the establishment's response:</p> <ul style="list-style-type: none"> <li>• The establishment described the event. It is not unusual for establishments to not agree (or more rarely outright contest) with what IPP said happen. What is relevant for you is determining whether the establishment has adequately addressed all the regulatory concerns related to the egregious event. The establishment can appeal the enforcement action or request a hearing, and those are the appropriate avenues if the establishment does not want to proceed with the EA process at the district level.</li> <li>• Employees were retrained on proper electric prod procedures, and the training was documented and provided for review.</li> <li>• The establishment provided monitoring procedures with an associated form and stated frequency.</li> <li>• In the new procedure for electric prod use, it is not clear where on the animal the electric prod can or should be applied, aside from "above the tail."</li> <li>• It is not clear if the monitor will be evaluating electric prod use for placement and how those findings will be documented on the monitoring form.</li> <li>• It is not clear what actions will be taken if an employee uses an electric prod improperly.</li> </ul>

	<p>Example questions to ask the establishment to facilitate an adequate response (may be sent in a formal letter or other means, depending on the district and situation):</p> <ul style="list-style-type: none"> <li>• The new procedure for electric prod use is to use it only “above the tail.” Does this mean the electric prod should be applied only to the back?</li> <li>• Will the monitor be looking at the placement of the electric prod when it is used, and how will that (location, acceptable/unacceptable) be documented on the monitoring form?</li> <li>• What action will be taken if an employee is using an electric prod improperly?</li> </ul>
51	<p>DVMOs assist in the development and review of the Verification Plan, as well as ensure the in-plant team has a clear understanding of the noncompliance issues and specific verification procedures.</p> <p>The Verification Plan is a tool designed to verify the effectiveness of the establishment's proposed corrective actions and preventative measures that were proffered and led to the decision to defer enforcement or hold a suspension in abeyance. They are designed to provide detailed instructions to the IPP and the DVMO for verifying the establishment's proposed corrective actions and preventative measures. Verification plan results are recorded in PHIS.</p> <p>The Verification Plan describes the FSIS verification responsibilities that cover a minimum of 90 calendar days when an enforcement has been deferred or held in abeyance. Verification Plan formats may vary from district to district, but all VPs must contain the following information:</p> <ul style="list-style-type: none"> <li>• The background that led to an enforcement action and deferral or abeyance of that action.</li> <li>• The organized list of the establishment’s proposed corrective actions and preventive measures.</li> <li>• The documents, processes, products, or programs that are required to be verified.</li> <li>• The frequency of the verification.</li> <li>• The directed PHIS task associated with each verification activity.</li> <li>• Free text space to record additional information as needed.</li> <li>• A statement to inform the establishment that the DO is to be informed of any changes to corrective actions and preventive measures during the verification period.</li> </ul> <p>The IIC is responsible for ensuring that the verification tasks are scheduled and documented in PHIS at the frequencies listed in the verification plan. The FLS reviews PHIS reports for completed verification activities on at least a bi-weekly basis.</p> <p><a href="#">Click to review an example VP.</a></p> <p>The format will vary by District, but the content meets the policy described in <a href="#">FSIS Directive 5100.3</a> "Administrative Enforcement Action Decision-Making and Methodology".</p>
52	<p><a href="#">Click to review the establishment response.</a></p> <p><a href="#">Click to download a template VP.</a></p>
53	<p><a href="#">Click to review the example VP for this workshop.</a></p>
54	<p>So far, you've learned the DVMO's role in developing and open enforcements. The next section covers the DVMO's role in follow-up visits (after a suspension has been held in abeyance or an intended enforcement has been deferred), and when a DVMO would recommend a reinstatement or closure of an enforcement.</p>
55	<p>The DVMO conducts follow-up verification visits at 30-, 60-, and 90-days at establishments whose enforcement action is held in abeyance or has been deferred.</p> <p>During these visits, the DVMO reviews the PHIS report/VP for verification activity results and assesses whether the corrective actions are effective. The DVMO will document their findings during the follow-up visits, including a description of the establishment's progress in implementing the corrective and preventative actions. <b>Note:</b> The visits prior to the final visit (e.g., 30-day and 60-day) focus DVMO</p>

	<p>verification on the VP. The final visit (e.g., 90-day) is a comprehensive VV. <a href="#">Click to review an example of a 30-day follow-up verification visit report.</a></p> <p>The DVMO should consider recommendations from the FLS and in-plant team. The DVMO will use this information to make a recommendation to the District Office on if an enforcement action should be reinstated or closed.</p> <p>A suspension may be reinstated during the abeyance period if the establishment fails to implement effective corrective actions and preventative measures. FSIS may decide to take an enforcement action at an establishment who was under deferral for an intended enforcement if the establishment fails to implement effective corrective actions and preventative measures.</p> <p>When an establishment has completed a verification period and has been able to demonstrate that the corrective actions and preventive measures have been successfully implemented and corrected the noncompliance described in the enforcement letter and related documents for a minimum of 90 calendar days, the DVMO may recommend the DO issue a LOW and close the enforcement action.</p> <p>When a follow-up visit is performed by a non-DVMO PHV trained in HH methodology, the DVMO communicates with the PHV regarding any questions or issues the PHV identified during the visit.</p>
56	<p>This section covers written documentation best practices you should consider in your DVMO role.</p>
57	<p>As a DVMO, you will review HH/GCP related documentation drafted by IPP, including HH/GCP NRs and MOIs. You will assist in drafting enforcement letters.</p> <p>It is important that the documentation is clear, concise, organized, objective, and supportable. If the written documentation is not as such, the Agency may not be able to support the decision for the enforcement action. The establishment may appeal the enforcement, and the appeal may be granted based on the lack of supporting documentation.</p> <p>NRs involving egregious events are sent to the DVMO in draft form for review. This is essential for NRs that document egregious inhumane handling situations because the information from those NRs must be incorporated into the enforcement letters. In some districts, all HH NRs drafted by IPP are sent in draft-form to the DVMO first, before IPP issue the NRs. In other Districts, non-egregious NRs are sent to the DVMO after they are finalized.</p> <p>As the SME, you will view many NRs and enforcement letters for HH/GCP related events. You will understand the appropriate vocabulary to utilize and what to include/not include to draft a narrative that supports the noncompliance (and enforcement, where applicable). Thus, you will play a key role in providing feedback to IPP on their NR drafts, such that the final NR issued to the establishment and included in the enforcement letter is clear and supports the enforcement action taken. This process may take a bit of back and forth with IPP to achieve the final draft document.</p>
58	<p>This slide provides an example of what you might receive as a DVMO, for a draft NR written by IPP in response to an egregious HH event.</p> <p><a href="#">Review the e-mail and draft NR.</a> Consider what feedback you would provide IPP. This may involve several instances of back/forth before a finished draft is complete.</p> <p>Once you've gathered your thoughts on the feedback you'd provide, <a href="#">review the example finalized NR</a> that was provided to the establishment (including the detailed information on the feedback that was provided). Finally, you may <a href="#">review the NOS/NOSA</a> that was sent to the establishment to see another example of the types of enforcement letters you may assist drafting as a DVMO.</p>
59	<p>This section covers some communication considerations to keep in mind in your DVMO role.</p>

60	<p>As a DVMO, it is important to maintain and improve your communication skills, both verbal and written. You will likely need to adapt your communication style to effectively accomplish the mission.</p> <p>Establishments vary in size, resources, and level of understanding of the regulations. This may impact how you communicate - for example, you may need to spend more time communicating to a very small establishment who may have less resources or expertise already available to them. It is a good practice to consider your audience when you are communicating with the establishment, as your audience will vary depending on the establishment (see LinkedIn Learning courses such as <a href="#">The Key to Good Communication: Your Audience</a>).</p> <p>Establishments under enforcement actions may be more challenging to communicate with. They may be frustrated, stressed, or concerned about the impact on their business. This may result in conflict during communication, so learning how to communicate best under conflict is a good skillset to build (see LinkedIn Learning courses such as <a href="#">Communicating Through Disagreement</a>).</p> <p>Communication is a skill that everyone can continue to grow and improve throughout their career. When a communication situation goes south, assess the situation afterwards with a mentor or colleague and consider how you could alter your approach next time to achieve a more successful outcome. Keep a look out for opportunities offered by FSIS (training, mentorship, etc.) that may help you grow and improve in your verbal and written communication skills (see <a href="#">Continuous Development Opportunities</a> on IPP Help).</p> <p>Finally, remember to take care of your own health and wellness. It is challenging to effectively communicate if you are not taking care of yourself. Communicating under stress and conflict is challenging, especially in a new role or position. Consider using the Agency's available resources via LinkedIn Learning (e.g., <a href="#">Support your Well-Being during Times of Change and Uncertainty</a>), <a href="#">worklife4you</a> and <a href="#">EAP (scroll down for more info on EAP and Worklife4You benefits)</a>.</p>
61	N/A



# HH/GCP: Correlation, Data, and Other Duties Module

## Learning Objectives

1. Identify situations where correlation with IPP and their supervisors is necessary.
2. Discuss the different types of individuals and groups that a DVMO will communicate with on HH/GCP related work.
3. Practice how to write concise and effective communications for high-level FSIS management.
4. Demonstrate how to respond to reports received for NASS requests.
5. Demonstrate how to apply management controls to analyze HH/GCP outcomes.
6. Review an odd-hour inspection report following guidance in FSIS Directive 6900.2 “Humane Handling and Slaughter of Livestock”.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	The DVMO will correlate and communicate with a variety of individuals and program areas, both within and outside FSIS.
4	<p>As a DVMO, you may encounter issues that are outside of FSIS' regulatory authority. You should obtain a district-specific contact list from your OJT mentor that includes the contacts you may need (e.g., state veterinarians, APHIS, FDA).</p> <p>You may also work with other program areas within FSIS, such as OIEA (Office of Investigations, Enforcement and Audit), and other DVMOs/DVMSs. Additionally, you will work with local IPP, their chain-of-command, and the District Office.</p>
5	<p>The DVMO will communicate with local FSIS personnel to share HH/GCP related policies and guidance, provide any recommendations based on HH/GCP data, and may mentor new IPP.</p> <p>The DVMO is to periodically attend FSIS inspection work unit meetings (as coordinated by the FLS or District Office) to discuss HH or GCP issues. Also, the DVMO is to present HH/GCP topics at work unit meetings, District FLS meetings, and/or conference calls as assigned. Topics could include but are not limited to the review of applicable regulations, directives, notices, or other issuances.</p> <p>When reviewing or considering data or other information pertaining to an establishment’s operating practices, the DVMO is to provide frequent updates to the district management team as well as remain in communication with the IIC and their supervisor. DVMOs are to inform the district management team, FLS and the IIC of findings and any recommendations made. The district management team may indicate a need for additional information or a need to provide additional resources. In addition, the DVMO may collaborate or communicate with the EIAO on humane handling issues as they arise.</p> <p>As schedules permit and as coordinated with the FLS and district management team, DVMOs are to review HH and poultry GCP with new CSIs and PHVs. Thus, from time to time the DVMO may act as a “mentor” to new or newly promoted IPP to provide informal training, mentoring and guidance regarding the Agency’s requirements and practice pertaining to treatment of poultry and HH of livestock. Such correlation by the DVMO would typically occur during the first 12 months that the CSI or PHV is in the new position.</p>
6	The DVMO will communicate with District Management and Headquarters personnel. As a DVMO, you will provide your expertise and recommendations.

