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Improvements for Poultry Slaughter Inspection

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Appendix F – FSIS Risk Assessment for Guiding Public Health-Based Poultry Slaughter Inspection

FSIS Risk Assessment for Guiding Public Health-Based Poultry Slaughter Inspection

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193

Executive Summary

194

BACKGROUND

195

196 Food Safety and Inspection Service on-line inspectors conduct hands-on appraisals of
197 every young poultry carcass to ensure it is unadulterated, free of feathers, bruises, and
198 defects and disease, while FSIS off-line inspectors verify that establishments maintain
199 sanitary operations and perform other health and safety-related assignments. It is possible
200 that by allowing FSIS personnel to perform additional wholesomeness, sanitation,
201 sampling, and other offline procedures tailored to mitigate *Salmonella* contamination on
202 poultry, the number of human illnesses from *Salmonella* can be reduced.

203

RISK MANAGEMENT QUESTIONS

204

205 This risk assessment addresses four risk management questions:

206

207

- 208 ▪ Can FSIS reallocate inspection activities in young chicken
209 slaughter establishments without significant negative impact on
210 microbial prevalence in the establishments?

211

- 212 ▪ How will the relocation of on-line inspectors to off-line duties, or
213 other areas within or outside the establishment, affect human
214 illness?

215

- 216 ▪ Where within the establishment can relocated inspection activities
217 have the most impact toward reducing microbial prevalence and
218 corresponding human illness?

218

219

- What is the uncertainty about these effects?

220

STRUCTURE AND SCOPE

221

222 This is a quantitative microbial food safety risk assessment. It evaluates variations in
223 personnel assignments and inspection activities in FSIS poultry slaughter facilities with
224 the prevalence of *Salmonella* on young chicken and, subsequently, attributable
225 salmonellosis in humans. Data used in the risk assessment came from several sources.
226 Data for the prevalence of *Salmonella* for poultry carcasses, representing 154 young
227 chicken slaughter establishments, came from the USDA/FSIS *Salmonella* Pathogen
228 Reduction/Hazard Analysis and Critical Control Point (PR/HACCP) verification
229 sampling collection program for 2003-2005. Data for inspection procedures performed in
230 an establishment came from the FSIS performance based inspection system (PBIS)
231 database. These data were paired with *Salmonella* prevalence data for the same
232 establishments and timeframes. The FSIS Resource Management and Planning Staff
233 provided personnel assignment profiles for each establishment. A stochastic simulation
234 model using multiple variable logistic regression techniques was used to account for
235 uncertainty in estimates of the association between food safety procedure activities in the
236 establishment and corresponding *Salmonella* prevalence on poultry.

237

238 Baseline estimates for the mean number of human salmonellosis from young chicken
239 were based on surveillance data gathered by the Centers for Disease Control and
240 Prevention (CDC). An uncertainty distribution was estimated around that mean number
241 of attributable illnesses. Changes in the number of annual human salmonellosis cases due
242 to inspection personnel activities were estimated as a function of predicted changes in
243 *Salmonella* prevalence in young chicken slaughter establishments. A Poisson uncertainty
244 distribution was used to incorporate both the variability in *Salmonella* illnesses per year
245 and uncertainty about the relationship between changes in prevalence levels at the
246 establishment level and corresponding number of attributable *Salmonella* illnesses. This
247 procedure is documented in the microbial risk modeling literature (Powell, 2000). For
248 this risk assessment, *Salmonella* serotypes were not delineated on pathogenicity. That is,
249 all *Salmonella* were assumed to have the same potential to cause human illness.

250

251

MODEL RESULTS

252

253 Key model results are summarized below. These results describe changes in estimated
254 human salmonellosis cases associated with the number of unscheduled procedures
255 performed in an establishment, the number of unperformed procedures in an
256 establishment, and the number of non-compliances.

257

258 Six scenarios were modeled out to human illness impact based on changes in microbial
259 contamination in the plants. Other scenarios were evaluated and provided no useful
260 information when modeled out to human illness due to uncertainty in predicted changes

261 in microbial contamination that were overwhelmed by the uncertainty distribution about
262 estimates of attributable human illness.
263

264 **A 50% increase in UNSCHEDULED SANITATION procedures (U-1)**

265 An uncertainty distribution was developed for the expected change in human illnesses
266 due to a 50% increase in all unscheduled sanitation procedures across all young chicken
267 slaughter establishments. Over 95% of all iterations with the model show expected
268 reduction in human *Salmonella* illnesses, with an average reduction of 7,573 attributable
269 *Salmonella* illnesses. The 95th percentile of the uncertainty distribution is a reduction of
270 2,593 illnesses.
271

272 **A 50% increase in UNSCHEDULED SAMPLING procedures (U-5)**

273 An uncertainty distribution was also developed for the expected change in human
274 illnesses due to a 50% increase in all unscheduled sampling procedures across all young
275 chicken slaughter establishments. Over 95% of all iterations with the model show
276 expected reduction in human *Salmonella* illnesses, with an average reduction of 19,780
277 attributable *Salmonella* illnesses. The 95th percentile of the uncertainty distribution is a
278 reduction of 9,916 illnesses.
279

280 **A 75% decrease in UNPERFORMED SAMPLING procedures (B-5)**

281 Similarly, an uncertainty distribution was developed for the expected change in human
282 illnesses due to a 75% decrease in all unperformed sampling procedures across all young
283 chicken slaughter establishments. Just under 85% of all iterations with the model show
284 expected reduction in human *Salmonella* illnesses, with an average reduction of 5,482
285 illnesses. The 85th percentile of the uncertainty distribution, however, shows an increase
286 of 258 illnesses. This implies that there is a 15% probability that attributable *Salmonella*
287 illnesses would not decrease because of a decrease in the number of unperformed
288 sampling procedures.
289

290 **A 75% decrease in UNPERFORMED HACCP procedures (B-3)**

291 An uncertainty distribution was developed for the expected change in human illnesses
292 due to a 75% decrease in unperformed HACCP procedures across all young chicken
293 slaughter establishments. Over 70% of all iterations with the model show expected
294 reduction in human *Salmonella* illnesses, with an average reduction of 2,060. The 75th
295 percentile of the uncertainty distribution, however, shows an increase of 297 illnesses.
296 This implies that there is a 25% probability that attributable *Salmonella* illnesses would
297 not decrease because of a decrease in the number of unperformed HACCP procedures.
298

299

A 75% decrease in UNPERFORMED SANITATION procedures (B-1)

300 In addition, an uncertainty distribution was developed for the expected change in human
301 illnesses due to a 75% decrease in unperformed sanitation procedures across all young
302 chicken slaughter establishments. Over 95% of all iterations with the model show
303 expected reduction in human *Salmonella* illnesses, with an average reduction of 8,592
304 illnesses. The 95th percentile of the uncertainty distribution shows a reduction of 2,021
305 illnesses.
306

307

A 75% decrease in NON COMPLIANCES for SANITATION procedures (NC-1)

308 Finally, an uncertainty distribution was developed for the expected change in human
309 illnesses due to a 75% decrease in non-compliances (NRs) for sanitation procedures
310 across all young chicken slaughter establishments. Over 65% of all iterations with the
311 model show expected reduction in human *Salmonella* illnesses, with an average reduction
312 of 2,321 illnesses. The 70th percentile of the uncertainty distribution, however, shows an
313 increase of 297 illnesses. Again, this implies that there is a 30% probability that
314 attributable *Salmonella* illnesses would not decrease because of a decrease in the number
315 of non-compliances (NRs) related to sanitation procedures.
316

317

CONCLUSIONS

318

319 The results of the risk assessment provide answers to each of the four risk management
320 questions.

321

- 322 ■ Can FSIS reallocate inspection activities in young chicken
323 slaughter establishments without significant negative impact on
324 microbial prevalence in the establishments?

325

326 Yes, risk assessment model results using 2003-2005
327 PR/HACCP *Salmonella* verification data from 154 young
328 chicken slaughter establishments show that reallocating
329 some on-line inspectors to off-line inspection duties
330 (replacing some online inspector with establishment
331 personnel) could be more effective at reducing *Salmonella*
332 prevalence in establishments.

333

334 Establishments with more off-line inspectors have lower
335 *Salmonella* prevalence than establishments with fewer off-
336 line inspectors.

337

338

- 339 ■ How will the relocation of on-line inspectors to off-line duties, or
340 other areas within or outside the establishment, effect human
341 illness?

342
343 This risk assessment suggests a high probability that
344 *Salmonella* attributable illnesses could decline or remain the
345 same when additional off-line inspection procedures are
346 performed. Both increases in unscheduled sanitation
347 procedures and increases in unscheduled sampling
348 procedures are associated with decreases in attributable
349 human *Salmonella* illnesses with greater than 90% certainty.
350 Other off-line duties, such as reducing the number of
351 unperformed sanitation, sampling, and HACCP procedures,
352 may also reduce attributable human *Salmonella* illnesses,
353 but we are less certain about these (85%, 70%, and 70%
354 certainty, respectively).

- 355
356
- 357 ■ Where within the establishment can relocated inspection activities
358 have the most impact toward reducing microbial prevalence and
359 corresponding human illness?

360
361 Relocated inspectors can have the most impact on reducing
362 *Salmonella* prevalence and corresponding attributable
363 illnesses by performing increased unscheduled sampling
364 procedures (U-5) and increased unscheduled sanitation
365 procedures (U-1). In addition, a reduction in uncompleted
366 sanitation procedures (B-1) can lower *Salmonella*
367 prevalence and illness.

- 368
369
- 370 ■ What is the uncertainty about these effects?

371
372 Uncertainty in establishment-level *Salmonella* prevalence is
373 accounted for using the mean of a Beta Inverse distribution
374 incorporating available sampling data. Uncertainty in
375 *Salmonella* prevalence across all young chicken slaughter
376 plants is modeled using a bootstrap simulation analysis.
377 Uncertainty about attributable human illness is based on the
378 central limit theorem and is lognormal in shape. The
379 uncertainty in the relationship between attributable
380 *Salmonella* human illness and *Salmonella* prevalence is
381 represented by the Poisson distribution.
382

383 FUTURE PLANS

384
385 In 2008, FSIS plans to have results from a new expanded FSIS microbiological baseline
386 data collection program for young chicken slaughter establishments. These results will

387 include rehang and post-chill observations for prevalence and bacterial counts of
388 *Salmonella*, *Campylobacter*, *E. coli*, and other indicator organisms. The quantitative risk
389 assessment model used in this analysis has been specifically designed to incorporate these
390 data in combination with data from the FSIS' performance based inspection system
391 (PBIS) program.

392
393 The explanatory inspection procedures records that were used in this analysis were
394 aggregated across similar procedures codes. A new analysis is planned to disaggregate
395 further the inspection procedures data used in the belief that individual procedure code
396 records will provide results that are more specific when the model is used to guide
397 resource allocation decisions.

398
399 There is also the ability to revise the current model to differentiate results based on
400 available speciation categories from the forthcoming microbiological baseline data. This
401 new information will facilitate the strengthening of the quantitative linkage between
402 inspection activities in the establishment and attributable human cases of illness from
403 *Salmonella*, *Campylobacter*, and *E. coli*.

404
405 In sum, the analytical capabilities of this risk assessment model, once the new FSIS
406 microbiological baseline data for young chicken slaughter establishments are available,
407 should prove useful for future establishment inspector assignment allocations within a
408 given establishment based on that establishment's individual risk profile.

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Introduction

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427 In 1985¹ and 1987,² the National Academies of Science (NAS) published two reports
428 arguing that current inspection methods do not reduce foodborne pathogens in meat and
429 poultry and calling for a modern, public health-based approach to inspection, a call
430 reiterated in a 1998 NAS report³ (reviewed by Cates *et al.*).⁴ On July 1996, FSIS issued
431 its landmark rule, Pathogen Reduction; Hazard Analysis and Critical Control Point
432 (PR/HACCP) systems (9 CFR §417), which emphasizes the prevention and reduction of
433 microbial pathogens on raw products, and clarifies the responsibilities that industry and
434 government are to assume for food safety. Prior to PR/HACCP, inspection was based on
435 organoleptic (sight, touch, and smell) methods. However, knowledge and concern
436 regarding microbial pathogens has increased and industry continues to produce new
437 technologies to control pathogens. As a result, new approaches to food safety are
438 necessary.

439

440 In keeping with the basis of PR/HACCP, FSIS is proposing a public health-based
441 inspection in poultry slaughter establishments. The system will be available first for
442 young chicken slaughter establishments. Under the proposed rule, young chicken
443 establishments will decide whether to operate under the current inspection system (9 CFR
444 § 381.76) or the proposed new system. Table 1 below shows a summary of differences
445 between the two systems. The proposed new system for young chicken slaughter
446 establishments will allow FSIS resources to be used more efficiently by allowing more
447 time and flexibility for FSIS personnel to perform off-line verification activities based on
448 risk factors of individual establishments. The proposed new system will also drive

449 technological innovation, as establishments will be encouraged to modernize equipment
 450 because they will be responsible for carcass sorting and establishing maximum line
 451 speeds. Consequently, establishments will design their own process control tasks that will
 452 incorporate new and improved equipment. This should result in the efficient production
 453 of poultry products of the highest quality and consistently lower *Salmonella* prevalence.

454 Table 1. Summary of differences between the current inspection system (9 CFR §
 455 381.76) and the proposed new inspection system for young chicken slaughter
 456 establishments.

	Current Inspection System	Proposed New System
<i>Carcass Sorting</i>	FSIS determines condemnation of carcasses; establishments do not sort carcasses.	Establishments are required to sort carcasses and ensure carcasses are not adulterated before entering chilling tanks.
<i>Performance Standards</i>	Establishments will continue to address CFR § 381.65(e).	Establishments must meet the food safety performance standards for poultry slaughter defects (zero fecal, zero septicemia/toxemia) as well as animal disease performance standards.
<i>Line Speed</i>	Establishments will adhere to regulatory limits (CFR § 381.67). Line speeds are dependent on slaughter class.	No maximum line speeds. Rather, limits on line speed will be based on establishment's ability to maintain process control and meet performance standards.
<i>Generic E. coli Process Control</i>	Current CFR § 381.94(a) will apply.	New process control performance standards will be adopted.
<i>Standards of Identity</i>	New proposed Standards of Identity regulations will provide a standard of quality for whole chickens. All establishments will be required to maintain a process control plan to ensure that whole chickens meet the proposed standard of identity.	Standard of Identity regulations for standard of quality of whole chickens.
<i>Time and Temperature</i>	Establishments will adhere to CFR § 381.66.	Current poultry chilling requirements in CFR § 381.66 amended to provide more flexibility to establishments.
<i>On-line Reprocessing</i>	Establishments will adhere to CFR § 381.91.	On-line reprocessing of pre-chill poultry carcasses accidentally contaminated with digestive tract contents at slaughter.

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SCOPE OF THE RISK ASSESSMENT

The risk assessment estimates the public health impact of converting from the current inspection system to the proposed new system for young poultry slaughter establishments. It addresses four risk management questions:

510

SUMMARY

511

512 Based on calls for public health-based inspection, FSIS has proposed a new public health-
513 based inspection system for young chicken slaughter establishments. The purpose of this
514 risk assessment is to estimate the public health impact of converting from the current
515 inspection system to the proposed new system for young poultry slaughter
516 establishments.

517

Hazard Identification

518 This chapter provides a brief overview of *Salmonella* on poultry, the disease caused by
519 *Salmonella*, and the epidemiology of *Salmonella*.
520

521

SALMONELLA

522

523 The genus *Salmonella* consists of 2 species, 6 subspecies, and over 2,400 serotypes.
524 *Salmonella* cells are Gram-negative, facultative anaerobes; they grow at temperatures of
525 ~8 to 45°C and pH values of ~4 to 8, with optimal growth at ~37°C, pH 7.
526

527

Salmonella on Poultry

528 Data for *Salmonella* from USDA FSIS microbiological sampling programs for poultry
529 are summarized in Table 2.
530

531 Table 2. Summary of data for *Salmonella* from FSIS routine testing programs, 1998 -
532 2005. For details, see [http://www.fsis.usda.gov/Science/Progress_Report_Salmonella_](http://www.fsis.usda.gov/Science/Progress_Report_Salmonella_Testing_Tables/index.asp)
533 [Testing_Tables/index.asp](http://www.fsis.usda.gov/Science/Progress_Report_Salmonella_Testing_Tables/index.asp).

Product	No. Samples Analyzed	No. Samples Positive	% Samples Positive
Broilers	63,754	7,778	12.2
Ground Chicken	2,255	532	23.6

534

535

536 These data show that *Salmonella* are present on a substantial portion of poultry inspected
537 by FSIS. Furthermore, recent reports show that *Salmonella* are present on broilers and
538 ground chicken sold at retail. Cui *et al.* recovered *Salmonella* from 61% of organic and
539 44% of conventionally reared chickens.¹² Using a polymerase chain reaction-based

540 method, Hong *et al.* detected *Salmonella* in 17% of retail chicken carcass rinses.⁵ Zhao *et*
541 *al.* found *Salmonella* on 4% of retail chickens in the Washington, D.C. area.⁶
542

543 ***Salmonella* Disease Characteristics**

544 Human cases of salmonellosis are characterized by diarrhea, fever, abdominal pain or
545 cramps, vomiting, headache, and nausea. Incubation is from eight to 72 hours with
546 symptoms lasting up to a week. Though the disease is typically self-limiting, fatalities
547 may occur, especially among infants, elderly, and the immunocompromised.
548

549 ***Salmonella* Epidemiology**

550 Foodborne *Salmonella* cause an estimated 1,300,000 cases of human illnesses, 15,000
551 hospitalizations, and 500 deaths each year in the United States.⁷ Of the 15,806 laboratory-
552 diagnosed infections ascertained through the Foodborne Diseases Active Surveillance
553 Network (FoodNet) in 2004, 6,464 (40.1%) were from *Salmonella*. From 1996-1998 to
554 2004, the estimated incidence of *Salmonella* infections decreased 8%.⁸

555

Hazard Characterization

556 This chapter describes methods used to estimate the attributable number of annual human
557 illnesses from *Salmonella* on young chickens. It then describes the method used to model
558 the relationship between changes in *Salmonella* prevalence on young chickens and
559 changes in human illnesses from *Salmonella*.

560

561

562

ESTIMATING HUMAN ILLNESSES FROM SALMONELLA ON YOUNG CHICKENS

563

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567

Table 3 summarizes the steps in estimating annual human illnesses from *Salmonella* on young chickens.

568

569

570

Table 3. Steps in estimating illnesses from *Salmonella* on young chickens.

Step	Input	<i>Salmonella</i>	Data Source/Estimation
1	Incidence of salmonellosis among the U.S. population	14.4/100,000	FoodNet Annual Report for 2003 ⁹
2	Population estimate 2003	290,788,976	US Census Bureau ¹⁰
3	Underreporting multiplier	38	Mead <i>et al.</i> ⁷
4	Foodborne fraction	0.95	Mead <i>et al.</i> ⁷
5	Poultry attribution fraction	0.3351	Food Safety Research Consortium ^{11;12}
6	Young chicken fraction	0.838	ERS ¹³
7	Total illnesses	1,591,197	Step = 1 x 2 x 3
8	Total foodborne illnesses	1,511,637	Step = 4 x 7
9	Total foodborne illnesses from poultry	498,840	Step = 5 x 8
10	Total foodborne illnesses from young chickens	424,389	Step = 6 x 9

571

Incidence of Illness from *Salmonella*

572 Incidence of human illness from *Salmonella* was from surveillance data ascertained by
573 the Foodborne Diseases Active Surveillance Network (FoodNet) for the year 2003.⁹

574

U.S. Population Estimate for 2003

575 The 2003 population estimate of 290,788,976 was from the U.S. Census Bureau.¹⁰
576

577

Accounting for Underreporting

578 Cases of foodborne infection ascertained through FoodNet represent a fraction of those
579 that occur in the surveillance population. The underreporting multiplier of 38 for
580 *Salmonella* infections was from Mead *et al.*⁷
581

582

Estimating Proportion of Infections that are Foodborne

583 The proportion of *Salmonella* infections estimated to be foodborne, 95%, was from Mead
584 *et al.*⁷
585

586

Estimating Proportion of Foodborne Infections from Poultry

587 The estimate of the proportion of foodborne *Salmonella* infections from poultry, 34%,
588 was from an expert elicitation by the Food Safety Research Consortium.^{11;12}
589

590

Estimating Proportion of Foodborne Infections from Young Chickens

591 Data from the Economic Research Service (ERS)¹³ were used to estimate the proportion
592 of poultry-related *Salmonella* infections from young chicken. Approximately, 84% of
593 poultry production in the U.S. in 2004 was from young chickens (Table 4).
594

595

Table 4. U.S. poultry production and supply in 2003.

Category	Millions of lbs			
	Production Supply	Imports	Beginning Stocks	Total
Young Chickens (broilers)	32,399	12	763	33,173
Other Chicken	502	3	5	510
Turkey	5,577	2	333	5,912
Total	38,478	16	1,101	39,595

596

Adapted from USDA ERS.¹³

597

598

599

Steps 7 through 10 of Table 3 complete the estimate. Annual illnesses from *Salmonella*
600 are the product of the values in steps 1, 2, and 3. The proportion of foodborne illnesses

601 from *Salmonella* is the product of the values in steps 4 and 7. The proportion of
602 foodborne illnesses from *Salmonella* on poultry is the product of the values in steps 5 and
603 8. The proportion of foodborne illnesses from *Salmonella* on young chickens is the
604 product of the values in steps 6 and 9. The final estimate for annual number of human
605 illnesses from *Salmonella* on young chickens is 424,389.

