

Discuss Current Trends at Establishment

Instructions: Review this Job Aid and policy documents, regulations, and inspection methodologies with a mentor.

Acronyms/Definitions

- PHIS – Public Health Information System – System used by IPP to document verification activities and findings
- NR – Noncompliance Record
- MOI – Memorandum of Interview
- Noncompliance – Establishment’s failure to meet a regulatory requirement
- Food safety system (HACCP system) – HACCP plan in operation, including HACCP plan itself ([9 CFR 417.1](#))
- HACCP plan in operation – Hazard analysis, HACCP Plan (CCPs), supporting documentation including prerequisite programs, HACCP records
- Associated NRs – [IPP associate NRs](#) when they indicate an ongoing trend of related noncompliances. IPP may also associate NRs with other findings that have not resulted in noncompliance that may indicate systemic problems with the food safety system (e.g., establishment positive sampling results)
- PHR – Public Health Regulation –Regulations with higher noncompliance rates in establishments in the three months prior to a microbiological positive result or a public-health related enforcement action at those establishments.

Procedure Overview

- IPP are to be familiar with NRs recently documented at the establishment and other, related findings that did not result in noncompliance, including sampling results.
 - IPP may review NRs using the PHIS “Noncompliances” report.
 - IPP may review MOIs using the PHIS “Memoranda of Interview” report.
 - IPP review sampling results for FSIS using LIMS-Direct
 - IPP review establishment testing data
- IPP assess the significance of associated NRs, or other findings, in the context of the establishment’s food safety system. Trends that indicate systemic problems may not involve any NRs (e.g., repeated positive tests).
- IPP discuss trends of noncompliance or other findings with their supervisory chain to determine how the findings affect the overall food safety system. The FLS supports IPP in assessing the significance of the findings and associations.
- IPP discuss trends with the establishment during the weekly meeting and describe why the findings and observations indicate a trend of noncompliance or systemic problems.
- The FLS will notify the District Office when the findings demonstrate concerns about potential systemic problems.
- In the event of a PHR Early Warning Alert, IPP are to review the alert and the past 3 months of information for the establishment using the “PHR Noncompliance for an Establishment” report ([FSIS Directive 5100.5](#))

Basic Procedure

- Read the establishment's written programs. Understand the food safety system and the components of the system including prerequisite programs and supporting documentation.
- [Run the PHIS "Noncompliances" Report](#) to review recent NRs and assess for trends.
- Understand current associations between NRs or other findings not resulting in NRs at the establishment. Evaluate and discuss any trends in the findings.
 - **Note:** Trends that indicate systemic problems may not involve any NRs (e.g., positive test results from establishment testing).
 - These associations are documented in the Inspector Notes feature of PHIS rather than in the body of the NR.
 - Associated NRs are to be "linked" in PHIS.
- Review how associations between NRs or other findings are documented.
 - [Review the Inspection Notes feature of PHIS](#) to understand how NRs and other findings are associated. This includes brief descriptions of the reason behind IPP's decision to associate the NRs or other findings.
 - Review the weekly meeting MOIs to understand how trends are discussed and documented with the establishment. This includes any outcomes of the meeting.
 - Review the description block of associated NRs to understand the type of information included in the NR when it is associated with other NRs. This includes any unsuccessful further planned actions taken by the establishment to address the noncompliances.
 - Review the "link" feature in PHIS to understand how to link an NR with a past, related NR.
- Observe how IPP discuss associations between NRs or other findings with the establishment.
- Observe how IPP discuss associations between NRs or other findings with the FSIS supervisory chain-of-command.
- Consider the information gathered in the context of past findings and look for any patterns or trends in the findings. Consider the following questions:
 - Have any changes been made that could impact the establishment conditions?
 - Are conditions in the establishment getting worse over time?
 - Are the same or similar problems occurring repeatedly or consistently occurring on a seasonal basis?
 - Is the establishment responding effectively and in a timely manner to problems that do arise?
 - How do the findings affect the establishment's food safety system?
- PHR Early Warning Alert:
 - Review the alert on PHIS Dashboard
 - Review the past 3 months of information within PHIS via the "PHR Noncompliance for an Establishment" report
 - Analyze information and identify noncompliance trends

- Discuss analysis with FLS to determine if information demonstrates a trend of repetitive NRs or the implementation of ineffective corrective actions
- Discuss the following with the establishment at the next weekly meeting and document in the weekly meeting MOI:
 - PHR Early Warning Alert
 - Results of the analysis
 - Actions IPP intend to take in response to analysis
- Consider further verification activities and if the trend is continuing or if establishment corrective actions are effective to resolve the noncompliance

Discussion Points

- Discuss the significance of identifying and documenting associations between NRs or other findings.
- Discuss when to reach out to the FSIS supervisor to discuss trends.
- Discuss how IPP consider trends and associations when IPP assesses the effectiveness of the establishment's food safety system.
- Discuss IPP actions in response to PHR Early Warning Alerts.

Knowledge Check

- Why do IPP evaluate noncompliance records and other related findings for trends?

Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- [FSIS Directive 5100.5](#) – *Public Health and FSIS Response to Elevated Public Health Regulation Noncompliance Rates*