Communications (both written and verbal) should be clear, organized, and concise. In addition to coaching, mentoring, and feedback, there are many resources available to continue developing your written and verbal communication skills.

- [Federal plain language guidelines](#)
- LinkedIn Learning (e.g., [Communication Foundations; Tips for Writing Business E-mails](#))
- Learn how to communicate with your management (e.g., [Managing Up](#))
- Leadership Competencies (including oral and written communication skills, [IPP Help: Leadership Competencies](#))

When e-mailing management, here are a few best practices to ensure you convey your message clearly:

- Identify what your goal is for the message. Do you need action from management, such as a meeting with them or a review of your recommendation?
- Use a clear, appropriate subject line. Management may receive numerous e-mails. It is important that the subject line of your e-mail indicates what action you want the recipient to take (e.g., "Action requested: Meeting to discuss HH event"; "Review requested: Draft NOIE for HH event").
- Draft a message that is clear, concise, and organized. A message that is short and to the point will be easier to read and understand quickly, which is necessary for busy schedules. Start with the action you need from management and then include key supporting points. Two or three bullet points may be easier to read and understand quickly.
- Include a timeframe in which you need a response (e.g., "Could you please be available to meet by COB tomorrow?").

7 Review the scenario below. Then, draft an e-mail to your supervisor requesting a meeting to discuss the issues.

Scenario:

As a DVMO, you are responsible for reviewing and assessing district-wide HATS data at least quarterly and providing guidance to IPP on any issues identified. In your most recent quarterly review (Q1) of HATS Detail and Summary reports, you've identified numerous errors in the entry of HATS data for establishment M000. You identified that there are 22 slaughter days where there are no category IV hours entered, even though this is not a very small establishment and other HATS categories were verified. Per the instructions in [FSIS Directive 6900.2](#) "Humane Handling and Slaughter of Livestock" you know that a minimum of one-quarter hour is expected to be entered for each slaughter shift in HATS Category IV, "Ante-mortem Inspection". You also see that there are 13 days where the HATS hours are 20 hours or more, which exceeds the slaughter hours. Per the instructions in [FSIS Directive 6900.2](#), you know that during normal operations, the total maximum time that would be entered across all HATS categories will generally not exceed the total operational hours for that respective shift.

Additionally, there are 17 days where IPP entered HATS hours, but there is no corresponding slaughter data. This is an establishment where it is not common for IPP to conduct odd-hours inspection, because the establishment doesn't receive or handle live animals outside of IPP's normal tour of duty. You think maybe IPP are entering the HATS hours on a day other than the actual day of slaughter and forgetting to change the date in PHIS to correspond with the actual slaughter day.

You have e-mailed and called the FLS and IIC several times regarding the errors you identified above. You have received no response, e-mail or phone, from the FLS or the IIC.

You're pretty frustrated with the lack of follow up from the FLS and IIC at this establishment, especially since you've discussed similar types of issues with them at your previous verification visit. You're planning an upcoming verification visit at this establishment next week, which will include meeting with IPP at the establishment. Given the history of lack of communication from the FLS/IIC and the HATS report errors,

	you'd like to talk to your supervisor (DDM Dr. Great) about how to approach the issues you've found. You decide to e-mail your DDM.
8	<a href="#">Click to review an example e-mail to FSIS management.</a>
9	N/A
10	N/A
11	The DVMO reviews HH/GCP related data, as well as any other data assigned to them by their District (e.g., residue sampling data). This next section covers data review and other duties that a DVMO may be assigned.
12	The DVMO is to evaluate the National Agriculture Statistics Service (NASS) slaughter data reports and forward error reports to the FLS for in-plant follow up to verify the accuracy of the data entry. This evaluation is performed weekly. This includes missing poultry data reports, as well as livestock slaughter data.  <a href="#">Click to see an example of a NASS e-mail and report.</a>
13	The DVMO is to evaluate and assess in-plant residue control programs as outlined in <a href="#">FSIS Directive 10,800.1</a> "Residue Sampling, Testing and Other Verification Procedures under the National Residue Program for Meat and Poultry Products" and forward any issues found to FLS and DO.  The DVMO is to monitor residue sampling in their District, by: <ul style="list-style-type: none"> <li>• Monitoring surveillance (directed) residue sampling tasks to ensure that the tasks are completed when assigned through PHIS; and</li> <li>• Working with DO management to evaluate and assess inspector-generated sampling in establishments to ensure uniform and consistent implementation of the NRP.</li> </ul> The DVMO is to monitor residue violations in their District, by: <ul style="list-style-type: none"> <li>• Reviewing the weekly residue violator report and when warranted recommend appropriate action to DO management; and</li> <li>• Reviewing the repeat violator report posted on the FSIS website and when warranted recommend appropriate action to DO management.</li> </ul> <a href="#">Click to review an example residue e-mail and report.</a>  The DVMO also forwards the weekly residue violator report to the FLS and SPHV/IIC.
14	In previous modules, you've seen examples of the types of reports you may run as a DVMO. This includes HH/GCP specific reports (e.g., HATS validation) and other reports the District may ask you to review and assess (e.g., repeat residue violator reports).  The DVMO reports the following HH/GCP information to the District Office: <ul style="list-style-type: none"> <li>• At least annually, the DVMO reviews the number of establishments with a robust systematic approach and reports this information to DO management. This information can be used to determine outreach priorities and trends within the district.</li> <li>• At least quarterly, the DVMO is to generate the HATS Detail and Summary report for each establishment and circuit in PHIS to affirm that the task is completed. The DVMO is to provide recommendations to the FLS on items that require follow-up and send this information to DO management. The DVMO is to report to the DO management, on at least an annual basis, any district-wide trends identified from their analysis and correlation sessions.</li> <li>• The DVMO is to assess decision-making and documentation on any GCP NRs and poultry mistreatment MOIs that were issued and send any recommendations for follow up to DO management.</li> </ul>

	<p>Work with your District, supervisor, and OJT Mentor to understand the specific responsibilities you will assume as a DVMO in your local area. Understand the types of data you must review and assess, how to provide your recommendations, and what type of follow-up is expected by your management.</p> <p>As a DVMO, you play a key role as a leader and SME to ensure consistent, accurate inspection methodology across the district. Identifying potential errors or inconsistencies in data, reporting your recommendations, and verifying findings are addressed is part of your leadership and SME role.</p>
15	<p>The DVMO is to review IPP odd-hour inspection reports outlined in <a href="#">FSIS Directive 6900.2</a> "Humane Handling and Slaughter of Livestock" and forward to FLS and DO management. This review is performed quarterly (though the DMVO may also review the reports as they are received). You may review the reports as you receive them, to verify if there are any concerns with the documentation or how IPP are conducting odd-hour inspection.</p> <p>IPP perform odd-hour verification is necessary to ensure the regulatory requirements when livestock are being delivered to/handled at the establishment outside of IPP's regular tour of duty.</p> <p>The FLS (with DVMO input) determines the frequency at which odd-hour inspections occur. Criteria the FLS and DVMO will consider include:</p> <ul style="list-style-type: none"> <li>• Significant percentage of animals are unloaded when federal inspectors are not on duty.</li> <li>• No or minimal HATS time is being recorded for truck unloading.</li> <li>• Animals are frequently held over the weekend.</li> <li>• Observations during regular tour of duty indicate that injuries have occurred on premises.</li> <li>• Down or disabled animals are being delivered to the establishment during odd-hours.</li> <li>• The establishments are small or very small, slaughter 1-2 days per week, and inspector's assignment is a patrol.</li> <li>• Phone calls have been received from the general public indicating that inhumane handling was witnessed during odd-hours.</li> <li>• Dead animals are condemned on ante-mortem inspection and these animals were not observed by IPP at truck unloading.</li> </ul> <p>IPP document the verification under directed HH verification tasks, selecting "Supervisor Instruction" as the reason. If IPP document an NR during odd hour inspection, the DVMO should expect to receive a copy of it (per the directive – IPP should send the NR to SPHV, FLS, DVMO). The DVMO reviews the odd-hour reports (<a href="#">FSIS Form 8100-1</a> weblink; <a href="#">FSIS Form 8100-1</a> download). Common errors on this form may include:</p> <ul style="list-style-type: none"> <li>• Incomplete address, missing establishment number.</li> <li>• Missing name of the person performing the odd-hour inspection.</li> <li>• Box for "Livestock on Premises" not checked.</li> <li>• Box for "Personnel/Guard-on-site" not checked.</li> <li>• HATS Categories left blank. <ul style="list-style-type: none"> <li>○ Note: Categories VIII and IX under odd-hours involve IPP verifying the HH regulations are met for any animals the establishment euthanizes on the trucks or in the pens, outside of normal slaughter operations (e.g., downers). If this specific situation does not occur during IPP's odd-hour inspection, IPP may indicate as such in the category VII and IX text boxes.</li> </ul> </li> <li>• Not including the type and number of animals present.</li> </ul>
16	<p><a href="#">Click to review odd-hour report 1.</a>  <a href="#">Click to review odd-hour report 2.</a></p>
17	<p><a href="#">Click to review odd-hour report 1 key.</a>  <a href="#">Click to review odd-hour report 2 key.</a></p>
18	<p>DVMOs provide SME on 3rd party complaints regarding HH/GCP issues. These complaints are typically forwarded by the HHEC or District to the DVMO for their input. You may review these complaints, perform on-site visits in response to the complaints, and draft an internal recommendation based on your findings.</p>