606
607

608 **Deriving uncertainty about annual number of human *Salmonella* illnesses**
609 **attributable to poultry**

610

611 Uncertainty about total *Salmonella* illnesses per year attributable to poultry can be
612 derived by considering the uncertainty in the components used to derive the most likely
613 (expected) value for attributable human *Salmonella* illnesses (as shown in Table 3).
614 Alternatively, an approximation for this uncertainty is the assumption that the uncertainty
615 about *Salmonella* illnesses attributable to poultry is proportional to the uncertainty about
616 *E. coli* O157:H7 illnesses attributable to ground beef. This uncertainty analysis about
617 attributable fractions of human illness to specific FSIS-regulated products was previously
618 described by Powell *et al.*¹⁸

619

620 Proportional uncertainty between *Salmonella* in poultry and *E. coli* O157:H7 in ground
621 beef implies equivalency in the coefficients of variation for these distributions. In other
622 words,

623

624
$$cv_{E.coli/beef} = cv_{Salm/poultry} = \frac{\sqrt{Var(\lambda_{E.coli/beef})}}{E[\lambda_{E.coli/beef}]} = \frac{\sqrt{Var(\lambda_{Salm/poultry})}}{E[\lambda_{Salm/poultry}]}$$

625

626 By estimating all but $\sqrt{Var(\lambda_{Salm/poultry})}$, we can calculate the variance about *Salmonella*
627 illnesses attributable to poultry.

628

629 From Powell *et al.*,¹⁸ we know the 2.5th and 97.5th percentiles of the uncertainty
630 distribution for *E. coli* O157:H7 illnesses attributable to ground beef (i.e., 9,478 and
631 29,171, respectively) (see Table 5). The median for this distribution was 15,904. Such a
632 distribution is clearly skewed to the right; consequently, a lognormal distribution is
633 assumed.^a The 2.5th and 97.5th percentile values are fit to a lognormal distribution. The
634 resultant lognormal parameters are $\mu = 9.7188$ and $\sigma = 0.29$. The expected value of this
635 lognormal distribution is $E[\lambda_{E.coli/beef}] = 17,326$ and its standard deviation

^a A lognormal distribution is reasonable given that the derivation of the distribution represented the product of many positive random variables; according to the central limit theorem, multiplying several random variables together will generate a distribution that is lognormal in shape.

636 is $\sqrt{Var(\lambda_{E.coli/beef})} = 5073$. The resultant coefficient of variation for this distribution
 637 is $cv_{E.coli/beef} = 0.29$.

638
 639 Equating $cv_{Salm/poultry}$ to $cv_{E.coli/beef}$ and assuming $E[\lambda_{Salm/poultry}] = 420,000$, the standard
 640 deviation of the uncertainty distribution for *Salmonella* illnesses attributable to poultry
 641 is $\sqrt{Var(\lambda_{Salm/poultry})} = 122,972$. Using these moments of the distribution, we calculate that
 642 the parameters of this lognormal distribution are $\mu = 12.91$ and $\sigma = 0.29$.^b The resulting
 643 distribution for $\lambda_{Salm/poultry}$ (or λ_{ill} as defined in this assessment) is shown in Figure 1
 644 below. The 5th percentile of this distribution is ~251,000, its median is ~403,000, and its
 645 95th percentile is ~646,000.

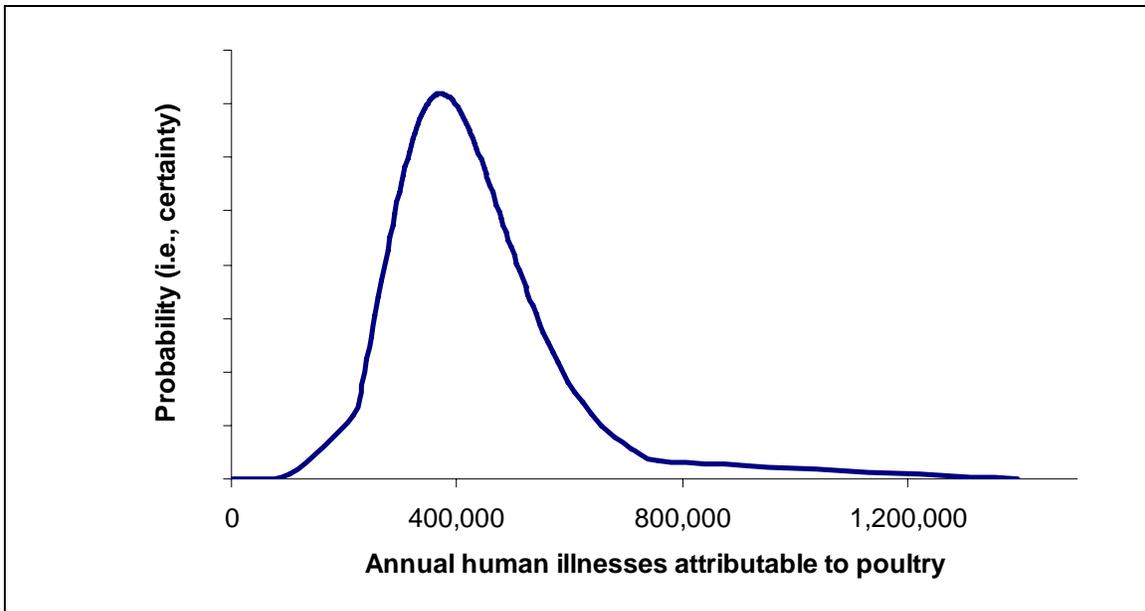
647 Table 5. Uncertainty distributions for *E. coli* illnesses attributable to ground beef.
 648 Adapted from Powell *et al.*¹⁸

Epidemiologic Parameter	Distribution
Reported rate of <i>E. coli</i> O157:H7 per 100,000 person-years	Discrete Uniform (2.04, 1.25, 1.51)
U.S. Population (1998)	269.4 million
P(Bloody case reported)	Beta (409 + 1, 480 - 409 + 1)
P(Non-bloody case reported)	1 - Beta (409 + 1, 480 - 409 + 1)
P(Laboratory cultures stool sample for O157)	(<i>Bloody</i>) Beta (182 + 1, 230 - 182 + 1) (<i>Non-bloody</i>) Beta (108 + 1, 230 - 108 + 1)
P(Physicians obtain culture from patient)	(<i>Bloody</i>) Beta (1515 + 1, 1943 - 1515 + 1) (<i>Non-bloody</i>) Beta (699 + 1, 1943 - 699 + 1)
P(III person seeks medical care)	(<i>Bloody</i>) Beta (32 + 1, 58 - 32 + 1) (<i>Non-bloody</i>) Beta (88 + 1, 1100 - 88 + 1)
<i>Proportion of cases attributable to ground beef</i>	
min = 16.3%	<i>Pert (minimum, most likely, maximum)</i> 2.5 th percentile of Beta (344 + 1, 1916 - 344 + 1) (the proportion of outbreak-associated illnesses due to ground beef)
most likely = 18.0%	50 th percentile of Beta (344 + 1, 1916 - 344 + 1)
maximum = 40.3%	97.5 th percentile of Beta (36 + 1, 115 - 36 + 1) (the proportion of outbreaks due to ground beef)
Results	Median 95% Confidence Interval
Total non-bloody	60 495 38 206 – 102 541
Total bloody	13 838 9604 – 22 425
Total annual cases O157 US	74 346 49 844 – 120 964
Annual cases O157 US due to ground beef	15 904 9478 – 29 171

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^b If @Risk is used to simulate this distribution, the function takes the mean and standard deviation of the distribution as arguments rather than the distribution's parameters.

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658 Figure 1. Uncertainty distribution for attributable annual illness from *Salmonella* on
659 young poultry.

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Exposure Assessment

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689 This chapter describes the estimated prevalence of *Salmonella* on young chickens at
690 slaughter establishments and the estimated number of annual cases of human illnesses
691 from *Salmonella* attributable to young chicken consumption in the U.S. It then provides a
692 description of the risk assessment model, including its structure, parameters, and the
693 various model scenarios.

694

695 **SALMONELLA ON YOUNG POULTRY IN SLAUGHTER ESTABLISHMENTS**

696

697 Prevalence of *Salmonella* on young chicken in slaughter establishments was determined
698 using data from FSIS microbiological HACCP data collection programs for the years
699 2003 through 2005. Detailed descriptions of the microbiological data collection programs
700 are available at http://www.fsis.usda.gov/Science/Baseline_Data/index.asp.

701

702

In-establishment Inspection Procedures

703 Data from 154 young chicken slaughter/processing establishments in six general
704 inspection system procedure (ISP) code activity categories (Sanitation, PR/HACCP,
705 Economic/Wholesomeness, Sampling, Other Inspection Requirements, and Emergency
706 Activities) were taken from the Performance Based Inspection System (PBIS) database
707 for the 2003-2005 calendar years. A total of 2,395 monthly observations were used,
708 representing the following inspection types: streamlined inspection system, SIS (595
709 observations), new enhanced line speed inspection system, NELS (467 observations),

710 HACCP-based inspection models program, HIMP (317 observations), new eviscerations
711 systems – Nu-Tech (Stork Gamco, Gainesville, GA) inspection system (146
712 observations) and MAESTRO (Meyn Poultry, Gainesville, GA) inspection systems (474
713 observations), and 295 observations from establishments with multiple lines representing
714 “MIXED” inspection systems. An additional 101 observations were from establishment
715 inspection types that were undetermined. A major difference among these systems of
716 inspection is the maximum regulated line speeds of 70 birds per minute for SIS, 91 birds
717 per minute of NELS, 102 birds per minute for NuTech/MAESTRO, and unlimited line
718 speed for HIMP. The average line inspector inspects about 35 carcasses a minute;
719 therefore, higher line speeds (except for HIMP) result from having more than one
720 inspector on a line with alternate carcass inspection.

721

722 The ISP codes taken from the PBIS database were tabulated monthly for all scheduled
723 procedures, unscheduled procedures, uncompleted procedures, and non-compliances for
724 each establishment. Scheduled procedures are assigned to each establishment’s shift
725 according to frequency of previous non-compliances by the automated PBIS management
726 system. Unscheduled procedures are performed according to in-establishment inspector
727 needs, and they typically involve regulatory inspection activities such as fecal checks for
728 zero-tolerance twice per line per shift in SIS and NELS establishments but at four times
729 that rate for HIMP establishments. Unscheduled procedures are also performed according
730 to unforeseen hazards, unsanitary conditions arising from Sanitation Standard Operating
731 Procedures (SSOP) failures, and PR/HACCP corrective actions. In addition, the numbers
732 of monthly scheduled procedures not performed and the total monthly number of non-
733 compliances were tabulated by ISP code.

734

735 The 6 ISP code activities were divided into procedure elements. Among the six general
736 procedure activities, 44 specific ISP procedure codes were used, including 5 Sanitation
737 codes, 11 PR/HACCP codes, 8 Economic/Wholesomeness codes, 5 Sampling codes, 3
738 Other Inspection Requirements codes, and 12 Emergency Activity codes. Sanitation
739 procedures are prefixed by “01” followed by “A” for procedure verification, “B” for
740 preoperational sanitation, and “C” for operational sanitation. Recorded ISP procedures
741 include “01” and “02” suffixes for verification methodology for monitoring, verification,
742 record keeping, corrective action, and reassessment requirements. The ISP codes for
743 Sanitation were 01A01, 01B01, 01B02, 01C01, and 01C02.

744

745 Similarly, PR/HACCP procedures are prefixed by “03” followed by “B” for raw ground
746 product, “C” for raw not ground product, “G” for fully cooked- not shelf stable, “H” for
747 heat-treated- not fully cooked, and “J” for slaughter. The ISP codes for PR/HACCP were
748 03A01, 03B01, 03B02, 03C01, 03C02, 03G01, 03G02, 03H01, 03H02, 03J01, and
749 03J02. The ISP codes for Economic/Wholesomeness are prefixed by “04” followed by
750 “A” for specific products suffixed by “02”, “03”, and “04” for product solution
751 formulation, comminuted and mechanically separated products, and battered products
752 respectively. The 04A01, 04A02, 04B01, 04B02, 04B03, and 04B04 ISP codes for
753 determining product meets standard, packaging/labeling standards, stated label net
754 weight, and product identification respectively were also included as was the 04C01 ISP
755 code for meeting product lot requirements. The “05” prefix was used for Sampling ISP
756 codes. The five codes used were 05A01 and 05A02 (establishment generic *Escherichia*
757 *coli* record review), 05A03 (raw product sampling for *Salmonella*), 05B02 (select

758 program requested samples and send to designated laboratory); and 05C01 (random
759 sample selection for residues).

760

761 The “06” prefix was used for “Other Inspection Requirements.” The three ISP codes
762 selected were 06A01 (compliance with export requirements), 06D01 (compliance with
763 sanitation performance standards), and 06D02 (random facility sanitation inspection
764 compliance). The twelve ISP codes used for “Emergency Activities” involving
765 biosecurity issues used the “08” prefix and the “S” activity code: 08S01, 08S03, 08S04,
766 08S05, 08S06, 08S07, 08S08, 08S09, 08S10, 08S11, 08S12, and 08S13. These codes
767 cover a wide variety of activities such as facility, personnel, equipment, ingredients, and
768 products checks for tampering, suspicious activity, and unusual circumstances.

769

770

771 To estimate the probability of *Salmonella* contamination from the observed prevalence
772 data, the beta distribution was used:

773

774

$$p = \text{Beta} (\alpha_1, \alpha_2)$$

775

776 where

777

778 α_1 = the number of *Salmonella*-positive samples +1

779 α_2 = the total number of samples – the number of *Salmonella*-positive samples + 1

780

781

782 Thus, for example, supposing that of 11 samples collected from an individual processing
783 establishment in a given month, 3 are *Salmonella*-positive, the probability of a
784 *Salmonella*-positive sample in future tests may then be described as

785

786

787

$$p = \text{Beta} (3 + 1, 11 - 3 + 1) = \text{Beta} (4, 9)$$

788

789

790 The more samples taken from an establishment in a single month, the tighter the beta
791 distribution will be for *Salmonella* prevalence estimate for that observation. For further
792 details, see Vose.¹⁴

793

794

INSPECTOR ASSIGNMENT PROFILE DATA

795

796 Assignment profiles for young chicken establishments came from the FSIS Office of
797 Field Operation’s Resource Management and Planning Staff. These data give the number
798 of FSIS inspectors assigned to on-line (OLS) and off-line (ISP) inspection activities
799 during calendar year 2005. In most cases, an individual inspector’s time in staff years
800 (SY) is allocated between OLS and ISP tasks. In a few cases, a portion of an inspector’s
801 time is allocated to other duties.

802

803 On-line inspectors conduct hands-on appraisals of every young chicken carcass to ensure
804 it is unadulterated. They make determinations about sorting and appropriate disposition
805 of carcasses for presence of feathers, bruises, or other quality issues, contamination, and
806 disease. Off-line inspectors verify that establishments maintain sanitary operations,
807 adhere to their HACCP plan(s), and perform other food safety-related assignments.

808
809 Under the current inspection system, there is approximately one off-line inspector for
810 every six on-line inspectors; but this ratio varies between establishment inspection types.
811 Under provisions of the proposed rule, the ratio of off-line to on-line inspectors will
812 increase. On-line inspectors will still conduct critical hands-on appraisals of every young
813 chicken carcass to ensure that adulterated or diseased carcasses receive appropriate
814 disposition. Establishment inspection personnel will complete much of the sorting and
815 disposition of carcasses prior to FSIS inspection. FSIS inspectors will still be responsible
816 for inspecting every carcass leaving the slaughter line.

817

818

MODEL DESCRIPTION

819

820 This analysis was based on estimating change in one observed variable (*Salmonella*
821 prevalence) as a function of other observed variables in the young chicken slaughter
822 establishment (structural parameters, number of inspectors, and various measurements of
823 completed/uncompleted PBIS procedures). Capturing these relationships allows the
824 prediction of how the dependent variable (*Salmonella* prevalence) changes in response to
825 increases or decreases in the independent decision variables (number of inspectors,
826 number of PBIS procedure tasks completed) based on the observed data.

827

828 There was variability associated with the relationship between observed prevalence and
829 chosen explanatory or dependent variables. This was expected, because prevalence
830 sampling results from each establishment respond differently to changes in dependent
831 variable values.¹⁴ This variability can be thought of as random variations around a
832 regression line – which are unknown. Uncertainty, in addition, still exists in a current
833 regression equation because the true values of relationship parameters are unknown.

834

835 To analyze this uncertainty while accounting for the observation-to-observation
836 variability, a least squares regression model can describe the relationship between
837 random observations of the dependent and independent variables together, assuming both
838 observations are drawn from approximate bivariate Normal distributions. Vose¹⁴
839 describes a non-parametric Bootstrap procedure that allows regression coefficients to be
840 collected as parameters in a bivariate Normal distribution. In this procedure, paired (or
841 combinations in the case of multiple parameter regression) observations of the dependent
842 and chosen independent variable at each Bootstrap replicate are resampled and the
843 regression coefficient recalculated. If P , *Salmonella* prevalence, represents a function of
844 prevalence for the dependent variable, and X the independent variable in the model, this
845 relationship for a single bootstrap can be represented as

846

847

$$P_i = \hat{b}_0 + \sum_h^{11} \hat{b}_{hi} * x_{hi} + \sum_j^{13} \hat{b}_{ji} * x_{ji} + \sum_k^{10} \hat{b}_{ki} * x_{ki} \quad (\text{Equation 1})$$

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where i represents the i th observation draw from a uniform distribution of observed combinations of prevalence and explanatory variables. Each observation represents the uncertainty estimate for establishment prevalence from microbial testing results for a 1-month period and the corresponding procedures done in that establishment during that month. Here, $h = 1$ to 11 representing 11 different structural variables describing that observation. Those 11 structural variables are described in Table 6 below. Similarly, $j = 1$ to 13 represents 13 different decision tracking variables combined with that monthly prevalence observation. Similarly, $k = 1$ to 10 represents 10 different performance deficiency tracking variables combined with that monthly prevalence observation. Those 23 decision/performance deficiency-tracking variables are described in Table 7 and Table 8 below. The intercept, b_0 , and the slope parameters (b_{hi} , b_{ji} , and b_{ki}), are estimated at each bootstrap iteration.

Table 6. Description of structural parameters in the FSIS risk assessment model for guiding public health-based poultry slaughter inspection.

Description	Code	Value
Dummy variable for observation occurring in year 2003	YR=2003	1 if YR=2003, 0 otherwise
Dummy variable for observation occurring in year 2005	YR=2005	1 if YR=2005, 0 otherwise
Dummy variable for observation occurring in 2nd quarter	Q=2	1 if Q=2, 0 otherwise
Dummy variable for observation occurring in 3rd quarter	Q=3	1 if Q=3, 0 otherwise
Dummy variable for observation occurring in 4th quarter	Q=4	1 if Q=4, 0 otherwise
Dummy variable for observation if a NELS (inspection type) establishment	NELS	1 if NELS, 0 otherwise
Dummy variable for observation if a HIMP (inspection type) establishment	HIMP	1 if HIMP, 0 otherwise
Dummy variable for observation if a SIS (inspection type) establishment	SIS	1 if SIS, 0 otherwise
Dummy variable for observation if a Nu-Tech (inspection type) establishment	Nu-Tech	1 if Nu-Tech, 0 otherwise
Dummy variable for observation if a MAESTRO (inspection type) establishment	MAESTRO	1 if MAESTRO, 0 otherwise
2004 annual volume of production in establishment (source: CY 2004 ADRS and eADRS, 09/01/05)	volume	Annual production

864 Table 7. Description of decision tracking parameters in the FSIS risk assessment model for guiding public health-based poultry
865 slaughter inspection.

Parameter Number	Description	Code	Source
1	Number of online inspectors	Online#	2005 inspector assignment profiles ¹
2	Number of offline inspectors	Offline#	2005 inspector assignment profiles ¹
3	Scheduled sanitation procedures	S-1	USDA/FSIS PBIS database (2003-2005)
4	Unscheduled sanitation procedures	U-1	USDA/FSIS PBIS database (2003-2005)
5	Scheduled PR/HACCP procedures	S-3	USDA/FSIS PBIS database (2003-2005)
6	Unscheduled PR/HACCP procedures	U-3	USDA/FSIS PBIS database (2003-2005)
7	Scheduled wholesomeness procedures	S-4	USDA/FSIS PBIS database (2003-2005)
8	Unscheduled wholesomeness procedures	U-4	USDA/FSIS PBIS database (2003-2005)
9	Scheduled sampling procedures	S-5	USDA/FSIS PBIS database (2003-2005)
10	Unscheduled sampling procedures	U-5	USDA/FSIS PBIS database (2003-2005)
11	Other scheduled inspection requirement procedures	S-6	USDA/FSIS PBIS database (2003-2005)
12	Unscheduled other inspection requirement procedures	U-6	USDA/FSIS PBIS database (2003-2005)
13	Unscheduled emergency/biosecurity procedures	U-8	USDA/FSIS PBIS database (2003-2005)

866 ¹2005 inspector assignment profiles were used as a proxy for current inspector numbers.
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872

873 Table 8. Description of performance deficiency tracking parameters in the FSIS risk assessment model for guiding public health-
 874 based poultry slaughter inspection.

Parameter Number	Description	Code	Source
1	Uncompleted sanitation procedures	B-1	USDA/FSIS PBIS database (2003-2005)
2	Non compliances for scheduled sanitation procedures	NC-1	USDA/FSIS PBIS database (2003-2005)
3	Uncompleted PR/HACCP procedures	B-3	USDA/FSIS PBIS database (2003-2005)
4	Non compliances for PR/HACCP procedures	NC-3	USDA/FSIS PBIS database (2003-2005)
5	Uncompleted wholesomeness procedures	B-4	USDA/FSIS PBIS database (2003-2005)
6	Non compliances for wholesomeness procedures	NC-4	USDA/FSIS PBIS database (2003-2005)
7	Uncompleted sampling procedures	B-5	USDA/FSIS PBIS database (2003-2005)
8	Non compliances with sampling procedures	NC-5	USDA/FSIS PBIS database (2003-2005)
9	Uncompleted other inspection requirement procedures	B-6	USDA/FSIS PBIS database (2003-2005)
10	Non compliances for other inspection requirement procedures	NC-6	USDA/FSIS PBIS database (2003-2005)

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Transforming the Dependent Variables

878 Monthly *Salmonella* prevalence estimates are generated from sampling results in young
879 chicken slaughter establishments. To reflect uncertainty of the true prevalence rate for a
880 given establishment, month, and year, the Beta distribution is used. Thus, at each
881 bootstrap iteration the uncertainty function

882

$$883 \quad Y_i = \text{Beta}(\alpha_1, \alpha_2) \quad (\text{Equation 2})$$

884

885 where α_1 is number of positive samples plus 1, and α_2 is number of total samples minus
886 number of positives plus 1.

887

888 To evaluate the relationship in Equation 1 as a linear regression, the independent
889 variable, Y_i , is transformed using a logit transformation according to the following
890 formula¹⁵

891

$$892 \quad Z_i = \text{LN}(Y_i / (1 - Y_i)) \quad (\text{Equation 3})$$

893

894

895 This logit transformation of Y represents the dependent variable in each observation.

896

897

898

Simulation of Scenarios for Prevalence

899 Each bootstrap iteration in the risk assessment model drew 2,395 observations with
900 replacement from the data set of 154 establishments (2,395 observations in total).
901 Baseline estimates of *Salmonella* prevalence (still logit transformation) were determined
902 by multiplying each of the estimated coefficients by the mean values of the independent
903 variable:

904

905

$$906 \quad \hat{Z}_{iBASE} = \sum_h^{11} \hat{b}_{hi} * \bar{x}_{hi} + \sum_j^{23} \hat{b}_{ji} * \bar{x}_{ji} \quad (\text{Equation 4})$$

907

908

909 Note that the mean values of the independent variable change at each bootstrap iteration.
910 Similarly, scenario estimates of *Salmonella* prevalence were determined as follows

911

$$912 \quad \hat{Z}_k = \sum_h^{11} \hat{b}_{hi} * \bar{x}_{hi} + \sum_j^{23} (\hat{b}_{ji} * \bar{x}_{ji} + \hat{b}_{(k=j)l} * \gamma_k) \quad (\text{Equation 5})$$

913

914 where γ_k represents the “shock”^c to decision/performance deficiency tracking variable i .
 915 This only occurs for $k = j$. To measure differences in prevalence estimates between
 916 baseline and scenario run, the dependent variable estimates were re-transformed into
 917 prevalence as

918
 919
 920
$$\hat{Y}_{iBASE} = EXP(\hat{\gamma}_{iBASE}^0) / (1 + EXP(\hat{\gamma}_{iBASE}^0)) \quad (\text{Equation 6})$$

921
 922
 923 and similarly for the scenarios:

924
 925
 926
$$\hat{Y}_{ik} = EXP(\hat{\gamma}_{ik}^0) / (1 + EXP(\hat{\gamma}_{ik}^0)) \quad (\text{Equation 7})$$

927
 928
 929 Change in expected *Salmonella* prevalence brought about by the shock was expressed as
 930 percentage using the following formula:

931
 932
 933
$$\Delta_{ik} = (\hat{Y}_{ik} - \hat{Y}_{iBASE}) / \hat{Y}_{iBASE} \quad (\text{Equation 8})$$

934
 935
 936 These changes, Δ_{ik} , were simultaneously calculated for each scenario, and collected. The
 937 procedure described above was repeated for each bootstrap iteration run using the risk
 938 assessment model. Results reported were summarized from the collection of 20,000 risk
 939 assessment model iterations.

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THE SCENARIOS

945 Simultaneously at each bootstrap replicate, the baseline estimate for *Salmonella*
 946 prevalence was shocked for changes in each of the decision/performance deficiency
 947 tracking parameters independently. That shock file is described in Table 9. Each of these
 948 scenarios was implemented by evaluating each parameter estimate other than the decision
 949 parameter of interest at its mean value for each model iteration. The decision variable of
 950 interest was evaluated after shocking the mean value (Mean * shock). A difference
 951 between the scenario estimate of prevalence and the baseline estimate of prevalence
 952 captured the change in estimated prevalence that would be expected to be associated with
 953 those establishments where shock values were observed. These expected changes were
 954 captured at each bootstrap replicate. All scenarios depicted in Table 9, although chosen

^c Shock analysis is similar to sensitivity analysis, where a subgroup of all baseline parameter values in a quantitative model is changed or "shocked" to reflect a shift in baseline assumptions. Differences between baseline and shock outcomes are measured as scenario impacts from the "shock."

955 independently of the data, were later shown to be inside one standard deviation of the
 956 mean of the data for that respective parameter.^d
 957

958 Table 9. Description of shock file used for decision/performance deficiency tracking
 959 scenarios in the FSIS risk assessment model for guiding public health-based poultry
 960 slaughter inspection.

Number of Scenarios	Description of Scenarios
1	Baseline using data values from bootstrap draw
5	25% increase in each scheduled procedure: sanitation (S-1), PR/HACCP (S-3), wholesomeness (S-4), sampling (S-5), random facility sanitation (S-6)
5	50% increase in each unscheduled procedure: : sanitation (U-1), PR/HACCP (U-3), wholesomeness (U-4), sampling (U-5), random facility sanitation (U-6)
5	75% reduction in each uncompleted procedure: sanitation (B-1), PR/HACCP (B-3), wholesomeness (B-4), sampling (B-5), random facility sanitation (B-6)
5	75% reduction in non-compliances for each procedure: sanitation (NC-1), PR/HACCP (NC-3), wholesomeness (NC-4), sampling (NC-5), random facility sanitation (NC-6)

961

^d There was one exception found post-analysis. The S-1 shock was found to be just outside the mean value plus one standard deviation for the s-1 procedure observations.

MODELING ILLNESSES AVOIDED

Definitions

Y_{Base} is a random variable that describes uncertainty about average prevalence of *Salmonella* for the baseline (as is) scenario.

Y_k is a random variable that describes uncertainty about average prevalence of *Salmonella* for scenario k . Most of such scenarios involve reduced *Salmonella* prevalence.

Y_{Base} and Y_k are correlated random variables. Because both distributions are generated from the same data and regression model, the uncertainty about one is predictive of the uncertainty about the other.

R is a random variable of the ratio of prevalence in scenario k to prevalence in the baseline scenario (i.e. $R = \frac{Y_k}{Y_{Base}}$).

$P(ill | exposure)$ is the probability of illness given that a random person is exposed to a random contaminated serving. This probability describes the integration of the dose-response function with an exposure distribution that is truncated above zero. This exposure distribution essentially describes the frequency of dose levels given that a serving is contaminated.

V is the total number of servings of poultry consumed in one year.

λ_{ill} is the total number of *Salmonella* illness that occurs from consuming poultry per year.

If we assume the exposure distribution remains unchanged but prevalence of *Salmonella* on poultry was reduced from Y_{Base} to Y_k (where $Y_k < Y_{Base}$), then the reduction in human illnesses attributed to scenario k is:

$$IllnessesAvoided \approx Poisson((Y_{Base} - Y_k) \times V \times P(ill | exposure)) \quad (\text{Equation 9})$$

In this equation, we assume the variability in total human *Salmonella* cases attributed to poultry can be described as a Poisson process with an average number predicted by $Y_{Base} \times V \times P(ill | exposure) = \lambda_{ill}$. Therefore, if we already have a good estimate of λ_{ill} , then the reduction in human illnesses from scenario k is simply

999
$$Illnesses\ Avoided \approx Poisson\left(\left(1 - \frac{Y_k}{Y_{Base}}\right) \times \lambda_{Ill}\right) = Poisson((1 - R) \times \lambda_{Ill}) \quad (\text{Equation } 10)$$

1000

1001
$$Change\ in\ illnesses \approx (-)Poisson((1 - R) \times \lambda_{Ill}) \quad (\text{Equation } 11)$$

1002

1003 In this prediction of the number of illnesses avoided by scenario k , we have avoided any
1004 need for an exposure distribution or a dose-response function. The change in human
1005 illnesses is the negative of illnesses avoided (i.e., a negative value for the change signifies
1006 a reduction in human illnesses per year while a positive value signifies an increase in
1007 human illnesses).

1008

1009 Given our equation for prediction of illnesses avoided by scenario k , we must also
1010 consider the uncertainty about Y_{Base} , Y_k , and λ_{Ill} . Monte Carlo methods are needed to
1011 properly correlate Y_{Base} and Y_k in the calculation of the distribution of R . Similarly, Monte
1012 Carlo methods are needed to multiply $(1 - R)$ by λ_{Ill} . The resulting compound distribution
1013 can be used to determine our confidence about the number of illnesses avoided (e.g.,
1014 what percent of iterations result in the number of illnesses avoided greater than zero?).

1015

1016 In this approach, we have incorporated both the variability in illnesses per year – that is
1017 Poisson distributed – and the uncertainties about the parameter of the Poisson. To
1018 separate the effects of variability and uncertainty would require second-order modeling
1019 techniques. Nevertheless, the effect of the Poisson variability is not expected to influence
1020 substantially decisions about this model’s results. Therefore, second-order modeling is
1021 not done.

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Risk Characterization

1046 This chapter provides results from the FSIS risk assessment model for guiding public
1047 health-based poultry slaughter inspection and answers for the four risk management
1048 questions. The chapter then describes research needs identified during the assessment,
1049 and closes with some general conclusions.
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MODEL RESULTS

1052 The results of the risk assessment are shown in the following figures as cumulative
1053 frequency diagrams. It is important to understand that the values shown in the figures are
1054 not predictions per se, but rather, associations.
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Cumulative Frequency Diagrams

A cumulative frequency shows the number of observations above or below a particular point. Cumulative frequency diagrams give a visual overview of a distribution, which is often preferable to tables. When viewing these diagrams, keep in mind the following:

- The x-axis in figures 5-7 represents average prevalence level among all poultry slaughter plants.
- The cumulative frequency diagram represents uncertainty about what that average prevalence is and is based on 20,000 iterations of the model.
- The median for the distribution is determined by locating the point at which the data line crosses the 50% label on the vertical axis and then locating the corresponding value on the x axis

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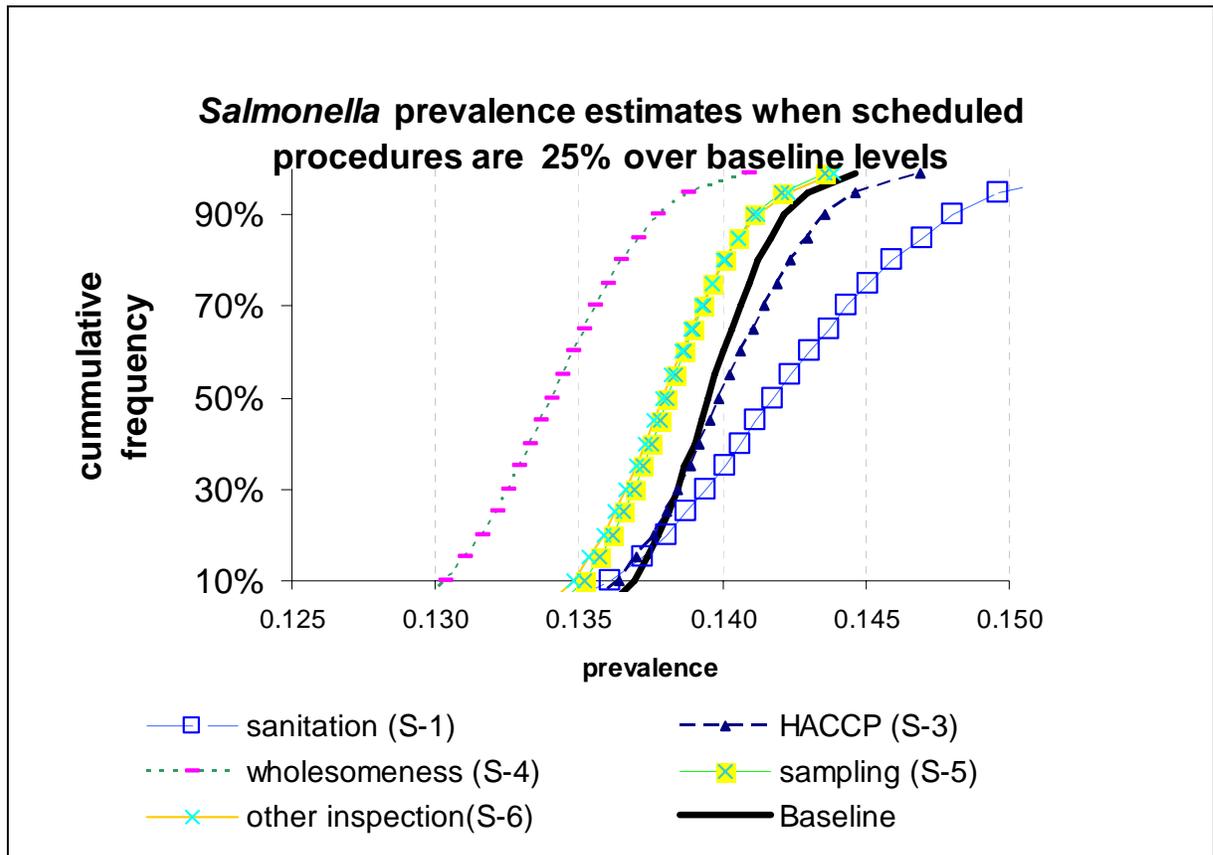
The first three figures on the following pages show associations between inspection activities within an establishment and prevalence of *Salmonella* on young poultry carcasses in establishments. The second group of figures shows associated estimates of changes in human illness associated with changes in selected activities inspection activities.

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Changes in *Salmonella* prevalence

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Increases in each of two scheduled procedures by 25% are associated with reduced *Salmonella* prevalence (Figure 2). An increase in scheduled wholesomeness (S-4) procedures by 25% is associated with lower *Salmonella* prevalence, at the mean value from 14% to 13.4%. An increase in scheduled sampling (S-5) procedures by 25% is associated with lower *Salmonella* prevalence, at the median value from 14% to 13.8%. Increases in other scheduled procedures, including scheduled PR/HACCP (S-3) procedures, scheduled sanitation procedures, and scheduled other inspection procedures are not associated with reduced *Salmonella* prevalence.



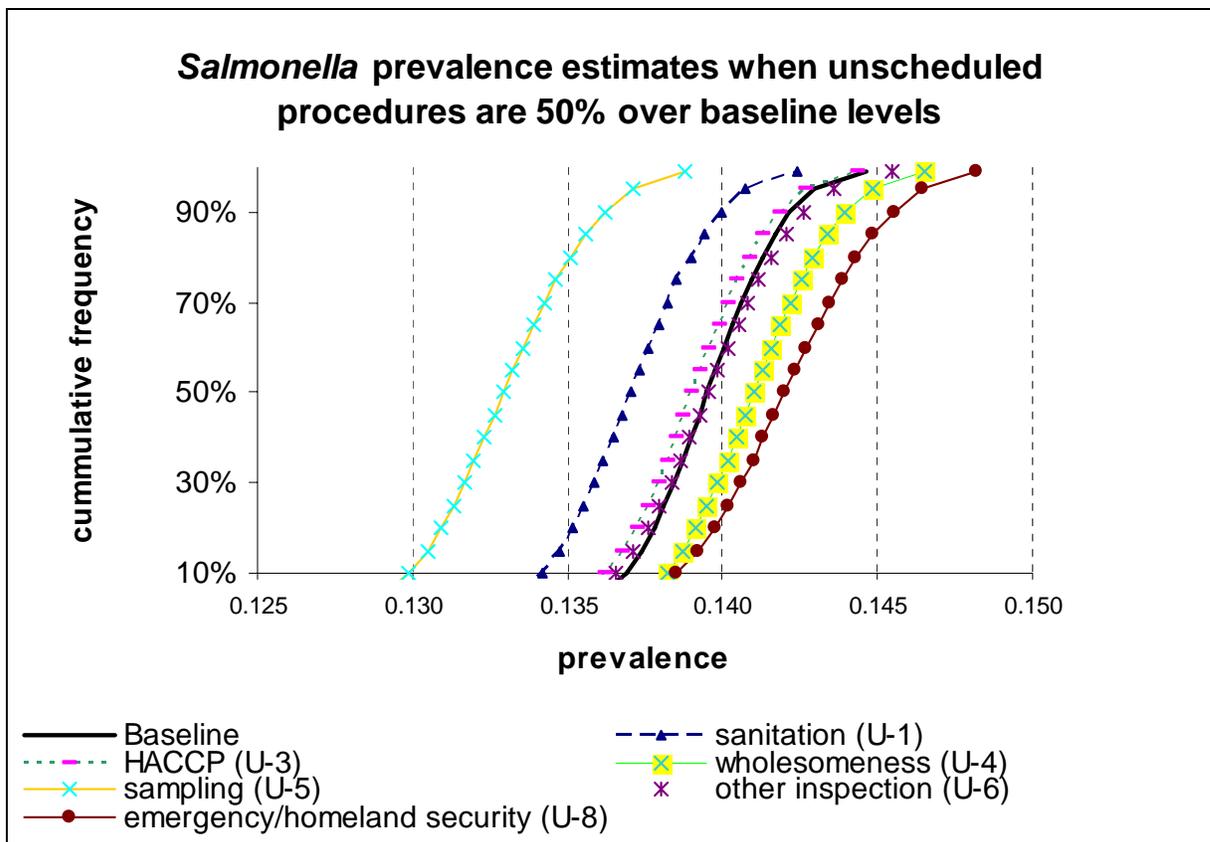
1078

1079 Figure 2. *Salmonella* prevalence on young chickens in slaughter establishments
 1080 associated with a 25% increase over baseline levels in scheduled procedures.

1081
 1082 The association between those establishments with 50% more unscheduled procedures
 1083 and *Salmonella* prevalence on young chickens in slaughter establishments is shown in
 1084 Figure 3. At the median value, increases in each of three scheduled procedures by 50%
 1085 are associated with lower *Salmonella* prevalence. An increase in sampling (U-5)
 1086 procedures by 50% is associated with lower *Salmonella* prevalence, at the mean from
 1087 14% to 13.3%. An increase in sanitation (U-1) procedures by 50% is associated with
 1088 lower *Salmonella* prevalence, at the mean from 14% to 13.7%. An increase in
 1089 unscheduled PR/HACCP (U-3) procedures is associated with small reductions in
 1090 *Salmonella* prevalence, at the mean from 14% to 13.9%.

1091
 1092 Increases in other unscheduled procedures - homeland security (U-8), wholesomeness
 1093 (U-4), or random facility sanitation (U-6) procedures – are not associated with lowered
 1094 *Salmonella* prevalence. A 50% increase in homeland security unscheduled procedures is
 1095 associated with an increase in mean *Salmonella* prevalence from 14% to 14.2%. A 50%
 1096 increase in wholesomeness unscheduled procedures is associated with an increase in
 1097 mean *Salmonella* prevalence from 14% to 14.1%. An increase in other inspection
 1098 unscheduled procedures by 50% is associated with no change in *Salmonella* prevalence.
 1099 Thus, based on uncertainty distributions, increases in two of six unscheduled procedures
 1100 will likely reduce *Salmonella* prevalence on young chickens in slaughter establishments.

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1104 Figure 3. *Salmonella* prevalence on young chickens in slaughter establishments
1105 associated with a 50% increase over baseline levels in unscheduled procedures.

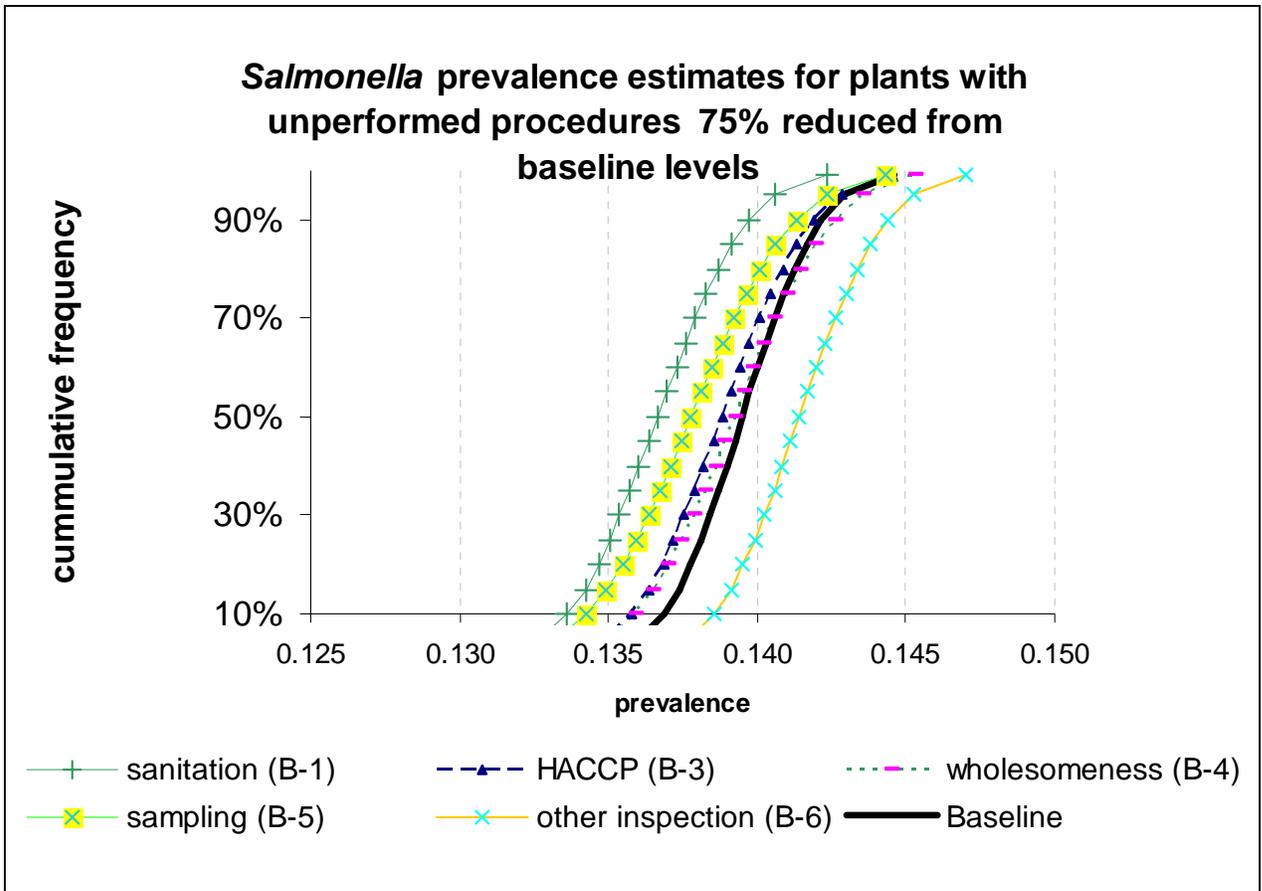
1106
1107 The association between those establishments with 75% more unperformed procedures
1108 and *Salmonella* prevalence on young chickens in slaughter establishments is shown in
1109 Figure 4. A decrease in each of three unperformed procedures by 75% is associated lower
1110 *Salmonella* prevalence. A decrease in unperformed sanitation (B-1) procedures by 75% is
1111 associated with lower *Salmonella* prevalence, at the mean from 14% to 13.7%. A
1112 decrease in unperformed sampling (B-5) procedures by 75% is associated with lower
1113 *Salmonella* prevalence, at the mean from 14% to 13.8%. A decrease in unperformed
1114 PR/HACCP (B-3) procedures by 75% is associated with lower *Salmonella* prevalence, at
1115 the mean from 14% to 13.9%.