	<p><a href="#">Click to see an example of a livestock 3rd party complaint</a>, including an example of an investigative plan the DVMO may draft in response to the complaint.</p> <p><a href="#">Click to see an example of a poultry 3rd party complaint and investigative plan.</a></p> <p><a href="#">Click to see an example of a 3rd party complaint and district response.</a></p> <p><a href="#">Click to see an example procedure for maintaining the AER case file addressing 3rd party complaints.</a> <b>Note:</b> This is an example. Follow specific procedures from your District on addressing 3rd party complaints.</p>
19	The DVMO may review and provide expertise on HH/GCP appeals. The DVMO reviews the NR, assesses the information, and provides an internal recommendation.
20	<p>In some districts, there are states that participate in the <a href="#">Cooperative Interstate Shipment program</a> (see <a href="#">FSIS Directive 5740.1</a> "Cooperative Interstate Shipment Program". The application process for this program includes a DVMO-HH visit. The methodology for these visits is similar to the verification visit methodology discussed in a previous module. However, documentation of these visits does not occur in PHIS. See below for two examples of how the CIS visits may be documented. Consult with your OJT Mentor and District to learn how CIS visits are documented in your District.</p> <p><a href="#">Click to review an example CIS verification visit report.</a></p> <p><a href="#">Click to review another example CIS visit report.</a></p>
21	N/A
22	N/A

# APHIS MOUs Module

## Learning Objectives

1. Identify active MOUs between APHIS and FSIS.
2. Recognize DVMO responsibilities within active MOUs.
3. Describe situations in which the FSIS APHIS Liaison should be contacted.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<p>To ensure the safety of meat, poultry, and egg products FSIS collaborates with other organizations, including Federal agencies such as the Animal and Plant Health Inspection Service (USDA-APHIS). The procedures and responsibilities under these collaborative efforts are documented in Memoranda of Understanding (MOUs). As a DVMO, you should be familiar with how to locate MOUs and recognize your responsibilities related to these MOUs. Your responsibilities may vary depending on your local area, so it is important to discuss what MOUs are relevant to your position with your District Office. <a href="#">MOUs are posted on the FSIS Website</a>.</p> <p>It is important to note that while you should be familiar with the contents of the MOUs, you are to follow specific instructions in the FSIS Directives.</p> <p>Two MOUs you should review as part of this training are covered on the upcoming slides and linked below. Please take the time to read each MOU and familiarize yourself with the contents. If you have specific questions regarding your responsibilities, discuss those questions with your District.</p> <ul style="list-style-type: none"> <li>• <a href="#">MOU Between FSIS and APHIS Relative to Cooperation on Import/Export Activities and Surveillance Programs</a></li> <li>• <a href="#">MOU Between FSIS and APHIS Regarding Final Rule 72 FR, Docket No. APHIS-2006-0041</a></li> </ul>
4	In this section you will find an overview of the DVMO's responsibilities under the MOU Between FSIS and APHIS Relative to Cooperation on Import/Export Activities and Surveillance Programs.
5	<p>The MOU discusses both FSIS and APHIS responsibilities regarding collaborative efforts relative to inspection of domestic products, reinspection of imported products, animal health slaughter surveillance activities, and information sharing. Key points regarding the DVMO's responsibility within this MOU are covered on the slide. Directives relevant to this MOU include:</p> <ul style="list-style-type: none"> <li>• <a href="#">FSIS Directive 6000.1</a> "Responsibilities Related to Foreign Animal Diseases and Reportable Conditions"</li> <li>• <a href="#">FSIS Directive 6240.1</a> "Inspection, Sampling, and Disposition of Animals for Tuberculosis"</li> <li>• <a href="#">FSIS Directive 6600.2</a> "Inspection Procedures Related to Feral Swine and Reactor Pigs"</li> <li>• <a href="#">FSIS Directive 10230.6</a> "Submitting Tissue Specimens for Pathologic Evaluation to the Laboratory"</li> <li>• <a href="#">FSIS Directive 10400.1</a> "Sample Collection from Cattle Under the Bovine Spongiform Encephalopathy Ongoing Surveillance Program"</li> </ul> <p>As a reminder, it is important that you be familiar with the contents of the MOU, but you are to follow the specific instructions in the FSIS Directives.</p>
6	The MOU includes FSIS responsibilities regarding APHIS access to PHIS, veterinary biologics, and industrial chemicals, FAD agents, or toxic agents suspects. Key points regarding the DVMO's responsibility are covered on the slide.
7	In this section you will find an overview of the DVMO's responsibilities under the MOU Between FSIS and APHIS Regarding Final Rule 72 FR, Docket No. APHIS-2006-0041.
8	The MOU Between FSIS and APHIS Regarding Final Rule 72 FR, Docket No. APHIS-2006-0041 discusses both FSIS and APHIS responsibilities.

	Additionally, <a href="#">FSIS Directive 9530.1</a> "Importation of Live Canadian Cattle, Sheep, and Goats into the United States" provides instructions to IPP on APHIS requirements regarding the receipt, slaughter, and inspection of live cattle, sheep, and goats imported or originating from Canada.
9	This next section emphasizes the importance of contacting your chain-of-command when you receive requests from entities outside of what is written in the MOU.
10	<p>As a DVMO, you may interact with APHIS in certain situations. By maintaining knowledge of your FSIS responsibilities under the MOUs, you will be able to identify if and when you are asked to conduct responsibilities outside of the MOUs.</p> <p>If you are asked by APHIS to conduct responsibilities that you are not familiar with or that seem outside of the MOU, you must reach out to your District Office. Your District will coordinate with the FSIS APHIS liaison to discuss the request and determine what actions to take.</p> <p>Discuss with your District what their expectations are for you as a DVMO for communicating with other entities such as APHIS. Be aware of those expectations and reach out through your chain-of-command if you have any questions or concerns.</p>
11	Feedback: You must discuss any unfamiliar requests or requests outside of the established MOUs with your supervisor and District prior to agreeing to any requests from other entities, including APHIS.
12	N/A

# Soft Skills/Other: Time Management Module

## Learning Objectives

1. Identify strategies for efficient completion of work assignments.
2. Formulate a plan to maximize your time management strengths.
3. Classify work assignments by priority and propose approaches that can be utilized when time is limited.
4. Discuss strategies on setting boundaries while still being available across shifts.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	<p>To get started, look at the definition of time management.</p> <p>Time management is the practice of using the time that you have available in a useful and effective way, especially in your work.</p> <p>As you move through this module you will learn some strategies to understand time management and how to apply it to your DVMO position as you schedule your workday and complete your required tasks.</p>
3	<p>As you go through some of these examples and tips for time management, you are going to notice that some of the techniques overlap. Some of them borrow from each other. Some of them even contradict each other, and that is OK. At the end of the day, you need to find what technique works the best for you.</p> <p>To get into the right mindset take a few seconds to think about:</p> <ul style="list-style-type: none"> <li>○ What are your biggest time wasters?</li> <li>○ What are you currently doing to manage your time?</li> <li>○ What do you think you could be doing better?</li> <li>○ And finally, if you came away from this training today with only one solution, what is the problem that you are trying to solve?</li> </ul>
4	N/A
5	In this section you will become familiar with various strategies for time management. These strategies can be implemented to increase productivity and assist in task prioritization for completion.
6	<p>This video outlines 20 quick tips for time management:</p> <ol style="list-style-type: none"> <li>1. Create daily plan</li> <li>2. Peg time limit for each task</li> <li>3. Use calendar</li> <li>4. Use organizer</li> <li>5. Know your deadline</li> <li>6. Learn to say "No"</li> <li>7. Target to be early</li> <li>8. Time box your activities</li> <li>9. Have a clock/watch visible to you</li> <li>10. Set reminders for 15 minutes before</li> </ol>



	<ol style="list-style-type: none"> <li>11. Focus</li> <li>12. Block out distractions</li> <li>13. Track your time spent</li> <li>14. Don't fuss about unimportant details</li> <li>15. Prioritize</li> <li>16. Delegate</li> <li>17. Batch similar tasks together</li> <li>18. Eliminate your time wasters</li> <li>19. Cut off when you need to</li> <li>20. Leave buffer time in between</li> </ol>
7	<p>Setting SMART goals when following the below criteria will not only help you plan but also achieve your goals in a reasonable timeframe.</p> <p>S=Specific--make them definable and precise centering around one focus area/task  M=Measurable--this will provide you a quantifiable way to evaluate your progress  A=Attainable--be sure to keep your task/goal attainable "Can you be successful?"  R=Relevant--the goal has significance to your duties  T=Time-based--set a deadline for completion</p> <p>The benefits to utilizing the SMART goal setting criteria are you are able to track/evaluate your progress, become more efficient, provide strategies that help you avoid procrastination, and can increase the opportunities you may have.</p> <p>When utilizing this method, you will create a list of tasks to accomplish the goal, block out time on your schedule to complete those tasks, delegate tasks when able, take breaks, and avoid distractions while focusing on one task at a time. Studies show that multitasking will decrease your productivity since your brain can only focus on one task at a time.</p>
8	<p>SMART goals started to prove counterproductive to a fast paced and changing environment. A new goal setting strategy that is especially good for team objectives and team goals is a CLEAR goal. CLEAR helps leaders to set realistic, actionable goals that can adapt and change when new information or new situations arise. Setting that CLEAR goal allows the team to set those goals long term, short term and break them down into achievable and actionable steps.</p> <ul style="list-style-type: none"> <li>• Collaborative=allows working together in a group with varied skill sets (Who?)</li> <li>• Limited=determining the scope and duration of the task will help you set clear and achievable goals, defined timelines, and boundaries</li> <li>• Emotional=taps into the energy and passion of the scheduler, critical for motivation-- Emotion=Action=Results</li> <li>• Appreciable=breaking the large goal into smaller important milestones-helps with burnout or feeling overwhelmed</li> <li>• Refinable=goals are clear and defined but flexible enough to adapt to changing situations</li> </ul>
9	<p>The practice of scheduling your time will not only assist in prioritizing your day, but also addressing those immediate or most important tasks that need the most of your attention.</p> <p>Some benefits of scheduling out your day are:</p> <ol style="list-style-type: none"> <li>1. Ability to pencil in the appropriate amount of time to address those important tasks that need to be completed</li> <li>2. Improved work-life balance through helping you work more efficiently during normal work hours</li> <li>3. Pencils in appropriate break time to focus on personal wellness and help prevent burnout</li> <li>4. Provides the insight needed in setting realistic goals that are achievable on a daily, weekly, or monthly basis</li> </ol>
10	<p><b>Most Important Task</b>-Focus only on important tasks rather than a long list of tasks.  List the top 3 high priority tasks you must complete and focus on those 3 tasks.</p>