1116
1117 Decreases in unperformed wholesomeness (B-4), or other facility sanitation (B-6)
1118 procedures are not associated with lower *Salmonella* prevalence.

1119
1120 One explanation for this is that inspection resources allow for maximum performance of
1121 sanitation S-1 and PR/HACCP S-3 procedures such that scheduling more procedures
1122 results in the same number performed since they are counted in with the two fecal checks
1123 per line per shift and the daily pre-operational and operational sanitation checks already
1124 performed. Similarly, because inspection resources are limited scheduling more sampling
1125 (S-5) or facility sanitation (S-6) procedures do not increase the total number of these
1126 procedures performed since the count will be moved from unscheduled procedures
1127 already being performed to the scheduled procedure category. On the other hand,
1128 scheduling more wholesomeness (S-4) procedures results in checks for parts and carcass
1129 defects and contamination at the pre-chill, post-chill, reconditioning, and quality control
1130 stations when resources allow these procedures to be performed. These can be looked
1131 upon as additional zero tolerance fecal checks that decrease the prevalence by increasing
1132 the total number of PR/HACCP-like (S-3) procedures. Because of plant management
1133 awareness for passing fecal checks and pre-operational and operational sanitation
1134 procedures which are heavily weighted in the (S-1) and (S-3) procedures, the results are
1135 biased. The prevalence associated with these categories cannot be decreased because the
1136 maximum number of procedures is already being performed and passed. By scheduling
1137 more procedures in a different category that can have the same effect, a significant net
1138 decrease in prevalence is seen due to the wholesomeness (S-4) category.

1139
1140 Thus, decreasing three of five unperformed procedures will likely reduce *Salmonella*
1141 prevalence on young chickens in slaughter establishments. As shown in Figure 4, at the
1142 90th percentile of the uncertainty distribution, these results hold.

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1146 Figure 4. *Salmonella* prevalence on young chickens in slaughter establishments
 1147 associated with a 75% decrease in unperformed procedures.

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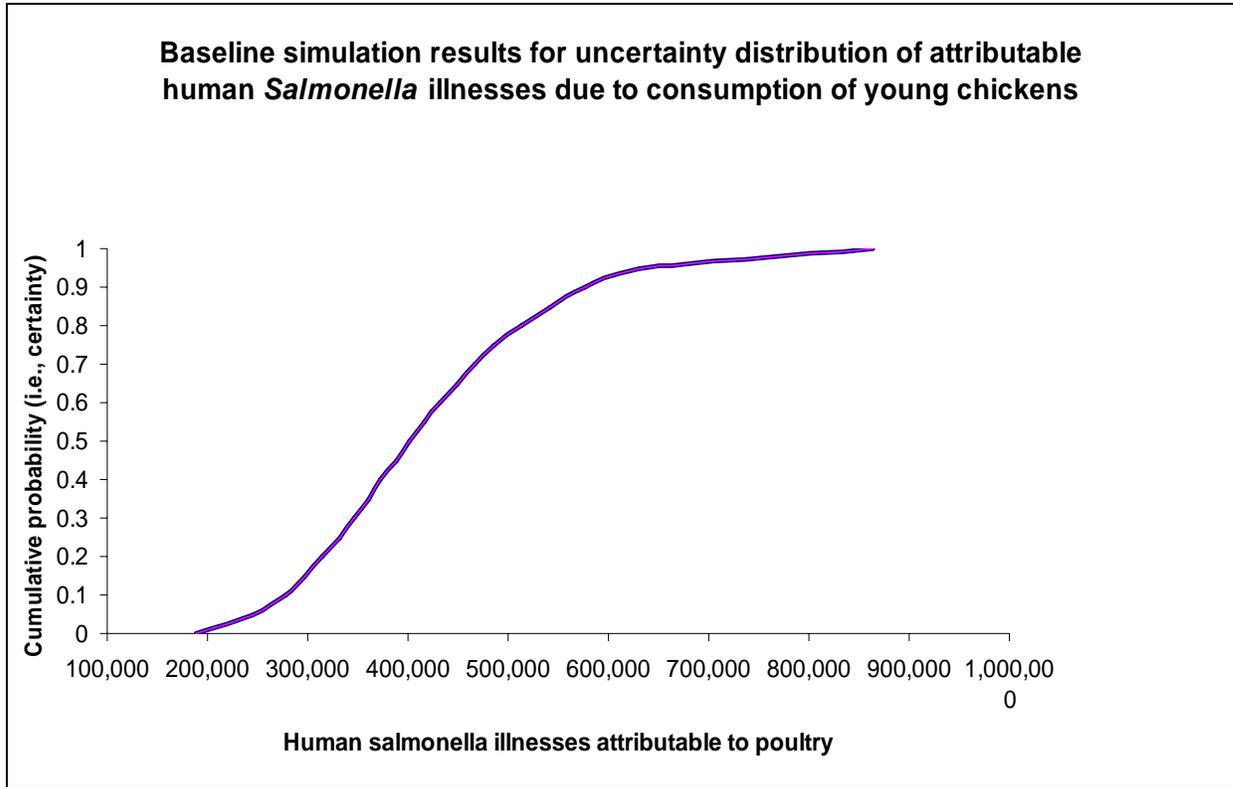
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Changes in Human Illness

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1152 Simulation results describing the uncertainty distribution for baseline human illnesses
 1153 attributable to consumption of young chickens are shown in Figure 5. With a mean
 1154 expected value of 420,000 attributable illnesses, we are 90% confident that the true
 1155 number of human *Salmonella* illnesses attributable to young chickens will be less than
 1156 583,000.

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1159 Figure 5. Baseline simulation results for uncertainty distribution of attributable human
1160 *Salmonella* illnesses due to consumption of young chickens.

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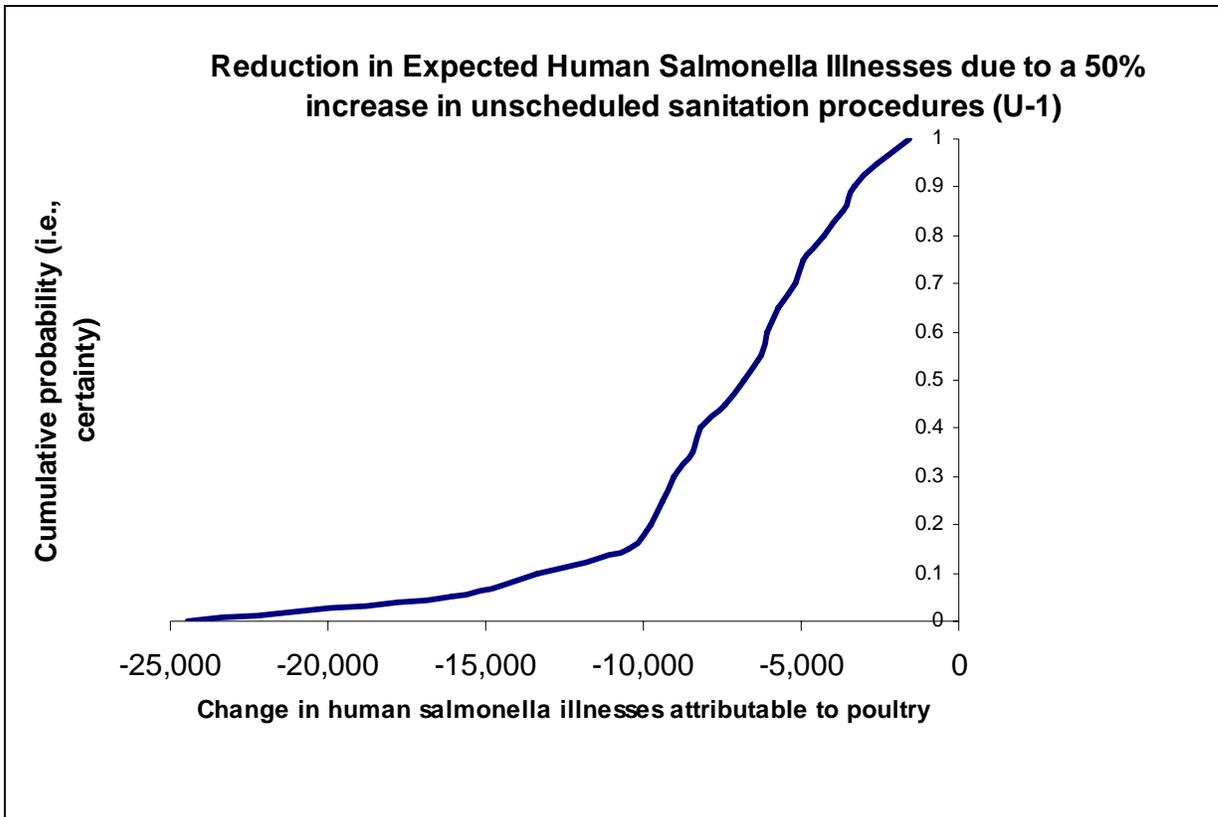
1162 Six scenarios were modeled out to human illness impact based on changes in microbial
1163 contamination in the plants. Other scenarios tried provided no additional information
1164 when modeled out to human illness due to a combination of insignificant changes in
1165 microbial contamination (see Figure 6 through Figure 11) and uncertainty about estimates
1166 of attributable human illness.

1167

1168 ***A 50% increase in UNSCHEDULED SANITATION procedures (U-1)***

1169 Figure 6 shows the uncertainty distribution for the expected change in human illnesses
1170 due to a 50% increase in all unscheduled sanitation procedures across all young chicken
1171 slaughter establishments. Over 95% of all iterations with the model show expected
1172 reduction in human *Salmonella* illnesses, with an average reduction of 7,573 illnesses.
1173 The 90th percentile of the uncertainty distribution is a reduction of 3,302 illnesses.

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1175

1176 Figure 6. Reduction in Expected Human *Salmonella* Illnesses due to a 50% increase in
 1177 unscheduled sanitation procedures (U-1).

1178

1179 ***A 50% increase in UNSCHEDULED SAMPLING procedures (U-5)***

1180 Figure 7 shows the uncertainty distribution for the expected change in human illnesses
 1181 due to a 50% increase in all unscheduled sampling procedures across all young chicken
 1182 slaughter establishments. Over 95% of all iterations with the model show expected
 1183 reduction in human *Salmonella* illnesses, with an average reduction of 19,779. The 90th
 1184 percentile of the uncertainty distribution is a reduction of 10,865 illnesses.

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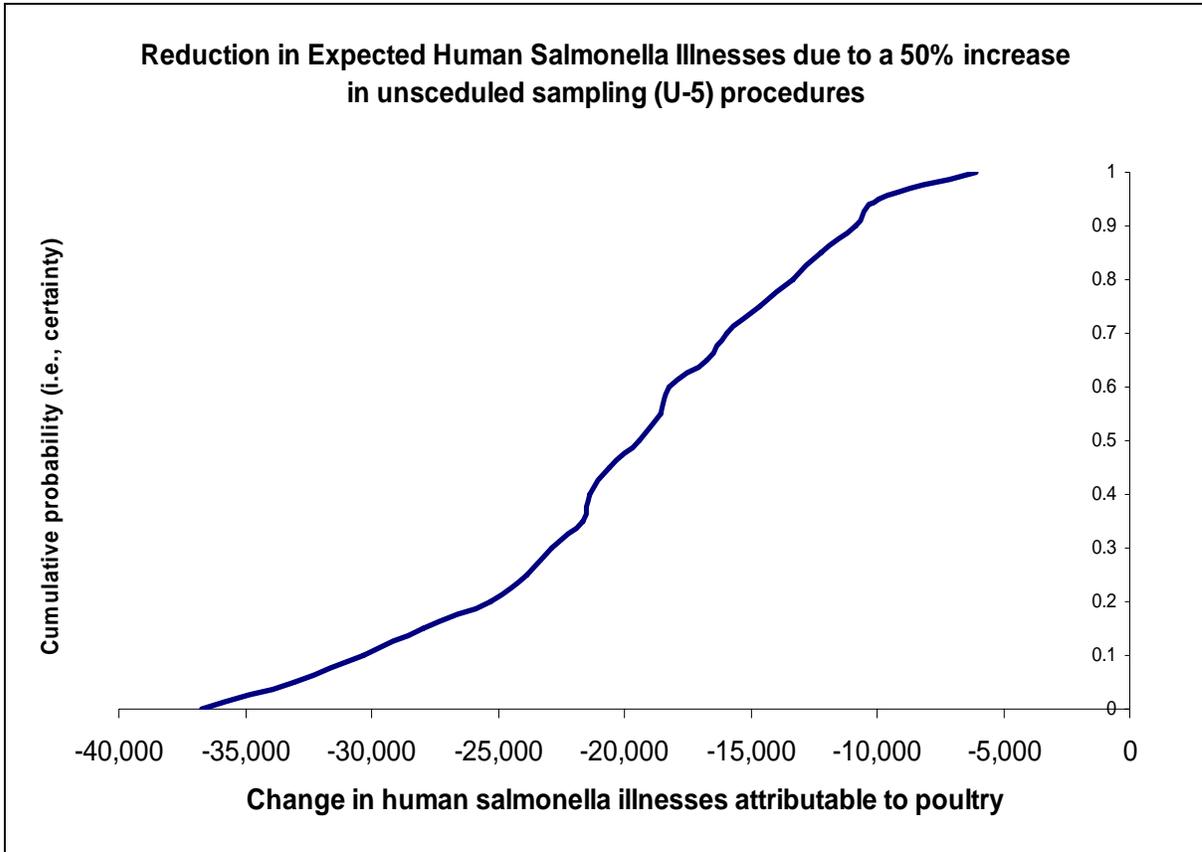
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1193 Figure 7. Reduction in Expected Human *Salmonella* Illnesses due to a 50% increase in
1194 unscheduled sampling (U-5) procedures.

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1196 ***A 75% decrease in UNPERFORMED SAMPLING procedures (B-5)***

1197 Figure 8 shows the uncertainty distribution for the expected change in human illnesses
1198 due to a 75% decrease in all unperformed sampling procedures across all young chicken
1199 slaughter establishments. Over 80% of all iterations with the model show expected
1200 reduction in human *Salmonella* illnesses, with an average reduction of 5,482 illnesses.
1201 The 90th percentile of the uncertainty distribution, however, shows an increase of 1,725
1202 illnesses.

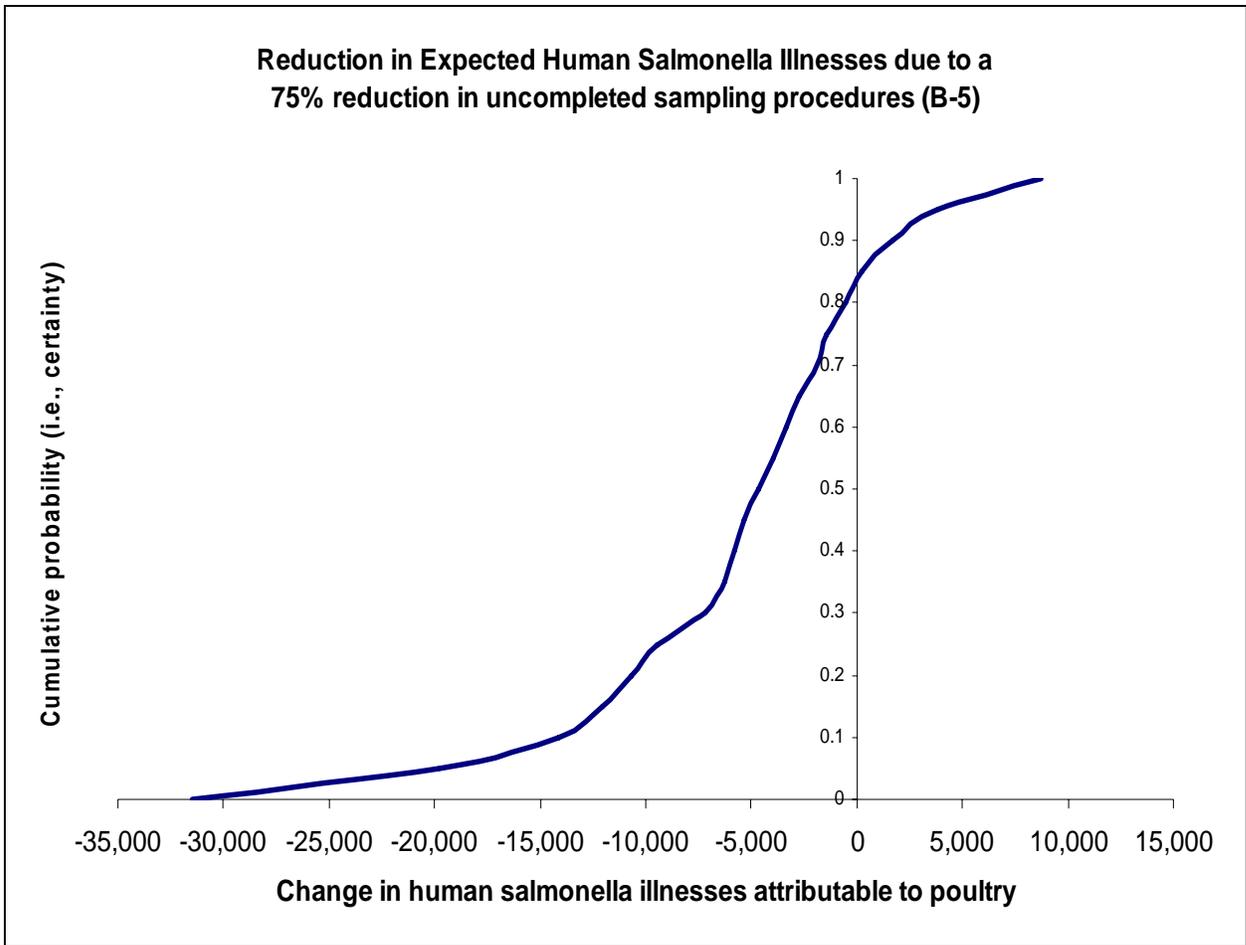
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1209 Figure 8. Reduction in Expected Human *Salmonella* Illnesses due to a 75% reduction in
1210 uncompleted sampling procedures (B-5).

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1212 ***A 75% decrease in UNPERFORMED HACCP procedures (B-3)***

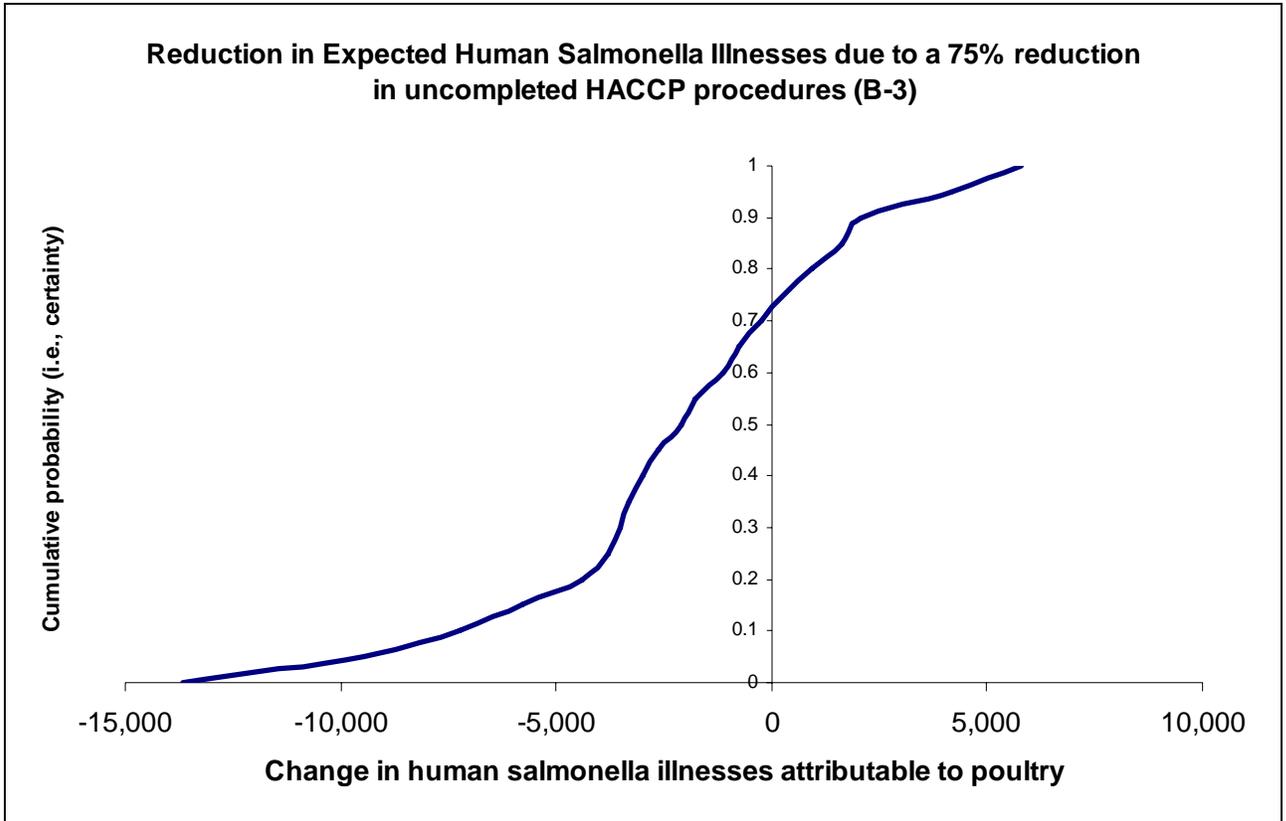
1213 Figure 9 shows the uncertainty distribution for the expected change in human illnesses
1214 due to a 75% decrease in unperformed HACCP procedures across all young chicken
1215 slaughter establishments. Over 70% of all iterations with the model show expected
1216 reduction in human *Salmonella* illnesses, with an average reduction of 2,060 illnesses.
1217 The 90th percentile of the uncertainty distribution, however, shows an increase of 2,064
1218 illnesses.

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1224 Figure 9. Reduction in Expected Human *Salmonella* Illnesses due to a 75% reduction in
1225 uncompleted HACCP procedures (B-3).

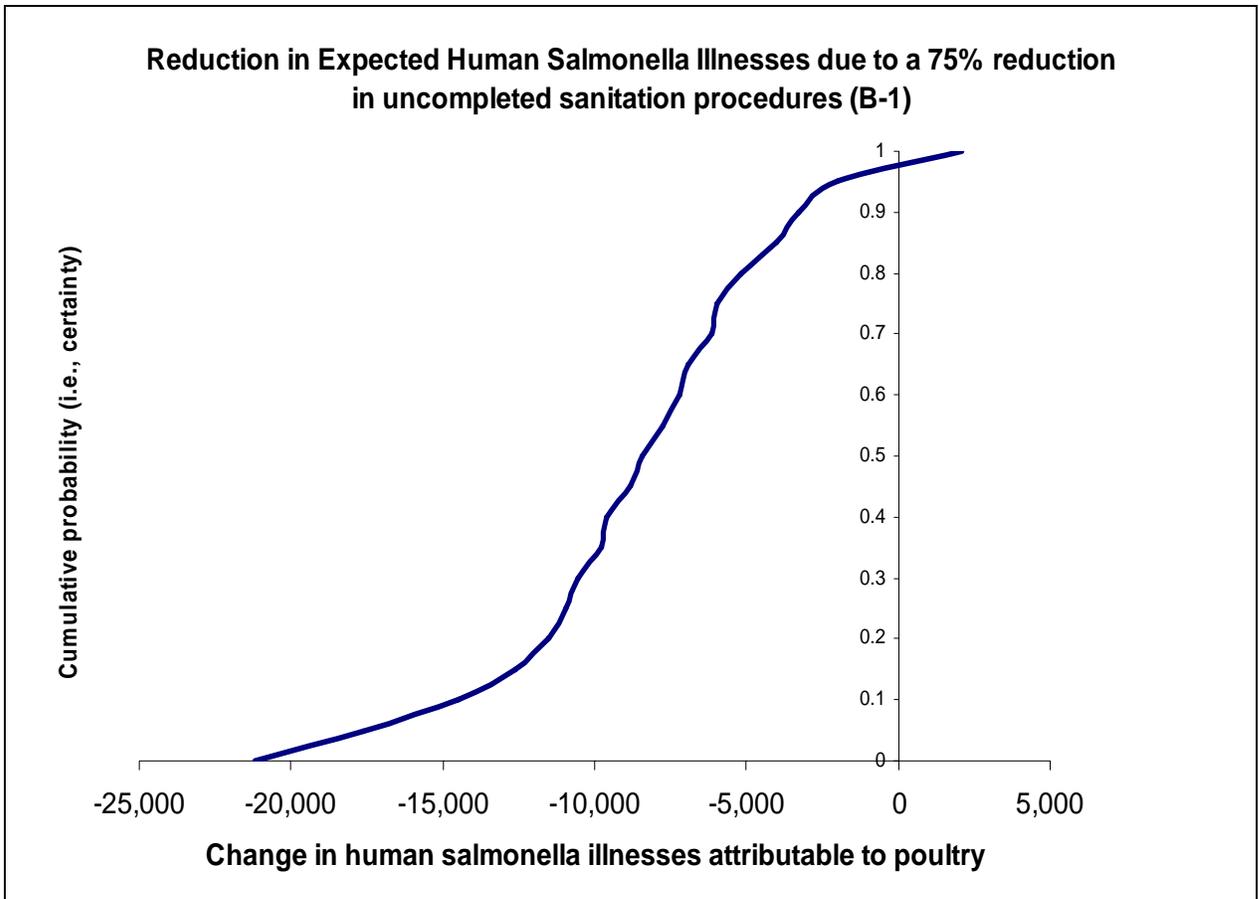
1226

1227 ***A 75% decrease in UNPERFORMED SANITATION procedures (B-1)***

1228 Figure 10 shows the uncertainty distribution for the expected change in human illnesses
1229 due to a 75% decrease in unperformed sanitation procedures across all young chicken
1230 slaughter establishments. Over 95% of all iterations with the model show expected
1231 reduction in human *Salmonella* illnesses, with an average reduction of 19,594. The 90th
1232 percentile of the uncertainty distribution shows a reduction of 8,592 illnesses.

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1236 Figure 10. Reduction in Expected Human *Salmonella* Illnesses due to a 75% reduction
 1237 in uncompleted sanitation procedures (B-1).

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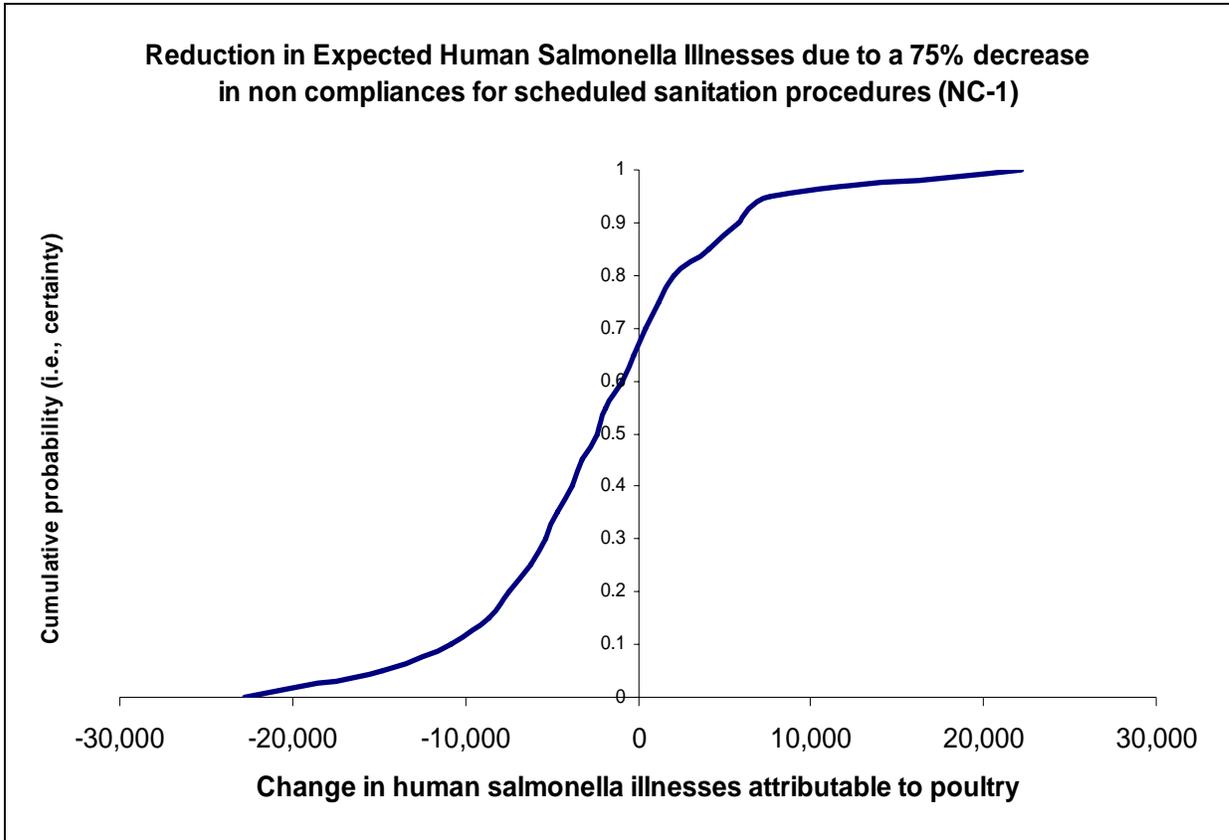
1239 ***A 75% decrease in NON COMPLIANCES for SANITATION procedures (NC-1)***

1240 Figure 11 shows the uncertainty distribution for the expected change in human illnesses
 1241 due to a 75% decrease in non-compliances (NRs) for sanitation procedures across all
 1242 young chicken slaughter establishments. Over 65% of all iterations with the model show
 1243 expected reduction in human *Salmonella* illnesses, with an average reduction of 2,321.
 1244 The 90th percentile of the uncertainty distribution, however, shows an increase of 6,000
 1245 illnesses.

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1250 Figure 11. Reduction in Expected Human *Salmonella* Illnesses due to a 75% decrease
1251 in non-compliances for scheduled sanitation procedures (NC-1).

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1253 **RISK ASSESSMENT FINDINGS IN RESPONSE TO RISK MANAGEMENT**
1254 **QUESTIONS**

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1256 The following is a summary of responses to FSIS risk management questions based on
1257 the findings of this risk assessment:

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- Can FSIS reallocate inspection activities in young chicken slaughter establishments without significant negative impact on microbial prevalence in the establishments?

Yes, risk assessment model results using available data from 154 young chicken slaughter establishments show that reallocating some on-line inspectors to off-line inspection duties (replacing some online inspector with establishment personnel) could be more effective at reducing *Salmonella* prevalence in establishments.

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Establishments with more off-line inspectors have lower *Salmonella* prevalence than establishments with fewer off-line inspectors.

- How will the relocation of on-line inspectors to off-line duties, or other areas within or outside the establishment, effect human illness?

This analysis suggests a high probability that *Salmonella* attributable illnesses could decline or remain the same when additional off-line inspection procedures are performed. Both increases in unscheduled sanitation procedures and increases in unscheduled sampling procedures, as well as reducing the number of unperformed sanitation procedures are associated with decreases in attributable human *Salmonella* illnesses with 90% or higher certainty. Other off-line duties, such as reducing the number of unperformed sampling, and HACCP procedures, may also reduce attributable human *Salmonella* illnesses, but we are less certain about these (85% and 70%, respectively).

- Where within the establishment can relocated inspection activities have the most impact toward reducing microbial prevalence and corresponding human illness?

Relocated inspectors can have the most impact on reducing prevalence and illness by performing increased unscheduled sampling procedures (U-5) and increased unscheduled sanitation procedures (U-1). In addition, a reduction in uncompleted sanitation procedures (B-1) can lower *Salmonella* prevalence and illness.

- What is the uncertainty about these effects?

Uncertainty in establishment-level *Salmonella* prevalence is accounted for using the mean of a Beta Inverse distribution incorporating available sampling data. Uncertainty in *Salmonella* prevalence across all young chicken slaughter plants is modeled using a bootstrap simulation analysis. Uncertainty about attributable human illness is based on the central limit theorem and is lognormal in shape. The uncertain relationship between attributable *Salmonella* human illness and *Salmonella* prevalence is represented by the Poisson distribution.

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DATA NEEDS

The model described in this report used FSIS microbiological data for *Salmonella* prevalence. As such, when estimating human illnesses, it was not possible to use a dose-response function. Use of a dose-response requires enumeration data for *Salmonella* on young poultry at slaughter. These data should be forthcoming following completion of future FSIS microbiological baseline sampling programs. In addition to qualitative and quantitative microbiological data for *Salmonella*, FSIS baseline sampling programs will provide prevalence and enumeration data for *Campylobacter* and *E. coli*, which will be used in a future version of this risk assessment model.

Second, additional data that provide further discrimination of *Salmonella* isolates should be collected. Examples of these data include serotype results, antimicrobials susceptibility profiles, and pulsed field gel electrophoresis (PFGE) patterns. This type of additional discrimination of isolates will allow for more precise results from future risk assessments for *Salmonella* attributable illness.

Third, additional collaborative studies with the Agricultural Research Service (ARS) to study 20 HIMP plants used in this risk assessment are planned and will provide additional prevalence and enumeration data for contamination on chicken carcasses at rehang and post-chill locations for *Salmonella* serotypes, *Campylobacter*, and generic *E. coli*. Additional data on new variables such as line speed will also be collected.

Fourth, a study by the Research Triangle Institute (RTI), in which FSIS young chicken data and an RTI-administered questionnaire on plant characteristics associated with *Salmonella*-positive cultures from 221 establishments are being analyzed, is nearing completion. The results of this analysis can provide support to the risk assessment model. Preliminary analysis for predictive *Salmonella* risk factors using classification and regression trees (CART) and factor analysis found facility sanitation (S-6), sanitation (S-1), PR/HACCP (S-3), and establishment size (slaughter totals, number of employees, and total sales) to be significant risk factors. Additional risk factors not included in this study were identified to be production area older than 20 years, number of employees, percent quality assurance trained employees, number of inspected plants owned, and the amount of raw poultry from outside sources to be significant. Examination of these additional risk factors using the risk assessment model seems warranted.

CONCLUSION

The results of this risk assessment suggest that FSIS can reallocate resources to further strengthen young chicken slaughter inspection, and subsequently, reduce illness and protect public health. Additional data, most importantly *Salmonella* enumeration data, will provide valuable data used to develop future version of this model to provide greater certainty in model estimates of the impact between allocation of inspection resources and reductions in human cases of salmonellosis attributable to young poultry.

Appendix I: Dependent and Independent Variable Distributions

DISTRIBUTION EVALUATION

The Vose model used for this analysis was the multivariate analog of a simple linear regression model evaluating population parameters of interest.¹⁴ A bivariate normal distribution was assumed to apply to the dependent and independent variable in the simple regression model. The multivariate regression model also assumed bivariate normality between all pairs of variates. In fact, the joint distribution implied by the regression model is termed a multivariate normal distribution. In this risk assessment, categorical or structural variables were included in the regression equation. This in effect created partitions of the dependent and independent variable pairs, which stratified the data according to the structural variables in the model. In effect, subsets of multivariate normal variables were created that had to be evaluated separately if the distributions within categories were shown to be substantially different. Without very large datasets, joint normality is difficult to demonstrate statistically assuming no stratification. Given the modest amount of stratified data in this assessment, we attempted to evaluate each variable for univariate normality, bivariate normality, and multivariate joint normality using reasonably robust statistical methods.

Dependent Variable

The dependent variable was defined as the logit of *Salmonella* prevalence estimated by the beta cumulative distribution function. This was the variable analyzed for normality, although graphical output for evaluation uses the back transformed prevalence estimate as a percentage of the baseline prevalence. A linear relationship between the logit of the beta distribution *Salmonella* prevalence was assumed in the regression model with the independent variables in the equation. This was the dependent variable in the generalized logistic non-quantal regression model. There was only one dependent variable. In demonstrating bivariate or multivariate normality, the distinction between dependent and independent variables in the model is lost.

Independent Variables

There are 34 independent variables in the regression model: 11 structural, 13 decision tracking, and 10 performance deficiency variables. All the structural variables except volume, which is a continuous variable, were modeled as “dummy” variables. These are the categorical variables for years 2003, 2004, and 2005 and for the first, second, third, and fourth quarters of each year. Additionally, there are six plant category variables. Recall that dummy variables reduce the dimension of each of these respective variables by one, making a total of 10 dummy variables. Subsets created by these variables are of primary interest in performing bivariate and multivariate tests given the failure of non-

1407 partitioned tests to detect normality. The remaining 23 variables (13 decision tracking
1408 and 10 performance deficiency) were the object of the partitioned tests for normality. The
1409 primary dataset used or distribution analysis consisted of 25 variables. These were the 23
1410 decision tracking and performance deficiency variables plus the volume variable and the
1411 logit-dependent variable.
1412

1413 **Univariate Distribution Evaluation**

1414 Univariate tests were done first without stratification. Only the dependent variable was
1415 transformed as required by the regression model. The natural scales of the independent
1416 variables were preserved without transformation to interpret the results easily. Normal
1417 probability plots were generated for each dependent and independent variable using the
1418 descriptive statistics routine in the Number Cruncher Statistical Systems 2004 version
1419 software.¹⁷ This graph plots the original data points falling near the normal probability
1420 line with 95% confidence bands. Points falling outside the bands were considered suspect
1421 outliers if the following tests for univariate normality were failed. The probability level
1422 was found from the X^2 distribution with two degrees of freedom. The univariate test
1423 failure was set at $p < 0.10$. Confidence in declaring a variable to have a normal distribution
1424 was gained for variables having an alpha probability greater than 0.05 by examining the
1425 results of the probability plot in conjunction with seven tests for normality employed in
1426 the NCSS software¹⁷ available in the normality test section. These tests were Shapiro-
1427 Wilk, Anderson-Darling, Martinez-Inglewicz, Kolmogorov-Smirnov, D'Agostino
1428 Skewness, D'Agostino Kurtosis, and the D'Agostino Omnibus test.¹⁸ Variables that
1429 failed all tests were considered not to have a normal distribution.
1430

1431 Table AI-1 shows the results for seven univariate tests for normality for the variables
1432 evaluated. Variables S8 and B8 did not have sufficient data to evaluate. The non-logit
1433 transformed beta function variable was included along with the logit transformed beta
1434 function. Note that very few variables passed these tests at the $p = 0.10$ level. Note also
1435 that none of these tests considered stratification. Redundant values were problematic for
1436 all variables, but particular trends were not found. According to this analysis, only the
1437 variables for volume, On, NC-5, B-6, and NC-8 could likely be used in the simple non-
1438 stratified regression model without transformation. Variables demonstrating non-normal
1439 distribution behavior are not likely to have bivariate normal distributions. The overall
1440 accept rate for this table was 2.3%, calculated as the number of tests passed out of the
1441 total performed.
1442

1443 **Levels of Stratification**

1444 The regression model was parameterized to account for stratification for calendar years
1445 2003, 2004, and 2005. Years were further stratified by first, second, third, and fourth.
1446 These first two levels of stratification account for 3 x 4 partitions making 12 primary
1447 levels. Secondly, the model was stratified within quarters for establishment inspection
1448 types of HIMP, MAESTRO, MIXED, NELLS, NU-TECH, and SIS. These additional
1449 levels of stratification provided 12 x 6 partitions, for a total of 72 levels. Stratum levels

1450 were numbered 1 to 71 in Tables AI-4 and AI-6 because one level of the NU-TECH
 1451 inspection system was missing from the first quarter of 2003.

1452 **Univariate Tests within Strata**

1453
 1454 Each level of stratification was evaluated using the univariate statistics as before. Table
 1455 AI-2 shows the results of the same seven tests as Table AI-1 for the same variable list
 1456 stratified by years with three levels per variable. A reject, however, was recorded if all
 1457 tests were failed and an “accept” was recorded if at least one test was passed. The overall
 1458 accept rate for this table was 32.1%. Variables passing the test for normality in one or
 1459 more years were Volume, On, S-1, S-3, S-4, S-5, NC-5, S-6, B-6, U-8, NC-8, and Logit.
 1460 Table AI-3 lists the results for the same univariate tests recorded as in Table AI-2, except
 1461 that the stratification is by year and quarter with twelve levels per variable. All variables
 1462 in this table passed all or some of the stratified tests for normality, except variables U-1,
 1463 NC-1, B-3, NC-4, U-6, and NC-6. The overall accept rate for this table was 42.9%. It was
 1464 decided that further univariate tests would be conducted in conjunction with the tests for
 1465 bivariate and multivariate normality because these tests would be constructed using the
 1466 same statistics as described below in Appendix III. Table AI-4 shows the results of the
 1467 univariate S-B tests that were used in the bivariate and multivariate normal tests. The
 1468 overall accept rate for this table was 64.9%.
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1470 Table AI-1. Univariate non-stratified test results for normality – 2.3% accept rate.

Test*	Beta	Volume	On	Off	S1	U1	B1
Shapiro-Wilk	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Anderson-Darling	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Martinez-Inglewicz	Reject	Accept	Accept	Reject	Reject	Reject	Reject
Kolmogorov-Smirnov	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Skewness	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Kurtosis	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Omnibus	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Distinct Values of 1519	123	156	35	14	74	51	51
	NC1	S3	U3	B3	NC3	S4	U4
Shapiro-Wilk	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Anderson-Darling	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Martinez-Inglewicz	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Kolmogorov-Smirnov	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Skewness	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Kurtosis	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Omnibus	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Distinct Values of 1519	68	186	508	53	45	173	225
	B4	NC4	S5	U5	B5	NC5	S6
Shapiro-Wilk	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Anderson-Darling	Reject	Reject	Reject	Reject	Reject	Accept	Reject
Martinez-Inglewicz	Reject	Reject	Reject	Reject	Reject	Accept	Reject
Kolmogorov-Smirnov	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Skewness	Reject	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Kurtosis	Reject	Reject	Accept	Reject	Reject	Reject	Reject
D'Agostino Omnibus	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Distinct Values of 1519	73	38	32	66	19	3	44

	U6	B6	NC6	U8	NC8	logit
Shapiro-Wilk	Reject	Reject	Reject	Reject	Reject	Reject
Anderson-Darling	Reject	Reject	Reject	Reject	Accept	Reject
Martinez-Inglewicz	Reject	Accept	Reject	Accept	Accept	Reject
Kolmogorov-Smirnov	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Skewness	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Kurtosis	Reject	Reject	Reject	Reject	Reject	Reject
D'Agostino Omnibus	Reject	Reject	Reject	Reject	Reject	Reject
Distinct Values of 1519	215	12	50	115	7	123

1471 *For a description of the tests, see Shenton and Bowman.¹⁸

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1473 Table AI-2. Univariate test results for stratification by years only – 32.1% accept
1474 rate.