	<p><b>Time-blocking</b>-Plan the tasks you need to complete and assign times to do them. With time-blocking you will increase your productivity and limit your choices of the tasks to complete. The task will fall into one of two categories: Proactive or Reactive.</p> <p><i>Proactive</i>--tasks that are to be completed by close of business</p> <p><i>Reactive</i>--tasks that you do in your spare time; checking emails and notifications</p> <p>You will block specific time to adequately complete all proactive tasks and allow a specific block of time for conducting reactive tasks, so they do not interrupt your productivity throughout the day.</p> <p><b>Pomodoro Technique</b>-This method involves the grouping together of thought-intensive tasks/work broken up by breaks in between time chunks.</p> <ol style="list-style-type: none"> <li>1. Pick a task to complete.</li> <li>2. Set a timer for 25-30 minutes.</li> <li>3. Work until time expires.</li> <li>4. Break for 4-5 minutes.</li> <li>5. Repeat process for workday; for every 4 sessions completed take a longer break (e.g.,15 minutes).</li> </ol> <p><b>90-Minute Focus Technique</b>-This technique focuses on high energy vs. low energy cycles, ultradian rhythms. Work 90-minutes, rest 20-minutes.</p> <p>This technique utilizes optimal energy levels to complete necessary tasks and can help increase productivity.</p> <p><b>Time Estimation</b>-Utilize estimation methods to estimate the time needed to complete tasks. It will give you an idea of when you will complete a task or project. Upon final completion, adjust your estimation methods appropriately.</p> <p><b>Time Audits</b>-Understand how much time is actually spent on each task completed.</p> <ol style="list-style-type: none"> <li>1. Track time spent on each task.</li> <li>2. Record the results.</li> <li>3. Evaluate and determine what takes up most of your time.</li> <li>4. Create strategies to be more efficient.</li> </ol> <p><b>Duration Compression Technique</b>-Allows you to compress your schedule without reducing quality or scope. There are two categories:</p> <p><i>Fast-Tracking</i>-increases project speed by simultaneously completing tasks</p> <p><i>Crashing</i>-add resources to enable you to complete the task by deadline (e.g., involving others to assist, working overtime)</p> <p>This technique is often used when deadlines or project requirements change. You will choose to either use fast-tracking or crashing to complete the project on time. With fast-tracking you will work on various portions at the same time instead of doing each part separately and linearly. With crashing you may add people to assist or work longer hours on the project to get it finished.</p> <p><b>Circadian Rhythm Technique</b>-Utilizes your natural 24-hour waking and sleeping cycles in a regulated fashion. Your individual circadian rhythm may affect your body physically and mentally as well as alter the body's behavioral state.</p> <p>Most people peak in production around 10 AM, fall in energy between 1 PM and 3 PM, and then rise again late afternoon with the final fall between 9 PM and 11 PM.</p> <ul style="list-style-type: none"> <li>○ Perform time-consuming tasks between 10 AM and 1 PM.</li> <li>○ Perform less thought-intensive tasks between 1 PM and 3 PM.</li> <li>○ Return to more involved tasks between 3 PM and 9 PM.</li> </ul> <p><b>Online Calendars</b>-This method uses visual scheduling apps, +/- color coding. Utilizing this technique will help you visualize what you plan/need to accomplish and during what periods of the day, week, or month. You can create blocks of time, schedule meeting blocks, and set reminders.</p>
11	In this section you will discover how to utilize your strengths to formulate a plan for completing your assigned tasks in a manageable timeframe.

12	<p>In this video you will learn about NASA's Pathfinder Spacecraft that landed on Mars and after a time started to procrastinate, even as a computer. This was due to a scheduler bug that was affecting the proper functioning of the task scheduler. The task scheduler dictated how much time to spend on a specific task before switching to another task. It also dictated what task to switch to. The point is that even computers can get overwhelmed.</p> <p>Key points:</p> <ol style="list-style-type: none"> <li>1. The time spent prioritizing your work schedule is time taken away from doing the actual work. <ul style="list-style-type: none"> <li>○ Example-scanning through emails to choose the most important message to read and respond to: scan, read, respond, repeat (Quadratic Time Algorithm)</li> <li>○ This means that if your inbox the next day has twice the number of messages it will take you twice as long to work through this process, thus creating 4 times the amount of work (Time waster).</li> </ul> </li> <li>2. One may choose to utilize "Priority buckets". This will be less precise, but more efficient. Priority buckets are broader categories of tasks with limited ranking by importance. This will allow you to spend less time prioritizing and more time doing the tasks, thus increasing productivity.</li> <li>3. E-mail may be done in order or at random. This can help you be more efficient than ranking all e-mails first by importance and then responding in that order.</li> <li>4. Interruptions are the acts of moving from one task to another routinely <ul style="list-style-type: none"> <li>○ Minimize interruptions</li> <li>○ Group interruptions, also known as "interrupt coalescing" (i.e., check all emails at once then move on)</li> </ul> </li> </ol>
13	N/A
14	N/A
15	N/A
16	<p>In this section you will explore some options for prioritizing tasks in your assignment and approaches to make your schedule work for you with limited time.</p>
17	<p>In this video you will explore the process of prioritizing tasks to be more productive and have more time for other things.</p> <p>Tasks will fall into one of two categories:</p> <ul style="list-style-type: none"> <li>○ Urgent <ul style="list-style-type: none"> <li>○ Require attention right now</li> <li>○ Have immediate consequences</li> </ul> </li> <li>○ Important <ul style="list-style-type: none"> <li>○ Help you achieve long-term goals/values</li> <li>○ Have a big impact</li> <li>○ Unclear deadline</li> <li>○ Often pushed off until later, which may ultimately turn into never</li> </ul> </li> </ul> <ol style="list-style-type: none"> <li>1. Make a To-Do-List</li> <li>2. Prioritize tasks according to the Eisenhower Matrix (introduced by Stephen Covey)</li> </ol> <p>The Eisenhower Matrix is a two-by-two grid with the columns of Urgent and Not Urgent, and the rows of Important and Not Important</p> <ul style="list-style-type: none"> <li>○ Urgent-Important box: Tasks that need to be done NOW</li> <li>○ Not Urgent-Important box: Tasks that need to be SCHEDULED and done SOON</li> <li>○ Urgent-Not Important box: Tasks that need to RESCHEDULED and/or DELEGATED</li> <li>○ Not Urgent-Not Important box: Tasks that need to be done LATER and/or AVOIDED</li> </ul> <p>Finally, the video ends with the concept of action vs. reaction.</p> <ul style="list-style-type: none"> <li>○ <i>Act</i>-Know what's important and is 100% what you are aiming for</li> <li>○ <i>React</i>-Letting the urgent-not important items dictate your actions and thoughts</li> </ul> <p>"Your actions reflect your priorities."</p>

18	<p>This video covers the need to prioritize tasks and schedule your day in the proper order to be the most efficient at getting more things done. When completed in the proper order one can complete all the tasks they need to do as well as have time for the little tasks that they want to do that are fun.</p> <ol style="list-style-type: none"> <li>1. Glass jar: The amount of time in the day you have to complete your tasks</li> <li>2. Sand: The little stuff in life that you want to do and that are fun, i.e. tv, videos, other non-important things</li> <li>3. Pebbles: Those tasks that are kind of important and need to be done that you would like to do today, but are lower priority on the list</li> <li>4. Rocks: The big, really important tasks that are high priority and need to be done right away</li> </ol> <p>If you put the tasks in the jar in the wrong order based on preference they will not fit (1. Sand, 2. Pebbles, 3. Rocks), but if you place the tasks in the jar by priority and order of importance (1. Rocks, 2. Pebbles, 3. Sand) they will all fit, and you will find that you can accomplish the most in one day.</p> <p>You must decide: "What are the big rocks?" Do those first.</p>
19	<p>The 4 D's approach to a list of tasks is to review your list of tasks and assign the appropriate action "D" to the task. With this approach you have the following action options to take:</p> <ol style="list-style-type: none"> <li>1. Do--task only takes a few minutes to complete (&lt;5), can quickly be accomplished and provide momentum to your productivity</li> <li>2. Delegate--give the task to someone else, it needs to be done but not explicitly by you</li> <li>3. Delay--a task that needs to be completed by you, but not immediately; set it aside and revisit later</li> <li>4. Delete--unnecessary tasks that take up time better spent on other tasks</li> </ol>
20	<p>Please take 5 minutes to think about the items in the table and determine if you will Do, Delegate, Delay, or Delete the items listed.</p> <p>When do you perform the following:</p> <ol style="list-style-type: none"> <li>1. Do--task only takes a few minutes to complete (&lt;5), can quickly be accomplished and provide momentum to your productivity</li> <li>2. Delegate--give the task to someone else, it needs done but not explicitly by you</li> <li>3. Delay--a task that needs completed by you, but not immediately; set it aside and revisit later</li> <li>4. Delete--unnecessary tasks that take up time better spent on other tasks</li> </ol>
21	<p>Remember that you perform the 4 D's based on the following thought processes:</p> <ol style="list-style-type: none"> <li>1. Do--task only takes a few minutes to complete (&lt;5), can quickly be accomplished and provide momentum to your productivity</li> <li>2. Delegate--give the task to someone else, it needs done but not explicitly by you</li> <li>3. Delay--a task that needs completed by you, but not immediately; set it aside and revisit later</li> <li>4. Delete--unnecessary tasks that take up time better spent on other tasks</li> </ol> <p>In the workshop you find various items on your desk and decide which D would be appropriate:</p> <ul style="list-style-type: none"> <li>• Junk e-mail--this is clutter and does not require your attention to look through so just delete it from inbox</li> <li>• MS Teams invite to a non-essential webinar occurring during your annual leave--the webinar will cover information that is of interest to you, but not essential to be present for, access the recording and file it away for future reference. (Use the same logic of an email of an issuance-as you see what it is about and determine that it can be filed away, put it in the proper folder and out of your inbox within Outlook)</li> <li>• E-mail request for a HATS Validation report for a specific establishment--Delegate this task to an appropriate in-plant person/FLS; In-plant IPP can run this report and provide the information requested. These are tasks that can be accomplished by someone other than you.</li> <li>• Request to report to establishment to perform a disposition at the end of your tour--this does not need to be done right now as it is not urgent; Delay and do the following day. (This can be the same for an updated Directive that is not pressing to the tasks at hand for the day, but you will need to be familiar with the information updated. You will file it away and read it later.)</li> </ul>