	Beta	Volume	On	Off	S1	U1	B1
2003	Reject	Accept	Accept	Reject	Accept	Reject	Reject
Distinct Values of 1519	77	125	33	14	48	85	38
2004	Reject	Accept	Accept	Reject	Accept	Reject	Reject
Distinct Values of 1519	92	138	33	14	42	87	37
2005	Reject	Accept	Accept	Reject	Reject	Reject	Reject
Distinct Values of 1519	98	152	35	14	47	85	34
	NC1	S3	U3	B3	NC3	S4	U4
2003	Reject	Reject	Reject	Reject	Reject	Accept	Reject
Distinct Values of 1519	46	124	154	38	32	118	123
2004	Reject	Accept	Reject	Reject	Reject	Accept	Reject
Distinct Values of 1519	46	126	232	36	33	120	142
2005	Reject	Reject	Reject	Reject	Reject	Reject	Reject
Distinct Values of 1519	55	140	366	40	38	124	160
	B4	NC4	S5	U5	B5	NC5	S6
2003	Reject	Reject	Reject	Reject	Reject	Accept	Accept
Distinct Values of 1519	36	28	29	52	15	2	42
2004	Reject	Reject	Accept	Reject	Reject	Accept	Reject
Distinct Values of 1519	38	25	28	52	16	3	38
2005	Reject	Reject	Accept	Reject	Reject	Accept	Reject
Distinct Values of 1519	71	26	30	59	17	2	42
	U6	B6	NC6	U8	NC8	logit	
2003	Reject	Accept	Reject	Accept	Accept	Reject	
Distinct Values of 1519	122	10	34	19	1	77	
2004	Reject	Accept	Reject	Accept	Accept	Reject	
Distinct Values of 1519	135	11	32	19	2	92	
2005	Reject	Accept	Reject	Accept	Accept	Accept	
Distinct Values of 1519	151	8	42	108	7	98	

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Table AI-3. Univariate test results for stratification by years and quarters only - 42.9% accept rate.

Year	Quarter	Logit	Beta	Volume	On	Off	S1	U1
2003	Q1	Pass	Fail	Pass	Pass	Pass	Fail	Pass
2003	Q2	Pass	Fail	Pass	Pass	Pass	Pass	Fail
2003	Q3	Fail	Fail	Pass	Pass	Pass	Pass	Fail
2003	Q4	Fail	Fail	Pass	Pass	Fail	Pass	Fail
2004	Q1	Pass	Fail	Pass	Pass	Fail	Fail	Fail
2004	Q2	Pass	Fail	Pass	Pass	Pass	Fail	Fail
2004	Q3	Fail	Fail	Pass	Pass	Pass	Pass	Fail
2004	Q4	Fail	Fail	Pass	Pass	Pass	Fail	Fail
2005	Q1	Pass	Pass	Pass	Pass	Pass	Fail	Fail
2005	Q2	Pass	Pass	Pass	Pass	Pass	Pass	Fail
2005	Q3	Pass	Pass	Pass	Pass	Fail	Fail	Fail
2005	Q4	Pass	Fail	Pass	Pass	Fail	Pass	Fail
Total Pass		8	3	12	12	8	6	1
Total Fail		4	9	0	0	4	6	11
Year	Quarter	B1	NC1	S3	U3	B3	NC3	S4
2003	Q1	Fail	Fail	Pass	Pass	Fail	Fail	Fail
2003	Q2	Fail	Fail	Fail	Pass	Fail	Pass	Pass
2003	Q3	Pass	Fail	Pass	Fail	Fail	Fail	Fail
2003	Q4	Fail	Fail	Pass	Fail	Fail	Fail	Fail
2004	Q1	Fail	Fail	Pass	Fail	Fail	Fail	Pass
2004	Q2	Fail	Fail	Fail	Fail	Fail	Fail	Fail
2004	Q3	Fail	Fail	Pass	Fail	Fail	Fail	Pass
2004	Q4	Fail	Fail	Fail	Fail	Fail	Fail	Fail
2005	Q1	Fail	Fail	Pass	Fail	Fail	Fail	Fail
2005	Q2	Pass	Fail	Pass	Pass	Fail	Fail	Pass
2005	Q3	Fail	Fail	Pass	Fail	Fail	Fail	Pass
2005	Q4	Fail	Fail	Fail	Fail	Fail	Fail	Pass
Total Pass		2	0	8	3	0	1	6
Total Fail		10	12	4	9	12	11	6
Year	Quarter	U4	B4	NC4	S5	U5	B5	NC5
2003	Q1	Pass	Fail	Fail	Pass	Pass	Fail	Pass
2003	Q2	Fail	Fail	Fail	Pass	Pass	Fail	Pass
2003	Q3	Fail	Pass	Fail	Pass	Pass	Pass	Pass
2003	Q4	Fail	Fail	Fail	Fail	Pass	Fail	Pass
2004	Q1	Fail	Fail	Fail	Pass	Pass	Fail	Pass
2004	Q2	Fail	Fail	Fail	Pass	Fail	Fail	Pass
2004	Q3	Fail	Fail	Fail	Pass	Pass	Fail	Pass
2004	Q4	Fail	Fail	Fail	Fail	Pass	Fail	Pass
2005	Q1	Fail	Pass	Fail	Fail	Pass	Fail	Pass
2005	Q2	Pass	Fail	Fail	Pass	Fail	Fail	Pass
2005	Q3	Fail	Pass	Fail	Pass	Pass	Fail	Pass
2005	Q4	Fail	Fail	Fail	Pass	Fail	Fail	Pass
Total Pass		2	3	0	9	9	1	12
Total Fail		10	9	12	3	3	11	0
Year	Quarter	S6	U6	B6	NC6	U8	NC8	
2003	Q1	Pass	Fail	Fail	Fail	Pass	Pass	

2003	Q2	Fail	Fail	Pass	Fail	Pass	Pass
2003	Q3	Fail	Fail	Pass	Fail	Pass	Pass
2003	Q4	Fail	Fail	Pass	Fail	Pass	Pass
2004	Q1	Fail	Fail	Pass	Fail	Pass	Pass
2004	Q2	Pass	Fail	Fail	Fail	Pass	Pass
2004	Q3	Fail	Fail	Pass	Fail	Pass	Pass
2004	Q4	Fail	Fail	Fail	Fail	Pass	Pass
2005	Q1	Pass	Fail	Fail	Fail	Pass	Pass
2005	Q2	Pass	Fail	Pass	Fail	Pass	Pass
2005	Q3	Pass	Fail	Pass	Fail	Pass	Pass
2005	Q4	Pass	Fail	Pass	Fail	Pass	Pass
Total Pass		6	0	8	0	12	12
Total Fail		6	12	4	12	0	0

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1484 Table AI-4a. Univariate test results for year, quarter, and inspection system -
1485 64.9% accept rate.

Stratum	Logit	S-1	U-1	B-1	NC-1	S-3	U-3
1	Pass	Fail	Pass	Fail	Pass	Pass	Pass
2	Pass	Pass	Pass	Pass	Pass	Fail	Pass
3	Pass	Pass	Pass	Pass	Pass	Pass	Pass
4	Pass	Pass	Fail	Pass	Pass	Pass	Pass
5	Pass	Fail	Fail	Pass	Pass	Pass	Fail
6	Pass	Fail	Fail	Fail	Fail	Pass	Fail
7	Pass	Fail	Fail	Fail	Pass	Fail	Pass
8	Pass	Fail	Fail	Fail	Fail	Fail	Fail
9	Pass	Pass	Pass	Fail	Pass	Pass	Pass
10	Pass	Fail	Fail	Pass	Pass	Pass	Fail
11	Pass	Fail	Fail	Fail	Pass	Fail	Fail
12	Pass	Pass	Pass	Pass	Pass	Pass	Pass
13	Pass	Fail	Pass	Pass	Pass	Pass	Pass
14	Fail	Fail	Pass	Fail	Pass	Pass	Pass
15	Pass	Pass	Fail	Fail	Pass	Pass	Fail
16	Pass	Fail	Pass	Fail	Pass	Pass	Fail
17	Fail	Fail	Fail	Fail	Pass	Fail	Fail
18	Pass	Fail	Fail	Pass	Pass	Pass	Fail
19	Fail	Fail	Fail	Pass	Fail	Fail	Pass
20	Pass	Fail	Pass	Fail	Pass	Fail	Pass
21	Pass	Fail	Fail	Fail	Pass	Fail	Pass
22	Pass	Fail	Fail	Fail	Pass	Pass	Pass
23	Fail	Fail	Fail	Fail	Fail	Fail	Fail
24	Pass	Fail	Pass	Fail	Pass	Pass	Pass
25	Pass	Fail	Pass	Fail	Pass	Pass	Pass
26	Pass	Fail	Pass	Fail	Pass	Fail	Pass
27	Pass	Pass	Fail	Fail	Pass	Fail	Pass
28	Pass	Pass	Pass	Pass	Fail	Pass	Fail
29	Pass	Fail	Fail	Fail	Pass	Fail	Fail

30	Pass	Fail	Fail	Pass	Pass	Pass	Fail
31	Pass	Fail	Pass	Fail	Fail	Fail	Pass
32	Pass	Pass	Pass	Fail	Pass	Fail	Fail
33	Pass	Pass	Fail	Fail	Pass	Pass	Pass
34	Pass	Pass	Pass	Fail	Pass	Pass	Pass
35	Pass	Fail	Fail	Fail	Fail	Fail	Pass
36	Pass						
37	Fail	Fail	Fail	Pass	Pass	Fail	Pass
38	Pass	Fail	Pass	Pass	Pass	Fail	Pass
39	Pass	Fail	Pass	Pass	Pass	Fail	Pass
40	Pass	Pass	Fail	Pass	Pass	Pass	Pass
41	Pass	Fail	Fail	Pass	Pass	Fail	Fail
42	Pass						
43	Pass	Fail	Pass	Pass	Pass	Pass	Pass
44	Fail	Pass	Pass	Pass	Pass	Pass	Pass
45	Pass	Fail	Pass	Fail	Fail	Pass	Pass
46	Pass	Fail	Fail	Fail	Pass	Pass	Pass
47	Pass	Fail	Pass	Fail	Pass	Pass	Pass
48	Pass	Fail	Pass	Fail	Pass	Pass	Fail
49	Pass	Pass	Fail	Pass	Fail	Pass	Fail
50	Pass	Fail	Pass	Fail	Pass	Pass	Pass
51	Pass	Pass	Pass	Pass	Fail	Pass	Pass
52	Fail	Pass	Pass	Pass	Pass	Pass	Pass
53	Pass	Fail	Fail	Fail	Fail	Pass	Fail
54	Pass	Pass	Pass	Pass	Pass	Fail	Pass
55	Pass	Fail	Pass	Fail	Fail	Fail	Pass
56	Pass	Fail	Pass	Pass	Pass	Fail	Pass
57	Pass	Pass	Fail	Pass	Fail	Pass	Fail
58	Pass	Fail	Pass	Pass	Pass	Fail	Pass
59	Pass	Fail	Fail	Fail	Pass	Pass	Fail
60	Pass	Fail	Pass	Pass	Fail	Pass	Fail
61	Pass	Fail	Fail	Pass	Pass	Fail	Pass
62	Pass	Fail	Fail	Pass	Pass	Fail	Pass
63	Pass	Fail	Fail	Pass	Pass	Fail	Pass
64	Pass	Fail	Fail	Fail	Pass	Fail	Fail
65	Pass	Fail	Fail	Fail	Fail	Fail	Fail
66	Pass	Fail	Pass	Pass	Pass	Pass	Pass
67	Pass	Fail	Fail	Fail	Fail	Fail	Fail
68	Pass	Fail	Fail	Pass	Pass	Fail	Pass
69	Pass	Fail	Fail	Fail	Pass	Fail	Pass
70	Pass	Fail	Pass	Pass	Pass	Pass	Pass
71	Pass	Fail	Fail	Fail	Fail	Fail	Fail
Total	64	20	35	34	54	39	46
Pass							
Total Fail	7	51	36	37	17	32	25
%Pass	90.1	28.2	49.3	47.9	76.1	54.9	64.8

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Table AI-4b. Univariate test results for year, quarter, and inspection system.

Stratum	B-3	NC-3	S-4	U-4	B-4	NC-4	S-5
1	Pass						
2	Fail	Fail	Pass	Pass	Pass	Pass	Pass
3	Fail	Fail	Pass	Pass	Pass	Pass	Pass
4	Pass	Pass	Pass	Pass	Pass	Fail	Pass
5	Pass	Pass	Fail	Fail	Fail	Fail	Pass
6	Pass	Pass	Fail	Fail	Pass	Pass	Pass
7	Fail	Pass	Fail	Pass	Fail	Pass	Fail
8	Pass	Pass	Fail	Pass	Fail	Fail	Pass
9	Pass	Fail	Pass	Pass	Pass	Pass	Pass
10	Pass	Pass	Fail	Fail	Pass	Pass	Pass
11	Fail	Pass	Fail	Fail	Fail	Fail	Pass
12	Pass						
13	Pass	Pass	Pass	Pass	Pass	Fail	Pass
14	Pass	Pass	Fail	Pass	Pass	Pass	Pass
15	Pass	Pass	Pass	Fail	Pass	Fail	Pass
16	Pass	Pass	Fail	Fail	Pass	Pass	Pass
17	Fail	Fail	Fail	Fail	Pass	Pass	Fail
18	Fail	Pass	Pass	Pass	Pass	Pass	Pass
19	Fail	Pass	Fail	Fail	Pass	Fail	Fail
20	Pass	Pass	Pass	Pass	Pass	Fail	Pass
21	Fail	Pass	Pass	Pass	Fail	Fail	Pass
22	Pass	Pass	Fail	Fail	Pass	Pass	Pass
23	Fail	Fail	Fail	Fail	Pass	Pass	Pass
24	Fail	Pass	Pass	Pass	Pass	Fail	Pass
25	Fail	Pass	Pass	Pass	Pass	Fail	Pass
26	Pass	Pass	Fail	Pass	Pass	Fail	Pass
27	Pass	Pass	Pass	Pass	Pass	Fail	Pass
28	Pass						
29	Fail	Fail	Fail	Pass	Fail	Pass	Pass
30	Pass	Pass	Pass	Fail	Pass	Pass	Pass
31	Fail	Pass	Fail	Fail	Pass	Fail	Fail
32	Pass	Pass	Fail	Fail	Fail	Fail	Pass
33	Pass	Pass	Pass	Fail	Pass	Fail	Pass
34	Pass	Pass	Pass	Pass	Fail	Pass	Pass
35	Fail	Fail	Fail	Fail	Pass	Fail	Pass
36	Pass						
37	Pass						
38	Pass	Fail	Pass	Pass	Fail	Fail	Pass
39	Pass	Pass	Pass	Fail	Pass	Pass	Pass
40	Pass	Pass	Pass	Pass	Pass	Fail	Pass
41	Fail	Pass	Fail	Fail	Pass	Pass	Pass
42	Fail	Pass	Pass	Pass	Fail	Pass	Fail
43	Pass	Pass	Pass	Fail	Pass	Fail	Pass
44	Pass	Pass	Pass	Pass	Pass	Fail	Pass
45	Pass	Pass	Fail	Fail	Fail	Fail	Pass
46	Pass	Pass	Fail	Fail	Fail	Pass	Pass
47	Pass	Fail	Pass	Pass	Pass	Fail	Pass

48	Fail	Pass	Pass	Fail	Pass	Fail	Pass
49	Pass	Fail	Pass	Pass	Pass	Fail	Pass
50	Pass	Pass	Pass	Fail	Pass	Fail	Fail
51	Pass	Fail	Fail	Fail	Pass	Fail	Pass
52	Pass						
53	Fail	Fail	Fail	Fail	Pass	Fail	Pass
54	Pass						
55	Fail	Pass	Pass	Pass	Pass	Fail	Fail
56	Fail	Pass	Fail	Fail	Pass	Fail	Fail
57	Pass						
58	Pass	Pass	Pass	Fail	Pass	Pass	Pass
59	Fail	Fail	Fail	Fail	Fail	Fail	Pass
60	Pass	Pass	Pass	Fail	Pass	Fail	Pass
61	Fail	Fail	Pass	Fail	Fail	Fail	Fail
62	Pass	Pass	Pass	Fail	Pass	Fail	Fail
63	Pass	Fail	Pass	Fail	Pass	Fail	Pass
64	Pass	Fail	Pass	Pass	Pass	Fail	Pass
65	Fail	Fail	Fail	Fail	Fail	Fail	Pass
66	Fail	Fail	Fail	Fail	Pass	Pass	Pass
67	Fail	Fail	Fail	Pass	Fail	Fail	Fail
68	Fail	Pass	Fail	Pass	Pass	Fail	Fail
69	Fail	Pass	Fail	Fail	Pass	Fail	Fail
70	Pass	Fail	Fail	Pass	Pass	Fail	Pass
71	Fail						
Total	43	50	40	36	54	28	57
Pass							
Total Fail	28	21	31	35	17	42	14
%Pass	60.6	70.4	56.3	50.7	76.1	40.0	80.3

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Table AI-4c. Univariate test results for year, quarter, and inspection system.

Stratum	U-5	B-5	NC-5	S-6	U-6	B-6	NC-6
1	Pass	Pass	Fail	Pass	Pass	Fail	Pass
2	Pass	Pass	Fail	Pass	Pass	Fail	Pass
3	Pass	Pass	Pass	Pass	Fail	Pass	Pass
4	Pass						
5	Pass	Fail	Pass	Pass	Pass	Fail	Pass
6	Fail	Pass	Pass	Pass	Fail	Pass	Pass
7	Pass	Fail	Pass	Fail	Pass	Fail	Fail
8	Pass	Pass	Pass	Fail	Pass	Fail	Fail
9	Pass	Pass	Pass	Fail	Pass	Fail	Fail
10	Pass	Pass	Pass	Pass	Fail	Fail	Pass
11	Pass	Pass	Pass	Pass	Pass	Fail	Pass
12	Pass						
13	Pass	Pass	Pass	Fail	Pass	Pass	Fail
14	Pass	Pass	Pass	Fail	Pass	Fail	Pass
15	Pass						
16	Pass	Fail	Pass	Fail	Fail	Pass	Pass

17	Fail	Pass	Pass	Fail	Fail	Fail	Pass
18	Fail	Pass	Pass	Pass	Pass	Fail	Fail
19	Fail	Fail	Pass	Fail	Pass	Pass	Fail
20	Pass						
21	Pass	Pass	Pass	Pass	Pass	Fail	Fail
22	Pass	Pass	Fail	Pass	Fail	Pass	Pass
23	Fail	Pass	Fail	Fail	Pass	Fail	Fail
24	Pass	Pass	Fail	Fail	Pass	Pass	Fail
25	Pass	Pass	Fail	Fail	Pass	Pass	Fail
26	Pass	Fail	Fail	Fail	Pass	Fail	Fail
27	Pass	Pass	Fail	Pass	Pass	Pass	Pass
28	Pass	Pass	Pass	Fail	Pass	Pass	Pass
29	Pass	Fail	Pass	Fail	Pass	Fail	Pass
30	Pass						
31	Pass	Pass	Fail	Fail	Fail	Fail	Fail
32	Pass	Pass	Pass	Pass	Pass	Fail	Pass
33	Pass	Pass	Pass	Pass	Fail	Pass	Fail
34	Pass	Pass	Pass	Pass	Pass	Fail	Pass
35	Pass	Pass	Pass	Fail	Fail	Fail	Fail
36	Pass						
37	Pass	Pass	Pass	Fail	Pass	Pass	Pass
38	Pass	Fail	Pass	Fail	Pass	Fail	Fail
39	Pass	Pass	Pass	Fail	Fail	Pass	Pass
40	Pass						
41	Fail	Pass	Fail	Fail	Fail	Fail	Pass
42	Pass	Pass	Pass	Pass	Fail	Fail	Fail
43	Pass						
44	Pass	Pass	Fail	Pass	Pass	Pass	Pass
45	Pass	Pass	Pass	Fail	Fail	Fail	Fail
46	Pass	Fail	Fail	Pass	Fail	Fail	Pass
47	Pass	Pass	Pass	Pass	Pass	Fail	Pass
48	Fail	Pass	Fail	Fail	Fail	Fail	Pass
49	Pass	Pass	Pass	Pass	Pass	Pass	Fail
50	Pass	Pass	Pass	Fail	Fail	Fail	Pass
51	Pass						
52	Pass						
53	Pass	Pass	Pass	Fail	Fail	Fail	Fail
54	Pass						
55	Pass	Pass	Pass	Pass	Pass	Fail	Fail
56	Pass	Pass	Pass	Fail	Pass	Fail	Pass
57	Pass	Pass	Fail	Pass	Pass	Pass	Pass
58	Fail	Pass	Fail	Pass	Fail	Pass	Pass
59	Fail	Fail	Pass	Fail	Pass	Fail	Fail
60	Pass	Pass	Pass	Pass	Pass	Fail	Fail
61	Pass	Fail	Pass	Fail	Fail	Pass	Fail
62	Pass	Pass	Fail	Pass	Fail	Fail	Fail
63	Pass	Pass	Pass	Pass	Fail	Fail	Pass
64	Pass	Pass	Pass	Fail	Pass	Fail	Pass
65	Pass	Pass	Fail	Fail	Fail	Fail	Pass

66	Fail	Pass	Pass	Pass	Fail	Fail	Fail
67	Pass	Fail	Fail	Fail	Pass	Fail	Fail
68	Pass	Fail	Pass	Fail	Fail	Pass	Pass
69	Pass	Fail	Fail	Fail	Fail	Fail	Fail
70	Pass	Pass	Pass	Fail	Fail	Fail	Fail
71	Pass	Fail	Fail	Fail	Fail	Fail	Fail
Total	61	57	51	37	44	30	42
Pass							
Total Fail	10	14	20	34	27	41	29
%Pass	85.9	80.3	71.8	52.1	62.0	42.3	59.2

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Table AI-4d. Univariate test results for year, quarter, and inspection system.

Stratum	U-8	NC-8	volume	ON	OFF	Beta
1	Fail	Pass	Pass	Pass	Fail	Pass
2	Fail	Pass	Pass	Pass	Pass	Pass
3	Pass	Pass	Pass	Pass	Pass	Pass
4	Fail	Pass	Pass	Pass	Pass	Pass
5	Fail	Pass	Pass	Pass	Pass	Pass
6	Fail	Pass	Fail	Pass	Fail	Pass
7	Fail	Pass	Pass	Pass	Pass	Pass
8	Fail	Pass	Pass	Pass	Pass	Fail
9	Fail	Pass	Pass	Fail	Pass	Pass
10	Fail	Pass	Pass	Pass	Pass	Pass
11	Fail	Pass	Pass	Pass	Pass	Pass
12	Pass	Pass	Pass	Pass	Pass	Pass
13	Pass	Pass	Fail	Pass	Pass	Pass
14	Fail	Pass	Pass	Pass	Pass	Pass
15	Pass	Pass	Pass	Pass	Pass	Pass
16	Pass	Pass	Pass	Pass	Fail	Pass
17	Fail	Pass	Pass	Pass	Pass	Fail
18	Pass	Pass	Pass	Pass	Pass	Pass
19	Fail	Pass	Fail	Fail	Pass	Fail
20	Fail	Pass	Fail	Pass	Pass	Pass
21	Pass	Pass	Pass	Fail	Pass	Pass
22	Fail	Pass	Fail	Pass	Pass	Pass
23	Fail	Pass	Pass	Fail	Pass	Fail
24	Pass	Pass	Pass	Pass	Pass	Pass
25	Pass	Pass	Pass	Pass	Pass	Pass
26	Fail	Pass	Pass	Pass	Pass	Pass
27	Fail	Pass	Pass	Fail	Pass	Pass
28	Fail	Pass	Pass	Pass	Pass	Pass
29	Fail	Pass	Pass	Pass	Pass	Pass
30	Fail	Pass	Pass	Fail	Pass	Pass
31	Fail	Pass	Pass	Pass	Pass	Pass
32	Fail	Pass	Pass	Pass	Pass	Pass
33	Fail	Pass	Fail	Fail	Pass	Fail
34	Fail	Fail	Pass	Pass	Pass	Pass

35	Fail	Pass	Pass	Pass	Pass	Pass	
36	Pass	Pass	Pass	Pass	Pass	Pass	
37	Fail	Pass	Pass	Pass	Pass	Fail	
38	Pass	Pass	Pass	Pass	Pass	Pass	
39	Pass	Pass	Pass	Fail	Pass	Pass	
40	Fail	Pass	Pass	Fail	Fail	Pass	
41	Fail	Pass	Fail	Fail	Pass	Pass	
42	Pass	Pass	Fail	Fail	Fail	Pass	
43	Fail	Pass	Pass	Pass	Pass	Pass	
44	Fail	Pass	Pass	Pass	Pass	Pass	
45	Fail	Pass	Pass	Pass	Pass	Pass	
46	Fail	Pass	Pass	Pass	Pass	Pass	
47	Fail	Pass	Pass	Pass	Pass	Pass	
48	Pass	Fail	Pass	Pass	Pass	Pass	
49	Pass	Fail	Pass	Pass	Pass	Pass	
50	Pass	Fail	Pass	Pass	Pass	Pass	
51	Pass	Fail	Pass	Pass	Pass	Pass	
52	Pass	Pass	Pass	Pass	Pass	Pass	
53	Pass	Fail	Pass	Pass	Pass	Pass	
54	Pass	Fail	Pass	Pass	Fail	Pass	
55	Fail	Fail	Pass	Pass	Pass	Pass	
56	Pass	Fail	Pass	Pass	Pass	Pass	
57	Pass	Fail	Pass	Pass	Pass	Pass	
58	Fail	Fail	Pass	Pass	Pass	Pass	
59	Pass	Fail	Pass	Fail	Pass	Pass	
60	Fail	Fail	Pass	Pass	Pass	Pass	
61	Fail	Fail	Pass	Pass	Pass	Pass	
62	Pass	Fail	Pass	Pass	Pass	Pass	
63	Fail	Fail	Pass	Pass	Pass	Pass	
64	Fail	Fail	Pass	Pass	Pass	Pass	
65	Fail	Fail	Pass	Pass	Pass	Pass	
66	Fail	Fail	Pass	Pass	Pass	Pass	
67	Fail	Fail	Pass	Pass	Pass	Fail	
68	Fail	Fail	Pass	Pass	Pass	Fail	
69	Pass	Fail	Pass	Pass	Pass	Pass	
70	Pass	Fail	Pass	Pass	Pass	Pass	
71	Fail	Fail	Pass	Pass	Pass	Fail	
Total	26	47	63	59	65	62	1244
Pass							
Total Fail	45	24	8	12	6	9	672
%Pass	36.6	66.2	88.7	83.1	91.5	87.3	64.9

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Bivariate Joint Distribution Evaluation within Strata

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The bivariate test for normality is essentially the core of the multivariate test for normality. This is rationalized because for a distribution to be multivariate normal, all the pair-wise distributions must be bivariate normal. This approach is used in calculating the

1502 test for multivariate normality. It was decided that an appropriate test for bivariate
 1503 normality was Shenton and Bowman's Omnibus test.¹⁸ The probability of passing this
 1504 test is enhanced by each variable passing the univariate test. The probability level is
 1505 found from the χ^2 distribution with two degrees of freedom for the univariate test and
 1506 with four degrees of freedom for the bivariate test. As mentioned above, because the
 1507 sample size was not large and the χ^2 distribution was approximated asymptotically,
 1508 failing the bivariate test at the 90% level may not mean the distribution is not
 1509 approximately normal. However, failing all the univariate tests and the bivariate test with
 1510 alpha probabilities much less than 0.01 (a cut-off of 0.001 was used) indicated a lack of
 1511 univariate and bivariate normality. Table AI-5 shows the results of 3,900 possible
 1512 bivariate tests for normality with the data stratified by year and by quarter. There were
 1513 325 tests per stratum. This number of tests was arrived at because there were 25 variables
 1514 analyzed for which there are $26 \times 25 / 2$ combinations, or 325 bivariate tests. The overall
 1515 accept rate was 22.4% for this table.
 1516

1517 Table AI-5. Results of bivariate test for normality with stratification by year and
 1518 quarter - 22.4% accept rate.

Stratum	Year	Quarter	<i>n</i>	Accept	Reject	% Accept
1	2003	1	71	133	192	40.9
2	2003	2	156	69	256	21.2
3	2003	3	90	58	267	17.8
4	2003	4	137	47	278	14.5
5	2004	1	127	72	253	22.2
6	2004	2	144	41	284	12.6
7	2004	3	84	100	225	30.8
8	2004	4	106	57	268	17.5
9	2005	1	131	91	234	28.0
10	2005	2	90	101	224	31.1
11	2005	3	172	61	264	18.8
12	2005	4	211	45	280	13.8
Total			1519	875	3025	22.4

1519
 1520
 1521 Table AI-6 shows the bivariate test results for normality using stratification by year,
 1522 quarter, and three levels of combined inspection systems. This was done in hopes of
 1523 finding a shorter solution involving fewer stratification levels than a possible 72. The
 1524 three levels of inspection system are IS1-HIMP+MAESTRO; IS2-
 1525 MIXED+NELS+NUTECH; and IS3-SIS. The overall accept rate for this table was 39%.
 1526 What is shown is that increasing the levels of partitioning increases the probability of
 1527 univariate and bivariate normality. This example shows that the increase is not due to a
 1528 loss in power from reducing the sample sizes within strata, since the sample sizes are
 1529 adequate to estimate the distribution moments used in the tests for normality.

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 1531
 1532

1533 Table AI-6. Results of bivariate tests for normality with stratification by year,
1534 quarter, and three combined inspection system variables - 39% accept rate.

Stratum	Year	Quarter	Inspection	n	Accept	Reject	% Accept
1	2003	1	IS1	22	120	205	36.9
2	2003	1	IS2	27	229	96	70.5
3	2003	1	IS3	22	1	324	0.3
4	2003	2	IS1	54	228	97	70.2
5	2003	2	IS2	65	214	111	65.8
6	2003	2	IS3	37	220	105	67.7
7	2003	3	IS1	23	11	314	3.4
8	2003	3	IS2	39	87	238	26.8
9	2003	3	IS3	28	234	91	72.0
10	2003	4	IS1	49	142	183	43.7
11	2003	4	IS2	48	20	305	6.2
12	2003	4	IS3	40	16	309	4.9
13	2003	1	IS1	53	10	315	3.1
14	2004	1	IS2	36	121	204	37.2
15	2004	1	IS3	38	207	118	63.7
16	2004	2	IS1	53	175	150	53.8
17	2004	2	IS2	54	187	138	57.5
18	2004	2	IS3	37	234	91	72.0
19	2004	3	IS1	15	2	323	0.6
20	2004	3	IS2	37	226	99	69.5
21	2004	3	IS3	32	213	112	65.5
22	2004	4	IS1	32	47	278	14.5
23	2004	4	IS2	50	192	133	59.1
24	2004	4	IS3	24	3	322	0.9
25	2005	1	IS1	51	21	304	6.5
26	2005	1	IS2	49	95	230	29.2
27	2005	1	IS3	30	274	51	84.3
28	2005	2	IS1	28	6	319	1.8
29	2005	2	IS2	29	116	209	35.7
30	2005	2	IS3	34	231	94	71.1
31	2005	3	IS1	51	60	265	18.5
32	2005	3	IS2	73	120	205	36.9
33	2005	3	IS3	48	136	189	41.8
34	2005	4	IS1	78	142	183	43.7
35	2005	4	IS2	84	188	137	57.8
36	2005	4	IS3	49	31	294	9.5
Total				1519	4559	7141	39.0

1535

1536

1537 Table AI-7 shows the complete stratification as implemented in the multiple regression
1538 model. Although the overall hypothesis accept rate was 47.3%, the overall distribution
1539 approximated a multivariate normal distribution; but the accept rate is not high enough to
1540 be absolutely convincing. In order to be more certain that partitioning was aiding in
1541 detecting latent distribution information in the dataset, a final partition was employed.

1542 Although portioning by months was not used in the regression model, the dataset was
 1543 partitioned by year and month bringing out detail lost due to aggregation by quarter.

1544 Table AI-7. Bivariate normal test results for complete stratification - 47.3% accept
 1545 rate.

Stratum	Year	Quarter	Inspection	<i>n</i>	Accept	Reject	% Accept
1	2003	1	HIMP	13	183	142	56.3
2	2003	1	MAESTRO	9	247	78	76.0
3	2003	1	MIXED	10	259	66	79.7
4	2003	1	NELS	17	251	74	77.2
5	2003	1	SIS	22	128	197	39.4
6	2003	2	HIMP	18	150	175	46.2
7	2003	2	MAESTRO	36	109	216	33.5
8	2003	2	MIXED	26	105	220	32.3
9	2003	2	NELS	29	198	127	60.9
10	2003	2	NUTECH	10	172	153	52.9
11	2003	2	SIS	37	115	210	35.4
12	2003	3	HIMP	3	162	163	49.8
13	2003	3	MAESTRO	20	235	90	72.3
14	2003	3	MIXED	18	215	110	66.2
15	2003	3	NELS	11	236	89	72.6
16	2003	3	NUTECH	10	187	138	57.5
17	2003	3	SIS	28	100	225	30.8
18	2003	4	HIMP	20	194	131	59.7
19	2003	4	MAESTRO	29	94	231	28.9
20	2003	4	MIXED	22	199	126	61.2
21	2003	4	NELS	15	157	168	48.3
22	2003	4	NUTECH	11	170	155	52.3
23	2003	4	SIS	40	57	268	17.5
24	2003	1	HIMP	23	171	154	52.6
25	2004	1	MAESTRO	30	78	247	24.0
26	2004	1	MIXED	14	135	190	41.5
27	2004	1	NELS	15	195	130	60.0
28	2004	1	NUTECH	7	229	96	70.5
29	2004	1	SIS	38	100	225	30.8
30	2004	2	HIMP	19	183	142	56.3
31	2004	2	MAESTRO	34	81	244	24.9
32	2004	2	MIXED	24	161	164	49.5
33	2004	2	NELS	24	178	147	54.8
34	2004	2	NUTECH	6	241	84	74.2
35	2004	2	SIS	37	91	234	28.0
36	2004	3	HIMP	3	162	163	49.8
37	2004	3	MAESTRO	12	222	103	68.3
38	2004	3	MIXED	15	159	166	48.9
39	2004	3	NELS	15	219	106	67.4
40	2004	3	NUTECH	7	191	134	58.8
41	2004	3	SIS	32	84	241	25.8
42	2004	4	HIMP	5	184	141	56.6
43	2004	4	MAESTRO	27	235	90	72.3

44	2004	4	MIXED	19	266	59	81.8
45	2004	4	NELS	17	135	190	41.5
46	2004	4	NUTECH	14	132	193	40.6
47	2004	4	SIS	24	198	127	60.9
48	2005	1	HIMP	29	106	219	32.6
49	2005	1	MAESTRO	22	173	152	53.2
50	2005	1	MIXED	28	171	154	52.6
51	2005	1	NELS	19	167	158	51.4
52	2005	1	NUTECH	2	162	163	49.8
53	2005	1	SIS	30	94	231	28.9
54	2005	2	HIMP	11	265	60	81.5
55	2005	2	MAESTRO	17	132	193	40.6
56	2005	2	MIXED	13	139	186	42.8
57	2005	2	NELS	9	180	145	55.4
58	2005	2	NUTECH	7	181	144	55.7
59	2005	2	SIS	34	58	267	17.8
60	2005	3	HIMP	18	146	179	44.9
61	2005	3	MAESTRO	33	83	242	25.5
62	2005	3	MIXED	27	125	200	38.5
63	2005	3	NELS	32	145	180	44.6
64	2005	3	NUTECH	14	113	212	34.8
65	2005	3	SIS	48	36	289	11.1
66	2005	4	HIMP	29	114	211	35.1
67	2005	4	MAESTRO	49	23	302	7.1
68	2005	4	MIXED	38	122	203	37.5
69	2005	4	NELS	36	51	274	15.7
70	2005	4	NUTECH	10	165	160	50.8
71	2005	4	SIS	49	18	307	5.5
Total				1519	10922	12153	47.3

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1548 Table AI-8 shows the results of this stratification. Although some power was lost due to
 1549 decrease in the sample sizes compared to stratification by year and quarter, the overall
 1550 accept rate was 86.2%. This result strongly suggests that the underlying data structure is
 1551 fundamentally bivariate normal for the majority of variate pairs. It also suggests that
 1552 increasing the sample size to permit additional stratification by month in the regression
 1553 model and increasing the number of structural parameters in the model would lead to
 1554 improved estimation.

1555

1556 Table AI-8. Stratification by year and month - 86.2% accept rate.

Stratum	Year	Month	Samples	Accept	Reject	% Accept
1	2003	January	24	741	59	92.6
2	2003	February	15	569	231	71.1
3	2003	March	33	760	40	95.0
4	2003	April	43	775	25	96.9
5	2003	May	71	552	248	69.0
6	2003	June	73	639	161	79.9

7	2003	July	41	683	117	85.4
8	2003	August	35	740	60	92.5
9	2003	September	24	700	100	87.5
10	2003	October	33	719	81	89.9
11	2003	November	31	746	54	93.3
12	2003	December	31	715	85	89.4
13	2004	January	14	791	9	98.9
14	2004	February	68	611	189	76.4
15	2004	March	73	577	223	72.1
16	2004	April	83	572	228	71.5
17	2004	May	55	661	139	82.6
18	2004	June	39	760	40	95.0
19	2004	July	37	703	97	87.9
20	2004	August	32	742	58	92.8
21	2004	September	27	728	72	91.0
22	2004	October	8	799	1	99.9
23	2004	November	13	800	0	100.0
24	2004	December	12	789	11	98.6
25	2005	January	38	722	78	90.3
26	2005	February	48	667	133	83.4
27	2005	March	56	656	144	82.0
28	2005	April	40	694	106	86.8
29	2005	May	26	751	49	93.9
30	2005	June	24	724	76	90.5
31	2005	July	73	546	254	68.3
32	2005	August	73	525	275	65.6
33	2005	September	68	682	118	85.3
34	2005	October	87	540	260	67.5
35	2005	November	38	672	128	84.0
36	2005	December	33	772	28	96.5
Total			1519	24823	3977	86.2

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Multivariate Joint Distribution Evaluation within Strata

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1561 Unfortunately, no level of partitioning or stratification permitted the multivariate
1562 omnibus test of Shenton and Bowman¹⁸ to be passed. The maximum Chi-square possible
1563 for $2p$ degrees of freedom, where p is the number of variates, makes $2p$ equal to 50
1564 degrees of freedom. This means that in any stratum where all pair-wise combinations of
1565 the 25 variates are computed, eliminating all cross-product sums due to the conversion of
1566 the dataset to an orthonormal basis, the result is a sum of 25 pairs of squared terms. The
1567 statistic cannot exceed a Chi-square of 67.5 ($p=0.05$) or 86.7 ($p=0.001$). This was not
1568 achievable with the present dataset thereby ruling out definite proof of partitioned
1569 multivariate normality. However, the argument for a joint distribution approaching
1570 multivariate normality within certain partitions and demonstrating bivariate normality in
1571 many dimensions can be made with caution.

Appendix II: Analysis of Residual Distributions

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1575 The Vose simple linear regression population model assumes, in addition to a bivariate
1576 normal distribution of the input dependent and independent variables, a normal
1577 distribution of the residual errors produced by the model.¹⁴ Due to the difficulty in
1578 demonstrating a multivariate normal distribution for the multivariate regression model,
1579 compelling evidence for model validity can be provided by residual analysis. The
1580 residual errors are calculated as the difference between the input dependent variable logit
1581 transformed beta distributed *Salmonella* prevalence and the output or predicted logit
1582 transformed beta prevalence. The tests for normality used in Appendix I were applied to
1583 the distribution of residuals of the multivariate regression model in order to determine
1584 univariate normality for the baseline input distribution of dependent and independent
1585 variables. It is sufficient to demonstrate univariate normality for the residual errors when
1586 considering model validity. It may be possible further to demonstrate multivariate joint
1587 normality if individual regressions are considered for each of the 24 independent
1588 variables, as described in Appendix I. Multivariate normality of the residual distribution
1589 may be established by applying the respective shock levels used in the core analysis, as
1590 described in the main body of this document. One variable is evaluated at a time in the
1591 multiple regression model. The residuals are evaluated for normality at each of the shock
1592 variable levels one regression model at a time to complete an $n \times p$ matrix of residuals.
1593 The matrix can then be evaluated by the Shenton and Bowman Omnibus test¹⁸ for
1594 multivariate normality, as described in Appendix III.

1595

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Univariate Evaluation of Residuals

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1599 The baseline multiple regression model was used to calculate the regression coefficients
1600 using the complete dataset without bootstrapping. The dependent variable was the logit of
1601 the beta distributed *Salmonella* prevalence and the independent variables were: S-1, S-3,
1602 S-4, S-5, S-6, U-1, U-3, U-4, U-5, U-6, U-8, B-1, B-3, B-4, B-5, B-6, NC-1, NC-3, NC-4,
1603 NC-5, NC-6, NC-8, ON, OFF, Volume, and the structural variables for years, quarters,
1604 and inspection systems. The predicted values of the dependent variable were subtracted
1605 from the input-dependent variable to obtain the unweighted residuals. Studentized
1606 residuals proved of no advantage and were not used. The set of residuals was subjected to
1607 the seven univariate tests for normality from the NCSS software, as outlined in Appendix
1608 I. Two of the five tests could not reject the hypothesis of normally distributed residuals at
1609 the 5% probability level. Figure AII-1 shows the histogram plot of the residuals and
1610 Figure AII-2 shows the corresponding normal probability plot. It can be concluded that
1611 the population hypothesis for multiple regression model is suitable, and that it is
1612 supported by the data used. The Martinez-Inglewicz test is the most robust test for
1613 normality among the seven tests employed and is expected to pass a marginally normal
1614 distribution at the 20% level.¹⁸ It is remarkable that the residuals pass this test at the 5%
1615 level. The failure of the other five tests can be explained due to the marginal sample size
1616 and more sensitivity in detecting slightly skewed distributions.