	<ul style="list-style-type: none"> <li>Revised Directive XXXX (HH/GCP) containing updated information essential to your day-to-day job--Do, this will take some time, but is essential before continuing with your verification procedures</li> </ul>
22	<p>In this section you will cover boundary setting while remaining accessible across all shifts. This module will help you learn how to say "no" in the right circumstances. Some items that will come up outside of the normal workday are pressing while others can be set aside until the following day.</p>
23	<p>When you start your new position as a DVMO you will want to start by determining the accessibility expectations. You may need to be available across multiple shifts within your assignment. However, that doesn't mean you are "working all the time". The best method to determine the expectations the DO has for you covering your assignment is to get in contact with your supervisor.</p> <p>Items to discuss with your supervisor:</p> <ol style="list-style-type: none"> <li>What are the hours of duty you are expected to keep?</li> <li>How does the DO expect you to handle calls and e-mails that occur outside of those hours in assignments with multiple shifts?</li> </ol> <p>Every District is likely to vary on the specific expectations for the DVMO. Some examples of how the Districts may address situations that occur outside of the DVMOs typical hours of duty (e.g., in multiple shift assignments) include:</p> <ul style="list-style-type: none"> <li>District On-call Contact-field all IPP calls when DVMO is off duty and triage those calls to determine if they need immediate attention or it can wait until the following day</li> <li>District may require the DVMO to have their work cell phone on at all times and to answer the calls specific to their assignment <ul style="list-style-type: none"> <li>DVMO may be expected to check their phone for calls on a specific interval while off duty and respond appropriately</li> <li>DVMO may be expected to check phone 1-2 times each shift operating over the weekend and return emergency calls ASAP</li> <li>DVMO may be expected to answer every time the phone rings</li> </ul> </li> </ul> <p>If you have some flexibility to set your duty hours (maxiflex), you may consider having your duty hours span across portions of multiple shifts. Oftentimes for example, you have plants that are operating what is normally considered first and second shift hours so you may consider setting your tour for 0800-1630 hours instead of 0700-1530 hours to provide some coverage over both shift times.</p>
24	<p>As a DVMO your assignment may include establishments that have multiple shifts. You may receive phone calls from IPP on various shifts. Upon receipt of a phone call the DVMO will have to perform a triage of the information relayed and decide whether to Do, Delegate, or Delay in their action. This is particularly important when you receive a call outside of your normal working hours. By following the Do-Delegate-Delay method below, you will be able to respond to situations that require action immediately, while delegating or delaying situations that do not require an immediate response. This will contribute to and positively impact your work-life balance. As a DVMO, you may cover assignments across multiple shifts, but this does not mean that you are required to work 24 hours a day.</p> <ul style="list-style-type: none"> <li>Do--Those items deemed emergencies, i.e. Egregious Humane Handling situations, Possible FAD signs, etc. <ul style="list-style-type: none"> <li>Require adequate immediate action and communication to properly handle the situation</li> </ul> </li> <li>Delegate--Those items that are not required to be handled directly by the DVMO and can be handed off to another IPP, e.g., verifying corrective actions for a non-egregious animal handling incident <ul style="list-style-type: none"> <li>Talk over with IPP you will delegate task to on proper actions and follow-up the following day</li> </ul> </li> <li>Delay--Those items that need your attention, but not an emergency, e.g., carcass disposition(s), MOI/NR responses, etc.</li> </ul>

	<ul style="list-style-type: none"> <li>○ Plan to follow-up on the item the following day either by an in-person visit or via email/phone</li> </ul> <p>As a DVMO, you may be on a maxiflex schedule. This flexibility to adjust your schedule will allow you to Do-Delegate-Delay without working around the clock.</p>
25	<p>To be effective in time management you must know your priorities, obligations, and your schedule. The video highlights 8 tips to help you remain focused and be productive:</p> <ol style="list-style-type: none"> <li>1. Make a To-Do-List in order of importance.</li> <li>2. At the end of the day make a new list of the items not completed for the next day, again in order of importance.</li> <li>3. Do the hardest and least fun thing(s) first.</li> <li>4. If a task will take less than 5 minutes do it right away and if it will take longer than 5 minutes put it on the list.</li> <li>5. Turn off notifications for new emails--check for new mail at specified times during the day.</li> <li>6. Take inventory of how you spend your time and determine what your time wasters are, do this over a couple of days.</li> <li>7. Aim to handle papers/emails only once.</li> <li>8. Use downtime waiting for a meeting to begin, for example update your to-do-list or read/respond to emails.</li> </ol>
26	N/A
27	N/A
28	N/A
29	N/A
30	N/A
31	N/A
32	N/A
33	N/A
34	N/A

# Soft Skills/Other: Managing Up Module

## Learning Objectives

1. Explain essential concepts for "managing up."
2. Select a "managing up" strategy in response to different manager work styles.
3. Develop communication strategies for interacting with higher-level management.
4. Identify personal strategies to align expectations with higher-level management.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<ul style="list-style-type: none"> <li>• We work in a social system and our relationships within that system matter.</li> <li>• Managing up is how we manage those relationships. It is consciously and deliberately developing a productive and positive working relationship with those "higher up" in the organization.</li> <li>• It is not about being manipulative.</li> <li>• Poor relationships with our supervisors are the #1 cause of employee unhappiness and turnover; 75% of employees report that the "worst part of their job" is their direct manager (Hogan Assessments 2014).</li> <li>• Your boss matters and can have a significant effect on your career.</li> <li>• Your career matters, so you must be proactive and manage your career. This includes taking actions to have a successful relationship with your supervisor.</li> <li>• You can't change how others manage, but you can change how you interact with others.</li> <li>• Learn to be both a great leader and follower.</li> </ul>
4	<p>Identify how higher-level management, including your supervisor, function in the workplace and how they like to communicate. Is your supervisor an introvert or an extrovert, long-winded or short-winded? What is their work style? Do they want you to work independently or collaborate as a team to accomplish the mission?</p> <p>Do they prefer written communication through emails, or oral communication through in-person or Teams meetings?</p> <p>Does your supervisor prefer concise communication, or do they need highly detailed communication?</p> <p>Are they fast paced or slow paced? Are they task oriented in gauging your productivity? Are they relationship oriented?</p> <p>What motivates your supervisor? What do they prioritize?</p> <p>The organizational culture can also influence how higher-level management communicates with you and impact how you communicate.</p>
5	<ul style="list-style-type: none"> <li>• <b>The introvert</b> prefers internal processing, time alone, and working in smaller groups.             <ul style="list-style-type: none"> <li>○ <b>Manage:</b> communicate using their preferred method, be proactive with communication by scheduling meetings ahead of time and be conscientious of excessive chatting.</li> </ul> </li> <li>• <b>The extrovert</b> prefers external processing, is energized by the interactions with others, and takes action quickly.             <ul style="list-style-type: none"> <li>○ <b>Manage:</b> build the relationship with your supervisor, speak up and participate in meetings, and summarize what they are communicating with you to be sure you are on the same page.</li> </ul> </li> </ul>

- **The advancer** wants to get things done quickly and effectively. Fast paced and task oriented, pragmatic, and sometimes blunt.
  - **Manage:** keep up with your supervisor's speed. Be prepared, strive to be self-sufficient and accomplish tasks independently.
- **The energizer** brings passion and new ideas, they motivate people. Fast paced, big picture, future-oriented thinkers.
  - **Manage:** build the relationship with your supervisor. Listen to their ideas and collaborate. Communicate the big picture ideas and be optimistic, high energy, and creative.
- **The evaluator** likes to get things right and thrives on producing high quality work. Task oriented, care about the details and ask a lot of questions.
  - **Manage:** slow down and follow the prescribed process, know and communicate the details with your supervisor. Demonstrate high quality work by making decisions using clear logic and methodologies.
- **The harmonizer** is nice, warm, friendly, avoid conflict. Moderate paced, people focused. They are slow decision makers, taking other people's opinions into consideration.
  - **Manage:** get to know your supervisor. Be a compassionate, positive, collaborative team player and don't be aggressive or overly critical.
- **The micromanager** has a need for certainty. They need a lot of information and involvement to be sure things are done right.
  - **Manage:** give them all the information. Proactively update your supervisor with what you are doing and clarify what they want before starting projects.
- **The workaholic** is always at work; they bring their A game every day with high energy, and they expect high level productivity and commitment.
  - **Manage:** set boundaries and get a clear understanding of your supervisor's expectations. Strive to provide high level productivity and energy every day. Keep them updated with your productivity and periodically go the extra mile.
- **The ghost** is hands-off; they allow autonomy and independence, but they are not always around to answer questions.
  - **Manage:** be proactive, schedule meetings and be concise and prepared to discuss important projects with your supervisor, keep them updated. Embrace your independence and collaborate with colleagues.
- **The impulsive** is always shifting priorities and changing their mind.
  - **Manage:** ask your supervisor to prioritize their projects. Offer pros and cons on their new ideas to help clarify their priorities and provide project lists.
- **The narcissist** has an overinflated sense of self. They are often very successful, but they care more about their success than anyone else.
  - **Manage:** be prepared to praise the narcissist while protecting your self-esteem and your self-image. Let your colleagues know you are independent. Appeal to your supervisor's image.

6	<p>Take time right now to develop your personal strategy to align your expectations with higher-level management.</p> <p>Schedule a meeting with your supervisor and specifically ask how they like to communicate. How often do they want to be updated? What are their communication preferences?</p> <p>Identify your supervisor's top priorities. What would they like you to focus on as you begin your DVMO position?</p> <p>What are your supervisor's expectations for you? Do you need to do anything differently to succeed as a DVMO?</p> <p>Adapt to managing up. Identify your higher-level management's expectations, evaluate your communication and work styles, and then adapt to become a better DVMO.</p>
7	Now that you are more familiar with Managing Up concepts, including various strategies to communicate with your supervisor based on their management style, use this workshop to apply these concepts to a scenario.
8	N/A
9	N/A



10	N/A
11	N/A
12	N/A
13	N/A

# Soft Skills/Other: Maxiflex Work Schedule Module

## Learning Objectives

1. Identify the basic work requirements and flexibilities of the maxiflex work schedule within a bi-weekly pay period.
2. Demonstrate how to complete a timesheet using a maxiflex work schedule.
3. Apply a maxiflex work schedule to effectively balance work duties and maximize work-life balance.

## “Info Button” Notes

Slide	Info Button Text
1	N/A
2	N/A
3	<p>As a DVMO, you will perform your daily duties using a maxiflex work schedule, although other work schedules are available. It is important to understand the other types of work schedules and their impacts on various entitlements.</p> <ul style="list-style-type: none"> <li>• <b>Administrative Workweek:</b> The administrative workweek begins on Sunday at 12:00 am and ends the following Saturday at midnight.</li> <li>• <b>Traditional Work Schedule:</b> The most common type of work schedule is the traditional tour of duty which you may have used in the past or are currently using. The traditional work schedule is fixed and consists of the employee working 8 hours per workday, 5 consecutive days per week, 2 consecutive days off with no flexibility.</li> <li>• <b>Compressed Work Schedule:</b> The Compressed Work Schedule (CWS) allows full time employees to complete their 80-hour bi-weekly work requirement in less than 10 days. All CWS schedules are fixed with no flexibility, similar to a traditional work schedule. The most common CWS schedules are: <ul style="list-style-type: none"> <li>○ <b>5/4-9:</b> An employee works eight 9-hour days and one 8-hour day per pay period. This allows the employee to have a scheduled day off each pay period.</li> <li>○ <b>4/10:</b> An employee works eight 10-hour days during a pay period. This allows the employee to have two scheduled days off each pay period.</li> </ul> </li> <li>• <b>Maxiflex Work Schedule:</b> A maxiflex work schedule allows full time employees to complete their 80-hour bi-weekly work requirement with flexibility on how it is accomplished in a pay period.</li> </ul> <p>For more information on tours of duty, refer to:</p> <ul style="list-style-type: none"> <li>• <a href="#">FSIS Directive 4610.2</a> - "Tour of Duty"</li> </ul>
4	<p>The maxiflex work schedule allows considerable flexibility with how the 80-hour bi-weekly work requirement is accomplished based on your personal or business needs. As a DVMO, you may be required to work varying schedules across multiple shifts each day, so the maxiflex work schedule will allow you the flexibility to determine your work schedule to accomplish the mission. The maxiflex work schedule can allow you to:</p> <ul style="list-style-type: none"> <li>• Complete the 80-hour work requirement in 8-10 days during a pay period.</li> </ul>

- Glide your start and end time.
- Provide flexibility in the length of a meal break, i.e. 30, 45, or 60 minutes.
- Earn up to 24 hours of credit hours.
- Split the shift instead of work a continuous shift.
  - **Example:** 6:00am - 9:00am and 12:00pm - 5:00pm
- Adjust your work schedule during a pay period to meet personal and business needs (with supervisory approval)
  - **Example:** Sign off for two hours beginning at 9:00am to attend a Dentist appointment and resume work at 11:00am.

**Note:** As a DVMO, there may be establishments in your coverage assignment that work multiple shifts. This does not mean that you will be expected to continuously work "around the clock." You must use the flexibilities provided to you by the maxiflex work schedule to arrange your work schedule to accomplish the mission while also maintaining a reasonable work-life balance.

**Tour of Duty Window:** The Tour of Duty (TOD) window is a fixed period of time during a pay period for employees to accomplish their 80-hour work requirement. The TOD window will be determined by the District, program area, or staff needs.

- **Example 1:** The District sets the TOD window from 6:00am to 6:00pm. Employees can set their work schedule within this timeframe.
- **Example 2:** The District set the TOD for field employees, such as a DVMO, from 12:00am to 12:00am, Monday through Saturday. This allows employees the flexibility to design their schedule to cover multiple shifts at multiple establishments, as needed.

**Note:** Employees utilizing a maxiflex work schedule will receive a maxiflex plan from their District Office that covers the TOD window and other requirements.

**Extended Lunch Periods:** Employees are provided with the flexibility to have an extended meal period during a workday. The meal period may be between 30 to 60 minutes and does not require supervisory approval. However, it is the employee's responsibility to ensure the 80-hour bi-weekly work requirement is met by working extra hours on the same or different workday within the pay period or take appropriate leave.

5 **Glide Period:** Gliding allows employees to vary their arrival and departure time, usually within a 1-hour window, as long as the 80-hour work requirement is met.

- **Example 1:** You are completing a humane handling audit at the end of your scheduled shift and need to finish reviewing records. The glide period allows you to work past your scheduled end time.
- **Example 2:** The commute to your duty station took longer than expected due to road construction, and you arrive at work 30 minutes past your scheduled start time. Since the time falls within the allowed glide period, you do not need to take leave and can make up the time later in the pay period.

**Note:** Gliding should not become a regular occurrence. The glide period allows employees with the flexibility to react to unforeseen circumstances during a pay period without the need to take leave or be considered late. This also affords employees the flexibility to work earlier or later than scheduled

so they can earn credit time or adjust their schedule on a particular day to take care of personal business, such as a medical appointment. The glide period can be between 30 minutes and two hours, and this is determined by your District Office.

**Core Hours:** Core hours are the hours that an employee on a maxiflex schedule is required to be in a work status or in an approved leave status. During core hours, an employee is not allowed to flex their time or use that day as a regular day off. For example, a District may require employees to be in a work status every Wednesday between 9:00am and 11:00am because this is the time they have weekly staff meetings.

**Credit Hours:** Credit hours are the hours within a maxiflex schedule that exceed an employee's basic work requirement and which the employee voluntarily elects to work. Credit hours may only be earned during the days and clock hours established in the TOD window. An employee may only have a balance of 24 credit hours at any given time.

Benefits of credit hours:

- Credit hours never expire.
- Earned credit hours can be used in lieu of annual or sick leave.
- If leaving the agency or transferring to a different position that does not utilize credit hours, you will be compensated for the credit hours at the base pay rate at the time of transfer or separation.

**Note:** Employees are not required to work 80 hours before earning credit hours because employees must submit a proposed work schedule prior to each pay period. The proposed work schedule accounts for all necessary work or leave hours needed to meet the 80-hour bi-weekly work requirement.

6 **Compensatory Time:** An employee may earn compensatory time only if management directs them to work past their scheduled time during the current administrative work week.

**Overtime Pay:** An employee is entitled to receive overtime pay if it is known and directed by management prior to the beginning of the administrative workweek.

**Note:** Compensatory time, overtime, and credit hours have different requirements and eligibilities.

1. **Compensatory time:** Directed by management **during** a current administrative work week (Ordered, not voluntary).
2. **Overtime:** Known and directed by management **prior** to the administrative work week (Ordered, not voluntary).
3. **Credit hours:** The employee can **volunteer** to earn credit hours, and it cannot be directed or asked by management.

**Night Differential:** This is typically not paid to employees who elect or volunteer to work between the hours of 6:00pm and 6:00am.

- **Example:** An employee was scheduled to work from 9:00am to 6:00pm and elected to use the glide period to work one additional hour past 6:00pm. This does not grant the employee an

	<p>entitlement to night differential pay. The earning of credit hours also does not entitle employees to night differential pay.</p> <p><b>Note:</b> If an employee submitted their proposed work schedule prior to the beginning of the administrative work week with hours between 6:00pm and 6:00am, the employee would be entitled to night differential pay. Talk to your District Office about their expectations and requirements concerning your work schedule and earning night differential.</p> <p><b>Holidays:</b> Under the maxiflex work schedule, employees are entitled to 8 hours of holiday time off for federal holidays. If an employee is required to work on the federal holiday, they are entitled to receive 8 hours of Paid Holiday Time Off (TC-66) and up to 8 hours of Holiday Worked (TC-31).</p>
7	<p><b>Annual and Sick Leave Usage:</b> When using annual or sick leave on a workday, the employee can only use up to the number of hours scheduled to work on that day.</p> <ul style="list-style-type: none"> <li>• <b>Example 1:</b> An employee is scheduled to work 8 hours on Wednesday as written in their approved work schedule and calls in sick. The employee would be charged 8 hours of leave for that day.</li> <li>• <b>Example 2:</b> An employee is scheduled to work 6 hours of regular time and planned to earn 2 credit hours for a total of 8 hours on Friday as written in their approved work schedule. The employee calls in sick on that day, so the employee is charged 6 hours of leave, and no credit hours are earned.</li> </ul> <p>An alternative option, if approved by your supervisor, is to make up the missed time by working additional hours later in the pay period or use credit hours instead of accrued leave.</p> <p><b>Leave Combination Usage:</b> Employees can combine the use of annual and sick leave with accumulated credit hours. The use of accumulated credit hours can be used to reduce the need to use accrued annual or sick leave.</p> <p><b>Annual Leave Restoration Limitation:</b> The use of accrued credit hours in lieu of annual leave cannot be used as a valid excuse to have forfeited annual leave restored. It is your responsibility to ensure that use-or-lose annual leave hours are used prior to using credit hours, especially near the end of a leave year.</p>
8	<p><b>Submission Due Date:</b> Unlike compressed and traditional work schedules that are fixed, the maxiflex work schedule has considerable flexibility. Therefore, it is required for all employees to submit their proposed work schedule using a method approved by their supervisor. The schedule should be submitted by a specific day prior to the beginning of the next pay period. Additionally, supervisors may require submission earlier in some situations, so always check with your supervisor for their requirements.</p> <p>One benefit of ensuring proposed work schedules are set prior to the beginning of the pay period is to help determine appropriate entitlements for overtime, compensatory time, night differential, and Sunday differential.</p> <p><b>Note:</b> Your District's maxiflex plan will outline the acceptable submission method and due date of your proposed work schedule.</p>

**What to include in the proposed work schedule:**

- Regular time worked
  - Including starting and ending times
  - Also include your meal period
- Leave scheduled
- Number of credit hours planned to earn or use (if known in advance)
- Scheduled days off (SDOs)

**Meal Period Requirement:** When you work 6 or more hours in a workday, a meal period of at least 30 minutes is required. Employees cannot "skip" their meal period in order to shorten their day.

**Note:** All leave and credit hours must be entered into WebTA prior to earning or using (if known in advance).

**Shift Flexibility:** Unlike other work schedules, the maxiflex work schedule does not require your shift to be consecutive, i.e. 8:00am to 4:30pm.

- **Example:** A DVMO plans to cover different shifts at an establishment or multiple establishments in a workday. The maxiflex work schedule allows the employee to schedule their work hours around the time they need to physically be present at each establishment.
  - Establishment A: 6:00am - 8:00am
  - 8:00am - 12:00pm: The employee is off work
  - Establishment B: 12:00pm - 6:30pm (with a 30-minute meal period)

**Supervisory Approval:** All proposed work schedules are reviewed and approved by supervisors prior to the beginning of a new pay period. Once approved, you will need to work with your supervisor if you need to flex time or change your schedule during the pay period.