1617

1618

1619 Table All-1. Univariate test results for residuals normality.

Test*	Test Value	5% Critical Value	Decision at 5% Level
Shapiro-Wilk	0.9892417		Reject normality
Anderson-Darling	2.179302		Reject normality
Martinez-Iglewicz	0.9773419	1.0024	Cannot reject normality
Kolmogorov-Smirnov	2.79E-02	0.025	Reject normality
D'Agostino Skewness	4.979506	1.96	Reject normality
D'Agostino Kurtosis	-0.776	1.96	Cannot reject normality
D'Agostino Omnibus	25.3976	5.991	Reject normality

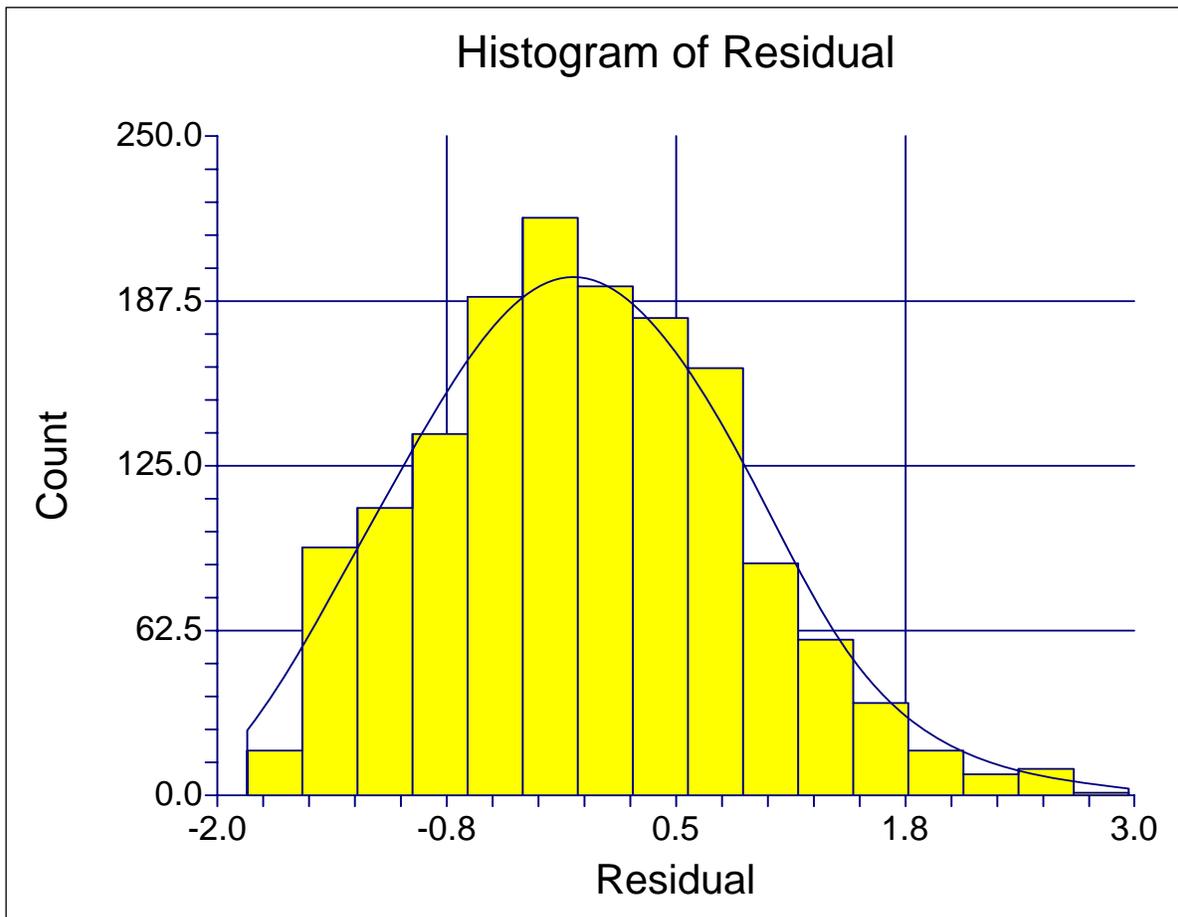
1620 *For a description of the tests, see Shenton and Bowman.¹⁸

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1625 Figure All-1. Residual histogram plot.

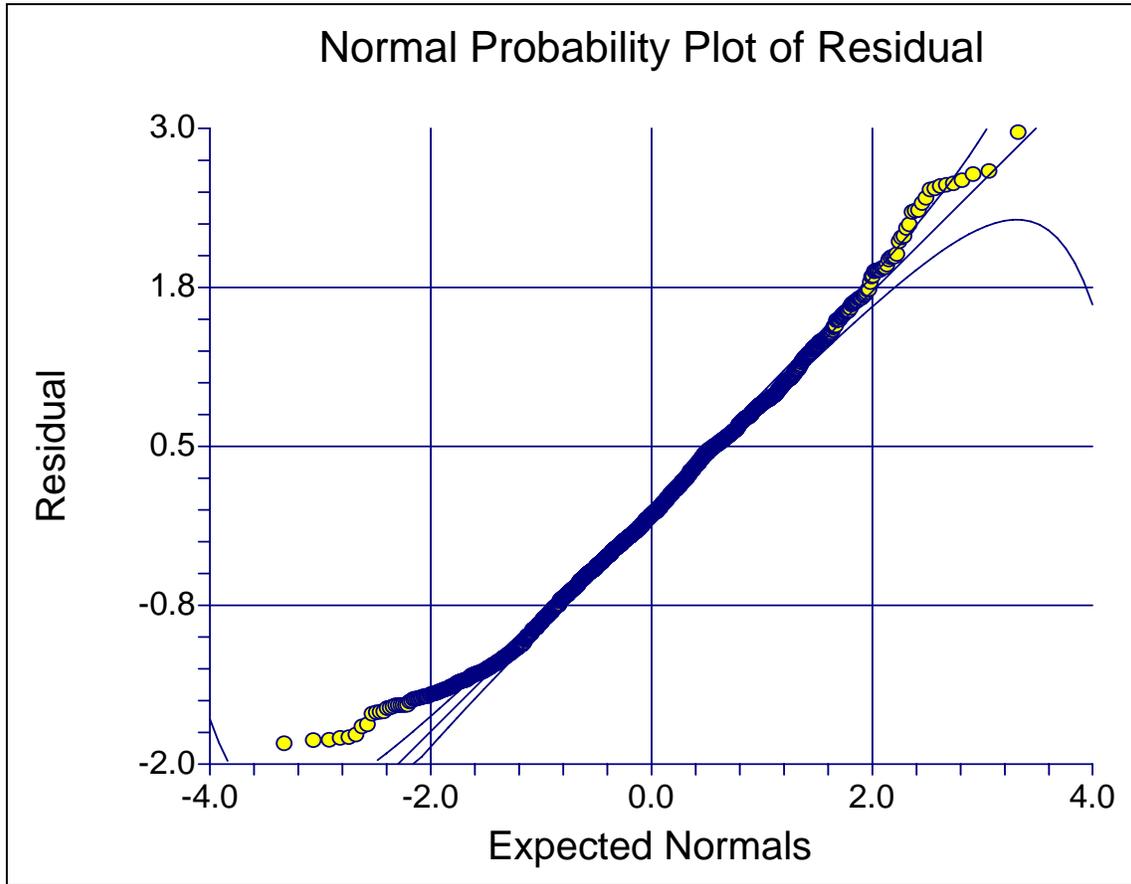
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1634 Figure All-2. Residual normal probability plot.

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Multivariate Evaluation of Residuals

1638 It was decided to examine the multivariate properties of the residuals produced, one
1639 variable at a time, by employing the shock level used for each variable in the main body
1640 of the analysis. Twenty-five multiple regressions were evaluated for joint residual
1641 normality using sample sizes of 1,000 bootstrapped dataset points for each regression.
1642 Table AII-2 compares 50 regressions where 24 shock variables were employed. The least
1643 stringent significance level possible had only an 84% acceptance rate; it was therefore not
1644 possible to conclude absolute joint normality of the residuals. Four of the shock variable
1645 residual distributions failed to pass the Shenton and Bowman univariate test.¹⁸ The
1646 combined Chi-square value of the 24 shock variable distributions exceeded the Chi-
1647 square critical value for joint multivariate normality. Because these tests were constructed
1648 from uncorrelated variates, the univariate Chi-squares could be combined for the joint
1649 test.

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1653 Table AII-2. Univariate uncorrelated Shenton and Bowman tests¹⁸ for normality
 1654 for bootstrapped shocked and unshocked variables.

Shock Variable	Univariate Significance Level			No Shock Bootstrap	Univariate Significance Level		
	P>0.0001	P>0.001	P>0.01		P>0.0001	P>0.001	P>0.01
S1+25%	Pass	Pass	Pass	1	Fail	Fail	Fail
S3+25%	Pass	Fail	Fail	2	Fail	Fail	Fail
S4+25%	Pass	Fail	Fail	3	Fail	Fail	Fail
S5+25%	Pass	Fail	Fail	4	Fail	Fail	Fail
S6+25%	Fail	Fail	Fail	5	Fail	Fail	Fail
U1+50%	Pass	Pass	Fail	6	Fail	Fail	Fail
U3+50%	Fail	Fail	Fail	7	Pass	Fail	Fail
U4+50%	Pass	Pass	Fail	8	Pass	Fail	Fail
U5+50%	Pass	Pass	Fail	9	Pass	Fail	Fail
U6+50%	Pass	Pass	Pass	10	Pass	Pass	Fail
U8+100%	Fail	Fail	Fail	11	Pass	Pass	Fail
B1-75%	Pass	Pass	Fail	12	Pass	Pass	Fail
B3-75%	Pass	Pass	Fail	13	Pass	Pass	Fail
B4-75%	Pass	Pass	Fail	14	Pass	Pass	Fail
B5-75%	Pass	Pass	Fail	15	Pass	Pass	Fail
B6-75%	Pass	Pass	Fail	16	Pass	Pass	Fail
NC1-75%	Pass	Pass	Fail	17	Pass	Pass	Fail
NC3-75%	Pass	Fail	Fail	18	Pass	Pass	Fail
NC4-75%	Fail	Fail	Fail	19	Pass	Pass	Fail
NC5-75%	Pass	Pass	Fail	20	Pass	Pass	Fail
NC6-75%	Pass	Pass	Fail	21	Pass	Pass	Pass
NC8-75%	Pass	Pass	Pass	22	Pass	Pass	Pass
On-5%	Pass	Pass	Fail	23	Pass	Pass	Pass
OFF+25%	Pass	Fail	Fail	24	Pass	Pass	Pass
Baseline	Pass	Pass	Pass	25	Pass	Pass	Pass
Pass	21	16	4	Pass	19	16	5
Fail	4	9	21	Fail	6	9	20
Pass%	84.0	64.0	16.0	Pass%	76.0	64.0	20.0

1655

1656

1657 Table AII-2 indicates that the bootstrapping employed in obtaining the regression results
 1658 in the main body of the document produced at least 84% normality in the shocked
 1659 variable assessment and a similar level of acceptance for non-shocked bootstrapped
 1660 residual results. This is added evidence that the multiple regression population model has
 1661 been appropriately applied.

Appendix III: Univariate and Joint Omnibus Test for Normality

The univariate and joint omnibus test for normality developed by Shenton and Bowman¹⁸ uses the definition of distribution moments to define skewness and kurtosis variables termed b_1 and b_2 respectively. The moments are

$$u_1 = \Sigma x / n = \text{mean}$$

$$u_2 = \Sigma (x - \text{mean})^2 / n$$

$$u_3 = \Sigma (x - \text{mean})^3 / n$$

$$u_4 = \Sigma (x - \text{mean})^4 / n$$

where skewness is defined as

$$\sqrt{b_1} = u_3 / u_2^{3/2}$$

and kurtosis is defined as

$$b_2 = u_4 / u_2^2$$

The problem of small sample size is dealt with by using transformations for the skewness and kurtosis variables, since an approximate solution that is slowly convergent is found from the formula for Ep :

$$Ep = n b_1 / 6 + n (b_2 - 3)^2 / 24$$

The distribution of Ep is Chi-square with 2 degrees for freedom. The univariate test is achieved by computing the skewness and kurtosis parameters which are transformed by D'Agostino's method for skewness and transformation¹⁸ from a gamma distribution to a Chi-square distribution is used for the kurtosis which is then translated to standard normal using the Wilson-Hilferty cubed root transformation.¹⁸ This permits the conversion of $\sqrt{b_1}$ to Z_1 and b_2 to Z_2 . Since the new variables are uncorrelated, a simple sum of squares of the two new variables has the required Chi-square distribution with 2 degrees of freedom.

$$Ep = Z_1^2 + Z_2^2$$

The bivariate and multivariate cases of this method proceed from the univariate case analogously. In the bivariate case is a special case of the multivariate solution. The original variables are termed X as an $n \times p$ matrix of n rows and p columns corresponding to the sample size n and the number of variates p . The original variables are transformed

1707 to standard normal by subtracting the mean and dividing by the standard deviation. An
1708 orthonormal set of variates is then created easily using the matrix transformation to a
1709 dataset that has all pair-wise correlations equal to zero. The E_p statistic with $2p$ degrees
1710 of freedom will equal

1711

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$$E_p = n \mathbf{B}_1' \mathbf{B}_1 / 6 + n (\mathbf{B}_2 - 3i)' (\mathbf{B}_2 - 3i) / 24$$

1713

1714 Where \mathbf{B}_1' is the row vector of $p \sqrt{b_1}$ variates and \mathbf{B}_2 is the column vector of $p b_2$
1715 variates. Again, since the above formula applies to only very large samples, the use of the
1716 skewness and kurtosis transformations is employed in order to arrive at

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$$E_p = \mathbf{Z}_1' \mathbf{Z}_1 + \mathbf{Z}_2' \mathbf{Z}_2$$

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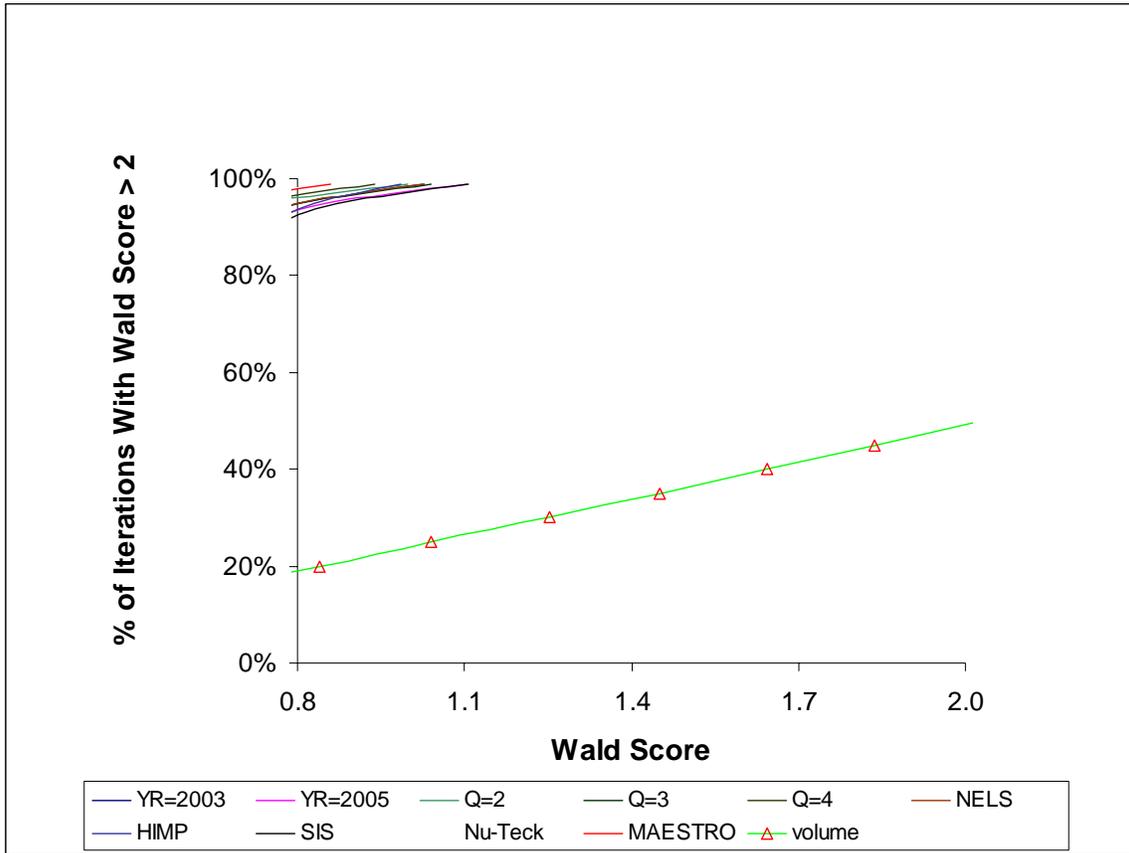
1720 where \mathbf{Z}_1' is the row vector of transformed $p \sqrt{b_1}$ variates and \mathbf{Z}_2' is the row vector of
1721 transformed $p b_2$ variates.

1722

1723 In the case of the regression model, the bivariate tests involved the transformed sums of
1724 the four squares of $\sqrt{b_1}$ and b_2 for pairs of the 25 variates of concern whose sum of
1725 squares must not exceed a Chi-square with 4 degrees of freedom within any partition. In
1726 the multivariate case, the 25×2 sums of squares of the 25 variates of concern in any
1727 partition cannot exceed a Chi-square with 50 degrees of freedom. The overall distribution
1728 test for the completely partitioned regression model would involve $m \times 50$ degrees of
1729 freedom, where m is the number of partitions for a final Chi-square summed over all
1730 partitions.

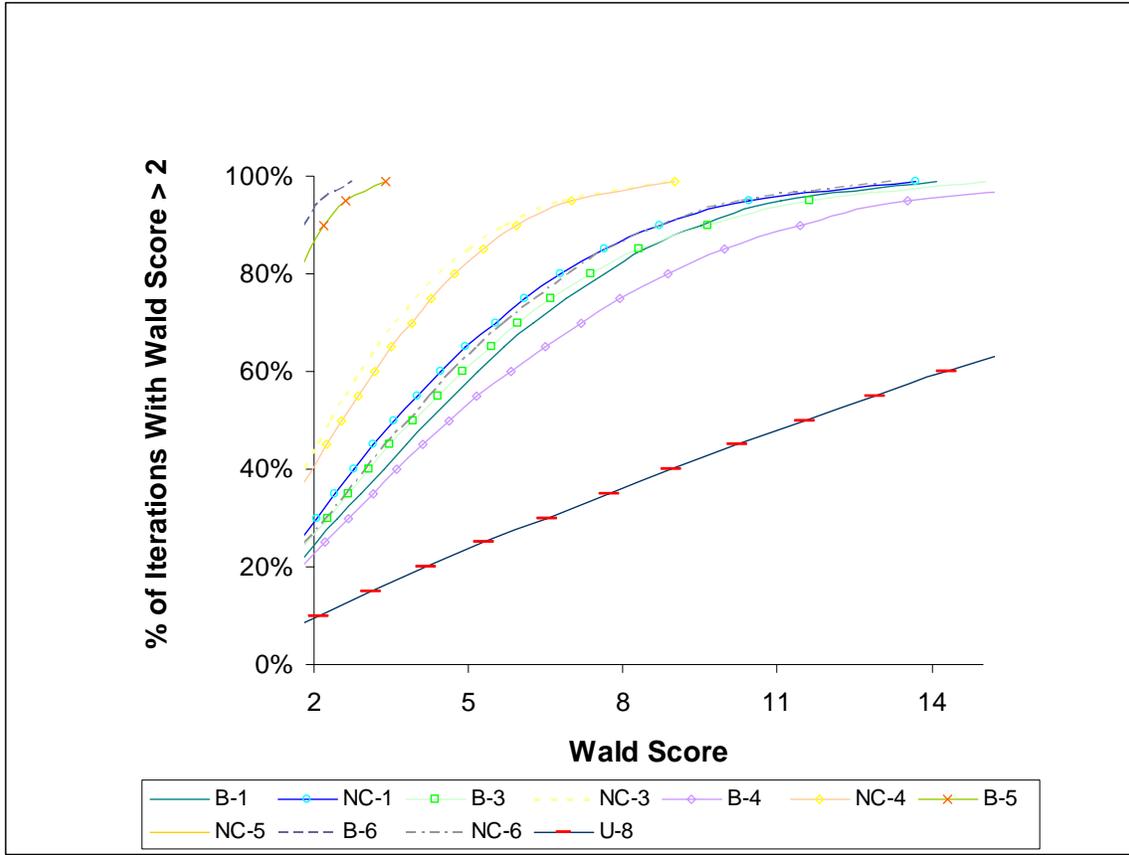
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Appendix IV: Graphical representation of Wald Score Results from 20,000 model iterations



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Figure AIV-1. Distribution of Wald test scores for structural parameters in the model.



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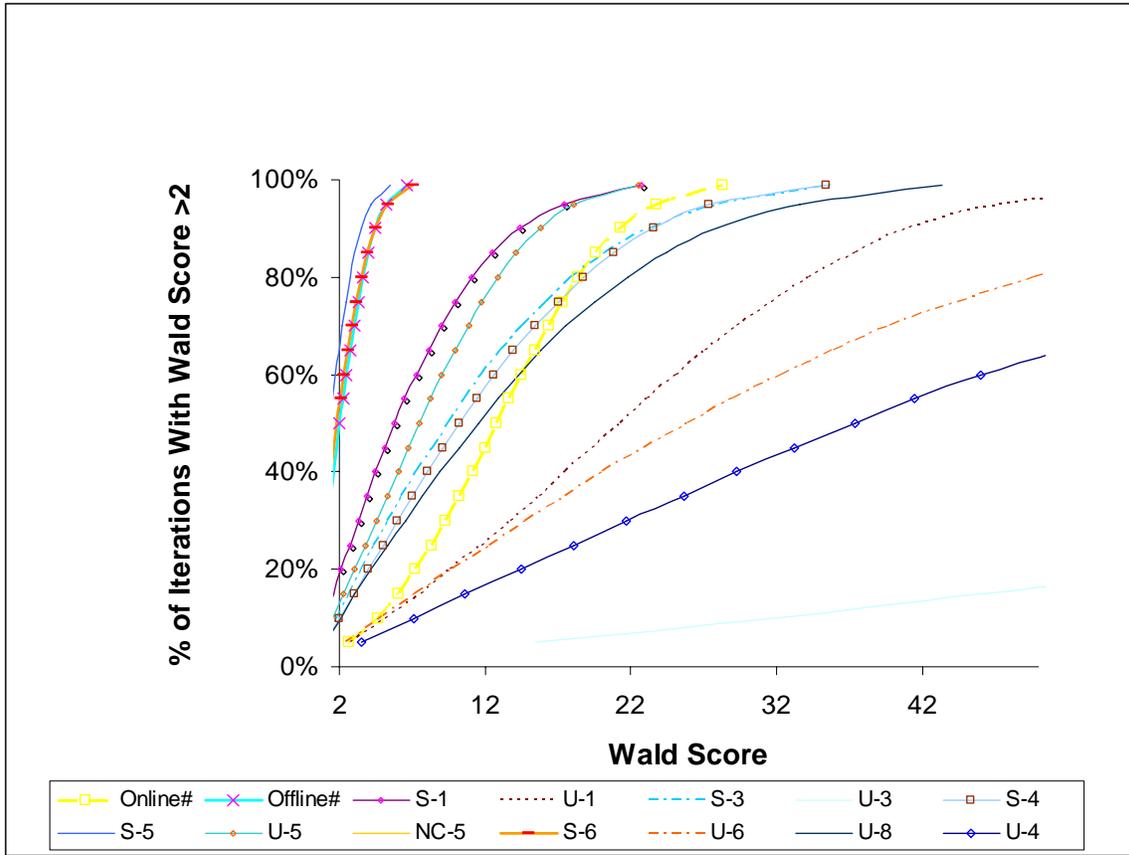
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Figure AIV-2. Distribution of Wald test scores for performance tracking parameters in the model.

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Figure AIV-3. Distribution of Wald test scores for decision parameters in the model.

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