- **Example:** An employee's submitted proposed schedule looked like this:
  - Mondays through Thursdays: 6:00am - 3:30pm (9 hours worked with a 30-minute meal period)
  - 1st Friday: 7:00am - 3:30pm (8 hours worked with a 30-minute meal period)
  - 2nd Friday: Scheduled day off (SDO)
- During the pay period, the employee was informed of a special event at their child's school on the first Friday. The employee worked with the supervisor for approval to change their schedule to have the first Friday off and work on the second Friday.

9

Use the following schedule to create your own proposed work schedule. When finished, see the completed proposed work schedule.

**Week 1:**

- **Monday:** Work at Establishment A from 7:00am - 4:30pm with a 30-minute lunch break.
- **Tuesday:** Work at Establishment B from 6:00am - 9:00am and then at Establishment C from 11:00am - 5:30pm with a 30-minute lunch break.
- **Wednesday:** Federal Holiday

	<ul style="list-style-type: none"> <li>• <b>Thursday:</b> Work at Establishment C from 7:00am - 11:00am. Daughter has a medical appointment until 1:30pm. Return to Establishment C and work from 2:00pm until 7:30pm with a 30-minute lunch break.</li> <li>• <b>Friday:</b> Work at Establishment A from 4:00am - 1:30pm with a 30-minute lunch break.</li> </ul> <p><b>Week 2:</b></p> <ul style="list-style-type: none"> <li>• <b>Monday:</b> Work at Establishment C from 6:00am - 12:00pm and then at Establishment A from 2:00pm - 5:30pm with a 30-minute lunch break.</li> <li>• <b>Tuesday:</b> Work at Establishment B from 7:00am - 5:00pm with a 1-hour lunch break.</li> <li>• <b>Wednesday:</b> Work at Establishment D from 1:00pm - 10:30pm with a 30-minute lunch break.</li> <li>• <b>Thursday:</b> Work at Establishment A from 8:00am - 5:30pm with a 30-minute lunch break.</li> <li>• <b>Friday:</b> Scheduled Day Off</li> </ul> <p><a href="#">Proposed Work Schedule Template (Fillable)</a></p> <p><a href="#">Proposed Work Schedule Example</a></p>
10	<p>The completed timesheet from this scenario is a good example of how you can utilize maxiflex to flex your time in order to accommodate your personal needs and the needs of the Agency.</p> <p><a href="#">Completed Timesheet</a></p>
11	<p>For employees who will be placed on a maxiflex work schedule, you will need to meet several prerequisites:</p> <ol style="list-style-type: none"> <li>1. <b>Training Requirement:</b> All employees must attend a training or receive an overview of the maxiflex plan.</li> <li>2. <b>Maxiflex Agreement:</b> The employee must review and sign the maxiflex agreement. By signing the agreement, you are agreeing to adhere to the requirements and expectations laid out in the document and maxiflex plan.</li> <li>3. <b>Application for Tour of Duty, FSIS Form 4610-2:</b> In order to switch from your current work schedule to a maxiflex work schedule, you will need to complete and submit FSIS Form 4610-2, Application for Tour of Duty, to your supervisor.</li> <li>4. When switching to a maxiflex work schedule, the new tour of duty must start at the beginning of a new pay period.</li> </ol>
12	N/A

# Soft Skills/Other: Transition Training Module

## Learning Objectives

1. Compare and contrast the scope of the DVMO role to previous SPHV role.
2. Apply techniques to help manage unfamiliar situations and change.
3. Create a personal plan for how to maintain personal health and wellness during change.

## “Info Button” Notes

Slide	Info Button Text
1.	N/A
2.	N/A
3.	N/A
4.	N/A
5.	N/A
6.	<p>SPHV responsibilities</p> <ul style="list-style-type: none"> <li>• Antemortem (AM) and Postmortem (PM) inspection activities:               <ul style="list-style-type: none"> <li>○ Conducts AM and PM inspection of livestock and poultry.</li> <li>○ Enforces Federal meat and poultry inspection procedures.</li> <li>○ Prepares reports and assembles information on emerging issues and concerns to the Frontline Supervisor (FLS).</li> <li>○ Conducts foreign animal disease surveillance.</li> <li>○ Prepares reports and assembles information on emerging issues and concerns occurring in-plant.</li> </ul> </li> <li>• HH &amp; GCP verification activities:               <ul style="list-style-type: none"> <li>○ Verifies compliance with all Humane Handling (HH) and Good Commercial Practices (GCPs) regulations.</li> <li>○ Prepares reports and assembles information on emerging issues and concerns to the FLS and District Office.</li> </ul> </li> <li>• Training:               <ul style="list-style-type: none"> <li>○ Facilitates and conducts OJT for IPP to include CSIs and FIs.</li> </ul> </li> <li>• Export Certification:               <ul style="list-style-type: none"> <li>○ Reviews and verifies export certificates and supporting documentation for accuracy and completeness.</li> <li>○ Ensures that products approved for export are in full compliance with applicable Federal laws, regulations, and foreign country requirements.</li> </ul> </li> <li>• Supervision:               <ul style="list-style-type: none"> <li>○ Supervises and assists FIs and CSIs with their inspection activities to ensure compliance with Federal regulations.</li> <li>○ Reports all personnel issues or emerging food safety issues to the FLS.</li> </ul> </li> </ul>
7.	<ul style="list-style-type: none"> <li>• AM &amp; PM support activities:               <ul style="list-style-type: none"> <li>○ Provides support and consultation to industry and Agency personnel on animal diseases and proper AM and PM inspection procedures.</li> <li>○ Provides dispositions on live animals and retained carcasses.</li> </ul> </li> <li>• HH &amp; GCP support and verification activities:               <ul style="list-style-type: none"> <li>○ Provides support and consultation to industry and Agency personnel on HH and GCP issues.</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>○ Keeps abreast of current and emerging animal diseases and new animal handling techniques by attending national, professional, and industry conferences, and networks with the Office of Public Health Science (OPHS), Office of Policy and Program Development (OPPD), and outside experts.</li> <li>○ Performs announced and unannounced visits to establishments to ensure animals are humanely handled and slaughtered and to assess any inspection and/or industry concerns.</li> <li>○ Prepares reports of investigative findings concerning violations of the FMIA, PPIA, and HMSA and associated regulations and advises the District Office of determinations.</li> <li>● Training: <ul style="list-style-type: none"> <li>○ Facilitates and conducts OJT for IPP which may include PHVs, SCSIs, FIs and CSIs.</li> </ul> </li> <li>● Export Certification <ul style="list-style-type: none"> <li>○ Reviews and verifies export certificates and supporting documentation for accuracy and completeness.</li> <li>○ Ensures that products approved for export are in full compliance with applicable Federal laws, regulations, and foreign country requirements.</li> </ul> </li> <li>● SBREFA: <ul style="list-style-type: none"> <li>○ Leads interactions with small and very small establishments within the assignment to support Small Business Regulatory Enforcement Fairness Act (SBREFA) by identifying resources for design and implementation.</li> </ul> </li> <li>● District Office Assistance: <ul style="list-style-type: none"> <li>○ Prepares responses to industry appeals related to ante-mortem and post-mortem condemnations, and other veterinary related issues originating at any of the slaughter establishments in the assigned area of responsibility.</li> <li>○ Prepares reports and assembles information on emerging issues and concerns to District Office personnel.</li> <li>○ Provides recommendations to designated FSIS contacts based on field interaction and observation of establishments.</li> <li>○ Consults and cooperates with industry personnel, FSIS personnel, and other local, state, and Federal organizations to reduce the incidence of foodborne pathogens and related human illness.</li> <li>○ Assists the DM/DDM in sharing information on HACCP systems and encouraging consolidated efforts in areas of residue related positive animal identification, good production practices, and risk management.</li> </ul> </li> </ul>
8.	<ul style="list-style-type: none"> <li>● As an SPHV, your responsibilities primarily involved conducting your supervisory duties and enforcement activities within your duty station, while directly reporting any concerns to your FLS.</li> <li>● As a DVMO, your responsibilities primarily involve serving as a liaison between the District Office and internal and external stakeholders, while directly reporting to the DM/DDM.</li> </ul>
9.	<ul style="list-style-type: none"> <li>● Common new job stressors: <ul style="list-style-type: none"> <li>○ Developing a comfort level in a job that is still unfamiliar</li> <li>○ Determining what level of flexibility is allowed</li> <li>○ Using more energy to learn a new way of working, processes, and people</li> <li>○ Having to figure out work/life balance all over again</li> <li>○ Becoming familiar with all the new responsibilities and expectations.</li> <li>○ Deciding the most appropriate way to set boundaries</li> </ul> </li> <li>● 5 healthy habits for managing a career transition include: <ul style="list-style-type: none"> <li>○ Prepare for change, but be open-minded</li> <li>○ Build relationships and a professional network</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Don't be afraid to ask questions</li> <li>○ Get to know your new boss</li> <li>○ Maintain your own personal health and wellness</li> </ul>
10.	N/A
11.	N/A
12.	N/A
13.	N/A
14.	N/A
15.	<ul style="list-style-type: none"> <li>● Differences between the DVMO and SPHV role: <ul style="list-style-type: none"> <li>○ As an SPHV your responsibilities primarily involved conducting your supervisory duties and enforcement activities within your duty station, while directly reporting any concerns to your FLS.</li> <li>○ As a DVMO, your responsibilities primarily involve serving as a liaison between the District Office and internal and external stakeholders, while directly reporting to the DM/DDM.</li> </ul> </li> <li>● 5 healthy habits: <ol style="list-style-type: none"> <li>1. Prepare for the change and be open-minded</li> <li>2. Build relationships and a professional network</li> <li>3. Don't be afraid to ask questions</li> <li>4. Get to know your new boss</li> <li>5. Maintain your own personal health &amp; wellness</li> </ol> </li> </ul>
16.	<ul style="list-style-type: none"> <li>● <b>Ask Questions</b>- You might consider calling a colleague who is more experienced with this task or more familiar with this establishment to get a better understanding of any potential issues specific to this establishment.</li> </ul>
17.	<ul style="list-style-type: none"> <li>● <b>Prepare/Ask Questions</b> – You would prepare to draft your analysis and recommendation by conducting your own investigation, reviewing the information presented by the establishment in the appeal, reviewing the original noncompliance, and, if necessary, asking questions of the in-plant inspection team so that you can reach a sound and supportable recommendation.</li> </ul>
18.	<ul style="list-style-type: none"> <li>● <b>Maintain your Personal Health and Well-being</b> – Caregivers can feel the impact of caring for their loved ones in several different ways, including his/her ability to work, engage in social activities, and maintain good physical and mental health. In this situation, you might consider taking some time to try to establish a healthier work/life balance by trying to get enough sleep, eating healthy foods, exercising, or even simply talking to someone. Remember, the Agency also has the Employee Assistance Program (EAP) in place to help you when the pressures of work, home life, or other stressors become overwhelming.</li> </ul>
19.	N/A
20.	N/A
21.	N/A
22.	N/A
23.	N/A
24.	N/A
25.	N/A
26.	<ul style="list-style-type: none"> <li>● A Personal Wellness Plan is a tool in which you identify areas within each wellness category that could use improvement in your daily life, and you create an action plan of goals you hope to achieve in each category.</li> </ul>
27.	<p>Common new job stressors:</p> <ul style="list-style-type: none"> <li>○ Developing a comfort level in a job that is still unfamiliar.</li> <li>○ Determining what level of flexibility is allowed.</li> <li>○ It takes more energy to learn a new way of working, processes, and people.</li> <li>○ Having to figure out work/life balance all over again.</li> </ul>

	<ul style="list-style-type: none"><li>○ Becoming familiar with all the new responsibilities and expectations.</li><li>○ Deciding the most appropriate way to set boundaries.</li></ul>
28.	N/A
29.	N/A
30.	N/A

# Soft Skills/Other: Communications Module

## Learning Objectives

1. Identify how to pivot your communication style to effectively communicate with others.
2. Demonstrate how to provide effective feedback to various audiences.
3. Recognize how emotional intelligence concepts impact your interactions.

## “Info Button” Notes

Slide	Info Button Text
1.	N/A
2.	N/A
3.	N/A
4.	N/A
5.	N/A
6.	N/A
7.	N/A
8.	N/A
9.	N/A
10.	<ul style="list-style-type: none"> <li>• Being a good listener:               <ul style="list-style-type: none"> <li>• Builds good relationships.</li> <li>• Allows you to gain a better understanding.</li> <li>• Allows you to make more informed decisions.</li> <li>• Most importantly, it improves communication.</li> </ul> </li> </ul>
11.	N/A
12.	<ul style="list-style-type: none"> <li>• Equally as important as the message YOU are trying to convey when communicating is the ability to <b>actively listen</b> to what someone else is trying to communicate TO YOU.</li> </ul>
13.	N/A
14.	<ul style="list-style-type: none"> <li>• Times when passive listening might be ideal would be:               <ul style="list-style-type: none"> <li>• When listening to a presentation and interrupting the speaker is not appropriate</li> <li>• During conversations when your role is to simply listen:                   <ul style="list-style-type: none"> <li>○ When the other person needs to vent</li> <li>○ The topic does not apply directly to you, and you have no contributions to make to the conversation</li> </ul> </li> </ul> </li> </ul>
15.	<ul style="list-style-type: none"> <li>• When done <b>correctly</b>, passive listening allows for the maximum absorption of information.</li> <li>• Because the listener is not actively engaged in the conversation, when done <b>incorrectly</b>, the listener can lose focus or be distracted from what the speaker is saying.</li> </ul>
16.	<ul style="list-style-type: none"> <li>• Strive to make sure you are actively listening to what the speaker has to say and not just hearing them talk to you or waiting for your next turn to speak!</li> <li>• There are situations when passive listening is important, such as:               <ul style="list-style-type: none"> <li>• When listening to a presentation and it would be considered inappropriate to interrupt the speaker, OR</li> <li>• When listening someone vent who is not seeking advice in return</li> </ul> </li> </ul>
17.	N/A
18.	<ul style="list-style-type: none"> <li>• 2 types of communication               <ul style="list-style-type: none"> <li>• Verbal and non-verbal</li> </ul> </li> <li>• 2 types of listening               <ul style="list-style-type: none"> <li>• Active and passive</li> </ul> </li> </ul>

19.	<ul style="list-style-type: none"> <li>• <b>Self-awareness</b> - Being aware of one's own emotions and knowing how to appropriately manage them in various situations</li> <li>• <b>Social awareness</b> - Being aware of the emotions of others and knowing how to respond appropriately in various situations</li> </ul>
20.	<p>Questions to consider:</p> <ul style="list-style-type: none"> <li>• How can I deal with my emotions in a way that aligns with the goals of the Agency?</li> <li>• How can I prevent my emotions from controlling my actions?</li> </ul>
21.	N/A
22.	N/A
23.	N/A
24.	<ul style="list-style-type: none"> <li>• <b>Formal:</b> This is the kind of communication that typically follows established rules and protocols. It can be characterized by delivering a message that is professional and uses formal/official language.</li> <li>• <b>Informal:</b> This type of communication is typically more laid back and is used in a more relaxed setting.</li> <li>• <b>Direct:</b> Conveys a clear message that gets straight to the point. It's typically straightforward, which is why it is increasingly important to maintain a respectful tone.</li> <li>• <b>Indirect:</b> Is the opposite of direct communication. It typically uses softer language with a focus on getting the point across without upsetting someone, or to avoid appearing too forward.</li> <li>• <b>Assertive:</b> Involves being confident and steadfast in your beliefs while getting your point across, without being aggressive and while still respecting others.</li> <li>• <b>Collaborative:</b> This style focuses on working together to achieve a common goal or solve problems. It involves open communication, creating a sense of team spirit and partnership.</li> <li>• <b>Empathetic:</b> Focuses on being considerate and compassionate to the needs and feelings of others.</li> <li>•</li> </ul>
25.	N/A
26.	<ul style="list-style-type: none"> <li>• 7 Communication Styles <ul style="list-style-type: none"> <li>• Formal</li> <li>• Informal</li> <li>• Direct</li> <li>• Indirect</li> <li>• Assertive</li> <li>• Collaborative</li> <li>• Empathetic</li> </ul> </li> </ul>
27.	<p>Formal, Assertive, and Empathetic</p> <ul style="list-style-type: none"> <li>• Blending formal language with assertiveness can demonstrate your professionalism. This coupled with remaining empathetic to the feelings of the manager in this situation shows that you acknowledge the impact your actions are having on him and will serve to build a sense of trust in the relationship.</li> </ul>
28.	<p>Direct, Informal, Collaborative</p> <ul style="list-style-type: none"> <li>• Blending direct language with informal language helps to demonstrate your professionalism, but in a more relaxed setting.</li> </ul>
29.	<p>Direct, Assertive, Empathetic</p> <ul style="list-style-type: none"> <li>• When dealing with upset or argumentative individuals, being direct and assertive helps address the issue head-on, while ensuring your perspective is clearly understood. Nonetheless, in these types of situations, it is equally important to acknowledge the emotions of the other individual so that they do not feel dismissed, which will hopefully aid in deescalating the situation.</li> </ul>
30.	N/A
31.	N/A

# Acronyms

ADR (Animal Disposition Reporting)  
AER (Administrative Enforcement Report)  
AM (Ante-Mortem)  
APHIS (Animal and Plant Health Inspection Service)  
AVIC (Area Veterinarian in Charge)  
BSE (Bovine Spongiform Encephalopathy)  
CFR (Code of Federal Regulations)  
CIS (Cooperative Interstate Shipment)  
CO<sub>2</sub> (Carbon Dioxide)  
CSI (Consumer Safety Inspector)  
DCS (District Case Specialist)  
DDM (Deputy District Manager)  
DEOV (DVMO Enhanced Outreach Visit)  
DM (District Manager)  
DO (District Office)  
DOA (Dead on Arrival)  
DOVS (Denial of Voluntary Services)  
DVMO (District Veterinary Medical Officer)  
EOB (Enforcement Operations Branch)  
EP (Establishment Profile)  
FAD (Foreign Animal Disease)  
FDA (Food and Drug Administration)  
FLS (Frontline Supervisor)  
FMIA (Federal Meat Inspection Act)  
FR (Federal Register)  
FSA (Food Safety Assessment)  
GCP (Good Commercial Practices)  
GCPVV (Good Commercial Practices Verification Visit)  
GOI (Grant of Inspection)

HATS (Humane Handling Activities Tracking System)  
HHEC (Humane Handling Enforcement Coordinator)  
HH (Humane Handling)  
HHVV (Humane Handling Verification Visit)  
HMSA (Humane Methods of Slaughter Act)  
HQ (Headquarters)  
IIC (Inspector in Charge)  
IPP (Inspection Program Personnel)  
LOC (Letter of Concern)  
LOW (Letter of Warning)  
MOI (Memorandum of Interview)  
NAD (Nonambulatory Disabled)  
NASS (National Agriculture Statistics Service)  
NARMS (National Antimicrobial Resistance Monitoring System)  
NRP (National Residue Program)  
NOIE (Notice of Intended Enforcement)  
NOS (Notice of Suspension)  
NOSA (Notice of Suspension Held in Abeyance)  
NR (Noncompliance Record)  
NROS (Notice of Reinstatement of Suspension)  
NROSA (Notice of Reinstatement of Suspension Held in Abeyance)  
OFO (Office of Field Operations)  
OIEA (Office of Investigation, Enforcement and Audit)  
OJT (On the Job)  
PHIS (Public Health Information System)  
PHV (Public Health Veterinarian)  
PM (Post-Mortem)  
PPIA (Poultry Products Inspection Act)  
RAD (Reportable Animal Disease)  
RCA (Regulatory Control Action)  
ROP (Rules of Practice)

RSA (Robust Systematic Approach)

SME (Subject Matter Expert)

SOP (Standard Operating Procedure)

SPHV (Supervisory Public Health Veterinarian)

TOD (Tour of Duty)

USC (United States Code)

VP (Verification Plan)

VS (Very Small)

VV (Verification Visit)



# Resources

- [FSIS Directive 6900.2](#) "Humane Handling and Slaughter of Livestock"
- [FSIS Directive 6110.1](#) "Verification of Poultry Good Commercial Practices"
- [FSIS Directive 6100.1](#) "Ante-Mortem Livestock Inspection"
- [FSIS Directive 5000.1](#) "Verifying an Establishment's Food Safety System"
- [FSIS Directive 5100.3](#) "Administrative Enforcement Action Decision-Making and Methodology"
- [FSIS Directive 8010.3](#) "Procedures for Evidence Collection, Safeguarding and Disposal"
- [Federal Register: Humane Handling and Slaughter Requirements and the Merits of a Systematic Approach To Meet Such Requirements](#)
- [Federal Register: Treatment of Live Poultry Before Slaughter](#)
- [DVMO Enhanced Outreach Plan](#)
- [Compliance Guide for a Systematic Approach to the Humane Handling of Livestock](#)
- [Humane Interactive Knowledge Exchange \(HIKE\) Scenarios](#)
- [FSIS Website Humane Handling](#)
- [IPP Help HH Video](#) (VPN Required)